

[TAB 1]

Statement of Contributions Civil Penalty Appeals

Presented By:

John Whitlock, Paralegal 3

CONSENT AGENDA CIVIL PENALTY APPEALS

UNDER AS 15.13.390, 2 AAC 50.855-860

Campaign Financial Disclosure - Statement of Contributions									
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September 10, 2025 Commission Meeting

[illegible]



**ALASKA PUBLIC OFFICES COMMISSION
STAFF RECOMMENDATION FOR COMMISSION ACTION**

PREPARED BY: John Grover Whitlock

DATE: August 27, 2025

RESPONDENT: A Stronger Alaska

CIVIL PENALTY

ASSESSED UNDER:

☒ Campaign Disclosure: AS 15.13.390, 2 AAC 50.855

REASON FOR FILING:

Ongoing group

LATE REPORT(S):

Campaign Disclosure Reports

☒ Group Registration¹

☒ Year End Report

DUE DATE OF LATE FILED REPORT: May 21, 2025

REPORT FILED ON: June 20, 2025

NUMBER OF DAYS LATE: 1,113 total days late for multiple violations

PENALTY ASSESSMENT SENT: July 10, 2025

DATE PENALTY APPEAL RECEIVED: July 17, 2025

MAXIMUM STATUTORY PENALTY: \$55,650

PENALTY ASSESSED²: \$55,650

RECOMMENDATION: **98% Reduction - \$1,113 penalty**
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

¹ AS 15.13.050(a)

² 2 AAC 50.855(b)(2)(B)(i).

RESPONDENT'S STATEMENT OF MITIGATING FACTS:

1. The late-filed reports only included administrative costs.
2. The information is readily available to the public in another forum.
3. The late filing of this report did not cause significant harm to the public.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. Respondent A Stronger Alaska registered as a group in 2022, listing its campaign plans as the 2022 State General Election. In February 2023, the group filed its year-end report. Although it had closing cash on hand, the group failed to re-register as a group or file year-end reports for 2023 and 2024. The group reported administrative expenses during this time but did not engage in campaign-related activity.
2. A civil penalty may be reduced by up to 50% or waived entirely if the late or erroneous reports include only administrative costs.³ Here, the group's late-filed 2023 and 2024 Year-End Reports⁴ included only bank and legal fees associated with campaign finance litigation and did not involve expenditures that supported or opposed a candidate or ballot measure. Being that only administrative costs and not direct expenditures made to a campaign for a candidate or ballot measure were involved, the mitigator applies.
3. A civil penalty may be reduced by a percentage greater than 50% or waived entirely if there is no significant harm to the public and no aggravating factors exist.⁵ Here, a mitigator cannot be applied since the respondent has more than one late-filed report in the previous five years⁶: late-filed group registrations for 2023 and 2024 and late-filed year end reports from 2023 and 2024. The respondent argues that the information not disclosed in the annual reports was disclosed in independent expenditure reports and was thus available to the public through another forum. While staff agrees, a mitigator on this ground cannot be applied due to the presence of an aggravating factor (more than one late-filed report in the previous five years).
4. A civil penalty may be reduced by up to 50% or waived entirely if the civil penalty assessment is significantly out of proportion to the degree of harm to the public for not having the information.⁷ A mitigator can apply in this case if an aggravating factor does not exist and if the assessed penalty exceeds the value of the transactions that were not reported. In this case, an aggravating factor is present, thus a mitigator cannot be applied.
5. Under all the circumstances, staff recommends that the maximum assessed penalty be reduced to \$1,113. Staff does not believe that a complete waiver is appropriate because of the presence of an aggravator of multiple late-filled reports filed by this group over the previous five years.

³ 2 AAC 50.865(b)(3)

⁴ See Attachment 1.

⁵ 2 AAC 50.865(b)(4)

⁶ 2 AAC 50.865(d)(2)(A)

⁷ 2 AAC 50.865(b)(5)

FILER'S REPORTING HISTORY:

2025

Year End/Final Report Timely

Group Registration filed on 4/29/25 Timely

2024

Year End Report..... 70 days late (subject to appeal)

Group Registration filed on 4/29/25 119 days late (subject to appeal)

2023

Year End Report..... 439 days late (subject to appeal)

Group Registration filed on 4/29/25 485 days late (subject to appeal)

2022

Year End Report..... Timely

Seven Day Report..... Timely

Thirty Day Report Timely

Group Registration filed on 2/2/22 Timely

2021

Year End Report..... Timely

Group Registration filed on 2/24/21 Timely

ACTIVITY ON LATE REPORT:

2024 Year End Report

Contributions:	\$0
Expenditures:	\$5

2023 Year End Report

Contributions:	\$0
Expenditures:	\$44,403.44

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff finds the following mitigation criteria applicable to the respondent's appeal:

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- ☐ Good filing history (no late filings in the previous 5 years). 2 AAC 50.865(a)(1)(A)
- ☐ Inexperienced filer.⁸ 2 AAC 50.865(a)(1)(B)
- ☐ Technical error at APOC. 2 AAC 50.865(a)(2)
- ☐ Reported information had a value of \$100 or less. 2 AAC 50.865(a)(3)
- ☐ Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. 2 AAC 50.865(a)(4)

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- ☐ Personal catastrophe/emergency or incapacitating illness. 2 AAC 50.865(b)(1)
- ☐ APOC Staff error. 2 AAC 50.865(b)(2)
- ☒ Report included only administrative costs. 2 AAC 50.865(b)(3)
- ☐ No significant harm to the public and no aggravating factors.⁹ 2 AAC 50.865(b)(4)
- ☐ The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.¹⁰ 2 AAC 50.865(b)(5)
- ☐ A unique circumstance. 2 AAC 50.865(b)(6)

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- ☐ Relying on another person or mailroom to mail, postmark or submit the statement on or before a due date. 2 AAC 50.865(c)(1)
- ☐ Forgetting to file. 2 AAC 50.865(c)(2)
- ☐ Being a volunteer. 2 AAC 50.865(c)(3)
- ☐ Having no change in data from previous statements on file. 2 AAC 50.865(c)(4)
- ☐ Relying on the filer's staff to remind the filer of the filing deadline or to complete the report. 2 AAC 50.865(c)(5)

⁸ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁹ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

¹⁰ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions

- ☐ Being too busy to file. 2 AAC 50.865(c)(6)
- ☐ Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. 2 AAC 50.865(c)(7)

Aggravating Factors [2 AAC 50.865(d)]:

- ☐ Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.¹¹ 2 AAC 50.865(d)(1)
- ☒ More than one late filing in the preceding 5 years. 2 AAC 50.865(d)(2)(A)
- ☐ Evidence suggesting deliberate non-reporting. 2 AAC 50.865(d)(2)(B)
- ☐ Failure to cooperate with staff. 2 AAC 50.865(d)(2)(C)
- ☐ A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. 2 AAC 50.865(d)(2)(D)

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

- ☐ Waived
- ☒ Reduced by 98% to \$1,113
- ☐ Upheld at the assessed amount of \$

¹¹ Value greater than \$1,000.

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **04/29/2025**
 Filer First Name: **ERIM**
 Filer Middle Name:
 Filer Last Name: **CANLIGIL**
 Filer's Title: **TREASURER**
 Report Type: **Year End Report**

GROUP INFORMATION

Group Name: **2023 - A Stronger Alaska**
 Group Abbreviation:
 Group Address: **1747 Pennsylvania Avenue, NW, Ste. 250**
 City, State Zip: **Washington, District of Columbia 20006**

REPORT INFORMATION

Election Year: **0**
 Election: **N/A**
 Report Type: **Year End Report**
 Reporting Period: From **01/01/2023** Through **02/01/2024**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$100,482.54				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$0.00	[+] ⇒	\$0.00	[=] ⇒	\$0.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$44,403.44	[+] ⇒	\$2,899,517.46	[=] ⇒	\$2,943,920.90
[=] ↓					
Closing Cash On Hand:	\$56,079.10				
[-] ↓					
Total Debts:	\$0.00				
[=] ↓					
Surplus/Deficit:	\$56,079.10				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
No Income / Nothing to Report				
		Number of Contributions under \$100:		0
		Sum of Contributions under \$100:		\$0.00
		Income Total:		\$0.00

EXPENDITURES

Attachment 1

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Date	Payment Method	Vendor	Purpose	Amount
02/09/2023	Electronic Funds Transfer	CHAIN BRIDGE BANK, N.A. 1445-A LAUGHLIN AVE MCLEAN, Virginia 22101	BANK FEES	\$10.00
02/09/2023	Electronic Funds Transfer	HOLMES WEDDLE AND BARCOTT PC 701 W. 8TH AVE., STE. 700 ANCHORAGE, Alaska 99501	LEGAL SERVICES	\$24,888.08
02/28/2023	Electronic Funds Transfer	CHAIN BRIDGE BANK, N.A. 1445-A LAUGHLIN AVE MCLEAN, Virginia 22101	BANK FEES	\$5.00
04/26/2023	Electronic Funds Transfer	CHAIN BRIDGE BANK, N.A. 1445-A LAUGHLIN AVE MCLEAN, Virginia 22101	BANK FEES	\$10.00
04/26/2023	Electronic Funds Transfer	HOLMES WEDDLE AND BARCOTT PC 701 W. 8TH AVE., STE. 700 ANCHORAGE, Alaska 99501	LEGAL SERVICES	\$14,039.73
06/16/2023	Check 80021	HOLMES WEDDLE AND BARCOTT PC 701 W. 8TH AVE., STE. 700 ANCHORAGE, Alaska 99501	LEGAL SERVICES	\$5,450.63
			Expenditure Total:	\$44,403.44

DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
No Debts / Nothing to Report				
			Remaining Debt Total:	\$0.00

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **04/29/2025**
 Filer First Name: **ERIM**
 Filer Middle Name:
 Filer Last Name: **CANLIGIL**
 Filer's Title: **TREASURER**
 Report Type: **Year End Report**

GROUP INFORMATION

Group Name: **2024 - A Stronger Alaska**
 Group Abbreviation:
 Group Address: **1747 Pennsylvania Avenue, NW, Ste. 250**
 City, State Zip: **Washington, District of Columbia 20006**

REPORT INFORMATION

Election Year: **0**
 Election: **N/A**
 Report Type: **Year End Report**
 Reporting Period: From **01/01/2024** Through **02/01/2025**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$56,079.10				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$0.00	[+] ⇒	\$0.00	[=] ⇒	\$0.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$5.00	[+] ⇒	\$2,943,920.90	[=] ⇒	\$2,943,925.90
[=] ↓					
Closing Cash On Hand:	\$56,074.10				
[-] ↓					
Total Debts:	\$0.00				
[=] ↓					
Surplus/Deficit:	\$56,074.10				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
No Income / Nothing to Report				
		Number of Contributions under \$100:		0
		Sum of Contributions under \$100:		\$0.00
		Income Total:		\$0.00

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
04/30/2024	Electronic Funds Transfer	CHAIN BRIDGE BANK, N.A. 1445-A LAUGHLIN AVE MCLEAN, Virginia 22101	BANK FEES	\$5.00
			Expenditure Total:	\$5.00

DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
No Debts / Nothing to Report				
			Remaining Debt Total:	\$0.00

INDEPENDENT EXPENDITURES FORM 15-6

COMPLETED

Submission Date: **02/17/2023**

FILER INFORMATION

Filer First Name: **ERIM**

Filer Middle Name:

Filer Last Name: **CANLIGIL**

Filer Full Address: **1747 PENNSYLVANIA AVE. NW, STE. 250
WASHINGTON, District of Columbia 20006**

Filer Occupation: **TREASURER**

Filer Employer: **A STRONGER ALASKA**

Filer's Title with Other Entity: **TREASURER**

REPORT INFORMATION

Report Year: **2022**

Election Year: **2022**

Report Type: **Ten Day**

Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **A Stronger Alaska**

Type of Business or Organization: **Registered Group**

Address: **1747 Pennsylvania Avenue, NW, Ste. 250**

City: **Washington**

State: **District of Columbia
20006**

Country: **United States**

Business/Other Entity Contact Person: **Erim Canligil**

Contact E-mail: **ecanligil@rga.org**

Contact Phone: **202-662-4928**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Dave Rexrode	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Chair

