

[07]

Lobbyist Civil Penalty Appeals

Presented By:

Heather Dalberg, Paralegal

CONSENT AGENDA CIVIL PENALTY APPEALS
UNDER AS 24.45.141, 2 AAC 50.855-860
Lobbyist/Employer of Lobbyist Reporting
June 25, 2025 Commission Meeting

UNDER AS 24.45.141, 2 AAC 50.855-860

Lobbyist/Employer of Lobbyist Reporting
--

June 25, 2025 Commission Meeting

[illegible]



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Heather Brakes

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 2, 2025

DAYS LATE: 2

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 24, 2025

MAXIMUM STATUTORY PENALTY: \$20.00

PENALTY ASSESSED: \$20.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=20978&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file her report. Based on this unique circumstance Ms. Brakes requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Heather Brakes is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Ms. Brakes reached out via email on February 28, 2025, at 9:01 am to alert staff of the outage and the website being down. Once the online filing system was accessible, Ms. Brakes filed her report on March 2, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Heather Brakes has been a registered lobbyist since 2015. This is her first late filing since 2017.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 24 2025

APOC-JUNEALL
PM HC FAX EM

Civil Penalty Appeal Affidavit
AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer): HEATHER BRAKES _____

Employer (if a lobbyist): _____ LEGISLATIVE CONSULTANTS, LLC _____

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

- ☐ Lobbyist Report for ____ JANUARY 2025 _____
☐ (month or quarter) Employer of Lobbyist Report for _____
____ (quarter)

Specify Year: 2025 _____

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed: The State websites went down on Thursday evening (February 27) due to a cut cable and did not come back on-line until Sunday March 2nd. I was unable to process my report by midnight on February 28.

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: Heather Brakes _____

Type/Print Signer's Name: HEATHER BRAKES _____



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Heather Brakes
PO Box 211165
Auke Bay, AK 99821

RE: January Lobbyist Report Civil Penalty Assessment

Dear Ms. Brakes:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 2, 2025 (2 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$20.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).


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.

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



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Heather Brakes PO Box 211165 Auke Bay, AK 99821 heather@lobbyalaska.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
 Signature	3/6/25 Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1675 02

U.S. Postal Service
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To *Legislative Consultants*

Postmark
Here

Street and Apt. No., or PO Box No.

224 4th Street

City, State, ZIP+4®

Juneau, AK 99801

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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:

Legislative Consultants
224 4th Street
Juneau, AK 99801



9590 9402 6609 1028 5115 35

2. Article Number (Transfer from service label)

9589 0710 5270 1274 1675 02

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

3-11

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
☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

☐ Restricted Delivery

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

Domestic Return Receipt

LOBBYIST REPORT FORM

COMPLETED

Signed **03/02/2025**

Year: **2025**

Report: **January**

Filer First Name: **Heather**

Filer Middle Name:

Filer Last Name: **Brakes**

LOBBYIST INFORMATION

First Name: **Heather**

Middle Name:

Last Name: **Brakes**

Business Name: **Heather K. Brakes**

Voter Registration District: **3B - Mendenhall Valley/Haines/Skagway/Gustavus**

Permanent Mailing Address: **P.O. Box 211165**

City, State Zip: **Auke Bay, Alaska 99821**

Phone: **907.723.3920**

E-mail: **heather@lobbyalaska.com**

Fax:

Legislative Mailing Address: **P.O. Box 211165**

City, State Zip: **Auke Bay, Alaska 99821**

Phone: **907.723.3920**

E-mail: **heather@lobbyalaska.com**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
Legislative Consultants LLC	Fee / Salary	\$50,000.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$50,000.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$50,000.00	New Total	\$0.00	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



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 5, 2025

Heather Brakes
PO Box 211165
Auke Bay, AK 99821
heather@lobbyalaska.com

Re: COMMISSION MEETING NOTICE

Ms. Brakes:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Heather Brakes
PO Box 211165
Auke Bay, AK 99821
heather@lobbyalaska.com



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Meghan Clemens

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 3, 2025

DAYS LATE: 3

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 7, 2025

MAXIMUM STATUTORY PENALTY: \$30.00

PENALTY ASSESSED: \$30.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21104&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file her report. Based on this unique circumstance Ms. Clemens requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Meghan Clemens is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Ms. Clemens reached out via email on February 28, 2025, at 10:02 am and 1:03 pm to alert staff of the outage and the website being down. Once the online filing system was accessible, Ms. Clemens filed her report on March 3, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Meghan Clemens has been a registered lobbyist since 2024. This is her first late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 07 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer): Meghan Clemens

Employer (if a lobbyist): Alaska Railroad Corporation

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



Lobbyist Report for January (month)



Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

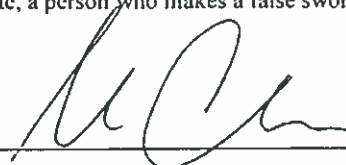
State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

I acknowledge that my January Report was not filed by February 28, 2025. But it was not for a lack of trying to submit the report on that date. Instead, when Alaska Railroad Corporation Legal Administrator Julie Zappas (who handles submission of my lobbying report) attempted to submit the report on February 28, the MyAlaska website was unavailable. On information and belief, the website was unavailable due to a communications line disruption in Juneau. When the attempt to file my report failed due to the unavailability of the MyAlaska site, Ms. Zappas emailed a copy of my January Report to Ms. Dahlberg in Juneau and reported to her our inability to file on MyAlaska. In a belt-and-suspenders attempt to meet the reporting deadline, Ms. Zappas then traveled physically to the Anchorage APOC office to attempt to submit my report there. APOC Staff in Anchorage indicated that they could not accept the report. Ms. Zappas submitted my report on the MyAlaska site when she arrived for her next shift, on Monday, March 3rd. In conclusion, while I acknowledge the report was late in being entered online via the MyAlaska site, I respectfully request that APOC rescind the finding of a reporting violation and vacate the assessed penalty. I believe such an action would be fair and appropriate in light of both the Internet outage and ARRC's numerous attempts to comply with the reporting deadline despite our inability to access MyAlaska.

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:



3.7.25

Type/Print Signer's Name:

Meghan Clemens



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Meghan Clemens
327 West Ship Creek Avenue
Anchorage, AK 99501

RE: January Lobbyist Report Civil Penalty Assessment

Dear Ms. Clemens:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 3, 2025 (3 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$30.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

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



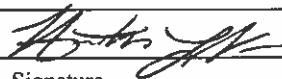
Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE:

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

Meghan Clemens
327 West Ship Creek Avenue
Anchorage, AK 99501
clemensm@akrr.com

☒ Email
☒ Certified Mail



Signature

3/6/25

Date

Encl: Civil Penalty Appeal Affidavit

9509 0710 5270 1274 1674 34

U.S. Postal Service[™]
CERTIFIED MAIL[®] RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com[®].

OFFICIAL USE

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy) \$

☐ Return Receipt (electronic) \$

☐ Certified Mail Restricted Delivery \$

☐ Adult Signature Required \$

☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

Meghan Clemens

Jan 1st 44

Street and Apt. No., or PO Box No.

City, State, ZIP+4[®]

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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:

Meghan Clemens
327 West Ship Creek Ave
Anchorage, AK 99501



9590 9402 6609 1028 5116 65

2. Article

9

PS Form

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

Jaylie Yang

C. Date of Delivery

3/13/25

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

☐ Priority Mail Express[®]

☐ Registered Mail[™]

☐ Registered Mail Restricted Delivery

☐ Signature Confirmation[™]

☐ Signature Confirmation Restricted Delivery

Return Receipt

LOBBYIST REPORT FORM

COMPLETED

Signed **03/03/2025**

Year: **2025**

Report: **January**

Filer First Name: **Andy**

Filer Middle Name: **F**

Filer Last Name: **Behrend**

LOBBYIST INFORMATION

First Name: **Meghan**

Middle Name: **Chappell**

Last Name: **Clemens**

Business Name: **Alaska Railroad Corporation**

Voter Registration District: **11F - Lower Hillside**

Permanent Mailing Address: **327 West Ship Creek Avenue**

City, State Zip: **Anchorage, Alaska 99501**

Phone: **907-887-6229**

E-mail: **clemensm@akrr.com**

Fax: **907-265-2312**

Legislative Mailing Address: **327 West Ship Creek Avenue**

City, State Zip: **Anchorage, Alaska 99501**

Phone: **907-887-6229**

E-mail: **clemensm@akrr.com**

Fax: **907-265-2312**

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
Alaska Railroad Corporation	Fee / Salary	\$610.50	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$610.50	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$610.50	New Total	\$0.00	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



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 5, 2025

Meghan Clemens
327 West Ship Creek Avenue
Anchorage, AK 99501
clemensm@akrr.com

Re: COMMISSION MEETING NOTICE

Ms. Clemens:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Meghan Clemens
327 West Ship Creek Avenue
Anchorage, AK 99501
clemensm@akrr.com



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg **DATE:** June 5, 2025

RESPONDENT: Nancy Coleman-Chavez

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

- ☒ Lobbyist Report - January¹
☐ Employer of Lobbyist
☐ Other

DUE DATE: February 28, 2025

FILED ON: March 2, 2025

DAYS LATE: 2

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 15, 2025

MAXIMUM STATUTORY PENALTY: \$20.00

PENALTY ASSESSED: \$20.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21099&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file her report. Based on this unique circumstance Ms. Coleman-Chavez requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Nancy Coleman-Chavez is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Ms. Coleman-Chavez reached out via email on February 28, 2025, at 7:40 am and 1:20 pm to alert staff of the outage and the website being down. Once the online filing system was accessible, Ms. Coleman-Chavez filed her report on March 2, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Nancy Coleman-Chavez has been a registered lobbyist since November of 2024. This is her first late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 15 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit
AS 24.45 Alaska Lobbying Law

Name of Appellant
(Lobbyist or Employer): Nancy Coleman-Chavez

Employer (if a lobbyist): DailyPay, Inc.

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

☒ Lobbyist Report for January (month or quarter)
☐ Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

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

The January 2025 lobbyist activity report for Nancy Coleman-Chavez could not be timely filed due to a system-wide MyAlaska services outage on February 28, 2025 that prevented access to the electronic lobbying filing portal. The civil penalty should not be assessed since efforts were made to timely file this report and to seek assistance from APOC to timely file.

