

[06]

POFD Exemption Request

Presented By:

Benjamin Wolfe, Paralegal



Memorandum

To: APOC Commissioners
From: Benjamin Wolfe, Paralegal II
Date: February 26, 2025
Subject: Request for Exemption from Disclosing Spouse's Financial Information
Elizabeth Reeves-Ramos, Fairbanks North Star Borough Assembly, Seat D

ISSUE

Elizabeth Reeves-Ramos, a Municipal Officer of the Fairbanks North Star Borough, is subject to Public Official Financial Disclosure (POFD) reporting. Ms. Reeves-Ramos is separated from her spouse and seeking a divorce.¹ She states that the divorce is highly contentious; she sought and was granted a long-term protective order against her spouse.² Ms. Reeves-Ramos seeks an exemption from reporting her estranged spouse's financial information on her 2025 Annual POFD Statement and any future reports until her divorce is finalized.³ Ms. Reeves-Ramos states that requesting such information from her estranged spouse would cause a concern for her personal safety and that she and her spouse have not commingled their funds since their separation in October 2023 and that "none of his income has been used for [her] benefit or support in the current filing year for 2024."⁴

Pursuant to this exemption request, staff reviewed the statutes regarding the disclosure of public officials' spouses' personal, business, and financial interests, standard exemptions from reporting, as well as past APOC interpretations or decisions and found no substantially similar requests or decisions. Accordingly, staff presents this recommendation for the Commission's consideration.⁵

LAW AND ANALYSIS

Under Alaska's POFD law, a municipal officer must file a statement identifying income sources and business interests.⁶ A filer's statement must be an accurate representation of their financial affairs and must disclose the same information for each member of their family, "to the extent that

¹ Exhibit A, Exemption Request.
² Ex. A and 4FA-24-00298CI.
³ Ex. A and Ex. B.
⁴ Ex. A.
⁵ 2 AAC 50.821(b)(1).
⁶ AS 39.50.020(a).

it is ascertainable” by the filer after making a good faith effort to obtain the information.⁷ A filer is not exempt from disclosure requirements “except to the extent state courts determine that legally privileged professional relationships preclude complete compliance.”⁸

Through regulation, the Commission has recognized several exemptions to the requirement to report sources of income.⁹ A public official can seek an exemption from any POFD requirement by submitting a written request on or before the due date of any report to which it relates.¹⁰ As relevant here, a municipal officer may request an exemption from reporting any “information required under AS 39.50.030”—the statute that requires public officials to disclose the income sources and business interests of their family members—“that exposes the [municipal officer] to a personal security threat.”¹¹

Additionally, a public official may request an exemption if they are “prohibited by law or court-ordered settlement” or if they believe “reporting...any other information required under AS 39.50.030...would violate rights of the source under state or federal statutes or constitutions.”¹²

Under ordinary circumstances, a filer must disclose the financial information of their spouse and if they do not have access to that family member’s financial records, they must make a good faith effort to obtain the information by a written request to each family member.¹³ However, Ms. Reeves-Ramos indicates such communications would endanger her safety. Further, she provides a court order in which a judge found that her estranged spouse had committed an act of domestic violence and the judge barred the spouse from contacting Ms. Reeves-Ramos directly or going to her home and workplace. So even if Ms. Reeves-Ramos tried to obtain information about her spouse’s income and business interests, if her spouse directly replied to such a request he would be in violation of a court-issued protective order.

RECOMMENDATION

Staff recommends that the Commission grant Ms. Reeves-Ramos’s request for an exemption from disclosing financial information for her estranged spouse. (Because a similar matter has not come before the Commission, staff is unable to grant Ms. Reeves-Ramos’s request for an exemption and instead presents its recommendation to the Commission.) In reaching this recommendation, staff notes that Ms. Reeves-Ramos has presented evidence—both in the form of her certified exemption request and in the court-issued protective order—that she will be exposed to a personal security threat if she attempts to obtain and disclose her estranged spouse’s income sources and business interests. Staff also considered that one purpose of AS 39.50 is to assure that public officials are free from the influence of undisclosed private or business interests and to develop accountability by permitting public access to information necessary to judge the credentials and performance of public office holders. Because Ms. Reeves-Ramos does not commingle her funds with her

⁷ AS 39.50.030(a); 2 AAC 50.690.

⁸ AS 39.50.035.

⁹ 2 AAC 50.775.

¹⁰ 2 AAC 50.821(a).

¹¹ 2 AAC 50.775(d).

¹² 2 AAC 50.775(c).

¹³ 2 AAC 50.690.

spouse's and her spouse's funds were not used for her support or benefit, her estranged spouse's income sources and business interests have diminished (if any) relevance to Ms. Reeves-Ramos's influences and credentials.