Name	Full Address	Title
Erim Canligil	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Treasurer
Eric Powell	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
02/09/2023	HOLMES WEDDLE AND BARCOTT PC 701 W. 8TH AVE., STE. 700 ANCHORAGE, Alaska 99501	Electronic Funds Transfer	SUPPORT: 2022 - Michael J. Dunleavy \ Nancy A. Dahlstrom Election: State General LEGAL SERVICES	\$24,888.08

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
No Contributions / Nothing to Report			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 1	
Total of paid Expenditures:	\$24,888.08
Previous Contributions:	
	\$0.00
Number of Contributions Reported with this Report: 0	
Total of Contributions Reported with this Report:	\$0.00
Cumulative Contribution Amounts:	\$0.00
Number of Officers: 3	
Number of Debts Reported with this Report: 0	
Total of Debts Incurred but not yet paid:	\$0.00

INDEPENDENT EXPENDITURES FORM 15-6

COMPLETED

Submission Date: **05/04/2023**

FILER INFORMATION

Filer First Name: **ERIM**

Filer Middle Name:

Filer Last Name: **CANLIGIL**

Filer Full Address: **1747 PENNSYLVANIA AVE. NW, STE. 250
WASHINGTON, District of Columbia 20006**

Filer Occupation: **TREASURER**

Filer Employer: **A STRONGER ALASKA**

Filer's Title with Other Entity: **TREASURER**

REPORT INFORMATION

Report Year: **2022**

Election Year: **2022**

Report Type: **Ten Day**

Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **A Stronger Alaska**

Type of Business or Organization: **Registered Group**

Address: **1747 Pennsylvania Avenue, NW, Ste. 250**

City: **Washington**

State: **District of Columbia
20006**

Country: **United States**

Business/Other Entity Contact Person: **Erim Canligil**

Contact E-mail: **ecanligil@rga.org**

Contact Phone: **202-662-4928**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Dave Rexrode	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Chair

Name	Full Address	Title
Erim Canligil	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Treasurer
Eric Powell	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
04/26/2023	HOLMES WEDDLE AND BARCOTT PC 701 W. 8TH AVE., STE. 700 ANCHORAGE, Alaska 99501	Electronic Funds Transfer	SUPPORT: 2022 - Michael J. Dunleavy \ Nancy A. Dahlstrom Election: State General LEGAL SERVICES	\$14,039.73

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
No Contributions / Nothing to Report			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 1		
Total of paid Expenditures:		\$14,039.73
Previous Contributions:		\$0.00
Number of Contributions Reported with this Report: 0		
Total of Contributions Reported with this Report:		\$0.00
Cumulative Contribution Amounts:		\$0.00
Number of Officers: 3		
Number of Debts Reported with this Report: 0		
Total of Debts Incurred but not yet paid:		\$0.00

INDEPENDENT EXPENDITURES FORM 15-6

COMPLETED

Submission Date: **06/26/2023**

FILER INFORMATION

Filer First Name: **ERIM**

Filer Middle Name:

Filer Last Name: **CANLIGIL**

Filer Full Address: **1747 PENNSYLVANIA AVE. NW, STE. 250
WASHINGTON, District of Columbia 20006**

Filer Occupation: **TREASURER**

Filer Employer: **A STRONGER ALASKA**

Filer's Title with Other Entity: **TREASURER**

REPORT INFORMATION

Report Year: **2022**

Election Year: **2022**

Report Type: **Ten Day**

Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **A Stronger Alaska**

Type of Business or Organization: **Registered Group**

Address: **1747 Pennsylvania Avenue, NW, Ste. 250**

City: **Washington**

State: **District of Columbia
20006**

Country: **United States**

Business/Other Entity Contact Person: **Erim Canligil**

Contact E-mail: **ecanligil@rga.org**

Contact Phone: **202-662-4928**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Dave Rexrode	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Chair

Name	Full Address	Title
Erim Canligil	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Treasurer
Eric Powell	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
06/16/2023	HOLMES WEDDLE AND BARCOTT PC 701 W. 8TH AVE., STE. 700 ANCHORAGE, Alaska 99501	Check Check Number: 80021	SUPPORT: 2022 - Michael J. Dunleavy \ Nancy A. Dahlstrom Election: State General LEGAL SERVICES	\$5,450.63

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
No Contributions / Nothing to Report			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 1		
Total of paid Expenditures:		\$5,450.63
Previous Contributions:		\$0.00
Number of Contributions Reported with this Report: 0		
Total of Contributions Reported with this Report:		\$0.00
Cumulative Contribution Amounts:		\$0.00
Number of Officers: 3		
Number of Debts Reported with this Report: 0		
Total of Debts Incurred but not yet paid:		\$0.00

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: Stacey C. Stone on behalf of A Stronger Alaska (Erim Canligil)

Office: Treasurer

Penalty issued in connection with (check box or boxes):

<input type="checkbox"/> 30 Day Report	<input type="checkbox"/> 105 Day Report	<input type="checkbox"/> Statement of Contributions (15-5)
<input type="checkbox"/> 7 Day Report	<input checked="" type="checkbox"/> Year End Report	<input type="checkbox"/> Independent Expenditure (15-6)
<input type="checkbox"/> 24 Hour Report	<input checked="" type="checkbox"/> Registration	<input type="checkbox"/> Paid for By Identifier
<input type="checkbox"/> Other: _____		

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): 23/24 (No Election Activity)

Statement: I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of the AS 15.13, the Alaska Campaign Disclosure Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed: Pursuant to 2 AAC 50.865(b), a civil penalty may be reduced by a percentage greater than 50 percent or waived entirely in the following situations: a late report included only administrative costs, if the information is readily available to the public in another forum, or if the civil penalty is significantly out of proportion to the degree of harm to the public for not having the information. In the instant case, all three of the foregoing mitigating factors exist. ASA has not engaged in any campaign related activity since the 2022 General Election. Since such time, the only expenditures made by ASA are legal fees incurred to respond to APOC's inquiries. Therefore, the reports referenced in the civil penalty assessment only included administrative costs, and did not include any campaign related costs. While the year end reports were not filed, the information was made available to the public and APOC. In fact, ASA filed 15-6 reports each time it issued a legal defense fund payment. In sum, given that ASA engaged in no campaign related activity, the civil penalty is significantly out of proportion to the degree of harm. In truth, there is practically zero harm to the public here, as the public had the required information given the filing of the 15-6 reports. For ease of reference, attached hereto are all 15-6 reports that were filed during the time period referenced in the civil penalty assessment. Furthermore, as APOC has noted, the regulations merely provide a starting point for assessment of penalties, and APOC has discretion to reduce or eliminate penalties. See e.g. APOC Case No. 23-03-CD. Given the nature of the expenditures and the reports, the undersigned submits that this is precisely the sort of case where penalties should be waived in their entirety. Alternatively, if any penalty is assessed, any fine should not exceed more than \$100 per report.

Certification: I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Dated:

Erim Canligil 6/20/2025



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

May 21, 2025

Via Certified Mail, U.S. Mail, and Email

A Stronger Alaska
1747 Pennsylvania Ave., NW, Ste. 250
Washington, DC 20006
staci@crosbyott.com
ecanligil@rga.org

Re: Notice of Penalty – Late-Filed Registration for 2023 and 2024¹
Notice of Penalty – Late Filed Year End Reports for 2023 and 2024

To Whom It May Concern:

You are receiving this notice for several reporting violations.

Because A Stronger Alaska disclosed a surplus of \$100,482.54 on its 2022 Year End Report filed February 15, 2023, it was an ongoing group² and was required to re-register each year and file a year-end report by February 15, as provided in AS 15.13.110.³ According to our records, A Stronger Alaska did not timely file a group registration or a year-end report for 2023 and 2024. By law, a maximum penalty of \$50 accrues each day A Stronger Alaska was in violation of AS 15.13.⁴ Accordingly, the civil penalties assessed by the Alaska Public Offices Commission are as follows:

Year	Report Due	Date Due	Date Filed	Days Late	Penalty
2023	Registration	12/31/23	4/29/25	485	\$24,250
2023	Year End Report	2/15/24	4/29/25	439	\$21,950
2024	Registration	12/31/24	4/29/25	119	\$5,950
2024	Year End Report	2/18/25	4/29/25	70	\$3,500
Total					\$55,650

Please be advised:

-
- 1 AS 15.13.050(a).
 - 2 2 AAC 50.405(7).
 - 3 2 AAC 50.384(b)(1)
 - 4 AS 15.13.390(a)(4).

- 1) You may pay the assessed penalties and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)⁵ to make a payment by credit card; or by paying in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.
- 2) Alternatively, you have the right to appeal staff’s conclusion that these violations occurred or the penalty amounts that have been assessed.⁶ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in person or telephonically.

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General’s Office.⁷

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION


John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Group File (w/o enclosures)

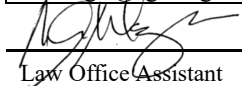
⁵ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

PLEASE NOTE: credit card payments cannot be made by phone; they must be made online.

⁶ 2 AAC 50.831(a).

⁷ 2 AAC 50.895.

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
A Stronger Alaska 1747 Pennsylvania Ave., NW, Ste. 250 Washington, DC 20006 staci@crosbyott.com ecanligil@rfga.org	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

	05/21/2025
Law Office Assistant	Date

9489 0090 0027 6610 9413 40



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

August 27, 2025

VIA EMAIL & CERTIFIED MAIL

A Stronger Alaska
Erim Canligil
Stacey Stone
1747 Pennsylvania Ave. NW, Ste.250
Washington, DC
ecanligil@rga.org
staci@crosbyott.com

RE: Commission Meeting Notice

Dear A Stronger Alaska:

The Commission will review the matter of the civil penalty assessed for your late-filed registrations and year-end reports at its September 10, 2025 Commission Meeting in Anchorage, Alaska.

I have enclosed for your review the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting, either in person or by telephone (1-907-202-7104, Access Code: 218853540#, in-person (2221 Northern Lights Blvd, Ste 128, Anchorage, Alaska, 99508) or via [Microsoft Teams Meeting](#).¹ Please notify our office if you intend to participate. Group Civil Penalty Appeals are expected to begin at **9:05 a.m. on Wednesday, September 10, 2025.**

This matter will initially be presented to the Commission on a Consent Agenda. If you do not wish to present your appeal or make a statement to the Commission, and your appeal is not removed from the agenda by a Commissioner, the Staff Recommendation will be approved without discussion or deliberation. If you do wish to present your appeal or make a statement before the Commission, please notify staff or the Commission prior to the approval of the consent agenda.

¹ Meeting ID: 234 956 901 993 7, Passcode: Yb9UE6WW

A Stronger Alaska
Commission Meeting Notice

Staff will send you a copy of the Commission's final decision regarding your appeal.

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

KIM STONE

Kim Stone
Campaign Disclosure Coordinator

Encl: Staff Recommendation

cc: Group File

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
A Stronger Alaska Erim Canligil Stacey Stone 1747 Pennsylvania Ave. NW, Ste.250 Washington, DC ecanligil@rga.org staci@crosbyott.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

KIM STONE

August 27, 2025

Signature

Date



**ALASKA PUBLIC OFFICES COMMISSION
STAFF RECOMMENDATION FOR COMMISSION ACTION**

PREPARED BY: John Grover Whitlock

DATE: August 27, 2025

RESPONDENT: First Bank

CIVIL PENALTY

ASSESSED UNDER:

☒ Campaign Disclosure: AS 15.13.390, 2 AAC 50.855

REASON FOR FILING:

Contribution of \$500 or more to an initiative proposal group

LATE REPORT(S):

Campaign Disclosure Reports

☒ 15-5 Statement of Contributions¹

DUE DATE OF LATE FILED REPORT: May 11, 2025

REPORT FILED ON: July 3, 2025

NUMBER OF DAYS LATE: 53

PENALTY ASSESSMENT SENT: July 10, 2025

DATE PENALTY APPEAL RECEIVED: July 17, 2025

MAXIMUM STATUTORY PENALTY: \$2,650

PENALTY ASSESSED²: \$2,650

RECOMMENDATION: Reduction - \$50 Penalty
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=5299&ViewType=SC>.