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: Nancy Coleman-Chavez 3/14/2025

Type/Print Signer's Name: Nancy Coleman-Chavez



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Nancy Coleman-Chavez
55 Water Street
New York, NY 10041

RE: January Lobbyist Report Civil Penalty Assessment

Dear Ms. Coleman-Chavez:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 2, 2025 (2 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$20.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

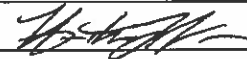
Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General's Office.

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



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Nancy Coleman-Chavez 55 Water Street New York, NY 10041 nancy.coleman-chavez@dailypay.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
 Signature	3/6/25 Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1674 41

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CERTIFIED MAIL® RECEIPT
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For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee	
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Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	
\$	
Total Postage and Fees	
\$	

Postmark
Here

Sent To	Nancy Coleman-Chavez	Jan 1st / 17
Street and Apt. No., or PO Box No.	55 Water Street	
City, State, ZIP+4®	New York, NY 10041	

LOBBYIST REPORT FORM

COMPLETED

Signed **03/02/2025**

Year: **2025**

Report: **January**

Filer First Name:

Filer Middle Name:

Filer Last Name:

LOBBYIST INFORMATION

First Name: **Nancy**

Middle Name:

Last Name: **Coleman-Chavez**

Business Name: **DailyPay, Inc.**

Voter Registration District: **Out of state**

Permanent Mailing Address: **55 Water Street**

City, State Zip: **New York, New York 10041**

Phone: **3154273284**

E-mail: **nancy.coleman-chavez@dailypay.com**

Fax:

Legislative Mailing Address: **55 Water Street**

City, State Zip: **New York, New York 10041**

Phone: **3154273284**

E-mail: **nancy.coleman-chavez@dailypay.com**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
DailyPay, Inc.	No Activity		No Activity		No Activity	
	Totals		Totals		Totals	
	This Report	\$0.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$0.00	New Total	\$0.00	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



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 5, 2025

Nancy Coleman-Chavez
55 Water Street
New York, NY 10041
chavez@dailypay.com

Re: COMMISSION MEETING NOTICE

Ms. Coleman-Chavez:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Nancy Coleman-Chavez
55 Water Street
New York, NY 10041
chavez@daily pay.com



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Kevin Jardell

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 2, 2025

DAYS LATE: 2

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 25, 2025

MAXIMUM STATUTORY PENALTY: \$20.00

PENALTY ASSESSED: \$20.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21097&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file his report. Based on this unique circumstance Mr. Jardell requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Kevin Jardell is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. Once the online filing system was accessible, Mr. Jardell filed his report on March 2, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

This is Kevin Jardell's first late filing since 2017.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 25 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer):

Kevin Jardell

Employer (if a lobbyist):

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

☒ Lobbyist Report for JANUARY (month or quarter)
☐ Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

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

Due to fiber optic cable being cut state computers were down. Thus, I could not file timely but did file as soon as possible.

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:

[Signature] 3/25/25

Type/Print Signer's Name:

Kevin Jardell



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Kevin Jardell
350 North Franklin Street
Juneau, AK 99801

RE: January Lobbyist Report Civil Penalty Assessment

Dear Mr. Jardell:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 2, 2025 (2 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$20.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).


³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

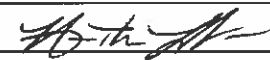
A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Kevin Jardell 350 North Franklin Street Juneau, AK 99801 kevin@kjardell.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

	3/6/25
Signature	Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1674 10

U.S. Postal Service CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®	
OFFICIAL USE	
Certified Mail Fee \$	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
Total Postage and Fees \$	
Sent To <i>K. Jardell</i> Jan. 18 th 15	
Street and Apt. No., or PO Box No. 350 North Franklin Street	
City, State, ZIP+4® Juneau, AK 99801	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

LOBBYIST REPORT FORM

COMPLETED

Signed **03/02/2025**

Year: **2025**

Report: **January**

Filer First Name: **Kevin**

Filer Middle Name:

Filer Last Name: **Jardell**

LOBBYIST INFORMATION

First Name: **Kevin**

Middle Name:

Last Name: **Jardell**

Business Name: **K Jardell Co.**

Voter Registration District: **3B - Mendenhall Valley/Haines/Skagway/Gustavus**

Permanent Mailing Address: **350 North Franklin Street**

City, State Zip: **Juneau, Alaska 99801**

Phone: **907-321-4540**

E-mail: **kevin@kjardell.com**

Fax:

Legislative Mailing Address: **350 North Franklin Street**

City, State Zip: **Juneau, Alaska 99801**

Phone: **907-321-4540**

E-mail: **kevin@kjardell.com**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
AARP	Fee / Salary	\$7,500.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$7,500.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$7,500.00	New Total	\$0.00	New Total	\$0.00
Arrow International, Inc	Fee / Salary	\$5,000.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$5,000.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$5,000.00	New Total	\$0.00	New Total	\$0.00
Exxon Mobil Corporation	Fee / Salary	\$14,600.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		



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

June 5, 2025

Kevin Jardell
350 North Franklin Street
Juneau, AK 99801
kevin@kjardell.com

Re: COMMISSION MEETING NOTICE

Mr. Jardell:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Kevin Jardell
350 North Franklin Street
Juneau, AK 99801
kevin@kjardell.com



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg **DATE:** June 5, 2025

RESPONDENT: Legislative Consultants

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

- ☒ Lobbyist Report - January¹
☐ Employer of Lobbyist
☐ Other

DUE DATE: February 28, 2025

FILED ON: March 2, 2025

DAYS LATE: 2

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 24, 2025

MAXIMUM STATUTORY PENALTY: \$20.00

PENALTY ASSESSED: \$20.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=210988&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file the report. Based on this unique circumstance Legislative Consultants requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbying firm, Legislative Consultants is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Ms. Brakes reached out on behalf of Legislative Consultants via email on February 28, 2025, at 9:01 am to alert staff of the outage and the website being down. Once the online filing system was accessible, Legislative Consultants filed the report on March 2, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Legislative Consultants has been a registered lobbying firm since 2014. This is their first late filing since 2018.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 24 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit
AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer): LEGISLATIVE CONSULTANTS, LLC

Employer (if a lobbyist): LEGISLATIVE CONSULTANTS, LLC

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

☐

Lobbyist Report for JANUARY 2025 (month or quarter)

☐

Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed: The State websites went down on Thursday evening (February 27) due to a cut cable and did not come back on-line until Sunday March 2nd. I was unable to process my report by midnight on February 28.

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: Heather Brakes

Type/Print Signer's Name: HEATHER BRAKES



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Legislative Consultants
224 4th Street
Juneau, AK 99801

RE: January Lobbyist Report Civil Penalty Assessment

Dear Ms. Brakes:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 2, 2025 (2 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$20.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

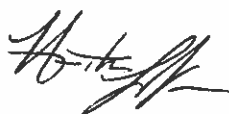
³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

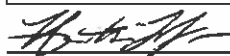
A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Legislative Consultants 224 4 th Street Juneau, AK 99801 heather@lobbyalaska.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail



Signature

3/6/25

Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1675 02

U.S. Postal Service CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®	
OFFICIAL USE	
Certified Mail Fee \$ _____	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$ _____	
<input type="checkbox"/> Return Receipt (electronic) \$ _____	
<input type="checkbox"/> Certified Mail Restricted Delivery \$ _____	
<input type="checkbox"/> Adult Signature Required \$ _____	
<input type="checkbox"/> Adult Signature Restricted Delivery \$ _____	
Postage \$ _____	
Total Postage and Fees \$ _____	
Sent To <u>Legislative Consultants</u> 1st 1/2 Jan	
Street and Apt. No., or PO Box No. <u>224 4th Street</u>	
City, State, ZIP+4® <u>Juneau, AK 99801</u>	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

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:

Legislative Consultants
224 4th Street
Juneau, AK 99801



9590 9402 6609 1028 5115 35

2. Article Number (Transfer from service label)

9589 0710 5270 1274 1675 02

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☒ Addressee

B. Received by (Printed Name)

C. Date of Delivery

3-11

- 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
☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Restricted Delivery

LOBBYIST REPORT FORM

COMPLETED

Signed **03/02/2025**

Year: **2025**

Report: **January**

Filer First Name: **Legislative Consultants LLC**

Filer Middle Name:

Filer Last Name: **Legislative Consultants LLC**

LOBBYIST INFORMATION

First Name: **Legislative Consultants LLC**

Middle Name:

Last Name: **Legislative Consultants LLC**

Business Name: **Legislative Consultants LLC**

Voter Registration District: **3B - Mendenhall Valley/Haines/Skagway/Gustavus**

Permanent Mailing Address: **224 4th Street**

City, State Zip: **Juneau, Alaska 99801**

Phone: **907-723-3920**

E-mail: **heather@lobbyalaska.com**

Fax:

Legislative Mailing Address: **224 4th Street**

City, State Zip: **Juneau, Alaska 99801**

Phone: **907-723-3920**

E-mail: **heather@lobbyalaska.com**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
Alaska Behavioral Health Association	Fee / Salary	\$4,583.33	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$4,583.33	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total		New Total	\$0.00	New Total	\$0.00
Alaska Emergency Medicine Associates	Fee / Salary	\$4,166.67	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$4,166.67	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total		New Total	\$0.00	New Total	\$0.00
Whaler Casino Supply LLC	Fee / Salary	\$4,166.66	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		



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

June 5, 2025

Legislative Consultants
224 4th Street
Juneau, AK 99801
heather@lobbyalaska.com

Re: COMMISSION MEETING NOTICE

Ms. Brakes:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Legislative Consultants
224 4th Street
Juneau, AK 99801
heather@lobbyalaska.com



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg **DATE:** June 5, 2025

RESPONDENT: Raymond Matiashowski

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

- ☒ Lobbyist Report - January¹
☐ Employer of Lobbyist
☐ Other

DUE DATE: February 28, 2025

FILED ON: March 2, 2025

DAYS LATE: 2

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 9, 2025

MAXIMUM STATUTORY PENALTY: \$20.00

PENALTY ASSESSED: \$20.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21094&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file his report. Based on this unique circumstance Mr. Matiashowski requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Raymond Matiashowski is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Mr. Matiashowski reached out via email on March 1, 2025, at 10:10 am to alert staff of the outage and the website being down. Once the online filing system was accessible, Mr. Matiashowski filed his report on March 2, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

This is Raymond Matiashowski's first late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 09 2025

APOC-JUNEAU
PM HC FAX (EM)

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer):

Ray Matiashowski

Employer (if a lobbyist):

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



Lobbyist Report for January 2025 (month or quarter)

☐ Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

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

Due to the submarine cable-cut near Juneau, State services were off-line on Feb 28th for several days. Because of this there was no way for me to file my January report at that time. I did file the report on Sunday March 2nd. I filed it with-in hours of service being restored.

