

[TAB 6]

**Complaint 25-18-CD,
*Gimarc v. LaFrance***

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

John Gimarc,	)	
	)	
Complainant,	)	
	)	
vs.	)	Case No. 25-18-CD
	)	
Suzanne LaFrance,	)	
	)	
Respondent.	)	
	)	

NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing in these cases will take place before the Alaska Public Offices Commission at approximately 11:00 a.m. on Wednesday, August 26, 2026.

The Commissioners will be present in person, by telephone, or via Microsoft Teams and will receive evidence regarding this matter. You may be present at the hearing either by telephone (1-907-202-7104, Access Code: 845 091 354#), in-person (2221 E. Northern Lights Blvd, Ste 128, Anchorage, Alaska), or via [Microsoft Teams Meeting](#).¹ You may be, but are not required to be, represented by an attorney or agent.

If you wish to participate by telephone and are an individual who requires special accommodation to participate, you must advise the Commission office on or before August 19, 2026, so that a special accommodation can be made.

PREHEARING AND HEARING PROCEDURES

- 1) Parties.** The parties in this case are Commission Staff and Respondent.
- 2) Issues.** At the hearing, the Commission will consider whether Respondent violated campaign disclosure law by improperly describing expenditures or using campaign contributions for expenditures that did not reasonably relate to election campaign activities.
- 3) Procedural history.** Complainant John Gimarc filed a complaint against Respondent Suzanne LaFrance on September 17, 2025. Respondent filed a Response to the Complaint on October 20, 2025. Staff's investigation report recommending the complaint be dismissed was issued July 14, 2026.

¹ Meeting ID: 250 016 996 214 088, Passcode: ss9Fo9K9

- 4) Hearing procedures.** The hearing will be conducted as provided in AS 15.13.380, 2 AAC 50.891, and the Alaska Administrative Procedure Act, AS 44.62.330 – 44.62.630. All testimony must be presented or submitted under oath. A party may call witnesses, cross-examine witnesses, present and rebut evidence. If the respondent does not testify, the respondent may be called and examined as if under cross-examination.
- 5) Evidence and exhibits.** All relevant evidence may be admissible at the hearing. In passing upon the admissibility of evidence, the Commission may consider, but is not bound to follow, the rules of evidence governing general civil proceedings in the courts of the State of Alaska. The Commission may exclude inadmissible evidence and order repetitive evidence discontinued.
- 6) Prehearing filings.** No later than August 18, 2026, a party:
- a) may file a list of witnesses expected to testify at the hearing;
 - b) may file copies of exhibits to be presented at the hearing that are marked and identified (for example, Resp.'s Ex. A);
 - c) may file a prehearing memorandum;
 - d) may file prehearing motions, including motions to dismiss, for summary judgment, or to exclude evidence, and
 - e) shall serve all parties and the Complainant with filings submitted.
- 7) Response to motions and requests for subpoenas.** No later than August 25, 2026, a party
- a) may respond to a motion; and
 - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

10) Order of proceedings. Matters considered at a hearing will ordinarily be disposed of in substantially the following order:

- a) pending motions, if any;
- b) complainant may present argument under 2 AAC 50.891(d)
- c) presentation of cases as follows, unless otherwise ordered by the Commission:
 - i) The Commission Staff's direct case, including the investigative report, evidence, and testimony of witnesses;
 - ii) Respondent's direct case;
 - iii) Rebuttal by the Commission Staff; and
 - iv) Closing statements, if any, by Respondent and Commission Staff.

10) Decision and Order. The Commission will issue an order no later than 10 days after the close of the record.

Dated: August 7, 2026



Heather Hebdon, Executive Director
Alaska Public Offices Commission

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
John Gimarc 11155 Bluff Creek Cir Anchorage, AK 99515 agimarc@ak.net	☒ Certified Mail ☒ Email
Suzanne LaFrance 8401 Pioneer Drive Anchorage, AK 99504 p.delaiarro@shipcreekgroup.com	☒ Certified Mail ☒ Email

Cari Rousselle

Signature

08/07/2026

Date

Rousselle, Cari J (DOA)

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NOTICE OF
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TO: APOC Commissioners
DATE: July 14, 2026
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report *John Gimarc v. Suzanne LaFrance*, 25-18-CD

SUMMARY OF COMPLAINT AND RESPONSE

Complainant John Gimarc filed complaint 25-18-CD against Respondent Suzanne LaFrance, alleging LaFrance failed to provide sufficient details of her expenditures during her 2024 campaign.¹ Respondent LaFrance denies the allegations and asks the Commission to dismiss the complaint.²

STAFF RECOMMENDATIONS

Respondent's descriptions of expenditures identified in the complaint meet the requirements of 2 AAC 50.321 and a preponderance of the evidence does not support a finding of violation. APOC staff recommends dismissal the complaint.

