

[TAB 15]

**Complaint 25-05-CD,
Randy Ruedrich v. Daniel Volland**

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Randy Ruedrich,)	
)	
Complainant,)	
)	
vs.)	Case No. 25-05-CD
)	
Daniel Volland,)	
)	
Respondent.)	

PROPOSED CONSENT AGREEMENT

I. SUMMARY OF PROCEEDINGS LEADING TO PROPOSED CONSENT AGREEMENT

A. Parties

The parties to this Proposed Consent Agreement are the respondent Daniel Volland and the Alaska Public Offices Commission Staff (“APOC staff”).

B. Complaint

The parties enter into this Proposed Consent Agreement regarding complaint 25-05-CD filed by Randy Ruedrich against Daniel Volland, relating to Volland’s campaign for Assembly in the 2022 Anchorage Special Election.¹ Ruedrich alleged Volland:

- failed to file both a 105-Day report and a February 15, 2023 report, and
- received contributions exceeding \$250 within nine days of the election and did not report them on a 24-hour report.

C. Synopsis of Staff Findings and Proposed Consent Agreement

The complaint alleges Volland did not file a 2022 105-day report. APOC staff finds, and Volland concedes, that he did not timely file this report in violation of Alaska Statute 15.13.110(a). After the complaint was filed in February 2025, Volland submitted the missing 105-day report and additionally self-reported two expenditure inaccuracies.

¹ [Complaint 25-05-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=26836), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=26836>.

During the investigation, APOC staff also found, and Volland concedes, that he failed to timely disburse his unused 2022 campaign contributions.² Consequently, his subsequent efforts in 2025 to transfer the unused campaign funds into a future campaign account (FCA) was untimely and the FCA funds must be forfeited under statute.³ Further, because Volland did not timely disburse the leftover 2022 campaign funds, he was required to file a February 15 report reflecting the forfeiture of those funds, which he failed to do.⁴

The complaint also alleges that Volland failed to report contributions over \$250 received within nine days of the election.⁵ The complaint offers no facts indicating Volland affirmatively received contributions he was required to report, instead offering only the complainant’s personal opinion that it was “highly unlikely” that Volland *didn’t* receive such contributions. Volland’s late-filed 105-day report discloses no contributions that required him to file any 24-hour reports. Absent a description of facts, relevant documentation, or any evidence of a violation, APOC staff finds nothing to support investigating the allegation.⁶

D. Intent of the Agreement

This Proposed Consent Agreement intends to resolve all pending matters related to 25-05-CD. The Parties understand that this Proposed Consent Agreement is not effective unless and until it is approved by the Alaska Public Offices Commission.

II. FACTS, LAW, AND LEGAL CONCLUSIONS

As a candidate in the 2022 Anchorage Special Election held June 21, 2022, Volland was required to disclose his financial activity. For each municipal campaign cycle, standard

² AS 15.13.116.

³ AS 15.13.116(c).

⁴ AS 15.13.110(a). For a municipal election, the 105-day report *can* serve as the final report to close out the election cycle: A candidate whose 105-day report reflects zero remaining funds (because all campaign contributions have been properly disbursed) does not need to file an additional report on February 15. However, because Volland did not zero out his campaign funds on his 105-day report, he was required to file a February 15 report but did not. By virtue of this Proposed Consent Agreement, Volland should amend his 105-day report to reflect the funds that remained at the end of the campaign and thereafter file a Feb 15 report reflecting the forfeiture of those funds pursuant to AS 15.13.116(c).

⁵ AS 15.13.110(b).

⁶ 2 AAC 50.870(a)(4)(6) and (d).

candidate reports include a year-start report, a 30-day report, a 7-day report, a 105-day, and if necessary, a February 15 report.⁷ For contributions exceeding \$250 from a single source and made in the nine days preceding an election, candidates must disclose the contributor, aggregate amount, and date received within 24 hours of receipt.⁸

A candidate who holds unused campaign contributions after the date of a special election must distribute the amount held within 90 days after the election.⁹ Distribution may include a transfer up to \$5,000 of the funds to an account for a future election campaign.¹⁰

A. Failure to Timely and Accurately File a 105-day report or a February 15 report

Volland concedes his campaign did not file a 105-day report after the 2022 special election by the statutory due date of October 4, 2022. A candidate bears the ultimate responsibility to timely file all required reports. APOC staff notes, however, that general agency practice is to contact a campaign, either informally or through a notice of deficiency, when a candidate misses a standard reporting deadline.¹¹ Here, it does not appear APOC staff sent notice to Volland after he failed to timely submit the 105-day report.

Ruedrich filed this complaint February 28, 2025, and within a week Volland submitted the missing report.¹² Volland also amended the report to include a previously unreported \$900 expenditure to Facebook for the placement of digital ads and additionally self-reported a \$229 discrepancy in the report that he was unable to reconcile.¹³

⁷ AS 15.13.110(a).