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:

Ray Matiashowski 3/9/25

Type/Print Signer's Name:

Ray Matiashowski



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Raymond Matiashowski
PO Box 240345
Douglas, AK 99824

RE: January Lobbyist Report Civil Penalty Assessment

Dear Mr. Matiashowski:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 2, 2025 (2 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$20.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

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



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Raymond Matiashowski PO Box 240345 Douglas, AK 99824 raym@kpunet.net	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

	3/6/25
Signature	Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1674 03

U.S. Postal Service
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

R. Matashowski

Street and Apt. No., or PO Box No.

City, State, ZIP+4®

Postmark
Here

PS Form 3800, January 2023 PSN 7530-02-000-9017 See Reverse for Instructions

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:

Ray Matashowski
 PO Box 240345
 Douglas, AK 99824



9590 9402 6609 1028 5116 96

2. Article Number (Transfer from service label)

9589 0710 5270 1274 1674 03

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Ray Matashowski

☐ Agent

☐ Addressee

B. Received by (Printed Name)

Ray Matashowski

C. Date of Delivery

3/8/25

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
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail

- ☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

all Restricted Delivery

Domestic Return Receipt

LOBBYIST REPORT FORM

COMPLETED

Signed **03/02/2025**

Year: **2025**

Report: **January**

Filer First Name: **RAYMOND**

Filer Middle Name:

Filer Last Name: **MATIASHOWSKI**

LOBBYIST INFORMATION

First Name: **Raymond**

Middle Name:

Last Name: **Matiasowski**

Business Name: **Ray Matiasowski and Associates**

Voter Registration District: **34Q - Mendenhall Valley**

Permanent Mailing Address: **PO Box 240345**

City, State Zip: **Douglas, Alaska 99824**

Phone: **360-471-5958**

E-mail: **raym@kpunet.net**

Fax:

Legislative Mailing Address: **PO Box 240345**

City, State Zip: **Douglas, Alaska 99824**

Phone: **360-471-5958**

E-mail: **raym@kpunet.net**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
Premera Blue Cross Blue Shield of Alaska	Fee / Salary	\$6,250.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$6,250.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$6,250.00	New Total	\$0.00	New Total	\$0.00
City and Borough of Wrangell	Fee / Salary	\$3,600.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$3,600.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$3,600.00	New Total	\$0.00	New Total	\$0.00
Conduent Incorporated and its Affiliates	Fee / Salary	\$5,000.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		



THE STATE
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GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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Fax: 907.276.7018
www.doa.alaska.gov/apoc

June 5, 2025

Raymond Matiashowski
PO Box 240345
Douglas, AK 99824
raym@kpunet.net

Re: COMMISSION MEETING NOTICE

Mr. Matiashowski:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Raymond Matiashowski

PO Box 240345

Douglas, AK 99824

raym@kpunet.net



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Sierra Minder

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 3, 2025

DAYS LATE: 3

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 27, 2025

MAXIMUM STATUTORY PENALTY: \$30.00

PENALTY ASSESSED: \$30.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21079&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file her report. Based on this unique circumstance Ms. Minder requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Sierra Minder is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Ms. Minder reached out via email on February 28, 2025, at 1:47 pm and attempted to call at 9:48 am and 2:09 pm to alert staff of the outage and the website being down. Once the online filing system was accessible, Ms. Minder filed her report on March 3, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Sierra Minder has been a registered lobbyist since August of 2023. This is her first late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 27 2025

APOC-JUNEALL
PM HC FAX EM

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer): Sierra Minder

Employer (if a lobbyist): Alaska Oil and Gas Association

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

- ☒ Lobbyist Report for January 2025 (month or quarter)
☐ Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

Statement: See Attached

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 AS 24.45, the Alaska Lobbying Law.

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

See Attached

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: 3/27/2025

Type/Print Signer's Name: Sierra Minder

AFFIDAVIT OF SIERRA MINDER

STATE OF ALASKA)
) ss.
FIRST JUDICIAL DISTRICT)

I, SIERRA MINDER, being first duly sworn upon oath, depose and state as follows:

1. I have personal knowledge of the matters stated herein and, if called as a witness, I could and would testify competently to the matters stated herein.

2. I have been a registered lobbyist for Alaska Oil and Gas Association (“AOGA”) since August 2023.

3. In my time as a registered lobbyist, I have a good filing history.

4. The January lobbyist report was due by midnight on Friday, February 28, 2025.

5. I submit my lobbyist reports electronically through MyAlaska- Alaska.
Public Offices Commission (APOC) Insight Online Filing System (“MyAlaska Portal”).

6. There was an internet and cellphone outage in Juneau that began on Thursday, February 27, 2025 and lasted through the weekend (the “Outage”).¹

¹ As reported in the Anchorage Daily News, "Damage to a subsea cable led to widespread cellphone and internet outages in Southeast Alaska, and caused state government websites to go offline for much of Friday into Saturday before services began to be restored." (McGuire, Sean. "Cable damage causes

7. As reported by the Anchorage Daily News, the Outage specifically affected the MyAlaska Portal², preventing electronic report filing.

8. On Friday, February 28, 2025, AOGA emailed and called Heather Dalberg, APOC Paralegal, to inform her that MyAlaska was inaccessible and January lobbyist reports could not be filed, and to seek guidance on how to proceed³.

9. After being unable to reach APOC, AOGA called the MyAlaska Hotline as well as the Anchorage APOC office, where AOGA was informed that the MyAlaska Portal is the only way to file the January APOC report and accordingly, physically dropped-off, emailed, or faxed filings would not be accepted.

10. My January lobbyist report was successfully filed on Monday, March 3, 2025.

11. 2 AAC 50.865 lists mitigating factors that may lead to the reduction or waiver of a civil penalty, including a good filing history (2 AAC 50.865(a)(1)(A)(i)), a technical error at the commission (2 AAC 50.865(a)(2)), and a unique circumstance that justifies reducing or waiving the penalty (2 AAC 50.865(b)(6)).

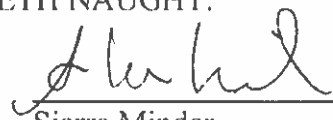
Southeast Alaska internet and cellphone outage, temporarily affecting state websites." *Anchorage Daily News*, 28 February 2025.) – Full article enclosed.

² *Id.*

³ Correspondence enclosed.

12. I appeal the penalty assessment and request the Commission dismiss this violation on account of the technical issues associated with the February 28, 2025, network outage.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Sierra Minder

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Alaska News

Cable damage causes Southeast Alaska internet and cellphone outage, temporarily affecting state websites

By Sean Maguire

Published: February 28, 2025



The Alaska State Capitol, photographed on Tuesday, Jan. 15, 2019 in Juneau. (Loren Holmes / ADN)

JUNEAU — Damage to a subsea cable led to widespread cellphone and internet outages in Southeast Alaska, and caused state government websites to go offline for much of Friday into Saturday before services began to be restored.

Service first went out late Thursday evening. A spokeswoman for Alaska Communications, a telecommunications provider based in Anchorage, said Friday afternoon that a repair ship was being dispatched.

“We are also working to find alternate ways to restore connectivity in Juneau,” said Heather Marron, a spokeswoman for Alaska Communications, at 12:30 p.m. Friday.

“This is our top priority and we deeply apologize for the inconvenience. We know how important staying connected is and we will not rest until this is fixed,” she added.

Marron said by email at 2:30 p.m. Friday that Alaska Communications was working to provide “temporary” restoration of services. Permanent repairs would take longer “as it takes time for the repair ship to get to the location and perform the fix,” she said.

By Saturday evening, Alaska Communications said in an update posted to social media that technicians and engineers had restored some capacity “to the State of Alaska to support State services.”

“They made good progress today and are continuing work to restore service to the rest of Juneau and Southeast,” the telecom provider said in Saturday’s update, adding that they “will keep working throughout the night to get service restored.”



Alaska Communications last Friday



3/2 7:57 A.M.: We have restored a majority of services in Juneau and Southeast. You should be seeing internet and voice services working again. We continue to work on restoring remaining impacted services. If your internet service is not yet working, please power off your modem, wait 2-3 minutes and power it back on. Thank you for your patience as we worked through this event. We know how important being connected is and are deeply sorry for the extended outage. We thank our ...
[See more](#)

107

62

106

Alaska Communications expected to share another update Sunday morning unless new information emerged before then.

MyAlaska — the central online portal for Alaskans to access government services — was offline Friday. State websites were also unavailable to apply for a Permanent Fund dividend, to renew a driver's license, and to book ferry trips.

The Alaska Legislature's website was also offline Friday, along with telephone services to legislators' offices. Lawmakers and legislative staffers said that email was working intermittently during the outage.

By Saturday evening, several of the state's websites had started coming back online.

Many state government websites are run out of Juneau, which is why they were offline across the state, Marron said.

State House and Senate floor sessions and committee hearings were held as normal Friday afternoon, and streamed on KTOO-TV, which uses a different service provider.

The Juneau Police Department posted on social media to say that the outage affected the department's business lines. But 911 calls were working as normal.

Alaska Communications' infrastructure is used by other carriers, including AT&T. A spokesperson for the telecommunications giant said they were in touch with Alaska Communications as they worked to restore service.

"We appreciate the patience of our customers while this work is completed," an AT&T spokesperson said by email.

Sean Maguire

Sean Maguire is a politics and general assignment reporter for the Anchorage Daily News based in Juneau. He previously reported from Juneau for Alaska's News Source. Contact him at smaguire@adn.com.



ADVERTISEMENT

ADVERTISEMENT

Sierra Minder

From: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>
Sent: Thursday, March 6, 2025 3:44 PM
To: Nicole Reilly
Cc: Kara Moriarty; Sierra Minder
Subject: RE: AOGA January APOC Reports
Attachments: Kara Moriarty - 1st Letter.pdf; Sierra Minder - 1st Letter.pdf; CPA Appeal Affidavit.pdf; Credit Card Payment Tutorial.pdf

Importance: High

Hello Ms. Reilly,

Thank you for filing the January Lobbyist Reports for Ms. Minder and Ms. Moriarty. Due to the internet outage on February 28th, many filers could not file timely. Unfortunately, APOC staff is not authorized to offer extensions to the deadline, even when there are technical difficulties. Therefore, I am required to issue a late assessment. Attached is your late fee notice. The accrued penalty is \$30.00 for each report.