² 2 AAC 50.855(b)(2)(B)(i).

RESPONDENT’S STATEMENT OF MITIGATING FACTS:

1. First Bank has a good filing history.
2. The late filing of this report did not cause any harm to the public.
3. An administrative error caused alerts not being triggered for a “nondeductible political contribution.”
4. Members of the First Bank accounts payable team were newly employed and were unaware of 15-5 filing requirements.

STAFF’S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. Respondent First Bank on April 11, 2025 contributed \$1,500 to the group Safeguard Sitka’s Future – Vote No on 1. First Bank did not file a Statement of Contributions, but the group reported the donation to APOC on its 30-day report.
2. A civil penalty may be reduced by up to 50% when a person has a good filing history. A person has a good filing history if they’ve had no late filings in the preceding five years. Here, Respondent has not been untimely with filing an APOC form since 2014.
3. A civil penalty may be reduced by a percentage greater than 50% or waived entirely if the violation caused no significant harm to the public and no aggravating factors exist.³ Here, no significant harm to the public occurred because Safeguard Sitka’s Future – Vote No on 1 reported the \$1,500 donation in its 30-day report on April 29, 2025.
4. A civil penalty may be reduced by up to 50% when a person has been subject to reporting requirements for less than 365 days or is engaged in their first election cycle.⁴ Here, the person subject to reporting requirements is First Bank – not the individual(s) working in accounts payable who were unaware of the filing requirements. First Bank has been subject to reporting requirements since 2014 when it filed its first Statement of Contribution form. Accordingly, staff is unable to apply the inexperienced filer mitigating factor.
5. Under all circumstances, staff recommends that the maximum assessed penalty be reduced to \$50. Staff does not believe a complete waiver is appropriate because the statute requires that a report be filed by the contributor whether the contribution is timely reported in another forum.

FILER’S REPORTING HISTORY:

2025

Statement of Contributions 15-531 days Late (subject to appeal)

2014

Statement of Contributions 15-57 days Late (Notice of Penalty Issued)

ACTIVITY ON LATE REPORT:

Contribution:	\$1,500
---------------	---------

³ 2 AAC 50.865(b)(4)

⁴ 2 AAC 50.865(a)(1)(B)

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff finds the following mitigation criteria applicable to the respondent's appeal:

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- ☒ Good filing history (no late filings in the previous 5 years). 2 AAC 50.865(a)(1)(A)
- ☐ Inexperienced filer.⁵ 2 AAC 50.865(a)(1)(B)
- ☐ Technical error at APOC. 2 AAC 50.865(a)(2)
- ☐ Reported information had a value of \$100 or less. 2 AAC 50.865(a)(3)
- ☐ Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. 2 AAC 50.865(a)(4)

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- ☐ Personal catastrophe/emergency or incapacitating illness. 2 AAC 50.865(b)(1)
- ☐ APOC Staff error. 2 AAC 50.865(b)(2)
- ☐ Report included only administrative costs. 2 AAC 50.865(b)(3)
- ☒ No significant harm to the public and no aggravating factors.⁶ 2 AAC 50.865(b)(4)
- ☐ The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.⁷ 2 AAC 50.865(b)(5)
- ☐ A unique circumstance. 2 AAC 50.865(b)(6)

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- ☐ Relying on another person or mailroom to mail, postmark or submit the statement on or before a due date. 2 AAC 50.865(c)(1)
- ☐ Forgetting to file. 2 AAC 50.865(c)(2)
- ☐ Being a volunteer. 2 AAC 50.865(c)(3)
- ☐ Having no change in data from previous statements on file. 2 AAC 50.865(c)(4)
- ☐ Relying on the filer's staff to remind the filer of the filing deadline or to complete the report. 2 AAC 50.865(c)(5)

⁵ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁶ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

⁷ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions

- ☐ Being too busy to file. 2 AAC 50.865(c)(6)
- ☐ Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. 2 AAC 50.865(c)(7)

Aggravating Factors [2 AAC 50.865(d)]:

- ☐ Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁸ 2 AAC 50.865(d)(1)
- ☐ More than one late filing in the preceding 5 years. 2 AAC 50.865(d)(2)(A)
- ☐ Evidence suggesting deliberate non-reporting. 2 AAC 50.865(d)(2)(B)
- ☐ Failure to cooperate with staff. 2 AAC 50.865(d)(2)(C)
- ☐ A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. 2 AAC 50.865(d)(2)(D)

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

- ☐ Waived
- ☒ Reduced by 98.11% to \$50.00
- ☐ Upheld at the assessed amount of \$

⁸ Value greater than \$1,000.

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: FIRST BANK

Office: KETCHIKAN, ALASKA

Penalty issued in connection with (check box or boxes):

<input type="checkbox"/> 30 Day Report	<input type="checkbox"/> 105 Day Report	<input checked="" type="checkbox"/> Statement of Contributions (15-5)
<input type="checkbox"/> 7 Day Report	<input type="checkbox"/> Year End Report	<input type="checkbox"/> Independent Expenditure (15-6)
<input type="checkbox"/> 24 Hour Report	<input type="checkbox"/> Registration	<input type="checkbox"/> Paid for By Identifier
<input type="checkbox"/> Other: _____		

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): 2025 Safeguard Sitka's Future

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of the AS 15.13, the Alaska Campaign Disclosure Law.

We would like to appeal to your good heart to waive the penalty imposed on our company.
State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

We request a reduction or waiver of the penalty.

- We disagree with the amount stated in the notice.
- The actual amount paid to Safeguard Sitka's Future was \$1,500, not \$5,500 as indicated in the notice. Please see the attached transaction history.
- We complied with the filing requirements upon receiving the notice from your office.
- We have no history of late filing or failure to file in the last 10 years.
- We were unaware that one of our checks was issued for political contributions because it was misclassified in our records. Please see the attached transaction history.
- The amount was mistakenly classified and recorded in our books as Donations and Sponsorships expense instead of Miscellaneous Nondeductible Political Contributions, which did not trigger any alerts. Please see the attached documentation.
- The members of First Bank's accounts payable team are newly employed and were unaware of the political contribution filing requirements during their training period.
- We believe that the delay in filing this report did not cause any harm to the public, and no aggravating factors exist.

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct, and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Notarized
original copy sent to the State was signed by
NERISSA C. BUENDIA, VP & CONTROLLER

7/2/2025

DATE



THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

July 10, 2025

VIA CERTIFIED MAIL, U.S. MAIL, and EMAIL

First Bank

2030 Sea Level Dr., #300

Ketchikan, AK 99835

accounting@firstbankak.com

RE: Notice of Penalty Assessment – Statement of Contributions Report

To Whom It May Concern:

According to our records, you did not timely file your Statement of Contributions Report that was due on May 11, 2025.¹ Instead, your report was filed on July 3, 2025 (53 days late). By law a maximum penalty of \$50 accrues each day the report is late.² The maximum penalty the Alaska Public Offices Commission has assessed you is **\$2,650**.³

Additionally, please be advised:

- 1) You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)⁴ to make a payment by credit card; or you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.
- 2) Alternatively, you have the right to appeal staff’s conclusion that a violation has occurred or the penalty amount assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

¹ 4/11/25, \$1,500 contribution to Safeguard Sitka’s Future – Vote No on 1.

² AS 15.13.390(a).

³ 2 AAC 50.855(a).

⁴ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

PLEASE NOTE: credit card payments cannot be made by phone; they must be made online.

⁵ 2 AAC 50.831(a).

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in person or telephonically.

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General's Office.⁶

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION


John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

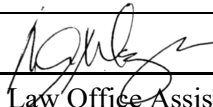
cc: Entity File

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

First Bank
2030 Sea Level Dr., #300
Ketchikan, AK 99835
accounting@firstbankak.com

☒ Certified Mail
☒ U.S. Mail
☒ Email


Law Office Assistant

07/10/2025

Date

9489 0090 0027 6610 9559 41

⁶ 2 AAC 50.895.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

August 27, 2025

VIA EMAIL & CERTIFIED MAIL

First Bank

ATTN: Nerissa Buendia

2030 Sea Level Dr., #300

Ketchikan, AK 99835

accounting@firstbankak.com

RE: Commission Meeting Notice

Dear First Bank:

The Commission will review the matter of the civil penalty assessed for your late-filed Statement of Contribution report at its September 10, 2025 Commission Meeting in Anchorage, Alaska.

I have enclosed for your review the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting, either in person or by telephone (1-907-202-7104, Access Code: 218853540#, in-person (2221 Northern Lights Blvd, Ste 128, Anchorage, Alaska, 99508) or via [Microsoft Teams Meeting](#).¹ Please notify our office if you intend to participate. Group Civil Penalty Appeals are expected to begin at **9:05 a.m. on Wednesday, September 10, 2025.**

This matter will initially be presented to the Commission on a Consent Agenda. If you do not wish to present your appeal or make a statement to the Commission, and your appeal is not removed from the agenda by a Commissioner, the Staff Recommendation will be approved without discussion or deliberation. If you do wish to present your appeal or make a statement before the Commission, please notify staff or the Commission prior to the approval of the consent agenda.

Staff will send you a copy of the Commission's final decision regarding your appeal.

¹ Meeting ID: 234 956 901 993 7, Passcode: Yb9UE6WW

First Bank
Commission Meeting Notice

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

KIM STONE

Kim Stone
Campaign Disclosure Coordinator

Encl: Staff Recommendation

cc: Group File

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Nerissa Buendia First Bank 2030 Sea Level Dr., #300 Ketchikan, AK 99835 accounting@firstbankak.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

KIM STONE

August 27, 2025

Signature

Date



**ALASKA PUBLIC OFFICES COMMISSION
STAFF RECOMMENDATION FOR COMMISSION ACTION**

PREPARED BY: John Grover Whitlock

DATE: August 27, 2025

RESPONDENT: Keith Manternach

CIVIL PENALTY

ASSESSED UNDER:

☒ Campaign Disclosure: AS 15.13.390, 2 AAC 50.855

REASON FOR FILING:

Contribution of \$500 or more to an initiative proposal group

LATE REPORT(S):

Campaign Disclosure Reports

☒ Statement of Contributions Form 15-5¹

DUE DATE OF LATE FILED REPORT: May 23, 2025

REPORT FILED ON: June 23, 2025

NUMBER OF DAYS LATE: 31

PENALTY ASSESSMENT SENT: July 1, 2025

DATE PENALTY APPEAL RECEIVED: July 17, 2025

MAXIMUM STATUTORY PENALTY: \$1,550

PENALTY ASSESSED²: \$1,550

RECOMMENDATION: **80% Reduction - \$310 penalty**
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

¹ [Manternach Statement of Contribution 15-5](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=5383&ViewType=SC) filed June 23, 2025,
<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=5383&ViewType=SC>.

² 2 AAC 50.855(b)(2)(B)(i).

BACKGROUND:

Persons who donate \$500 or more to initiative proposal groups and ballot measure groups must report their contributions within 30 days by submitting a Statement of Contributions.³ If the person is late in submitting a Statement of Contributions, they are imposed a \$50 daily penalty.⁴ APOC waives the penalty where the person is a first-time filer or where the late filing was the person's first error and the contribution's recipient reported it within 30 days.⁵

Here, the Respondent donated \$500 to an initiative proposal group, was late in filing his Statement of Contributions 15-5 form, and was issued a Notice of Penalty.⁶ He appeals.