⁸ AS 15.13.110(b); 2 AAC 50.321(h).

⁹ AS 15.13.116(a).

¹⁰ AS 15.13.116(a)(7).

¹¹ 2 AAC 50.850(b) (describing agency notice to person when a required report is not filed); 2 AAC 50.850(a) (noting that failure to receive a notice of deficiency “does not excuse that person’s failure” to file the report by its due date).

¹² [105-day report](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47288&ViewType=CDLINK>, filed March 4, 2025.

¹³ [Amended 105-day report](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47616&ViewType=CD>, filed May 29, 2025.

When a candidate timely disburses all remaining funds, the candidate can meet reporting requirements by documenting the transfer on a single, “final” report. For Volland, a special election candidate, the “final” report potentially could have been his 105-day report. However, where a candidate has undisbursed campaign funds at the end of the 105-day reporting cycle that must be forfeited, as Volland did, the candidate then must file a February 15 report documenting the campaign account’s zero balance after forfeiture as the candidate’s “final” report.¹⁴ He did not.

The parties agree Volland’s failure to timely file his 105-day report, and the inaccuracies contained within that report, and Volland’s failure to file a February 15 report, violated Alaska Statutes 15.13.040 and 15.13.110.

B. Failure to Timely and/or Properly Disclose Campaign Contributions

Complainant Ruedrich observes Volland did not file any 24-hour reports, required when a candidate receives a contribution exceeding \$250 within nine days of an election.¹⁵ However, beyond noting a general skepticism of the campaign’s reporting in this area, Complainant offers no evidence or personal knowledge of any kind to support that Volland violated campaign disclosure rules regarding campaign contributions.¹⁶ Regulation requires that a complainant provide: “(4) a clear and concise description of facts that, if true, would violate a provision of AS 15.13;” “(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.”¹⁷ Complainant set forth none of these in his complaint.¹⁸

APOC staff finds no violations of AS 15.13.110(b) or 2 AAC 50.321(h) and this Proposed Consent Agreement takes no action on this allegation.

C. Failure to Timely Disburse Unused 2022 Campaign Contributions and Improper Transfer of Funds into Future Campaign Account

¹⁴ AS 2 AAC 50.384(a).

¹⁵ AS 15.13.110(b); 2 AAC 50.321(h).

¹⁶ Complaint 25-05-CD, <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=26836>, p.3

¹⁷ 2 AAC 50.870(b)(4)-(6).

¹⁸ Notwithstanding the lack of evidence presented by the complainant, APOC staff nonetheless reviewed Volland’s reports and determined no contributions required reporting under AS 15.13.110(b).

Candidates must disburse all remaining funds in their campaign account within 90 days after a special election.¹⁹ A candidate has several options for disbursing the funds, including transferring them into a future campaign account (FCA), but the transfer must occur within the statutory timeframe.²⁰ Funds not transferred by the deadline must be forfeited to the Department of Revenue within 30 days.²¹

Next, on the first-filed report of the candidate’s subsequent campaign (typically a year-start or 30-day report), the APOC reporting system asks whether the candidate has an FCA that will be used in the current campaign. The system then records those FCA funds as “beginning cash on hand” in the report. Here, because Volland did not file a 105-day report at the close of his 2022 campaign, he necessarily did not establish or transfer his remaining campaign funds to an FCA.

When Volland, in response to this complaint, filed his 2022 105-day report (subsequently amended),²² he belatedly designated his remaining 2022 campaign funds in the amount of \$1,223.85 for disbursement as “FCA.”²³ Volland then amended his 2025 campaign’s year-start report – which originally listed \$0 beginning cash on hand²⁴ (meaning no FCA funds were carried forward) – to add his 2022 FCA funds as beginning cash on hand for the 2025 campaign.²⁵

While Volland’s actions in placing the remaining campaign funds into an FCA in March 2025 appear to have been a good-faith effort to correct his campaign’s past reporting errors, the statutory window to disburse unused campaign funds had long since passed by

¹⁹ AS 15.13.116(a); 2 AAC 50.384(a).

²⁰ Additionally, once an FCA is established, the candidate must “continue to file applicable reports,” including expenditures from the account. 2 AAC 50.384(a).

²¹ AS 15.13.116(c).

²² [Amended 105-day report](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47616&ViewType=CD>, filed May 29, 2025.

²³ [Future Campaign Account report](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47617&ViewType=CD>, filed May 29, 2025.

²⁴ [Year-start report 2025](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47102&ViewType=CD>, filed February 18, 2025.