I recommend you appeal the penalties by submitting the attached appeal affidavit form. The appeal will allow me to write a staff recommendation to present to the Commission, encouraging a waiver of the late fee. Please submit one form for each lobbyist.

You have 30 days to respond by either paying the fee or appealing. If you do not respond in 30 days, the matter will be referred to the Commission for final payment. A hard copy of the letter will also be sent.

You may either pay by check or cash, or [you can pay by credit card online](#).

To find your late fee, go to this link:

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

Let me know if you have any questions.

Heather L. Dalberg

**Paralegal, Lobbying Disclosure
Alaska Public Offices Commission
907.465.4864**

From: Dalberg, Heather L (DOA)
Sent: Monday, March 3, 2025 1:23 PM
To: Nicole Reilly <reilly@aoga.org>
Subject: RE: AOGA January APOC Reports

Excellent. Received.

I am waiting for word from APOC's executive director on how to proceed with the late filings resulting from the outage.

Once I get instructions, I will reach out and let you know what will need to happen moving forward.

Thank you very much for your patience, and again, apologies for being unable to assist on Friday.

Heather L. Dalberg
Paralegal, Lobbying Disclosure
Alaska Public Offices Commission
907.465.4864

From: Nicole Reilly <reilly@aoga.org>
Sent: Monday, March 3, 2025 12:12 PM
To: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>
Subject: RE: AOGA January APOC Reports

Thanks, Heather. I figured it out once I called the myAlaska help line. I'm filing the reports now.

Nicole Reilly
Office & Project Manager
Alaska Oil and Gas Association
121 W. Fireweed Lane, Suite 207
Anchorage, Alaska 99503
Office: (907) 272-1481
Direct: (907) 222-9606
www.aoga.org

From: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>
Sent: Monday, March 3, 2025 10:15 AM
To: Nicole Reilly <reilly@aoga.org>
Subject: RE: AOGA January APOC Reports

Hello Nicole,

Thank you for reaching out on Friday and my apologies for only getting back to you today. If you were not aware, Juneau experienced an internet outage which affected myAlaska and my office phones, so I was unreachable.

I am back online today, so I am reaching out to everyone who was unable to file to let them know that they should now be able to submit. Please submit the reports as soon as possible.

Once the reports are in, I will let you know next steps.

Heather L. Dalberg
Paralegal, Lobbying Disclosure
Alaska Public Offices Commission
907.465.4864

From: Nicole Reilly <reilly@aoga.org>
Sent: Friday, February 28, 2025 1:47 PM
To: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>
Subject: AOGA January APOC Reports

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.

Hi Heather,

I'm sure you're aware that the myAlaska website is down. I haven't filed our January reports yet...what should I do at this point? I'm assuming the website is not going to come back online before the end of the day. I've also tried calling your office a few times and it goes straight to voicemail.

Thanks for your help.

Nicole Reilly
Office & Project Manager
Alaska Oil and Gas Association
121 W. Fireweed Lane, Suite 207
Anchorage, Alaska 99503
Office: (907) 272-1481
Direct: (907) 222-9606
www.aoga.org



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Sierra Minder
121 W. Fireweed Lane, 207
Anchorage, AK 99503

RE: January Lobbyist Report Civil Penalty Assessment

Dear Ms. Minder:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 3, 2025 (3 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$30.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

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



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE:

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

Sierra Minder
121 W. Fireweed Lane, 207
Anchorage, AK 99503
minder@aoga.org

☒ Email
☒ Certified
Mail



Signature

3/6/25

Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1674 89

U.S. Postal Service
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

\$

Total Postage and Fees

\$

Sent To

Sierra Minder
 Street and Apt. No., or PO Box No.

City, State, ZIP+4®

Postmark
 Here

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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:

Sierra Minder
 121 W. Fireweed Lane, 207
 Anchorage, AK 99503



9590 9402 6609 1028 5115 66

2. Article Number (Transfer from service label)

9589 0710 5270 1274 1674 89

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

Robert Enya

C. Date of Delivery

3/12/25

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
☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Mail
 Restricted Delivery

Domestic Return Receipt

LOBBYIST REPORT FORM

COMPLETED

Signed **03/03/2025**

Year: **2025**

Report: **January**

Filer First Name: **SIERRA**

Filer Middle Name: **M**

Filer Last Name: **MINDER**

LOBBYIST INFORMATION

First Name: **SIERRA**

Middle Name: **M**

Last Name: **MINDER**

Business Name:

Voter Registration District: **12F - Far North Bicentennial Park**

Permanent Mailing Address: **121 W Fireweed Lane Suite 207**

City, State Zip: **Anchorage , Alaska 99503**

Phone: **907-347-1732**

E-mail: **minder@aoga.org**

Fax:

Legislative Mailing Address: **121 W Fireweed Lane Suite 207**

City, State Zip: **Anchorage , Alaska 99503**

Phone: **907-347-1732**

E-mail: **minder@aoga.org**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
Alaska Oil & Gas Association	Fee / Salary	\$2,677.50	Food / Beverage	\$256.69	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$904.84	Living	\$0.00
			Travel	\$1,586.97	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$2,677.50	This Report	\$2,748.50	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$2,677.50	New Total	\$2,748.50	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



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 5, 2025

Sierra Minder
121 W. Fireweed Lane, 207
Anchorage, AK 99503
minder@aoga.org

Re: COMMISSION MEETING NOTICE

Ms. Minder:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Sierra Minder
121 W. Fireweed Lane, 207
Anchorage, AK 99503
minder@aoga.org



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Kara Moriarty

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 3, 2025

DAYS LATE: 3

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 27, 2025

MAXIMUM STATUTORY PENALTY: \$30.00

PENALTY ASSESSED: \$30.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21107&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file her report. Based on this unique circumstance Ms. Moriarty requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Kara Moriarty is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Ms. Moriarty reached out via email on February 28, 2025, at 1:47 pm and attempted to call at 9:48 am and 2:09 pm to alert staff of the outage and the website being down. Once the online filing system was accessible, Ms. Moriarty filed her report on March 3, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

This is Kara Moriarty's first late filing since 2018.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 27 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer): Kara Moriarty

Employer (if a lobbyist): Alaska Oil and Gas Association

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



Lobbyist Report for January 2025 (month or quarter)



Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

Statement: See Attached

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 AS 24.45, the Alaska Lobbying Law.

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

See Attached

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:

Kara Moriarty

Date: 3/27/2025

Type/Print Signer's Name: Kara Moriarty

AFFIDAVIT OF KARA MORIARTY

STATE OF ALASKA)
) ss.
FIRST JUDICIAL DISTRICT)

I, KARA MORIARTY, being first duly sworn upon oath, depose and state as follows:

1. I have personal knowledge of the matters stated herein and, if called as a witness, I could and would testify competently to the matters stated herein.
2. I have been a registered lobbyist for Alaska Oil and Gas Association (“AOGA”) since at least 2010.
3. In my time as a registered lobbyist, I have a good filing history.
4. The January lobbyist report was due by midnight on Friday, February 28, 2025.
5. I submit my lobbyist reports electronically through MyAlaska- Alaska Public Offices Commission (APOC) Insight Online Filing System (“MyAlaska Portal”).
6. There was an internet and cellphone outage in Juneau that began on Thursday, February 27, 2025 and lasted through the weekend (the “Outage”).¹

¹ As reported in the Anchorage Daily News, "Damage to a subsea cable led to widespread cellphone and internet outages in Southeast Alaska, and caused state government websites to go offline for much of

7. As reported by the Anchorage Daily News, the Outage specifically affected the MyAlaska Portal², preventing electronic report filing.

8. On Friday, February 28, 2025, AOGA emailed and called Heather Dalberg, APOC Paralegal, to inform her that MyAlaska was inaccessible and January lobbyist reports could not be filed, and to seek guidance on how to proceed³.

9. After being unable to reach APOC, AOGA called the MyAlaska Hotline as well as the Anchorage APOC office, where AOGA was informed that the MyAlaska Portal is the only way to file the January APOC report and accordingly, physically dropped-off, emailed, or faxed filings would not be accepted.

10. My January lobbyist report was successfully filed on Monday, March 3, 2025.

11. 2 AAC 50.865 lists mitigating factors that may lead to the reduction or waiver of a civil penalty, including a good filing history (2 AAC 50.865(a)(1)(A)(i)), a technical error at the commission (2 AAC 50.865(a)(2)), and a unique circumstance that justifies reducing or waiving the penalty (2 AAC 50.865(b)(6)).

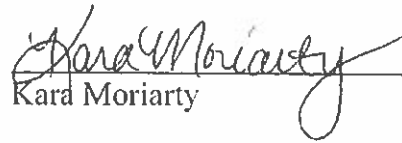
Friday into Saturday before services began to be restored." (McGuire, Sean. "Cable damage causes Southeast Alaska internet and cellphone outage, temporarily affecting state websites." *Anchorage Daily News*, 28 February 2025.) – Full article enclosed.

² *Id.*

³ Correspondence enclosed.

12. I appeal the penalty assessment and request the Commission dismiss this violation on account of the technical issues associated with the February 28, 2025, network outage.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


Kara Moriarty

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Alaska News

Cable damage causes Southeast Alaska internet and cellphone outage, temporarily affecting state websites

By Sean Maguire

Published: February 28, 2025



The Alaska State Capitol, photographed on Tuesday, Jan. 15, 2019 in Juneau. (Loren Holmes / ADN)

JUNEAU — Damage to a subsea cable led to widespread cellphone and internet outages in Southeast Alaska, and caused state government websites to go offline for much of Friday into Saturday before services began to be restored.

Service first went out late Thursday evening. A spokeswoman for Alaska Communications, a telecommunications provider based in Anchorage, said Friday afternoon that a repair ship was being dispatched.

“We are also working to find alternate ways to restore connectivity in Juneau,” said Heather Marron, a spokeswoman for Alaska Communications, at 12:30 p.m. Friday.

“This is our top priority and we deeply apologize for the inconvenience. We know how important staying connected is and we will not rest until this is fixed,” she added.

Marron said by email at 2:30 p.m. Friday that Alaska Communications was working to provide “temporary” restoration of services. Permanent repairs would take longer “as it takes time for the repair ship to get to the location and perform the fix,” she said.

By Saturday evening, Alaska Communications said in an update posted to social media that technicians and engineers had restored some capacity “to the State of Alaska to support State services.”