BACKGROUND FACTS AND ANALYSIS

Respondent LaFrance was a mayoral candidate in the 2024 Anchorage Municipal election and subsequent Anchorage Municipal Runoff election. During her campaign, Respondent made expenditures to campaign vendors Hamburger Group Creative, Alpha Media Group, Sage Media Planning & Placement, and Ship Creek Group, reporting them on her regularly scheduled campaign reports.

¹ [Complaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27266), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27266>.

² [Answer](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27286), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27286>.

Complainant names these vendors and points to reports in which they appear, noting the amount of the expenditure under the heading “failure to Disclose Expenditures as required in AS 15.13.104 & 2 AAC 50.321.” Implicit is the argument that the identified vendors are advertising agencies or businesses providing campaign consultation or management services. Respondent does not contest the nature of the businesses but points out that her descriptions identified all subcontractors and media placements and provided sufficient descriptions of the services rendered, and that the law does not require her to list specific dollar amounts spent by subcontractors.

LAW RELATING TO EXPENDITURE DESCRIPTIONS AND IDENTIFICATION OF SUBCONTRACTORS AND MEDIA PLACEMENTS

Alaska campaign disclosure law requires candidates to disclose debts and expenditures incurred by their campaigns. For the 2024 Anchorage election, mandatory APOC reports included a year-start, 30-day, 7-day, and 105-day report.³

For expenditures to vendors who provide general campaign goods and services, 2 AAC 50.321(a)(5) requires a candidate to report:

- (A) the date of payment;
- (B) the check number or the identifying transaction number. . . ;
- (C) the name and address of the payee;
- (D) the purpose of the expenditure; and
- (E) the amount of the expenditure . . .⁴

For expenditures to advertising agencies or those who provide campaign consultation or management services, 2 AAC 50.321(d) additionally requires a candidate to report “in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed, and the amount of the expenditure.”⁵

³ AS 15.13.110(a).

⁴ AS 15.13.040(a)(1)(A); 2 AAC 50.321(a)(5).

⁵ 2 AAC 50.321(d).

When APOC receives a properly filed complaint, Commission staff must undertake an investigation and present the investigation report.⁶ Staff bears the burden of proving a violation by a preponderance of the evidence.⁷

- a. Where media advertising is placed through an advertising agency, the expenditure must describe where the media advertising was placed but does not require the breakdown of individual amounts paid

The bulk of the complaint’s allegations focus upon Respondent’s failure to list specific dollar amounts paid to subcontracted “TV, Cable and radio stations” that Respondent identified in the expenditure description: “The key detail of how much for each of two TV stations is withheld,” (t)he key detail of how much paid to each of the four radio stations is withheld,” (t)hese () disclosures do not provide the funds earned by each of these Anchorage outlets.” The complainant argues “The Regulation requires the disclosure of each of the 78 station purchases.”⁸

Campaign disclosure law at 2 AAC 50.321(d) requires a candidate to disclose the names of the companies or platforms subcontracted by the advertising agency or consulting business, including where the media advertising was placed. Respondent’s disclosures did so, for example:

04/02/2024	Debit Card	Sage Media Planning & Placement 1322 G Street SE Washington, District of Columbia 20003	Radio buy: KYMG-FM, KBFX-FM, KENI-AM, KWHL-FM, KASH-FM, KLEF-FM, KBBO-FM; pd 4/2/24	\$9,995.00
04/19/2024	Electronic Funds Transfer	Sage Media Planning & Placement 1322 G Street SE Washington, District of Columbia 20003	Media buy: KTUU-TV, KYES-TV, KYUR-TV, KTBY-TV, MNBC-TV, CNN-TV, KASH-FM, KBBO-FM, KBFX-FM, KEAG-FM, KENI-AM, KGOT-FM, KLEF-FM, KMXS-FM, KWHL-FM, KYMG-FM. Paid 4/22/24	\$28,000.00

But in decisions issued subsequent to the filing of this complaint, the Commission has held that the rule “does not require the breakdown of amounts paid . . . for individual

⁶ 2 AAC 50.870; 2 AAC 50.891.