²⁵ [Year-start report \(amended\)](#), Disclosure Form View Amendment (Amended), filed March 4, 2025. This report was additionally amended to correct a self-disclosed error in expenditure reporting.

the time he attempted to retroactively disburse the 2022 campaign funds into an FCA. Without having followed the correct statutory procedure in 2022, it was unlawful to report these funds as available for use by the 2025 campaign.²⁶

The parties agree that Volland’s (1) failure to timely disburse remaining campaign funds after the 2022 special election and (2) untimely creation of a future campaign account violated Alaska Statutes 15.13.116 and the FCA funds must be forfeited.²⁷

III. MAXIMUM POTENTIAL CIVIL PENALTIES

The maximum civil penalty for failing to timely file a complete and accurate 105-day report is \$50 per day for each day the violation continues.²⁸ Tolling the running of the penalties for these 2022 violations as of the day the complaint was filed February 28, 2025 results a maximum civil penalties of **\$43,850** for the 105-day report (due October 4, 2022, accrued 877 days) and **\$37,200** for the February 15 report (due Feb 15, 2023, accrued 744 days). As discussed further below, this Proposed Consent Agreement proposes forfeiture of Volland’s unused campaign funds but no penalty against Volland for his failure to do so by the statutory deadline.

IV. MITIGATION CRITERIA

When staff assesses a penalty, the starting point for calculating the penalty is 2 AAC 50.855. Under this regulation, for the late filing of and inaccuracies in Volland’s 105-day report, the regulation dictates that staff reduce the assessment to 25% of the maximum \$43,850 penalty, to \$10,962.50, as it was his first late-filed report.²⁹ For

²⁶ See [907 Initiative v. Nelson](#), APOC Case No. 24-05-CD (January 27, 2025) [<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=26562>].

Volland also could have complied with the disbursement statute by forfeiting the funds to the Department of Revenue and filing a final report documenting the disbursement, but he did not; banking records reflect that the money was not forfeited but remained in Volland’s account.

²⁷ Volland’s initial, timely filed year-start report for his 2025 campaign listed \$0 in beginning cash on hand.²⁷ While the \$0 cash on hand resulted from his initial failure to disburse his 2022 funds to an FCA, it nonetheless resulted in a year-start report that correctly reflected \$0 in carryover funds, consistent with statute and this Proposed Consent Agreement. Accordingly, no penalty is assessed for Volland’s 2025 year-start report.

²⁸ AS 15.13.390(a)(1).

²⁹ 2 AAC 50.855(b)(2)(B).

Volland's late filing of his February 15 report, regulation dictates that staff reduce the assessment to 50% of the maximum \$37,200 penalty, to \$18,600 as the election cycle was his first.³⁰ The resulting staff penalty assessment is \$29,562.50.

In reaching this agreement, the parties have considered and agree that mitigating factors exist that would allow for a substantial reduction of the \$29,562.50 maximum penalty assessment and agree to a 98.5% reduction to \$443.44. The assessment takes into account that, at the time of the violations, Volland was an inexperienced filer, subject to reporting requirements for less than 365 days.³¹ The penalty assessment also reflects APOC staff error that justifies further reduction in the penalty. As noted earlier in this report, while it is always a candidate's responsibility to file reports required by Alaska campaign disclosure law, it does not appear that Volland received the benefit of APOC's standard agency practice, which is to alert filers when a report required under Alaska Statute 15.13.110 is not submitted. This notice of deficiency likely would have prompted Volland to file the reports and possibly provided the reminder needed to disburse campaign funds. APOC staff additionally notes that the purpose of Alaska's campaign disclosure statutes is to ensure open and transparent campaigns; to provide the public with information to allow them to make informed choices when they vote; and to ensure that campaigns are accountable. Failing to file an entire report negates those efforts to promote transparency. However, when faced with the complaint, Volland immediately undertook efforts to correct the mistakes and the filing consequences flowing from them. He additionally self-reported other errors he discovered and cooperated fully with APOC staff's investigation, including providing comprehensive documentation in response to staff's requests for information. For all these reasons, the substantial reduction in penalty is warranted.

APOC staff also considers the financial impact that will result from Alaska Statute 15.13.116(c), which requires Volland to forfeit the \$1,223.85 in FCA funds to the

³⁰ 2 AAC 50.855(b)(2)(C).

³¹ 2 AAC 50.865(a)(1)(B).