“They made good progress today and are continuing work to restore service to the rest of Juneau and Southeast,” the telecom provider said in Saturday’s update, adding that they “will keep working throughout the night to get service restored.”



Alaska Communications
last Friday



3/2 7:57 A.M.: We have restored a majority of services in Juneau and Southeast. You should be seeing internet and voice services working again. We continue to work on restoring remaining impacted services. If your internet service is not yet working, please power off your modem, wait 2-3 minutes and power it back on. Thank you for your patience as we worked through this event. We know how important being connected is and are deeply sorry for the extended outage. We thank our ...
[See more](#)

107

62

106

Alaska Communications expected to share another update Sunday morning unless new information emerged before then.

MyAlaska — the central online portal for Alaskans to access government services — was offline Friday. State websites were also unavailable to apply for a Permanent Fund dividend, to renew a driver's license, and to book ferry trips.

The Alaska Legislature's website was also offline Friday, along with telephone services to legislators' offices. Lawmakers and legislative staffers said that email was working intermittently during the outage.

By Saturday evening, several of the state's websites had started coming back online.

Many state government websites are run out of Juneau, which is why they were offline across the state, Marron said.

State House and Senate floor sessions and committee hearings were held as normal Friday afternoon, and streamed on KTOO-TV, which uses a different service provider.

The Juneau Police Department posted on social media to say that the outage affected the department's business lines. But 911 calls were working as normal.

Alaska Communications' infrastructure is used by other carriers, including AT&T. A spokesperson for the telecommunications giant said they were in touch with Alaska Communications as they worked to restore service.

"We appreciate the patience of our customers while this work is completed," an AT&T spokesperson said by email.

Sean Maguire

Sean Maguire is a politics and general assignment reporter for the Anchorage Daily News based in Juneau. He previously reported from Juneau for Alaska's News Source. Contact him at smaguire@adn.com.



ADVERTISEMENT

ADVERTISEMENT

Sierra Minder

From: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>
Sent: Thursday, March 6, 2025 3:44 PM
To: Nicole Reilly
Cc: Kara Moriarty; Sierra Minder
Subject: RE: AOGA January APOC Reports
Attachments: Kara Moriarty - 1st Letter.pdf; Sierra Minder - 1st Letter.pdf; CPA Appeal Affidavit.pdf; Credit Card Payment Tutorial.pdf

Importance: High

Hello Ms. Reilly,

Thank you for filing the January Lobbyist Reports for Ms. Minder and Ms. Moriarty. Due to the internet outage on February 28th, many filers could not file timely. Unfortunately, APOC staff is not authorized to offer extensions to the deadline, even when there are technical difficulties. Therefore, I am required to issue a late assessment. Attached is your late fee notice. The accrued penalty is \$30.00 for each report.

I recommend you appeal the penalties by submitting the attached appeal affidavit form. The appeal will allow me to write a staff recommendation to present to the Commission, encouraging a waiver of the late fee. Please submit one form for each lobbyist.

You have 30 days to respond by either paying the fee or appealing. If you do not respond in 30 days, the matter will be referred to the Commission for final payment. A hard copy of the letter will also be sent.

You may either pay by check or cash, or [you can pay by credit card online](#).

To find your late fee, go to this link:

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

Let me know if you have any questions.

Heather L. Dalberg
Paralegal, Lobbying Disclosure
Alaska Public Offices Commission
907.465.4864

From: Dalberg, Heather L (DOA)
Sent: Monday, March 3, 2025 1:23 PM
To: Nicole Reilly <reilly@aoga.org>
Subject: RE: AOGA January APOC Reports

Excellent. Received.

I am waiting for word from APOC's executive director on how to proceed with the late filings resulting from the outage.

Once I get instructions, I will reach out and let you know what will need to happen moving forward.

Thank you very much for your patience, and again, apologies for being unable to assist on Friday.

Heather L. Dalberg
Paralegal, Lobbying Disclosure
Alaska Public Offices Commission
907.465.4864

From: Nicole Reilly <reilly@aoga.org>
Sent: Monday, March 3, 2025 12:12 PM
To: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>
Subject: RE: AOGA January APOC Reports

Thanks, Heather. I figured it out once I called the myAlaska help line. I'm filing the reports now.

Nicole Reilly
Office & Project Manager
Alaska Oil and Gas Association
121 W. Fireweed Lane, Suite 207
Anchorage, Alaska 99503
Office: (907) 272-1481
Direct: (907) 222-9606
www.aoga.org

From: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>
Sent: Monday, March 3, 2025 10:15 AM
To: Nicole Reilly <reilly@aoga.org>
Subject: RE: AOGA January APOC Reports

Hello Nicole,

Thank you for reaching out on Friday and my apologies for only getting back to you today. If you were not aware, Juneau experienced an internet outage which affected myAlaska and my office phones, so I was unreachable.

I am back online today, so I am reaching out to everyone who was unable to file to let them know that they should now be able to submit. Please submit the reports as soon as possible.

Once the reports are in, I will let you know next steps.

Heather L. Dalberg
Paralegal, Lobbying Disclosure
Alaska Public Offices Commission
907.465.4864

From: Nicole Reilly <reilly@aoga.org>
Sent: Friday, February 28, 2025 1:47 PM
To: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>
Subject: AOGA January APOC Reports

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.

Hi Heather,

I'm sure you're aware that the myAlaska website is down. I haven't filed our January reports yet...what should I do at this point? I'm assuming the website is not going to come back online before the end of the day. I've also tried calling your office a few times and it goes straight to voicemail.

Thanks for your help.

Nicole Reilly
Office & Project Manager
Alaska Oil and Gas Association
121 W. Fireweed Lane, Suite 207
Anchorage, Alaska 99503
Office: (907) 272-1481
Direct: (907) 222-9606
www.aoga.org



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Kara Moriarty
121 W. Fireweed Lane, 207
Anchorage, AK 99503

RE: January Lobbyist Report Civil Penalty Assessment

Dear Ms. Moriarty:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 3, 2025 (3 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$30.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

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



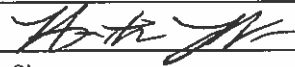
Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE:

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

Kara Moriarty
121 W. Fireweed Lane, 207
Anchorage, AK 99503
moriarty@aoga.org

☒ Email
☒ Certified
Mail



Signature

3/6/25

Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1674 72

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage	
\$	
Total Postage and Fees	
\$	

Sent To	<i>Kara Moriarty</i>	Jan 1st/1r
Street and Apt. No., or PO Box No.		
City, State, ZIP+4®		

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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:

Kara Moriarty
121 W. Fireweed Lane, 207
Anchorage, AK 99503



9590 9402 6609 1028 5115 73

2. Article Number (Transfer from service label)

9589 0710 5270 1274 1674 72

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *[Signature]* ☐ Agent ☐ Address

B. Received by (Printed Name)

Robert Erube

C. Date of Delivery

3/12/20

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

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input checked="" type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | |
| <input type="checkbox"/> all Restricted Delivery | |

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

Domestic Return Receipt

LOBBYIST REPORT FORM

COMPLETED

Signed **03/03/2025**

Year: **2025**

Report: **January**

Filer First Name: **Kara**

Filer Middle Name:

Filer Last Name: **Moriarty**

LOBBYIST INFORMATION

First Name: **Kara**

Middle Name:

Last Name: **Moriarty**

Business Name: **Alaska Oil and Gas Association**

Voter Registration District: **22K - Sand Lake**

Permanent Mailing Address: **121 W. Fireweed Lane, 207**

City, State Zip: **Anchorage, Alaska 99503**

Phone: **9073511116 9072721481**

E-mail: **moriarty@aoga.org**

Fax: **9072798114**

Legislative Mailing Address: **121 W. Fireweed Lane, 207**

City, State Zip: **Anchorage, Alaska 99503**

Phone: **9073511116 9072721481**

E-mail: **moriarty@aoga.org**

Fax: **9072798114**

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
Alaska Oil & Gas Association	Fee / Salary	\$6,713.52	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$904.84	Living	\$0.00
			Travel	\$236.20	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$6,713.52	This Report	\$1,141.04	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$6,713.52	New Total	\$1,141.04	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



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 5, 2025

Kara Moriarty
121 W. Fireweed Lane, 207
Anchorage, AK 99503
moriarty@aoga.org

Re: COMMISSION MEETING NOTICE

Ms. Moriarty:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Kara Moriarty
121 W. Fireweed Lane, 207
Anchorage, AK 99503
moriarty@aoga.org



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Ashley Reed

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

- ☒ Lobbyist Report - January¹
☐ Employer of Lobbyist
☐ Other

DUE DATE: February 28, 2025

FILED ON: March 2, 2025

DAYS LATE: 2

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: April 6, 2025

MAXIMUM STATUTORY PENALTY: \$20.00

PENALTY ASSESSED: \$20.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21095&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file his report. Based on this unique circumstance Mr. Reed requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Ashley Reed is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. Once the online filing system was accessible, Mr. Reed filed his report on March 2, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

This is Ashley Reed's first late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

Dalberg, Heather L (DOA)

From: Ashley Reed <ashleyreed1955@icloud.com>
Sent: Sunday, April 6, 2025 6:42 AM
To: Dalberg, Heather L (DOA)
Subject: Fwd: APOC - Appeal Affidavit Reminder
Attachments: Ashley Reed - 1st Letter.pdf; CPA Appeal Affidavit.pdf; Credit Card Payment Tutorial.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.

Dear APOC COMMISSION:

This correspondence is intended to suffice for a waiver of a fine related to last month's report filing. My report was late due to circumstances beyond my control — the internet outage made it impossible to be timely and compliant. My report was submitted within hours of the Internet coming on line. I trust the Commission understands. Thank you .

Ashley Reed
907-229-4049



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Ashley Reed
813 D Street, Suite 200
Anchorage, AK 99501

RE: January Lobbyist Report Civil Penalty Assessment

Dear Mr. Reed:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 2, 2025 (2 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$20.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

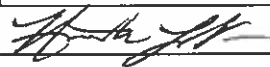
A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Ashley Reed 813 D Street, Suite 200 Anchorage, AK 99501 ashleyreed1955@icloud.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

	3/6/25
Signature	Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1674 96

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee
\$

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage
\$

Total Postage and Fees
\$

Sent To
Ashley Reed

Jan
1st. ltr.

Street and Apt. No., or PO Box No.