⁷ 2 AAC 50.891(d).

⁸ Complaint, p. 10.

advertising placements.”⁹ Respondent thus did not violate campaign disclosure law by not listing the amount paid to each media outlet. APOC staff recommends the Commission dismiss these allegations.

b. Respondent’s descriptions of services performed in-house and without subcontractors did not violate 2 AAC 50.321

The complaint also points to an expenditure to Ship Creek Group, LLC for “video production”¹⁰ and two expenditures to Hamburger Group Creative for “TV production expenses” and “TV production expenses.”¹¹

04/18/2024	Ship Creek Group, LLC 721 Depot Dr, Suite 100 Anchorage, Alaska 99501	Video production	\$12,500.00	\$12,500.00
10/24/2023	Debit Card	Hamburger Creative 5614 Connecticut Ave NW #219 Washington, District of Columbia 20015	Photography & videography	\$21,334.39
04/08/2024	Electronic Funds Transfer	Hamburger Group Creative 5614 Connecticut Ave NW #219 Washington, District of Columbia 20015	TV production expenses; paid 5/2/24	\$14,720.00

Relating to the Ship Creek expenditure, Complainant poses the question, “Were any contractors or subcontractors engaged in these activities?” and concludes – without answering the question or presenting evidence of subcontractor involvement – that “2 violations” occurred.¹² Relating to Respondent’s expenditures to Hamburger Group Creatives, Complainant offers that “(i)f these productions did not engage any contractor or

⁹ [McClure v. Wilson 25-11-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27771), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27771>, p. 2, *see also* [Alexander v. Hughes 25-19-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27394), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27394>, pp. 1-2; [Alexander v. Bjorkman 25-12-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27395), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27395>; [Alexander v. Costello 25-14-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27391), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27391>; [Gilliland v. Merrick, Order Approving Consent Agreement 25-10-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27387), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27387>.

¹⁰ [Year start report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=42018&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=42018&ViewType=CD>.

¹¹ [Anchorage Municipal Runoff 7-day report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=43389&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=43389&ViewType=CD>.

¹² Complaint, p. 10.

other services, these disclosures may be proper” but again asserts “2 violations” because “(i)f these productions are not Internal creations, then those details must be disclosed as is required by the APOC regulation.”¹³

Respondent points out that 2 AAC 50.321(d) does not require expenditure descriptions to *affirmatively deny* subcontractor use in order to be compliant, and further notes that Complainant failed to offer any proof or documentation even suggesting Respondent’s vendors used subcontractors. APOC staff finds both points to be true; further, Complainant has failed to provide either a basis of the knowledge of the facts alleged or relevant documentation or other evidence, as required by APOC regulation,¹⁴ beyond simply conjecture of a possible violation.

Despite the lack of evidence put forth in the complaint, Respondent answers the allegations by pointing out that Hamburger Creative Group’s website “clearly states that it provides in-house production and editing,”¹⁵ and the expenditure’s description of “production and editing” to describe work for photography, videography and TV production satisfied 2 AAC 50.321(d). Relating to Ship Creek Group, Respondent similarly notes the business “clearly provides in-house video/audio production” and provides a sample of an earlier project proposal identifying its services as including “Creative – graphic and web design, video/audio production” with a portfolio of such work available upon request.¹⁶

A preponderance of evidence does not support that Ship Creek Group or Hamburger Creative Group used subcontractors that Respondent then failed to identify or otherwise

¹³ Complaint, p. 11.

¹⁴ 2 AAC 50.870. Complaints. (b) A complaint under this section must . . . provide the following information: (4) a clear and concise description of facts that, if true, would violate a provision . . . of this chapter; (5) the basis of the complainant’s knowledge of the facts alleged, including those based on personal knowledge and those based upon other sources of information and belief; and (6) relevant documentation or other evidence that is available to the complainant. Despite the lack of evidence offered specific to these allegations, AS 15.13 has no mechanism to reject only that part of a complaint, as regulation allows only reject or acceptance of complaints in their entirety.

¹⁵ Answer, p. 7.

¹⁶ Answer, p. 8.

disclose services. APOC staff recommends the Commission find no violation relating to these expenditures.