In sum, staff recognizes the conflict between the requirement to disclose her spouse's financial affairs and the court-ordered restraining order against her spouse, in addition to her concern for her personal health and safety and therefore recommends that the Commission grant Ms. Reeves-Ramos's request for an exemption from disclosing financial information for her estranged spouse.

Encl: Exhibit A: Exemption Request dated Jan 26, 2025
Exhibit B: Email from Filer dated Feb 20, 2025

January 26, 2025

Alaska Public Offices Commission
2221 E. Northern Lights, STE 128
Anchorage, AK 99508

To whom it may concern,

I am writing to request a waiver or exemption of the requirements of AS 39.50 with respect to 2025 Annual POFD Statement disclosing finances that I must file on or before, March 15, 2025 as a current elected member to the Fairbanks North Star Borough Assembly.

(1) myself Elizabeth (Liz) Reeves-Ramos

(2) PO Box 10694, Fairbanks AK 99710

(3) liz_reeves@hotmail.com, (907) 388-8819

(4) I am seeking a waiver/exemption of the requirement that I report my spouse's personal financial information on my Annual POFD Statement.

(5) the waiver request does not relate to any chapters or provisions.

(6) I am seeking these exemptions for this and for future filings until my divorce is finalized.

(7) The reason for the exemption request is because I have been separated from my spouse since October of 2023. I filed for divorce on 2/20/2024, please refer to 4FA-24-01073CI. Unfortunately, this divorce is highly contentious and unfriendly. I filed for an ex-parte protective order on 5/16/2024, please refer to 4FA-24-00298CI and a long-term protective order was approved on 12/18/2024. It is not safe for me to request any information from my spouse currently and during our current litigation he has been unwilling to share information with me. I have not communicated directly with him outside of a courtroom in almost a year. I fear for my safety if I am required to request any information from him currently. Since our separation which occurred in 2023 there has been no comingling of funds and none of his income has been used for my benefit or support in the current filing year for 2024.

(8) n/a

(9) I certify that the information in this request is true.

Sincerely,

Liz Reeves-Ramos

A handwritten signature in black ink, appearing to read "Liz Reeves-Ramos", with a stylized flourish at the end.

Wolfe, Ben B (DOA)

From: Liz Reeves de Ramos <liz_reeves@hotmail.com>
Sent: Thursday, February 20, 2025 4:39 PM
To: Wolfe, Ben B (DOA)
Subject: Long Term Protective order
Attachments: Signed, Certified Long Term DVPO.pdf

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.

Hello Mr Wolfe,

Per your request please find attached the long term protective order i have against my husband. Please also let the commission know that i am requesting the waiver of reporting my husband's information for this and all future reports. Thank you



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
apoc@alaska.gov
doa.alaska.gov/apoc

June 9, 2025

Via Certified Mail, US Mail, and Email

Elizabeth Reeves-Ramos
PO Box 10694
Fairbanks, AK 99710
liz_reeves@hotmail.com

Re: COMMISSION MEETING NOTICE – Request for Exemption

Ms. Reeves-Ramos:

The Alaska Public Offices Commission will review the matter of your request for exemption at its June 25, 2025, Commission Meeting in Anchorage. Enclosed, you will find 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, by telephone (1-907-202-7104, Conference ID: 233 147 607#), or online via [Microsoft Teams](#) (Meeting ID: 217 752 983 222 7, Passcode: qD2Eb9rH). Please notify our office if you intend to participate. Deliberation on your exemption request is expected to begin at **10:45 am on Wednesday, June 25, 2025.**

Regardless of your participation at the meeting, staff will notify you of the Commission's final decision regarding your exemption request.

If you have any questions, please contact our office.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

P. Benjamin Wolfe
Paralegal II

Encl.: Staff Recommendation

CERTIFICATE OF SERVICE:

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

Elizabeth Reeves-Ramos
PO Box 10694
Fairbanks, AK 99710
liz_reeves@hotmail.com

☒ Certified Mail
☒ US Mail
☒ Email

Signature

06/09/2025

Date

9489 0090 0027 6610 9407 32

From: postmaster@outlook.com
To: liz_reeves@hotmail.com
Subject: Delivered: Re: COMMISSION MEETING NOTICE – 2025 Annual Public Official Financial Disclosure (POFD)
Date: Monday, June 9, 2025 3:43:11 PM
Attachments: [Re COMMISSION MEETING NOTICE 2025 Annual Public Official Financial Disclosure \(POFD\).msg](#)

Your message has been delivered to the following recipients:
liz_reeves@hotmail.com (liz_reeves@hotmail.com) <mailto:liz_reeves@hotmail.com>
Subject: Re: COMMISSION MEETING NOTICE – 2025 Annual Public Official Financial Disclosure (POFD)