City, State, ZIP+4®

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

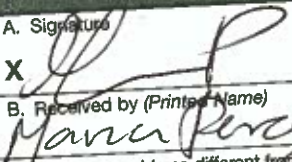
■ Complete items 1, 2, and 3.
■ Print your name and address on the reverse so that we can return the card to you.
■ Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
Ashley Reed
813 D Street, Ste 200
Anchorage, AK 99501


9590 9402 6609 1028 5115 59

2. Article Number (Transfer from service label)
9589 0710 5270 1274 1674 96

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X 

☐ Agent
☐ Addressee

B. Received by (Printed Name)
Maurice Perry

C. Date of Delivery
3/12/25

D. Is delivery address different from item 1?
If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type
☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail

☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

mail Restricted Delivery
0)

Domestic Return Receipt

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

LOBBYIST REPORT FORM

COMPLETED

Signed **03/02/2025**

Year: **2025**

Report: **January**

Filer First Name: **Ashley**

Filer Middle Name:

Filer Last Name: **Reed**

LOBBYIST INFORMATION

First Name: **Ashley**

Middle Name:

Last Name: **Reed**

Business Name: **Ashley Reed & Associates**

Voter Registration District: **21K - West Anchorage**

Permanent Mailing Address: **813 D Street, Suite 200**

City, State Zip: **Anchorage, Alaska 99501**

Phone: **9072794049**

E-mail: **ashleyreed1955@icloud.com**

Fax:

Legislative Mailing Address: **813 D Street, Suite 200**

City, State Zip: **Anchorage, Alaska 99501**

Phone: **9072294049**

E-mail: **ashleyreed1955@icloud.com**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
Juneau Hydropower Inc.	Fee / Salary	\$3,000.00	Food / Beverage	\$0.00	Food / Beverage	\$110.00
	Other	\$0.00	Living	\$0.00	Living	\$100.00
			Travel	\$0.00	Travel	\$105.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$3,000.00	This Report	\$0.00	This Report	\$315.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$3,000.00	New Total	\$0.00	New Total	\$315.00
Wells Fargo & Co.	Fee / Salary	\$2,720.00	Food / Beverage	\$0.00	Food / Beverage	\$115.00
	Other	\$0.00	Living	\$0.00	Living	\$100.00
			Travel	\$0.00	Travel	\$100.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$2,720.00	This Report	\$0.00	This Report	\$315.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$2,720.00	New Total	\$0.00	New Total	\$315.00
ENSTAR Natural Gas	Fee / Salary	\$5,000.00	Food / Beverage	\$0.00	Food / Beverage	\$211.00
	Other	\$0.00	Living	\$0.00	Living	\$250.00
			Travel	\$0.00	Travel	\$247.00
			Other	\$0.00		



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

June 5, 2025

Ashley Reed
813 D Street, Suite 200
Anchorage, AK 99501
ashleyreed1955@icloud.com

Re: COMMISSION MEETING NOTICE

Mr. Reed:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Ashley Reed
813 D Street, Suite 200
Anchorage, AK 99501
ashleyreed1955@icloud.com



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg **DATE:** June 5, 2025

RESPONDENT: Miguel Rohrbacher

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

- ☒ Lobbyist Report - January¹
☐ Employer of Lobbyist
☐ Other

DUE DATE: February 28, 2025

FILED ON: March 1, 2025

DAYS LATE: 1

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 26, 2025

MAXIMUM STATUTORY PENALTY: \$10.00

PENALTY ASSESSED: \$10.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21093&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file his report. Based on this unique circumstance Mr. Rohrbacher requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Miguel Rohrbacher is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. Mr. Rohrbacher went to the Juneau APOC office on February 28, 2025, at 12:01 pm to alert staff of the outage and the website being down. Once the online filing system was accessible, Mr. Rohrbacher filed his report on March 1, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Miguel Rohrbacher has been a registered lobbyist since 2023. This is his first late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 26 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer): Miguel Rohrbacher

Employer (if a lobbyist): Alaska Public Employees Association

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

☒
☐

Lobbyist Report for January (month or quarter)
Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

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

On Friday February 28, I attempted to submit my January 2025 monthly lobbyist report via the APOC website. Due to an areawide internet outage affecting Juneau I was undable to do so. I went in person to the Juneau APOC office at 240 Main Street and was told by Heather Dahlberg that there was not a way to submit a paper report.

I was advised by Ms. Dahlberg that I should file my report as soon as internet was restored, but that I would be assessed a late fee, and that I would be able to appeal.

As soon as internet was restored I submitted my report on Saturday March 1 2025. I respectfully request that the Commission uses it's discretion to not assess a late fee due to the extenuating circumstances.

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: Miguel Rohrbacher

Type/Print Signer's Name: Miguel Rohrbacher



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Miguel Rohrbacher
151 3rd Street
Juneau, AK 99801

RE: January Lobbyist Report Civil Penalty Assessment

Dear Mr. Rohrbacher:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 1, 2025 (1 day late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$10.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

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



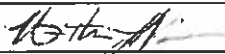
Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE:

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

Miguel Rohrbacher
151 3rd Street
Juneau, AK 99801
mrohrbacher@apea-aft.org

☒ Email
☒ Certified Mail



Signature


3/6/15

Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1673 97

U.S. Postal Service CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®	
OFFICIAL USE	
Certified Mail Fee \$ _____	Postmark Here
Extra Services & Fees (check box, add fee as appropriate) <input type="checkbox"/> Return Receipt (hardcopy) \$ _____ <input type="checkbox"/> Return Receipt (electronic) \$ _____ <input type="checkbox"/> Certified Mail Restricted Delivery \$ _____ <input type="checkbox"/> Adult Signature Required \$ _____ <input type="checkbox"/> Adult Signature Restricted Delivery \$ _____	
Postage \$ _____	
Total Postage and Fees \$ _____	
Sent To <u>M. Rohrbacher</u> <u>Jag. 1st ltr.</u> Street and Apt. No., or PO Box No. _____ City, State, ZIP+4® _____	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION <ul style="list-style-type: none"> ■ 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: <u>M. Rohrbacher</u> <u>151 3rd St.</u> <u>Tuneau, AK 99801</u> <div style="text-align: center;">  9590 9402 6609 1028 5117 02 </div> 2. Article Number (Transfer from service label) <u>9589 0710 5270 1274 1673 97</u>	COMPLETE THIS SECTION ON DELIVERY A. Signature <input checked="" type="checkbox"/> <u>Patrice Deas</u> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee B. Received by (Printed Name) <u>Patrice Deas</u> C. Date of Delivery <u>3/13/25</u> D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No 3. Service Type <input type="checkbox"/> Adult Signature <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail™ <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Mail Restricted Delivery (00)
---	--

Domestic Return Receipt

LOBBYIST REPORT FORM

COMPLETED

Signed **03/01/2025**

Year: **2025**

Report: **January**

Filer First Name: **miguel**

Filer Middle Name:

Filer Last Name: **rohrbacher**

LOBBYIST INFORMATION

First Name: **Miguel**

Middle Name: **Gonzales**

Last Name: **Rohrbacher**

Business Name:

Voter Registration District: **4B - Downtown Juneau/Douglas/Juneau Airport**

Permanent Mailing Address: **151 3rd Street**

City, State Zip: **Juneau, Alaska 99801**

Phone: **907-321-5064**

E-mail: **mrohrbacher@apea-aft.org**

Fax:

Legislative Mailing Address: **151 3rd Street**

City, State Zip: **Juneau, Alaska 99801**

Phone: **907-321-5064**

E-mail: **mrohrbacher@apea-aft.org**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
APEA/AFT	Fee / Salary	\$7,795.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$7,795.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$7,795.00	New Total	\$0.00	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



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 5, 2025

Miguel Rohrbacher
151 3rd Street
Juneau, AK 99801
mrohrbacher@apea-aft.org

Re: COMMISSION MEETING NOTICE

Mr. Rohrbacher:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Miguel Rohrbacher
151 3rd Street
Juneau, AK 99801
mrohrbacher@apea-aft.org



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Caroline Schultz

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 2, 2025

DAYS LATE: 2

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 18, 2025

MAXIMUM STATUTORY PENALTY: \$20.00

PENALTY ASSESSED: \$20.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=211028&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file her report. Based on this unique circumstance Ms. Schultz requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Caroline Schultz is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Ms. Schultz reached out via email on February 28, 2025, at 11:50 am to alert staff of the outage and the website being down. She followed up at 3:54 pm with an email containing the report information. Once the online filing system was accessible, Ms. Schultz filed her report on March 2, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Caroline Schultz has been a registered lobbyist since 2022. This is her first late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

ARRIVED

MAR 18 2025

APOC JUNEAU
PM HC FAX EM

Name of Appellant

(Lobbyist or Employer): Caroline Schultz

Employer (if a lobbyist): ConocoPhillips Alaska, Inc.

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

- ☒ Lobbyist Report for: January 2025 (month or quarter)
☐ Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

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

See attachment

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: CSchultz 3/17/2025

Type/Print Signer's Name: Caroline Schultz

AFFIDAVIT OF CAROLINE B. SCHULTZ

STATE OF ALASKA)
) ss.
FIRST JUDICIAL DISTRICT)

I, Caroline B. Schultz, being first duly sworn upon oath, depose and state as follows:

1. I have personal knowledge of the matters stated herein and, if called as a witness, I could and would testify competently to the matters stated herein.
2. I have been a registered lobbyist for ConocoPhillips Alaska, Inc. since March 23, 2022.
3. I have a good filing history, and no late filings in the previous 5 years.
4. The January lobbyist report was due by midnight on Friday, February 28, 2025.
5. As far as I am aware, the only way to submit a lobbyist report is electronically through the Alaska Public Offices Commission (APOC) Insight Online Filing System, which is part of the MyAlaska suite of services.
6. There was an internet and cellphone outage in Juneau that began on Thursday, February 27, 2025 and lasted through the weekend.

7. I had access to the internet on Friday, February 28, 2025, but I was unable to log in to the APOC Insight Online Filing System or any other MyAlaska service.

8. It was reported in the *Anchorage Daily News* that MyAlaska was offline statewide¹.

9. On Friday, February 28, 2025, I emailed Heather Dalberg, APOC Paralegal, to inform her that I was unable to access MyAlaska and file my January lobbyist report.

10. My February 28, 2025 email to Ms. Dalberg included the information I would have filed that day had I been able to access MyAlaska and the APOC Insight system².