RESPONDENT'S CIVIL PENALTY APPEAL AFFIDAVIT:

Respondent states he was unaware that he needed to file and that he has suggested to the group that they inform contributors of the need to file with APOC.⁷

STAFF'S ANALYSIS OF FACTS AND MITIGATION CRITERIA FOR COMMISSION REVIEW:

1. Previously, in 2022, Respondent contributed \$2,500 to a ballot proposition group and did not report the contribution. APOC notified Respondent on May 9, 2023⁸ and again on June 2, 2023⁹ by certified mail, regular mail, and email that campaign disclosure law required persons to report contributions of \$500 or more. APOC did not assess a penalty against the respondent for the late filing as he was a first-time filer.
2. Thereafter, on October 25, 2024, Respondent contributed \$499 to an initiative proposal group.
3. On April 23, 2025, Respondent made the \$500 contribution to an initiative proposal group at issue in this appeal.
4. A civil penalty may be reduced by a percentage greater than 50%, or waived entirely, if the penalty assessment is significantly out of proportion to the degree of harm suffered by the public.¹⁰ A penalty is considered significantly out of proportion to degree of harm when it exceeds the value of the transactions that were reported late.¹¹
5. Here, the value of the transactions reported late was \$500 (a single donation to an initiative proposal group) and the penalty assessment was \$1,550, qualifying for a reduction.
6. The Respondent, having previously filed a statement of contribution late without being penalized, was on notice that contributions of \$500 or more need to be reported and that

³ See AS 15.13.040(k). The Statement of Contributions is APOC's 15-5 form.

⁴ See AS 15.13.390(a).

⁵ See 2 AAC 50.855(b)(2)(A)(i); (b)(2)(A)(iv).

⁶ Exhibit 1, July 1, 2025 Notice of Penalty.

⁷ Exhibit 2, Manternach Civil Penalty Appeal Affidavit.

⁸ Exhibit 3, May 9, 2023 Notice of Deficiency.

⁹ Exhibit 4, June 2, 2023 Notice of Violation.

¹⁰ 2 AAC 50.865(b)(5).

¹¹ 2 AAC 50.865(d)(2)(A).

future late filings would be subject to penalties.¹² Additionally, Respondent in October 2024 contributed \$499 to an initiative proposal group, just below the \$500 reporting threshold, additionally indicating he was aware of the requirement.

7. Based on the foregoing, staff recommends an 80% reduction of the maximum assessed penalty, resulting in a penalty of \$310.

Filer's reporting history:

2025 (current)

Statement of Contributions 15-531 days Late (subject to appeal)

2023

Statement of Contributions 15-5202 days Late (Notice of Violation Issued)

Activity on late report:

Contribution:	\$500
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Staff's Recommendation based on standard mitigation criteria

Staff finds the following mitigation criteria applicable to the respondent's appeal:

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- ☐ Good filing history (no late filings in the previous 5 years). **2 AAC 50.865(a)(1)(A)**
- ☐ Inexperienced filer.¹³ **2 AAC 50.865(a)(1)(B)**
- ☐ Technical error at APOC. **2 AAC 50.865(a)(2)**
- ☐ Reported information had a value of \$100 or less. **2 AAC 50.865(a)(3)**
- ☐ Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. **2 AAC 50.865(a)(4)**

¹² Exhibit 4, Notice of Violation.

¹³ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- ☐ Personal catastrophe/emergency or incapacitating illness. **2 AAC 50.865(b)(1)**
- ☐ APOC Staff error. **2 AAC 50.865(b)(2)**
- ☐ Report included only administrative costs. **2 AAC 50.865(b)(3)**
- ☐ No significant harm to the public and no aggravating factors.¹⁴ **2 AAC 50.865(b)(4)**
- ☒ The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.¹⁵ **2 AAC 50.865(b)(5)**
- ☐ A unique circumstance. **2 AAC 50.865(b)(6)**

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following factors to reduce the amount of a penalty.

- ☐ Relying on another person or mailroom to mail, postmark or submit the statement on or before a due date. **2 AAC 50.865(c)(1)**
- ☐ Forgetting to file. **2 AAC 50.865(c)(2)**
- ☐ Being a volunteer. **2 AAC 50.865(c)(3)**
- ☐ Having no change in data from previous statements on file. **2 AAC 50.865(c)(4)**
- ☐ Relying on the filer's staff to remind the filer of the filing deadline or to complete the report. **2 AAC 50.865(c)(5)**
- ☐ Being too busy to file. **2 AAC 50.865(c)(6)**
- ☐ Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. **2 AAC 50.865(c)(7)**

Aggravating Factors [2 AAC 50.865(d)]:

- ☐ Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.¹⁶ **2 AAC 50.865(d)(1)**
- ☒ More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- ☐ Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- ☐ Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- ☐ A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

¹⁴ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

¹⁵ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions

¹⁶ Value greater than \$1,000.

Based on the applicable standard mitigation criteria, staff recommends that the civil penalty assessment be:

- ☐ **Waived**
- ☒ **Reduced by 80% to \$310**
- ☐ **Upheld at the assessed amount of \$**



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

July 1, 2025

VIA CERTIFIED MAIL, U.S. MAIL, and EMAIL

Keith Manternach
8225 Hartzell Road
Anchorage, AK 99507
keith@specialtytruckandauto.com

RE: Notice of Penalty Assessment – Statement of Contributions Report

Mr. Manternach:

According to our records, you did not timely file your Statement of Contributions Report that was due on May 23, 2025.¹ Instead, your report was filed on June 23, 2025 (31 days late). By law a maximum penalty of \$50 accrues each day the report is late.² The maximum penalty the Alaska Public Offices Commission has assessed you is **\$1,550**.³

Additionally, please be advised:

- 1) You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)⁴ to make a payment by credit card; or you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.
- 2) Alternatively, you have the right to appeal staff’s conclusion that a violation has occurred or the penalty amount assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

¹ 4/23/25, \$500 contribution to Repeal Now

² AS 15.13.390(a).

³ 2 AAC 50.855(a).

⁴ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

PLEASE NOTE: credit card payments cannot be made by phone; they must be made online.

⁵ 2 AAC 50.831(a).

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in person or telephonically.

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General's Office.⁶

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION


John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

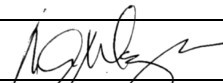
cc: Individual File

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

Keith Manternach
8225 Hartzell Road
Anchorage, AK 99507
keith@specialtytruckand
auto.com

☒ Certified
Mail
☒ U.S. Mail
☒ Email



Law Office Assistant

07/01/2025

Date

9489 0090 0027 6610 9558 59

⁶ 2 AAC 50.895.

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: _____

Office: _____

Penalty issued in connection with (check box or boxes):

- | | | |
|---|--|--|
| <input type="checkbox"/> 30 Day Report | <input type="checkbox"/> 105 Day Report | <input type="checkbox"/> Statement of Contributions (15-5) |
| <input type="checkbox"/> 7 Day Report | <input type="checkbox"/> Year End Report | <input type="checkbox"/> Independent Expenditure (15-6) |
| <input type="checkbox"/> 24 Hour Report | <input type="checkbox"/> Registration | <input type="checkbox"/> Paid for By Identifier |
| <input type="checkbox"/> Other: _____ | | |

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): _____

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of the AS 15.13, the Alaska Campaign Disclosure Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct, and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date: _____

2 AAC 50.865. Mitigating factors; aggravating factors

(a) A civil penalty determined under 2 AAC 50.855 may be reduced by up to 50 percent if

(1) a person required to file a statement or other filing

(A) has a good filing history; in this subparagraph, "good filing history" means

(i) no late filings in the immediately preceding five years; and

(ii) for groups, no more than \$500 in non-administrative activity shown on the group's overdue report; or

(B) is an inexperienced filer; in this subparagraph, "inexperienced filer" means a person required to file reports under this chapter if that person has been subject to a registration or reporting requirement for less than 365 days, or a person engaged in the person's first election cycle;

(2) a technical error at the commission, including a communication, facsimile machine, computer program, electronic filing system, or other equipment problem may have contributed to the late or incomplete filing;

(3) any unreported or mistakenly reported information had a value of \$100 or less; or

(4) any unreported or mistakenly reported information had a value higher than \$100 but no more than \$1,000, and a factor listed in (b) of this section also applies.

(b) A civil penalty determined under 2 AAC 50.855 may be reduced by a percentage greater than 50 percent, or waived entirely based on the following factors:

(1) the person required to file, or a family member of the person required to file, experienced a personal emergency, including a call for military service, a natural disaster, a civil disturbance, or an incapacitating illness that prevented the person from filing on or before the due date; this mitigating factor is only available to a natural person;

(2) a significant cause of the late filing is commission staff error, including

(A) furnishing reporting materials too late for filing on or before the due date;

(B) giving incorrect oral or written information to a person required to submit a statement or other filing; or

(C) failing to deliver required notices when due;

(3) a late or erroneous report included only administrative costs;

(4) a late or incomplete report did not cause significant harm to the public, and aggravating factors under (d) of this section do not exist; for purposes of this paragraph, a late or incomplete report did not cause significant harm to the public if

(A) the dollar amount missing from a form or disclosure is \$100 or less;

(B) the dollar amount for the information missing from a form or disclosure is more than \$100 but no more than \$1,000, and the person required to file self-reported the error; for purposes of this subparagraph, the error is self-reported if the person notified the staff of the error, but filing the late or missing information without notifying the staff does not constitute self-reporting; or

(C) the missing or incomplete information is readily available to the public through another forum;

(5) the civil penalty assessment is significantly out of proportion to the degree of harm to the public for not having the information; for purposes of this paragraph, absent the presence of aggravating factors in (d) of this section, an assessed penalty is significantly out of proportion if it exceeds the value of the transactions that were not reported or were reported late, or, in the case of seven-day or 24-hour reports, exceeds twice the value of the transactions that were not reported or were reported late; or

(6) a unique circumstance justifies reducing or waiving the penalty.

(c) The commission will not accept any of the following as mitigating factors to reduce the amount of a penalty:

(1) relying on another person or mailroom to mail, postmark, or submit the statement on or before a due date;

(2) forgetting to file;

(3) being a volunteer;

(4) having no change in reportable information from previous filed statements;

(5) relying on the responsible person's staff to remind the person of the filing deadline or to complete or file the report;

(6) being too busy to file;

(7) absence caused by travel, unless the travel was unplanned or unavoidable, including travel for a personal emergency, or weather-related travel problems.

(d) A civil penalty determined under 2 AAC 50.855 may be increased to the maximum amount allowed under the applicable statute if a person required to file a statement or other filing has

(1) failed to substantially comply with financial disclosure requirements by omitting a significant source of income, interest in real property, business interest, loan, trust, or other substantial financial interest; in this paragraph, "substantial financial interest" means an interest with a value greater than \$1,000; or

(2) a poor reporting history; indicators of a poor reporting history include any of the following:

(A) more than one late filing in the immediately preceding five years;

(B) evidence suggesting deliberate non-reporting;

(C) failure to cooperate with the staff;

(D) a violation of any provision of AS 15.13, AS 24.45, AS 24.60.200 - 24.60.260, AS 39.50, or this chapter in the preceding five years.

From: postmaster@specialtytruckandauto.com
To: keith@specialtytruckandauto.com
Subject: Delivered: RE: Notice of Penalty Assessment – Statement of Contributions Report
Date: Wednesday, July 2, 2025 9:04:23 AM
Attachments: [RE Notice of Penalty Assessment – Statement of Contributions Report.msg](#)

Your message has been delivered to the following recipients:
keith@specialtytruckandauto.com (keith@specialtytruckandauto.com) <mailto:keith@specialtytruckandauto.com>
Subject: RE: Notice of Penalty Assessment – Statement of Contributions Report

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: Keith Manternach

Office: _____

Penalty issued in connection with (check box or boxes):

- | | | |
|---|--|---|
| <input type="checkbox"/> 30 Day Report | <input type="checkbox"/> 105 Day Report | <input checked="" type="checkbox"/> Statement of Contributions (15-5) |
| <input type="checkbox"/> 7 Day Report | <input type="checkbox"/> Year End Report | <input type="checkbox"/> Independent Expenditure (15-6) |
| <input type="checkbox"/> 24 Hour Report | <input type="checkbox"/> Registration | <input type="checkbox"/> Paid for By Identifier |
| <input type="checkbox"/> Other: _____ | | |

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): _____

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of the AS 15.13, the Alaska Campaign Disclosure Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

I had no idea that I needed to make an APOC filing, I have suggested to the Repeal Now organization that they inform contributors that they may need to file with APOC to avoid future penalties.