- c. Respondent's descriptions of an expenditure for media commissions, under the circumstances, did not violate campaign disclosure law

Complainant's final point identifies an expenditure for media commissions reported in the 7-day report,¹⁷ describing it as vague and asking, "What media did vender (sic) buy to earn this commission?" Respondent counters that the reporting made clear that the commissions resulted from radio buys placed with Alpha Media, because the two expenditures occurred the same day and no other media buys occurred that day.

03/20/2024	Check 1110	Alpha Media Group 301 Arctic Slope Ave, Suite 200 Anchorage, Alaska 99518	Radio Buy (KWHL, KMXS, KBRJ, KEAG); paid 3/21/24	\$3,677.10
03/20/2024	Debit Card	Hamburger Group Creative 5614 Connecticut Ave NW #219 Washington, District of Columbia 20015	Media commissions; paid 3/22/24	\$648.90

There is some merit in both arguments. The description is vague as written but, given that the expenditures occurred on the same day, and one expenditure immediately followed the other on the reporting form, the descriptions are sufficient to understand the services rendered. Ideally, Respondent could have made it more obvious to the public that the expenditure was a "media commissions *related to the Alpha Media 3/20/24 radio buy*" (as Respondent subsequently amended the report to read¹⁸), rather than requiring additional deductive analysis by the reader. However, under the circumstances as described above, APOC staff does not find that the lack of additional detail of the expenditures renders Respondent's reporting incomplete under campaign disclosure law.

CONCLUSION

For the above stated reasons, Respondent's descriptions of expenditures identified in the complaint meet the requirements of 2 AAC 50.321 and a preponderance

¹⁷ [Anchorage Municipal Election 7-day report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=43174&ViewType=CD).

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=43174&ViewType=CD>.

¹⁸ Answer, pp. 4, 13.

of the evidence does not support a finding of violation. APOC staff recommends dismissal the complaint.

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Mayor Suzanne La France 8401 Pioneer Drive Anchorage, AK 99504 p.delaiarro@shipcreekgroup.com	☒ Certified Mail ☒ Email
John A. (Alex) Gimarc 11155 Bluff Creek Circle Anchorage, AK 99515 agimarc@ak.net	☒ Email

Cari Rousselle

07/14/2026

Signature

Date

Rousselle, Cari J (DOA)

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Staff Report John
Gimarc v. Su...

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Staff Report John
Gimarc v. Su...

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Mayor Suzanne LaFrance
8401 Pioneer Drive
Anchorage AK 99504



9590 9402 9917 5335 2984 21

2. Article Number (Transfer from service label)

9589 0710 5270 1126 7222 55

icted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Suzanne LaFrance ☐ Agent
☐ Addressee

B. Received by (Printed Name)

PAULA DELCATHARO

C. Date of Delivery

7/24/20

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below:

☐ No

Service Type

- | | |
|--|---|
| ☐ Adult Signature | ☐ Priority Mail Express® |
| ☐ Adult Signature Restricted Delivery | ☐ Registered Mail™ |
| ☐ Certified Mail® | ☐ Registered Mail Restricted Delivery |
| ☐ Certified Mail Restricted Delivery | ☐ Signature Confirmation™ |
| ☐ Collect on Delivery | ☐ Signature Confirmation Restricted Delivery |
| ☐ Collect on Delivery Restricted Delivery | |

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

John Gimarc
11155 Bluff Creek Circle
Anchorage AK 99515



9590 9402 9917 5335 2977 14

2. Article Number (Transfer from service label)

9589 0710 5270 1126 7200 91

stricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ X

John Gimarc

☐ Agent

☐ Addressee

B. Received by (Printed Name)

J. Gimarc

C. Date of Delivery

8/8/25

D. Is delivery address different from item 1?

If YES, enter delivery address below:

☐ Yes

☐ No

3. Service Type

- | | |
|--|---|
| ☐ Adult Signature | ☐ Priority Mail Express® |
| ☐ Adult Signature Restricted Delivery | ☐ Registered Mail™ |
| ☐ Certified Mail® | ☐ Registered Mail Restricted Delivery |
| ☐ Certified Mail Restricted Delivery | ☐ Signature Confirmation™ |
| ☐ Collect on Delivery | ☐ Signature Confirmation Restricted Delivery |
| ☐ Collect on Delivery Restricted Delivery | |