11. I attempted again to file on the morning of Saturday, March 1, 2025 but MyAlaska was still nonfunctional.

12. I successfully filed my January lobbyist report on Sunday, March 2, 2025.

13. 2 AAC 50.865 lists mitigating factors that may lead to the reduction or waiver of a civil penalty, including a good filing history (2 AAC 50.865(a)(1)(A)(i)), a

¹As reported in the Anchorage Daily News, "Damage to a subsea cable let to widespread cellphone and internet outages in Southeast Alaska, and caused state government websites to go offline for much of Friday into Saturday before services began to be restored... MyAlaska – the central online portal for Alaskans to access government services – was offline Friday." (McGuire, Sean. "Cable damage causes Southeast Alaska internet and cellphone outage, temporarily affecting state websites." *Anchorage Daily News*, 28 February 2025.) – Full article enclosed.

² Correspondence enclosed.

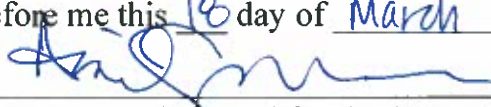
technical error at the commission (2 AAC 50.865(a)(2)), and a unique circumstance that justifies reducing or waiving the penalty (2 AAC 50.865(b)(6)).

14. I appeal the penalty assessment and request the Commission dismiss this violation on account of the technical issues associated with the February 28, 2025 network outage.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


Caroline B. Schultz

SUBSCRIBED and SWORN to before me this 18 day of March, 2025.


Notary Public in and for the State of Alaska
My Commission Expires: 12/25/2028



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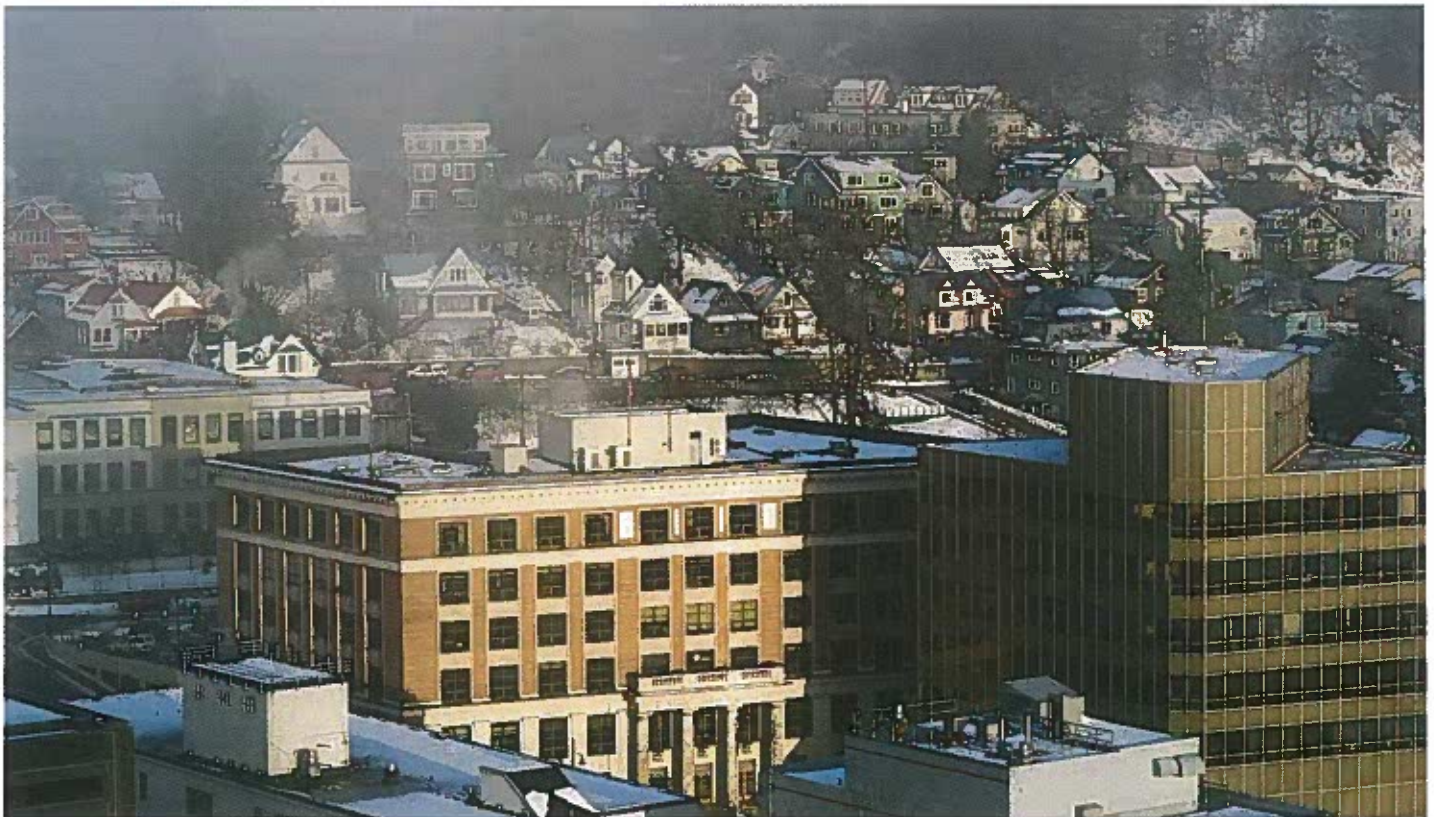
ADVERTISEMENT

Alaska News

Cable damage causes Southeast Alaska internet and cellphone outage, temporarily affecting state websites

By Sean Maguire

Published: February 28, 2025



JUNEAU — Damage to a subsea cable led to widespread cellphone and internet outages in Southeast Alaska, and caused state government websites to go offline for much of Friday into Saturday before services began to be restored.

Service first went out late Thursday evening. A spokeswoman for Alaska Communications, a telecommunications provider based in Anchorage, said Friday afternoon that a repair ship was being dispatched.

“We are also working to find alternate ways to restore connectivity in Juneau,” said Heather Marron, a spokeswoman for Alaska Communications, at 12:30 p.m. Friday.

“This is our top priority and we deeply apologize for the inconvenience. We know how important staying connected is and we will not rest until this is fixed,” she added.

Marron said by email at 2:30 p.m. Friday that Alaska Communications was working to provide “temporary” restoration of services. Permanent repairs would take longer “as it takes time for the repair ship to get to the location and perform the fix,” she said.

By Saturday evening, Alaska Communications said in an update posted to social media that technicians and engineers had restored some capacity “to the State of Alaska to support State services.”

“They made good progress today and are continuing work to restore service to the rest of Juneau and Southeast,” the telecom provider said in Saturday’s update, adding that they “will keep working throughout the night to get service restored.”



Alaska Communications

last Friday



3/2 7:57 A.M.: We have restored a majority of services in Juneau and Southeast. You should be seeing internet and voice services working again. We continue to work on restoring remaining impacted services. If your internet service is not yet working, please power off your modem, wait 2-3 minutes and power it back on. Thank you for your patience as we worked through this event. We know how important being connected is and are deeply sorry for the extended outage. We thank our ...

[See more](#)

107

62

106

Alaska Communications expected to share another update Sunday morning unless new information emerged before then.

MyAlaska — the central online portal for Alaskans to access government services — was offline Friday. State websites were also unavailable to apply for a Permanent Fund dividend, to renew a driver's license, and to book ferry trips.

The Alaska Legislature's website was also offline Friday, along with telephone services to legislators' offices. Lawmakers and legislative staffers said that email was working intermittently during the outage.

By Saturday evening, several of the state's websites had started coming back online.

Many state government websites are run out of Juneau, which is why they were offline across the state, Marron said.

State House and Senate floor sessions and committee hearings were held as normal Friday afternoon, and streamed on KTOO-TV, which uses a different service provider.

The Juneau Police Department posted on social media to say that the outage affected the department's business lines. But 911 calls were working as normal.

Alaska Communications' infrastructure is used by other carriers, including AT&T. A spokesperson for the telecommunications giant said they were in touch with Alaska Communications as they worked to restore service.

"We appreciate the patience of our customers while this work is completed," an AT&T spokesperson said by email.

Sean Maguire

Sean Maguire is a politics and general assignment reporter for the Anchorage Daily News based in Juneau. He previously reported from Juneau for Alaska's News Source. Contact him at smaguire@adn.com.



ADVERTISEMENT

ADVERTISEMENT



[EXTERNAL]APOC - Late Fee Notice & Appeal Affidavit

From Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>

Date Thu 3/6/2025 3:39 PM

To Schultz, Caroline <Caroline.Schultz@conocophillips.com>

📎 3 attachments (741 KB)

Caroline Schultz - 1st Letter.pdf; CPA Appeal Affidavit.pdf; Credit Card Payment Tutorial.pdf;

Hello Ms. Schultz,

Thank you for filing your January Lobbyist Report. Due to the internet outage on February 28th, many filers could not file timely. Unfortunately, APOC staff is not authorized to offer extensions to the deadline, even when there are technical difficulties. Therefore, I am required to issue a late assessment. Attached is your late fee notice. The accrued penalty is \$20.00.

I recommend you appeal the penalty by submitting the attached appeal affidavit form. The appeal will allow me to write a staff recommendation to present to the Commission, encouraging a waiver of the late fee.

You have 30 days to respond by either paying the fee or appealing. If you do not respond in 30 days, the matter will be referred to the Commission for final payment. A hard copy of the letter will also be sent.

You may either pay by check or cash, or [you can pay by credit card online.](#)

To find your late fee, go to this link:

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

Let me know if you have any questions.

Heather L. Dalberg

Paralegal, Lobbying Disclosure
Alaska Public Offices Commission
907.465.4864

From: Dalberg, Heather L (DOA)

Sent: Monday, March 3, 2025 10:15 AM

To: Schultz, Caroline <Caroline.Schultz@conocophillips.com>

Subject: RE: [EXTERNAL]APOC - January Lobbyist Report Due Tomorrow, Friday, February 28th

Hello Caroline,

Thank you for reaching out on Friday and my apologies for only getting back to you today. As you know, Juneau experienced an internet outage which affected myAlaska and my office phones, so I was unreachable.

I am back online today, so I am reaching out to everyone who was unable to file to let them know that I am waiting for word from APOC's executive director on how to proceed with the late filings resulting from the outage.

Once I get instructions, I will reach out and let you know what will need to happen moving forward.

Thank you very much for your patience, and again, apologies for being unable to assist on Friday.