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct, and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date:  7/17/25



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

May 9, 2023

VIA CERTIFIED MAIL & U.S. MAIL

Keith Manternach
8225 Hartzell Road
Anchorage, Alaska 99507

RE: Notice of Deficiency¹
Statement of Contributions Report – Due November 11, 2022

Mr. Manternach:

According to our records you have not filed your Statement of Contributions Report that was due on November 11, 2022.² Every individual, person, nongroup entity, or group that contributes \$500 or more in a calendar year to a group organized for the principal purpose of influencing the outcome of a ballot proposition must file a Statement of Contributions disclosing the contribution and the total amount of contributions to the group within 30 days of making the contribution.³ Failure to timely file a report results in the assessment of civil penalties for failure to comply with the provisions of the Campaign Disclosure law under Alaska Statute 15.13.

As of the date of this letter, your Statement of Contributions Report is **179 days** late and the accrued maximum penalty that may be assessed is **\$8,950**. This penalty continues to accrue by law at a rate of \$50 per-day until your Statement of Contributions Report is filed.⁴

To stop the accrual of penalties, you must file your Statement of Contributions Report. After your statement is filed, you will be notified of the assessed penalty amount. You have a right to appeal the assessment of a penalty. To do so, **you must submit your delinquent report and the enclosed appeal affidavit to the Commission within 30 days.** APOC staff will review your affidavit and prepare a recommendation for the Commission.

¹ 2 AAC 50.850(b).

² [\$2,500 contribution to [ConventionYes](#), October 12, 2022].

³ AS 15.13.040(k).

⁴ AS 15.13.390(a).

You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in-person or telephonically.

Failure to respond to this notice by filing the report, making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the total accrued penalty as of the date of the order; and referral to the Attorney General's Office for appropriate action.⁵

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION



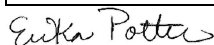
Charles Stormont
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

Filing Instructions

cc: Individual File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Keith Manternach 8225 Hartzell Road Anchorage, Alaska 99507	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail



5/9/202

Law Office Assistant

Date

9171-9690-0935-0294-3974-
87

⁵ 2 AAC 50.895.

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: _____

Office: _____

Penalty issued in connection with (check box or boxes):

- | | | |
|---|--|--|
| <input type="checkbox"/> 30 Day Report | <input type="checkbox"/> 105 Day Report | <input type="checkbox"/> Statement of Contributions (15-5) |
| <input type="checkbox"/> 7 Day Report | <input type="checkbox"/> Year End Report | <input type="checkbox"/> Independent Expenditure (15-6) |
| <input type="checkbox"/> 24 Hour Report | <input type="checkbox"/> Registration | <input type="checkbox"/> Paid for By Identifier |
| <input type="checkbox"/> Other: _____ | | |

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): _____

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of the AS 15.13, the Alaska Campaign Disclosure Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct, and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date: _____

2 AAC 50.865. Mitigating factors; aggravating factors

(a) A civil penalty determined under 2 AAC 50.855 may be reduced by up to 50 percent if

(1) a person required to file a statement or other filing

(A) has a good filing history; in this subparagraph, "good filing history" means

(i) no late filings in the immediately preceding five years; and

(ii) for groups, no more than \$500 in non-administrative activity shown on the group's overdue report; or

(B) is an inexperienced filer; in this subparagraph, "inexperienced filer" means a person required to file reports under this chapter if that person has been subject to a registration or reporting requirement for less than 365 days, or a person engaged in the person's first election cycle;

(2) a technical error at the commission, including a communication, facsimile machine, computer program, electronic filing system, or other equipment problem may have contributed to the late or incomplete filing;

(3) any unreported or mistakenly reported information had a value of \$100 or less; or

(4) any unreported or mistakenly reported information had a value higher than \$100 but no more than \$1,000, and a factor listed in (b) of this section also applies.

(b) A civil penalty determined under 2 AAC 50.855 may be reduced by a percentage greater than 50 percent, or waived entirely based on the following factors:

(1) the person required to file, or a family member of the person required to file, experienced a personal emergency, including a call for military service, a natural disaster, a civil disturbance, or an incapacitating illness that prevented the person from filing on or before the due date; this mitigating factor is only available to a natural person;

(2) a significant cause of the late filing is commission staff error, including

(A) furnishing reporting materials too late for filing on or before the due date;

(B) giving incorrect oral or written information to a person required to submit a statement or other filing; or

(C) failing to deliver required notices when due;

(3) a late or erroneous report included only administrative costs;

(4) a late or incomplete report did not cause significant harm to the public, and aggravating factors under (d) of this section do not exist; for purposes of this paragraph, a late or incomplete report did not cause significant harm to the public if

(A) the dollar amount missing from a form or disclosure is \$100 or less;

(B) the dollar amount for the information missing from a form or disclosure is more than \$100 but no more than \$1,000, and the person required to file self-reported the error; for purposes of this subparagraph, the error is self-reported if the person notified the staff of the error, but filing the late or missing information without notifying the staff does not constitute self-reporting; or

(C) except for a disclosure that must be submitted within 24 hours under AS 15.13.110 or 15.13.040, the missing or incomplete information is readily available to the public through another forum;

(5) the civil penalty assessment is significantly out of proportion to the degree of harm to the public for not having the information; for purposes of this paragraph, absent the presence of aggravating factors in (d) of this section, an assessed penalty is significantly out of proportion if it exceeds the value of the transactions that were not reported or were reported late, or, in the case of seven-day or 24-hour reports, exceeds twice the value of the transactions that were not reported or were reported late; or

(6) a unique circumstance justifies reducing or waiving the penalty.

(c) The commission will not accept any of the following as mitigating factors to reduce the amount of a penalty:

(1) relying on another person or mailroom to mail, postmark, or submit the statement on or before a due date;

(2) forgetting to file;

(3) being a volunteer;

(4) having no change in reportable information from previous filed statements;

(5) relying on the responsible person's staff to remind the person of the filing deadline or to complete or file the report;

(6) being too busy to file;

(7) absence caused by travel, unless the travel was unplanned or unavoidable, including travel for a personal emergency, or weather-related travel problems.

(d) A civil penalty determined under 2 AAC 50.855 may be increased to the maximum amount allowed under the applicable statute if a person required to file a statement or other filing has

(1) failed to substantially comply with financial disclosure requirements by omitting a significant source of income, interest in real property, business interest, loan, trust, or other substantial financial interest; in this paragraph, "substantial financial interest" means an interest with a value greater than \$1,000; or

(2) a poor reporting history; indicators of a poor reporting history include any of the following:

(A) more than one late filing in the immediately preceding five years;

- (B) evidence suggesting deliberate non-reporting;
- (C) failure to cooperate with the staff;
- (D) a violation of any provision of AS 15.13, AS 24.45, AS 24.60.200 - 24.60.260, AS 39.50, or this chapter in the preceding five years.

Exhibit 3
Page 6 of 8

Steps to file the required Statement of Contribution 15-5 Form with APOC

Please be aware that if you contribute \$500 or more to a ballot group or initiative proposal application group, you must file a Statement of Contribution 15-5 Form under AS 15.13.040(k).

For your reference, here are the steps to complete a Statement of Contribution 15-5 Form:

1. Go to <https://www.alaska.gov/>
2. Click on the “myAlaska” link at the top of the page
3. Sign in to myAlaska
4. Under the “Services” header, click “View Your Services”
5. Under the “Services for Individuals” header, click “APOC- Disclosure Forms”
6. This will bring you to the “Welcome to APOC Forms Online” Page
7. Click on “Statement of Contributions Forms 15-5” (5th link down)
8. Click the red button “Start New Form”

Please remember, this statement must be filed within 30 days of making the contribution. If you have any questions or need assistance, please do not hesitate to contact APOC.

Alaska Public Offices Commission
2221 E Northern Lights Rm 128
Anchorage, AK 99508
(907) 276-4176/ (800) 478-4176



May 17, 2023

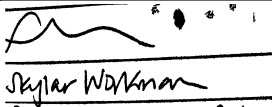
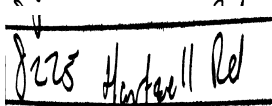
Dear Erika Potter:

The following is in response to your request for proof of delivery on your item with the tracking number:
9171 9690 0935 0294 3974 87.

Item Details

Status:	Delivered, Left with Individual
Status Date / Time:	May 10, 2023, 11:36 am
Location:	ANCHORAGE, AK 99507
Postal Product:	First-Class Mail®
Extra Services:	Certified Mail™ Return Receipt Electronic

Recipient Signature

Signature of Recipient:	
Address of Recipient:	

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,
United States Postal Service®
475 L'Enfant Plaza SW
Washington, D.C. 20260-0004

Exhibit 3
Page 8 of 8



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

June 2, 2023

VIA CERTIFIED MAIL, U.S. MAIL, & EMAIL

Keith Manternach
8225 Hartzell Road
Anchorage, Alaska 99507
keith@specialtytruckandauto.com
km@gci.net

RE: Notice of Violation – Statement of Contributions Report¹

Mr. Manternach:

You are receiving this Notice of Violation because you did not timely file your Statement of Contributions Report that was due on November 11, 2022.² Instead the report was filed on June 1, 2023 (202 days late). By law a maximum penalty of \$50 accrues each day the report is late.³ The maximum penalty the Alaska Public Offices Commission could assess you is \$10,100.⁴

However, no penalty is being assessed because you are a first-time filer.⁵ **Future late-filed Statement of Contribution reports will result in the assessment of penalties.**

Additionally, please be advised:

- 1) You have the right to appeal staff's conclusion that a violation has occurred.⁶ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter. If you do not file a timely appeal, staff will consider the matter closed and take no further action.**
- 2) If you appeal, staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when

¹ AS 15.13.040(k).

² [\$2,500 contribution to [ConventionYes](#), October 12, 2022, Check# 1].

³ AS 15.13.390(a).

⁴ 2 AAC 50.855(a).

⁵ 2 AAC 50.855(b)(2)(A)(iv).

⁶ 2 AAC 50.831(a).

the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in person or telephonically.

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION



Charles Stormont
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Individual File

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

Keith Manternach 8225 Hartzell Road Anchorage, Alaska 99507 keith@specialtytruckandauto.com km@gci.net	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email
---	--



Law Office Assistant

6/2/2023

Date

9171-9690-0935-0298-0977-34

Exhibit 4
Page 2 of 9

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: _____

Office: _____

Penalty issued in connection with (check box or boxes):

- | | | |
|---|--|--|
| <input type="checkbox"/> 30 Day Report | <input type="checkbox"/> 105 Day Report | <input type="checkbox"/> Statement of Contributions (15-5) |
| <input type="checkbox"/> 7 Day Report | <input type="checkbox"/> Year End Report | <input type="checkbox"/> Independent Expenditure (15-6) |
| <input type="checkbox"/> 24 Hour Report | <input type="checkbox"/> Registration | <input type="checkbox"/> Paid for By Identifier |
| <input type="checkbox"/> Other: _____ | | |

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): _____

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of the AS 15.13, the Alaska Campaign Disclosure Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct, and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date: _____

2 AAC 50.865. Mitigating factors; aggravating factors

(a) A civil penalty determined under 2 AAC 50.855 may be reduced by up to 50 percent if

(1) a person required to file a statement or other filing

(A) has a good filing history; in this subparagraph, "good filing history" means

(i) no late filings in the immediately preceding five years; and

(ii) for groups, no more than \$500 in non-administrative activity shown on the group's overdue report; or

(B) is an inexperienced filer; in this subparagraph, "inexperienced filer" means a person required to file reports under this chapter if that person has been subject to a registration or reporting requirement for less than 365 days, or a person engaged in the person's first election cycle;

(2) a technical error at the commission, including a communication, facsimile machine, computer program, electronic filing system, or other equipment problem may have contributed to the late or incomplete filing;

(3) any unreported or mistakenly reported information had a value of \$100 or less; or

(4) any unreported or mistakenly reported information had a value higher than \$100 but no more than \$1,000, and a factor listed in (b) of this section also applies.