Department of Revenue for having not timely disbursed them.³² Volland agrees to send the \$1,223.85 in surplus funds to the Department of Revenue within 30 days of approval of this Proposed Consent Agreement and to file a report documenting the forfeiture within 15 days.³³ The parties agree no additional penalty will be assessed based upon the lateness of the forfeiture, consistent with recent Commission decisions declining to separately penalize candidates who have forfeited FCA funds under similar circumstances.³⁴

V. TERMS OF PROPOSED CONSENT AGREEMENT

APOC Staff and Respondent agree to a proposed consent agreement in which:

1. The above facts and conclusions are acknowledged.
2. Respondent will pay a penalty of **\$443.44** within 30 days of the date of approval of this agreement.
3. Respondent will forfeit **\$1,223.85** unused campaign funds to the Alaska Department of Revenue within 30 days of the date of approval of this agreement and file a report documenting the forfeiture within 15 days thereafter.
4. Respondent will amend his reports to accurately reflect the **\$1,223.85** expenditure to the Alaska Department of Revenue and any complete any further amendments needed within 30 days of the date of approval of this agreement.

The parties also agree the Commission's investigation and adjudication costs will not be imposed because the matter did not involve extensive investigation or other pre-hearing discovery costs, and because Respondent cooperated fully with the investigation and resolution of the matter.

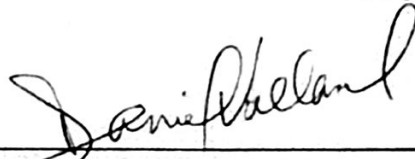
This proposed agreement is subject to approval by the Commission.

³² AS 15.13.116(c) requires delivery of undisbursed funds to the Department of Revenue *within 30 days* after the date has passed to disburse funds pursuant to (a) (September 19, 2022) which would have been October 19, 2022.

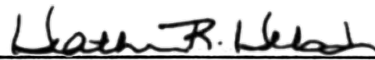
³³ AS 15.13.116(c); 2 AAC 50.384(a).

³⁴ See [907 Initiative v. Wright](#), APOC Case No. 24-04-CD, pp. 9-10 (January 27, 2025) [<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=26556>]; [907 Initiative v. Nelson](#), APOC Case No. 24-05-CD, pp. 9-10 (January 27, 2025) [<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=26562>].

Dated: 03/09/26

By: 
Daniel Volland
Respondent

Dated: 3/9/2026

By: 
Heather Hebdon, Executive Director
Alaska Public Offices Commission

I hereby certify that on this date a true and correct copy of the foregoing was served as follows:	
Randy Ruedrich 1515 W. 13 th Avenue Anchorage, AK 99501 raraep@gci.net	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> U.S. Mail
Daniel Volland 400 L Street, Ste 104 Anchorage, AK 99509 Daniel@vollandforassembly.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> U.S. Mail

Signature Date



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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www.doa.alaska.gov/apoc

May 15, 2026

Via Certified Mail and Email

Daniel Volland
400 L Street, Ste 104
Anchorage, AK 99509
Daniel@vollandforassembly.com

RE: Commission Meeting Notice

Dear Assembly Member Volland:

The Commission will review the enclosed Proposed Consent Agreement in the matter *Ruedrich v. Volland*, 25-05-CD at its June 2-3, 2026 Commission Meeting in Anchorage, Alaska.

Currently, the matter is scheduled to be considered at **10:30 a.m. on Wednesday, June 3, 2026**. The meeting will take place at the offices of the Alaska Public Offices Commission located at 2221 E. Northern Lights Boulevard, Room 128, in Anchorage, Alaska, by telephone (1-907-202-7104, Conference ID: 269 275 710#), or remotely via [Microsoft Teams](#) (Meeting ID: 226 535 332 612 23, Passcode: wZ9Uy9wz).

If you do not attend the meeting, staff will send you a final order notifying you of the Commission's decision.

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John G. Whitlock
Paralegal III

Encl: Proposed Consent Agreement

cc: Randy Ruedrich (email only)

CERTIFICATE OF SERVICE:	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Daniel Volland 400 L Street, Ste 104 Anchorage, AK 99509 Daniel@vollandforassembly.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
Randy Ruedrich raraep@gci.net	<input checked="" type="checkbox"/> Email only

Cari Rousselle
Signature

05/16/2026

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: Daniel@vollandforassembly.com
Sent: Friday, May 15, 2026 2:49 PM
Subject: Relayed: Commission Meeting Notice

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

[Daniel@vollandforassembly.com \(Daniel@vollandforassembly.com\)](mailto:Daniel@vollandforassembly.com)

Subject: Commission Meeting Notice



Commission
Meeting Notice

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:

Daniel Volland
 400 L Street STE 104
 Anchorage AK 99509



9590 9402 9917 5335 2996 40

2. Article Number (Transfer from service label)

9589 0710 5270 1126 7219
 75

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

Danny Sharp

Agent

B. Received by (Printed Name)

Mary Harper

Addressee

C. Date of Delivery

5/8/26

D. Is delivery address different from item 1? Yes
 if YES, enter delivery address below: No

3. Service Type

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

all Restricted Delivery (over \$500)

Domestic Return Receipt