(b) A civil penalty determined under 2 AAC 50.855 may be reduced by a percentage greater than 50 percent, or waived entirely based on the following factors:

(1) the person required to file, or a family member of the person required to file, experienced a personal emergency, including a call for military service, a natural disaster, a civil disturbance, or an incapacitating illness that prevented the person from filing on or before the due date; this mitigating factor is only available to a natural person;

(2) a significant cause of the late filing is commission staff error, including

(A) furnishing reporting materials too late for filing on or before the due date;

(B) giving incorrect oral or written information to a person required to submit a statement or other filing; or

(C) failing to deliver required notices when due;

(3) a late or erroneous report included only administrative costs;

(4) a late or incomplete report did not cause significant harm to the public, and aggravating factors under (d) of this section do not exist; for purposes of this paragraph, a late or incomplete report did not cause significant harm to the public if

(A) the dollar amount missing from a form or disclosure is \$100 or less;

(B) the dollar amount for the information missing from a form or disclosure is more than \$100 but no more than \$1,000, and the person required to file self-reported the error; for purposes of this subparagraph, the error is self-reported if the person notified the staff of the error, but filing the late or missing information without notifying the staff does not constitute self-reporting; or

(C) the missing or incomplete information is readily available to the public through another forum;

(5) the civil penalty assessment is significantly out of proportion to the degree of harm to the public for not having the information; for purposes of this paragraph, absent the presence of aggravating factors in (d) of this section, an assessed penalty is significantly out of proportion if it exceeds the value of the transactions that were not reported or were reported late, or, in the case of seven-day or 24-hour reports, exceeds twice the value of the transactions that were not reported or were reported late; or

(6) a unique circumstance justifies reducing or waiving the penalty.

(c) The commission will not accept any of the following as mitigating factors to reduce the amount of a penalty:

(1) relying on another person or mailroom to mail, postmark, or submit the statement on or before a due date;

(2) forgetting to file;

(3) being a volunteer;

(4) having no change in reportable information from previous filed statements;

(5) relying on the responsible person's staff to remind the person of the filing deadline or to complete or file the report;

(6) being too busy to file;

(7) absence caused by travel, unless the travel was unplanned or unavoidable, including travel for a personal emergency, or weather-related travel problems.

(d) A civil penalty determined under 2 AAC 50.855 may be increased to the maximum amount allowed under the applicable statute if a person required to file a statement or other filing has

(1) failed to substantially comply with financial disclosure requirements by omitting a significant source of income, interest in real property, business interest, loan, trust, or other substantial financial interest; in this paragraph, "substantial financial interest" means an interest with a value greater than \$1,000; or

(2) a poor reporting history; indicators of a poor reporting history include any of the following:

(A) more than one late filing in the immediately preceding five years;

- (B) evidence suggesting deliberate non-reporting;
- (C) failure to cooperate with the staff;
- (D) a violation of any provision of AS 15.13, AS 24.45, AS 24.60.200 - 24.60.260, AS 39.50, or this chapter in the preceding five years.

From: postmaster@specialtytruckandauto.com
To: [Potter, Erika M \(DOA\)](#)
Subject: Delivered: RE: Notice of Violation – Statement of Contributions Report
Date: Friday, June 2, 2023 3:17:57 PM
Attachments: [Delivered RE Notice of Violation – Statement of Contributions Report.msg](#)

[You don't often get email from postmaster@specialtytruckandauto.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

From: [Microsoft Outlook](#)
To: kendra.mclean77@gmail.com
Subject: Relayed: RE: Notice of Violation – Statement of Contributions Report
Date: Friday, June 2, 2023 3:17:58 PM
Attachments: [RE Notice of Violation Statement of Contributions Report.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
kendra.mclean77@gmail.com (kendra.mclean77@gmail.com) <mailto:kendra.mclean77@gmail.com>
Subject: RE: Notice of Violation – Statement of Contributions Report



June 7, 2023

Dear Erika Potter:

The following is in response to your request for proof of delivery on your item with the tracking number:
9171 9690 0935 0298 0977 34.


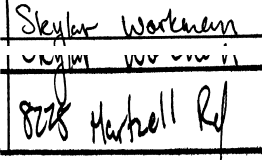
Item Details

Status:	Delivered, Left with Individual
Status Date / Time:	June 5, 2023, 12:01 pm
Location:	ANCHORAGE, AK 99507
Postal Product:	First-Class Mail®
Extra Services:	Certified Mail™ Return Receipt Electronic

Shipment Details

Weight:	0.2oz
----------------	-------

Recipient Signature

Signature of Recipient:	
Address of Recipient:	

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,
United States Postal Service®
475 L'Enfant Plaza SW
Washington, D.C. 20260-0004

Exhibit 4
Page 9 of 9



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

August 27, 2025

VIA EMAIL & CERTIFIED MAIL

Keith Manternach
8225 Hartzell Road
Anchorage, AK 99507
keith@specialtytruckandauto.com

RE: Commission Meeting Notice

Dear Mr. Manternach:

The Commission will review the matter of the civil penalty assessed for your late-filed Statement of Contribution report at its September 10, 2025 Commission Meeting in Anchorage, Alaska.

I have enclosed for your review the Staff Recommendation that will be presented to the Commission.

You have a right to participate at the meeting, either in person or by telephone (1-907-202-7104, Access Code: 218853540#, in-person (2221 Northern Lights Blvd, Ste 128, Anchorage, Alaska, 99508) or via [Microsoft Teams Meeting](#).¹ Please notify our office if you intend to participate. Group Civil Penalty Appeals are expected to begin at **9:05 a.m. on Wednesday, September 10, 2025.**

This matter will initially be presented to the Commission on a Consent Agenda. If you do not wish to present your appeal or make a statement to the Commission, and your appeal is not removed from the agenda by a Commissioner, the Staff Recommendation will be approved without discussion or deliberation. If you do wish to present your appeal or make a statement before the Commission, please notify staff or the Commission prior to the approval of the consent agenda.

Staff will send you a copy of the Commission's final decision regarding your appeal.

¹ Meeting ID: 234 956 901 993 7, Passcode: Yb9UE6WW

Keith Manternach
Commission Meeting Notice

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

KIM STONE

Kim Stone
Campaign Disclosure Coordinator

Encl: Staff Recommendation

cc: Group file

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Keith Manternach 8225 Hartzell Road Anchorage, AK 99507 keith@specialtytruckandauto.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

KIM STONE

August 27, 2025

Signature

Date



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

ALASKA PUBLIC OFFICES COMMISSION STAFF RECOMMENDATION FOR COMMISSION ACTION

PREPARED BY: John Grover Whitlock

DATE: August 27, 2025

RESPONDENT: Joanna "Jodi" Taylor

CIVIL PENALTY

ASSESSED UNDER:

☒ Campaign Disclosure:

REASON FOR FILING:

Contribution of \$500 or more to an initiative proposal group

LATE REPORT(S):

Campaign Disclosure Reports

☒ Statement of Contributions Form 15-5

DUE DATE OF LATE FILED REPORT: May 23, 2025

REPORT FILED ON: June 22, 2025¹

NUMBER OF DAYS LATE: 30

NOTICE OF VIOLATION SENT: July 1, 2025²

DATE PENALTY APPEAL RECEIVED: August 1, 2025

MAXIMUM STATUTORY PENALTY: \$1,500

PENALTY ASSESSED³: \$0

RECOMMENDATION: Uphold Violation - \$0 Penalty
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

¹ Exhibit 1 – Statement of Contributions Form 15-5, filed May 23, 2025.

² Exhibit 2 – July 1, 2025, Notice of Violation.

³ 2 AAC 50.855(b)(2)(B)(i).

BACKGROUND:

Pursuant to Alaska Statute 15.13.040(k), persons who donate \$500 or more to initiative proposal groups and ballot measure groups must report their contributions within 30 days by submitting a Statement of Contributions.⁴ If the person is late in submitting a Statement of Contributions, they incur a \$50 daily penalty.⁵ When the person is a first-time filer, or where the late-filed Statement of Contribution was the person's first error and the receiving group reported the contribution within 30 days, procedural regulations enable staff to document the violation without assessing a penalty.⁶

Here, the Respondent contributed \$500 to an initiative proposal group on April 23, 2025 and filed a Statement of Contributions Form 15-5 late. APOC issued a notice of violation, informing Respondent that her statement was late but because it was her first late filing and the contribution had been timely reported by the receiving group, no penalty would be assessed.⁷

Respondent appeals and asks that her violation be excused.⁸

RESPONDENT'S STATEMENT OF MITIGATING FACTS:

1. Respondent states she was not aware that she needed to file a Statement of Contributions.
2. Respondent states that no one from the group informed her of the need to file until after the reporting due date.
3. Respondent states contributors to the group had no means to learn of the reporting requirement for individuals' contributions and APOC has not run any publications or advertisements informing the public.
4. Respondent states that APOC's homepage does not have a readily available link on its homepage to donor forms.
5. Respondent states the report requires a myAlaska account which may not exist for every Alaskan.
6. Respondent states that violations are being assessed on Alaska citizens unless the receiving group manages this "new duplicative reporting process" for them, which creates hurdles for initiative groups, creates risk for individual Alaskans, and chills political involvement.

⁴ See AS 15.13.040(k). The Statement of Contributions is APOC's 15-5 form.

⁵ See AS 15.13.390(a)

⁶ See 2 AAC 50.855(b)(2)(A)(i); (b)(2)(A)(iv).

⁷ Exhibit 2.

⁸ See Exhibit 3 – Appeal submitted via email by Ms. Taylor on 8/1/25. The respondent's appeal purported to be on behalf of several other contributors to the same group who also received notices of violation for their late filings. APOC staff informed the respondent and those included in her appeal that individuals must file an appeal on their own behalf. Exhibit 4, APOC Letter to Respondent of August 12, 2025. None of the other individuals have since filed appeals.

7. Respondent states that sending certified letters to inform Alaskans of violations is inconsistent with APOC's mission and not reassuring to the public; and that "public agencies playing gotcha instills fear in Alaskans desiring to engage in the political process."

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. Despite Respondent's various policy arguments, nothing in the record supports a finding that a violation did not occur. A filer's lack of awareness of the law is not a factor that staff may rely on in its recommendation, and APOC staff finds no legal basis for the Commission to excuse Respondent's AS 15.13.040(k) filing requirement.
2. Alaska campaign disclosure law does not require ballot groups to provide notice to its contributors of the statement of contribution filing requirement. However, APOC's ballot group training materials advises groups that contributors who give \$500 or more must file a statement of contribution and provides template instructions that groups may use to inform their contributors of the requirement. This is because the receiving group is in the best position to timely alert its contributors. First, because the receiving group has instant knowledge of the triggering contribution; and also because the group will have the contributor contact information. Depending on when the triggering contribution is received and the group's activities, oftentimes there is a significant delay between the time that the contribution is received and when it is first disclosed by the group.
3. Although there is no statutory requirement that APOC "run advertisements" about reporting requirements, APOC's homepage since 2014 has consistently displayed an advisement concerning the statement contributions filing requirement along with a link to APOC's online filing system.⁹ In addition to the notice on its homepage, and as noted above, APOC's training materials for independent expenditure and ballot measure groups also note the statement of contribution of requirement and provides notification templates that groups can use to inform their contributors of the requirement.
4. APOC's website homepage also has contact information for the Anchorage office where a filer who is confused can ask questions about what they need to file or get help with the filing process. Additionally, information and links specific to filing a Statement of Contribution made to a group can also found under Quick Links, APOC Forms, Group Forms, with a link to "File Your Forms Electronically." This link directs the filer to myAlaska to sign in and then to the APOC Forms Online page. If a filer is unsure of how to navigate to the website, they can call APOC directly, for assistance.
5. Although Respondent does not assert that she herself is unable to electronically file due to a lack of myAlaska account, she argues that every Alaskan may not have an account. With limited exception, electronic filing of campaign disclosure forms, including a statement of contribution, is statutorily mandated.¹⁰ Given the many public services

⁹ Exhibit 5, Screenshots of APOC Homepage.

¹⁰ AS 15.13.040(m).

offered through myAlaska, many Alaskans already have accounts.¹¹ For those who don't, an account may be created by anyone with an email address. Here, Respondent filed her statement of contribution electronically so it does not appear this is a factor to consider in finding a violation did not occur.

6. The law requiring individuals to report contributions of \$500 or more to a ballot measure or initiative proposal group is was enacted in 1996 when the legislature passed legislation that was substantially similar to a citizen's campaign finance reform initiative that had been certified for the ballot.¹² It was not meant to place additional hurdles on an initiative group because the filing requirement does not lie with the group; rather, it is the responsibility of the contributor to file the statement and was intended to provide information during periods when the information had not yet been disclosed by the group. Neither was it intended to chill political involvement but rather was aimed at providing valuable information to the public about who was financing support or opposition to ballot initiatives.
7. Respondent takes issue with APOC's staff issuance of a certified letter to inform her of a violation while also waiving arbitrarily imposed penalties and infers that it is an example of a public agency playing "gotcha" and attempting to instill fear in Alaskans desiring to engage in the political process. However, the same regulation that enables staff to forego assessing a penalty in certain circumstances also requires that the violation itself be documented.¹³ Further, it is important to document notice of the violation or penalty because a filer that wishes to contest the finding must file an appeal within 30 days.

STAFF'S RECOMMENDATION

Despite Respondent's various policy arguments, nothing in the record supports a finding that a violation did not occur. Respondent contributed \$500 to an initiative proposal group and was required but failed to file a statement of contributions within 30 days.

Respondent fails to set forth grounds on appeal to support a withdrawal of the Notice of Violation issued on July 1, 2025. Accordingly, staff recommends that the July 1, 2025, Notice of Violation be upheld.

¹¹ E.g. PFD applications, DMV online services, fishing and hunting licenses, unemployment benefits.

¹² § 13 ch 48 SLA 96. *See also*, 95CFPO available at: https://www.elections.alaska.gov/petitions-and-ballot-measures/petition-status/?p_type=initiative&p_year=1995#is81213.

¹³ 2 AAC 50.855(b)(2) [for late filings under AS 15.13 "staff shall document the violation and..."]

STATEMENT OF CONTRIBUTIONS FORM 15-5

COMPLETED

Submission Date: 06/22/2025

REPORT TYPE

Filing Reason: **Contributions of \$500 or more**Report Year: **2025**Filed As: **Individual**

FILING

Filer First Name: **JOANNA**

Filer Middle Name:

Filer Last Name: **Taylor**Filer Phone: **9079520610**Filer Email: **jodiltaylor@gmail.com**Occupation: **Investor**Employer: **Self**

INDIVIDUAL INFORMATION

First Name: **JOANNA**Last Name: **Taylor**Address: **13910 Jarvi Drive**City: **Anchorage**State: **Alaska****99515**Country: **United States**

CONTRIBUTIONS

Contribution Date	Recipient	Form of Contribution	Amount	Total Annual Contribution
04/23/2025	2025 - Repeal Now	Credit Card	\$500.00	\$500.00

TRUE SOURCES

The Filer is the sole True Source for all contributed funds

REPORT SUMMARY

Number of Contributions Reported with this Report: **1**Total of Contributions Reported with this Report: **\$500.00**



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

July 1, 2025

VIA CERTIFIED MAIL, U.S. MAIL, and EMAIL

Joanna Taylor
13910 Jarvi Dr.
Anchorage, AK 99508
joditaylor@gmail.com

RE: Notice of Violation – Statement of Contributions Report¹

Ms. Taylor:

You are receiving this Notice of Violation because you did not timely file your Statement of Contributions Report that was due on May 23, 2025.² Instead the report was filed on June 22, 2025 (30 days late). By law a maximum penalty of \$50 accrues each day the report is late.³ The maximum penalty the Alaska Public Offices Commission could assess you is \$1,500.⁴

However, no penalty is being assessed because this was your first late filing and the contribution was timely reported by the receiving group.⁵ **Future late-filed reports will result in the assessment of penalties.**

Additionally, please be advised:

- 1) You have the right to appeal staff's conclusion that a violation has occurred.⁶ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.** If you do not file a timely appeal, staff will consider the matter closed and take no further action.

¹ AS 15.13.040(k).
² 4/23/25, \$500 contribution to Repeal Now
³ AS 15.13.390(a).
⁴ 2 AAC 50.855(a).
⁵ 2 AAC 50.855(b)(2)(A)(iv).
⁶ 2 AAC 50.831(a).

- 2) If you appeal, staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in person or telephonically.

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General's Office.⁷

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Individual File (w/o enclosures)

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

Joanna Taylor
13910 Jarvi Dr.
Anchorage, AK 99508
joditaylor@gmail.com

☒ Certified
Mail
☒ U.S. Mail
☒ Email

[Signature]
Law Office Assistant

07/01/2025

Date

9489 0090 0027 6610 9559 03

⁷ 2 AAC 50.895.

Civil Penalty Appeal Affidavit

AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: _____

Office: _____

Penalty issued in connection with (check box or boxes):

- | | | |
|---|--|--|
| <input type="checkbox"/> 30 Day Report | <input type="checkbox"/> 105 Day Report | <input type="checkbox"/> Statement of Contributions (15-5) |
| <input type="checkbox"/> 7 Day Report | <input type="checkbox"/> Year End Report | <input type="checkbox"/> Independent Expenditure (15-6) |
| <input type="checkbox"/> 24 Hour Report | <input type="checkbox"/> Registration | <input type="checkbox"/> Paid for By Identifier |
| <input type="checkbox"/> Other: _____ | | |

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): _____

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of the AS 15.13, the Alaska Campaign Disclosure Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct, and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date: _____

2 AAC 50.865. Mitigating factors; aggravating factors

(a) A civil penalty determined under 2 AAC 50.855 may be reduced by up to 50 percent if

(1) a person required to file a statement or other filing

(A) has a good filing history; in this subparagraph, "good filing history" means

(i) no late filings in the immediately preceding five years; and

(ii) for groups, no more than \$500 in non-administrative activity shown on the group's overdue report; or

(B) is an inexperienced filer; in this subparagraph, "inexperienced filer" means a person required to file reports under this chapter if that person has been subject to a registration or reporting requirement for less than 365 days, or a person engaged in the person's first election cycle;

(2) a technical error at the commission, including a communication, facsimile machine, computer program, electronic filing system, or other equipment problem may have contributed to the late or incomplete filing;

(3) any unreported or mistakenly reported information had a value of \$100 or less; or

(4) any unreported or mistakenly reported information had a value higher than \$100 but no more than \$1,000, and a factor listed in (b) of this section also applies.

(b) A civil penalty determined under 2 AAC 50.855 may be reduced by a percentage greater than 50 percent, or waived entirely based on the following factors:

(1) the person required to file, or a family member of the person required to file, experienced a personal emergency, including a call for military service, a natural disaster, a civil disturbance, or an incapacitating illness that prevented the person from filing on or before the due date; this mitigating factor is only available to a natural person;

(2) a significant cause of the late filing is commission staff error, including

(A) furnishing reporting materials too late for filing on or before the due date;

(B) giving incorrect oral or written information to a person required to submit a statement or other filing; or

(C) failing to deliver required notices when due;

(3) a late or erroneous report included only administrative costs;

(4) a late or incomplete report did not cause significant harm to the public, and aggravating factors under (d) of this section do not exist; for purposes of this paragraph, a late or incomplete report did not cause significant harm to the public if

(A) the dollar amount missing from a form or disclosure is \$100 or less;

(B) the dollar amount for the information missing from a form or disclosure is more than \$100 but no more than \$1,000, and the person required to file self-reported the error; for purposes of this subparagraph, the error is self-reported if the person notified the staff of the error, but filing the late or missing information without notifying the staff does not constitute self-reporting; or

(C) except for a disclosure that must be submitted within 24 hours under AS 15.13.110 or 15.13.040, the missing or incomplete information is readily available to the public through another forum;

(5) the civil penalty assessment is significantly out of proportion to the degree of harm to the public for not having the information; for purposes of this paragraph, absent the presence of aggravating factors in (d) of this section, an assessed penalty is significantly out of proportion if it exceeds the value of the transactions that were not reported or were reported late, or, in the case of seven-day or 24-hour reports, exceeds twice the value of the transactions that were not reported or were reported late; or

(6) a unique circumstance justifies reducing or waiving the penalty.

(c) The commission will not accept any of the following as mitigating factors to reduce the amount of a penalty:

(1) relying on another person or mailroom to mail, postmark, or submit the statement on or before a due date;

(2) forgetting to file;

(3) being a volunteer;

(4) having no change in reportable information from previous filed statements;

(5) relying on the responsible person's staff to remind the person of the filing deadline or to complete or file the report;

(6) being too busy to file;

(7) absence caused by travel, unless the travel was unplanned or unavoidable, including travel for a personal emergency, or weather-related travel problems.

(d) A civil penalty determined under 2 AAC 50.855 may be increased to the maximum amount allowed under the applicable statute if a person required to file a statement or other filing has

(1) failed to substantially comply with financial disclosure requirements by omitting a significant source of income, interest in real property, business interest, loan, trust, or other substantial financial interest; in this paragraph, "substantial financial interest" means an interest with a value greater than \$1,000; or

(2) a poor reporting history; indicators of a poor reporting history include any of the following:

(A) more than one late filing in the immediately preceding five years;

(B) evidence suggesting deliberate non-reporting;

(C) failure to cooperate with the staff;

(D) a violation of any provision of AS 15.13, AS 24.45, AS 24.60.200 - 24.60.260, AS 39.50, or this chapter in the preceding five years.

From: [Jodi Taylor](#)
To: [Whitlock, John G \(DOA\)](#)
Cc: [Keith Manternach](#); [Bob Griffin](#); [JMORRI23@YAHOO.COM](#); [Matt Heilala](#); [winchesteralaska@gmail.com](#)
Subject: Re: Follow up From APOC Call on 7/2/25
Date: Friday, August 1, 2025 12:49:49 PM

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

John,

Please accept the below letter, on behalf of everyone cc:, as our appeal of the letter I received July 2nd, the same day other signees received their letters, then called you the same day as referenced below in the email chain. We have one other person who wanted to sign on, Patricia Baum, but she has not reviewed the final draft letter below. I'll email you offline with Patricia when I hear back from her but wanted to submit the letter before the end of business to meet the APOC appeal timeline.

We look forward to hearing from you details on when we'd get a chance to address the commission.

Best,

Jodi Taylor

Dear APOC Staff and Commission:

We received your certified letters entitled "Notice of Violation" via certified mail on or about July 2, 2025. The letter contends that we violated APOC regulations by filing statements of contributions after the deadline. Your letter also indicates that we may be subjected to a fine of \$1500, which is a multiple of the value of our donations and, although APOC waived the \$1500 penalty amount, the violation remains in effect and may result in future penalties if the same or a similar infraction occurs again.

We hereby formally appeal this "notice of violation," regardless of whether the penalty has been waived. On April 22-24, we made donations ranging from \$500-\$1,000 to Repeal Now!, a ballot measure group. On June 21, Repeal Now! notified us — for the first time — that we needed to file a statement of contributions with APOC. Prior to June 21, none of us were aware of any obligation to file any statement, although some were aware that Repeal Now!

had that responsibility. We filed the statement of contributions as soon as practicable after notification by Repeal Now!, on various dates on or about June 22. On or about July 2, we received certified letters penalizing us with a violation for failing to comply with an obligation we were only informed of after it was too late.

We disagree strongly with these assessments of violation. Contributors to this ballot measure were unaware of the duplicative reporting requirement for contributions – nor had they any means to learn of it. To our knowledge APOC has not run any publications or advertisements informing the public of these burdensome and duplicative reporting requirements. Further, no link to these donor forms is readily evident on the APOC homepage. The "quick links" section contains forms for candidates, complaints, financial disclosures (for public and legislative officials), groups, and lobbyists but does not include forms for donors. Unlike the "filer" option, which lists campaign disclosure, financial disclosure (again, for legislative or public officials), and lobbyist disclosure, donors are not provided with any information or links to inform them of any required disclosures beyond what a campaign or group already manages. Lastly, filing this duplicative report appears to require a myAlaska account which may not exist for every Alaskan. As a result violations are being assessed on Alaska citizens unless the receiving group manages this new duplicative reporting process for them. This of course creates significant additional hurdles for initiative groups to meet, creates risk for individual Alaskans, and chills the process of public political involvement.

APOC's stated mission is to "promote public confidence in elected and appointed officials by enforcing Alaska's disclosure statutes and disseminating financial information related to election campaigns, public officials, lobbyists, and lobbyist employers." Certified letters of violation sent to Alaskans who had no way of knowing that they were in violation is inconsistent with this mission. Certified letters waiving arbitrarily imposed monetary penalties while simultaneously confirming violations and promising future penalties are in no way reassuring to the public. If the monetary penalty is waived the alleged infraction should also be excused. Public agencies playing 'gotcha' instills fear in Alaskans desiring to engage in the political process, the opposite of APOC's stated purpose.

We look forward to addressing the commission on this.

Bob Griffin
Matt Heilala
Keith Manternach
John Morris
Jodi Taylor
Jerry Winchester

On Mon, Jul 7, 2025 at 7:12 PM Jodi Taylor <jodiltaylor@gmail.com> wrote:

John,

I appreciate you asked your supervisor and your reply.

Best,

Jodi

On Thu, Jul 3, 2025, 5:10 PM Whitlock, John G (DOA) <john.whitlock@alaska.gov> wrote:

Dear Ms. Taylor,

Thank you for the call on 7/2/24. We discussed your thoughts on APOC's 15-5 Statement of Contribution filing requirements and wanted to follow up with you on some of your points:

First, you mentioned that the letter that you received was harsh in tone and recommended that a call would have been a better way to educate members of the public about Statement of Contribution filing requirements. Under our regulations, for late-filed statements of contributions, staff may document the violation and not assess a penalty when it is the person's first error, and the contribution was reported by the recipient group. The reason we send these letters is to inform the person of the violation and to document the violation.

Second, you asked if there were alternative methods to filing the form online. With limited exception, forms must be filed electronically under provisions of AS 15.13.040(m). See also 2 AAC 50.816. Electronic filing aids in our agency's mission to provide information to the public in a timely and streamlined manner.

Third, you asked how a reform in the filing process can be proposed to the commission.

First, members of the public may always speak address the Commission during the Commission's public comment period of their regular meetings. Additionally, filers can seek an exemption from electronic filing under provisions of 2 AAC 50.816 (c) and 2 AAC 50.821.

Don't hesitate to reach out to our office regarding any additional feedback.

Thanks,

John Grover Whitlock

Paralegal

Alaska Public Offices Commission

[2221 E. Northern Lights Blvd., Rm. 128](#)

[Anchorage, Alaska 99508](#)

Phone: (907) 276-4176

Fax: (907) 276-7018

CONFIDENTIALITY NOTICE: This communication with its content and any attachments may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use, or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

From: [Whitlock, John G \(DOA\)](#)
To: [Jodi Taylor](#)
Cc: [JMORRI23@YAHOO.COM](#); [Matt Heilala](#); [winchesteralaska@gmail.com](#); [pbq333@gci.net](#)
Subject: RE: Follow up From APOC Call on 7/2/25
Date: Thursday, August 7, 2025 5:29:00 PM
Attachments: [250807 Letter to Jodi Taylor.pdf](#)

Dear Ms. Taylor,

Please find the attached letter.

Cordially,

John Grover Whitlock
Paralegal
APOC

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

August 7, 2025

Via Email

Joanna Taylor
13910 Jarvi Drive
Anchorage, Alaska 99508
joditaylor@gmail.com

Re: Mass Appeal Sent on Friday, August 1, 2025

Dear Ms. Taylor:

This letter responds to your August 1, 2025, email regarding your notice of violation and your desire to file appeals on behalf of other individuals through a consolidated appeal.

I start with a foundational point: The campaign disclosure laws requiring individuals to report contributions of \$500 or more (AS 15.13.040(k)) and imposing a \$50 daily penalty for violations (AS 15.13.390(a)) are not rules APOC created – they are set forth in Alaska statutes. APOC does not have authority, *under the law*, to ignore the statute (or “excuse” the violation, as your email suggests) on grounds that a person was “unaware” of the law. While you suggest that imposing the law under these circumstances reflects “public agencies playing ‘gotcha’” to instill fear in Alaskans, APOC can only operate within the framework set forth by Alaska law, as created by the Alaska State Legislature. Your letter further refers to “arbitrarily imposed monetary penalties” but here again, the penalty rate is prescribed by Alaska law, AS 15.13.390(a), as created by the Alaska State Legislature, not APOC.

Where the law does allow APOC some discretion is through the penalty assessment framework of 2 AAC 50.855, which APOC used in your case to forego your fine entirely.

Alaska law provides the right to appeal and sets forth the requirements in 2 AAC 50.831:

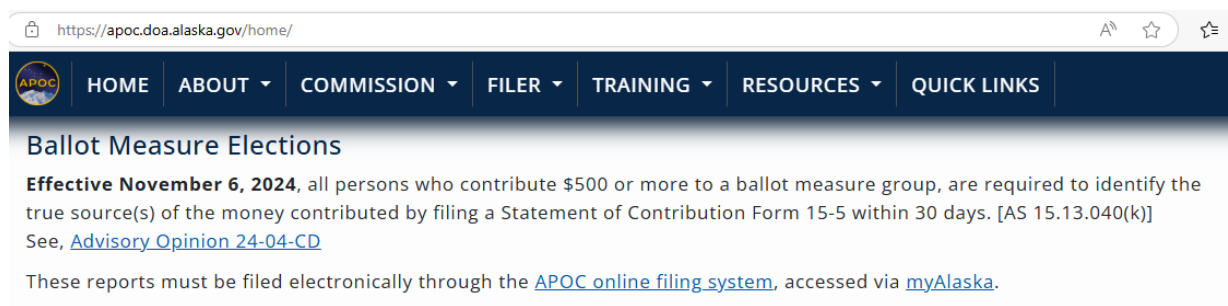
Administrative appeal of staff decision. (a) A person that receives an adverse staff decision, including a penalty assessment under [2 AAC 50.855](#), may appeal the staff decision to the commission as provided in this section. Unless otherwise provided, a person must appeal from an adverse staff decision by filing a notice of appeal and a written statement explaining the reasons the appellant believes the staff decision should be rejected. The notice of appeal and statement of reasons must be mailed or delivered to the

commission no later than 30 days after the date the staff decision was mailed or delivered to the person. The commission will not consider an appeal that is not timely filed.

Statute and code do not allow a person to submit an appeal on behalf of another person, or several persons, or to file a “group” appeal. Individuals who have received notices can voice their concerns by appealing and participating in the meeting where their individual appeal is considered.

We recognize you are frustrated with the situation but it’s important to understand what APOC, as an agency applying Alaska law, can and can’t do to address your concerns. Addressing the Commission during the public comment period is a way to be heard on these issues, and the Commission welcomes such participation. You may also wish to contact your Alaska legislators concerning changes you’d like to see in the laws.

We finally note that the ballot group receiving contributions is in the absolute best position to make contributors like you aware of Alaska’s reporting responsibilities. The group’s chair or treasurer should know of the reporting requirement¹ and have frontline, real time awareness of who makes the contribution and when. Additionally, APOC’s homepage provides notice and links to file for donors.



APOC will continue to discuss ways in which it can continue to educate groups about their donors’ Statement of Contribution (15-5) obligations.

Don’t hesitate to contact us if you have any questions.

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

cc: Individual Files

¹ The 15-5 Statement of Contribution requirements are discussed in group training materials posted on APOC’s training page. [APOC training materials for groups](#).

APOC's current advisement:

apoc.doa.alaska.gov/home/

APOC HOME ABOUT COMMISSION FILER TRAINING RESOURCES QUICK LINKS

Ballot Measure Elections

Effective November 6, 2024, all persons who contribute \$500 or more to a ballot measure group, are required to identify the true source(s) of the money contributed by filing a Statement of Contribution Form 15-5 within 30 days. [AS 15.13.040(k)]
See, [Advisory Opinion 24-04-CD](#)

These reports must be filed electronically through the [APOC online filing system](#), accessed via [myAlaska](#).

APOC's homepage in 2017:

State of Alaska myAlaska My Government Resident Business in Alaska Visiting Alaska State Employees

APOC Alaska Department of Administration
Alaska Public Offices Commission

APOC Home Commission Filer Resources Training

Insight Search Reports Find Complaints & AO's Contact Us

Alaska Public Offices Commission

! Every individual, Person (including, but not limited to corporations, labor organizations, partnerships, firms, associations and organizations including tax exempt organizations) or group making contributions of \$500 or more (in aggregate) to a ballot proposition group must report that contribution, and all subsequent contributions, on a [Statement of Contribution form 15-5](#).

Calendars and Deadlines

- [Annual Calendar](#)
- [Lobbying Due Dates](#)
- [Candidates - Anchorage Election](#)
- [Candidates - Municipal Elections](#)
- [Candidates - State Elections](#)
- [Groups - Anchorage Election](#)
- [Groups - Municipal Elections](#)

APOC's homepage in 2014:

APOC Alaska Department of Administration
Alaska Public Offices Commission

APOC Home Commission Filer Resources Training

Current Topics Insight Search Reports Find Complaints & AO's How Do I FAQs

Alaska Public Offices Commission

! Filers will be unable to electronically sign documents from 10:30 PM, Aug 21 to 12:00 PM, Aug 22, while the myAlaska electronic signature services will be down for maintenance.

! Individuals making contributions of over \$500 (in the aggregate) to a ballot proposition group must report that contribution, and all subsequent contributions, on a [Statement of Contribution form 15-5](#).

Upcoming Dates

AUG 22 Independent Expenditure/Ballot Group Training

AUG 23 Candidate 101 Training



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August 27, 2025

VIA EMAIL & CERTIFIED MAIL

Joanna Taylor
13910 Jarvi Dr.
Anchorage, AK 99508
joditaylor@gmail.com

RE: Commission Meeting Notice

Dear Ms. Taylor:

The Commission will review the matter of the civil penalty assessed for your late-filed Statement of Contribution report at its September 10, 2025 Commission Meeting in Anchorage, Alaska.

I have enclosed for your review the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting, either in person or by telephone (1-907-202-7104, Access Code: 218853540#, in-person (2221 Northern Lights Blvd, Ste 128, Anchorage, Alaska, 99508) or via [Microsoft Teams Meeting](#).¹ Please notify our office if you intend to participate. Group Civil Penalty Appeals are expected to begin at **9:05 a.m. on Wednesday, September 10, 2025.**

This matter will initially be presented to the Commission on a Consent Agenda. If you do not wish to present your appeal or make a statement to the Commission, and your appeal is not removed from the agenda by a Commissioner, the Staff Recommendation will be approved without discussion or deliberation. If you do wish to present your appeal or make a statement before the Commission, please notify staff or the Commission prior to the approval of the consent agenda.

Staff will send you a copy of the Commission's final decision regarding your appeal.

¹ Meeting ID: 234 956 901 993 7, Passcode: Yb9UE6WW

Joanna Taylor
Commission Meeting Notice

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

KIM STONE

Kim Stone
Campaign Disclosure Coordinator

Encl: Staff Recommendation

cc: Individual File

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Joanna Taylor 13910 Jarvi Dr. Anchorage, AK 99508 joditaylor@gmail.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

KIM STONE

August 27, 2025

Signature

Date