Heather L. Dalberg

Paralegal, Lobbying Disclosure
Alaska Public Offices Commission
907.465.4864

From: Schultz, Caroline <Caroline.Schultz@conocophillips.com>

Sent: Friday, February 28, 2025 3:54 PM

To: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>

Subject: Re: [EXTERNAL]APOC - January Lobbyist Report Due Tomorrow, Friday, February 28th

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.

Good afternoon Heather,

Due to the ACS outage, MyAlaska and the APOC lobbying filing website are down and I am currently unable to complete my January 2025 lobbying report.

In the public interest, I have attached and copied below the information that I would submit on the form if it were available. I hope that this attempt is taken into consideration if I am assessed a fine for late filing due to the outage.

Thank you for your patience, and I hope that the internet outage is resolved soon! I will try to file before midnight, or as soon as possible.

Thank you,
Caroline

Lobbyist Report Form - January 2025

Report Year	2025
Reporting As	Caroline Schultz
Report	January
Lobbyist information	
No changes	
Gifts and Exchanges	
Did you give one or more legislators or legislative employees tickets or donations to charity events?	
No	
Did you give one or more legislators or legislative employees compassionate gifts as defined in AS 24.60.075?	
No	
Did you present a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period?	
No	
Did you have any exchange of more than \$100 in value of money, goods, or services with any public official or member of the immediate family of a public official?	
No	
Did you have any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?	
No	

Total gifts	\$0
Notice of termination	N/A
Schedule A	
Reimbursible Expenses	
Food/Beverage	\$1,053
Living Accomodations	\$3,200
Travel	\$878
Other	\$250
Subtotal	\$5,381
Nonreimbursible Expenses	
Food/Beverage	\$0
Living Accomodations	\$0
Travel	\$0
Compensation	\$315
Total	\$5,696
Schedule A-1	
No food/beverage	\$0
Signed	Caroline Schultz
	2/28/2025

From: Dalberg, Heather L (DOA) <heather.dalberg@alaska.gov>

Sent: Thursday, February 27, 2025 9:39 AM

Subject: [EXTERNAL]APOC - January Lobbyist Report Due Tomorrow, Friday, February 28th

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

TO: Lobbyists

FROM: Heather Dalberg, Paralegal II, APOC

DATE: February 27, 2025

RE: January Lobbyist Report Due Tomorrow, Friday, February 28th

The 2025 January Lobbyist Report is due by **midnight tomorrow, Friday, February 28th**.

If you are receiving this reminder, it means that your report is not filed. If you believe your report was already filed, please check or contact me to confirm. Remember, you do not have to wait until the last day to file your report.

Please Note: This report covers January activity.

If you need any assistance, please do not hesitate to call me. The link to sign in can be found [here](#).

Heather L. Dalberg

Paralegal, Lobbying Disclosure
Alaska Public Offices Commission
907.465.4864



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Caroline Schultz
700 G St ATO 1920
Anchorage, AK 99501

RE: January Lobbyist Report Civil Penalty Assessment

Dear Ms. Schultz:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 2, 2025 (2 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$20.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

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



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE:

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

Caroline Schultz
700 G St ATO 1920
Anchorage, AK 99501
caroline.schultz@conocophillips.com

☒ Email
☒ Certified
Mail



Signature

3/6/25

Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1674 27

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postage	
\$	
Total Postage and Fees	
\$	

Sent To	Caroline Schultz	Jan 1st 11r
Street and Apt. No., or PO Box No.		
City, State, ZIP+4®		

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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:

Caroline Schultz
200 G St ATO1920
Anchorage, AK 99501



9590 9402 6609 1028 5116 72

2. Article Number (Transfer from service label)

9589 0710 5270 1274 1674 27

COMPLETE THIS SECTION ON DELIVERY

A. Signature	<input type="checkbox"/> Agent
B. Received by (Printed Name)	<input type="checkbox"/> Addressee
C. Date of Delivery	
D. Is delivery address different from item 1? <input type="checkbox"/> Yes	
If YES, enter delivery address below: <input type="checkbox"/> No	

3. Service Type	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Collect on Delivery Restricted Delivery	
all Restricted Delivery	

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

Domestic Return Receipt

LOBBYIST REPORT FORM

COMPLETED

Signed **03/02/2025**

Year: **2025**

Report: **January**

Filer First Name: **Ben**

Filer Middle Name:

Filer Last Name: **Stevens**

LOBBYIST INFORMATION

First Name: **Caroline**

Middle Name: **Blake**

Last Name: **Schultz**

Business Name:

Voter Registration District: **17I - Downtown Anchorage**

Permanent Mailing Address: **700 G St ATO 1920**

City, State Zip: **Anchorage, Alaska 99501**

Phone: **19073605835**

E-mail: **caroline.schultz@conocophillips.com**

Fax:

Legislative Mailing Address: **235 2nd St**

City, State Zip: **Juneau, Alaska 99801**

Phone: **19073605835**

E-mail: **caroline.schultz@conocophillips.com**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
ConocoPhillips Alaska, Inc.	Fee / Salary	\$315.00	Food / Beverage	\$1,053.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$3,200.00	Living	\$0.00
			Travel	\$878.00	Travel	\$0.00
			Other	\$250.00		
			APOC lobbyist registration fee			
	Totals		Totals		Totals	
	This Report	\$315.00	This Report	\$5,381.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$315.00	New Total	\$5,381.00	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



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 5, 2025

Caroline Schultz
700 G St ATO 1920
Anchorage, AK 99501
caroline.schultz@conocophillips.com

Re: COMMISSION MEETING NOTICE

Ms. Schultz:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Caroline Schultz
700 G St ATO 1920
Anchorage, AK 99501
caroline.schultz@conocophillips.com



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: John Stacey

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 3, 2025

DAYS LATE: 3

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 31, 2025

MAXIMUM STATUTORY PENALTY: \$30.00

PENALTY ASSESSED: \$30.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21114&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file his report. Based on this unique circumstance Mr. Stacey requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, John Stacey is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Mr. Stacey called on February 28, 2025, at 12:35 pm to alert staff of the outage and the website being down. Once the online filing system was accessible, Mr. Stacey filed his report on March 3, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

John Stacey has been a registered lobbyist since 2012. This is his first late filing since April of 2023.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 31 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer): John Thoralf Stacey

Employer (if a lobbyist): self

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

- ☒ Lobbyist Report for January, 2025 (month or quarter)
☐ Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

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

I was unable to file my report in a timely by the deadline because the state's website went down due to an internet outage caused by a damaged undersea cable.

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:  3/31/2025

Type/Print Signer's Name: John T Stacey



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

John Stacey
PO Box 211231
Auke Bay, AK 99821

RE: January Lobbyist Report Civil Penalty Assessment

Dear Mr. Stacey:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 3, 2025 (3 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$30.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

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



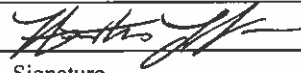
Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

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 Stacey
PO Box 211231
Auke Bay, AK 99821
thorstacey@gmail.com

☒ Email
☒ Certified
Mail



Signature

3/6/25

Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1675 40


U.S. Postal Service [™]	
CERTIFIED MAIL [®] RECEIPT	
Domestic Mail Only	
For delivery information, visit our website at www.usps.com .	
OFFICIAL USE	
Certified Mail Fee \$	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
Total Postage and Fees \$	
Sent To <u>John Stacey</u> JAN 13 11	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4 [®]	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

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 Stacey
PO Box 211231
Auke Bay, AK 99821



9590 9402 6609 1028 5115 28

2. Article Number (Transfer from service label)

9589 0710 5270 1274 1675 40

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [Signature] ☐ Agent ☒ Addressee

B. Received by (Printed Name)
Ana Wohlhueter

C. Date of Delivery
3/14/25

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

3. Service Type

<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express [®]
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail [™]
<input checked="" type="checkbox"/> Certified Mail [®]	<input type="checkbox"/> Registered Mail Restricted Delivery
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation [™]
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery
<input type="checkbox"/> Collect on Delivery Restricted Delivery	

LOBBYIST REPORT FORM

COMPLETED

Signed **03/03/2025**

Year: **2025**

Report: **January**

Filer First Name: **JOHN**

Filer Middle Name: **T**

Filer Last Name: **STACEY**

LOBBYIST INFORMATION

First Name: **JOHN**

Middle Name: **T**

Last Name: **STACEY**

Business Name: **Thor Stacey and Associates**

Voter Registration District: **34Q - Mendenhall Valley**

Permanent Mailing Address: **PO Box 211231**

City, State Zip: **Auke Bay, Alaska 99821**

Phone: **907-723-1494 907 723 1494**

E-mail: **thorstacey@gmail.com**

Fax:

Legislative Mailing Address: **PO Box 211231**

City, State Zip: **Auke Bay, Alaska 99821**

Phone:

E-mail: **thorstacey@gmail.com**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
HEX	No Activity		No Activity		No Activity	
	Totals		Totals		Totals	
	This Report	\$0.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$0.00	New Total	\$0.00	New Total	\$0.00
Alaska Professional Hunters Association, Inc.	Fee / Salary	\$7,000.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$7,000.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$7,000.00	New Total	\$0.00	New Total	\$0.00
National Federation of Independent Business	Fee / Salary	\$2,800.00	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$2,800.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$2,800.00	New Total	\$0.00	New Total	\$0.00



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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Fax: 907.276.7018
www.doa.alaska.gov/apoc

June 5, 2025

John Stacey
PO Box 211231
Auke Bay, AK 99821
thorstacey@gmail.com

Re: COMMISSION MEETING NOTICE

Mr. Stacey:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

John Stacey
PO Box 211231
Auke Bay, AK 99821
thorstacey@gmail.com



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Miranda Strong

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 3, 2025

DAYS LATE: 3

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 14, 2025

MAXIMUM STATUTORY PENALTY: \$30.00

PENALTY ASSESSED: \$30.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21106&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file her report. Based on this unique circumstance Ms. Strong requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Miranda Strong is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Ms. Strong called on February 28, 2025, at 3:15 pm to alert staff of the outage and the website being down. Once the online filing system was accessible, Ms. Strong filed her report on March 3, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Meghan Clemens has been a registered lobbyist since 2022. This is her second late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 14 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit

AS 24.45 Alaska Lobbying Law

Name of Appellant Miranda Strong
(Lobbyist or Employer):

Employer (if a lobbyist): Calista Corporation

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

☒
☐

Lobbyist Report for January (month or quarter)
Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

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

I was not able to file by the February 28, 2025 deadline due to the internet outage affecting the State of Alaska website. I filed as soon as the website was working.

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:  3.14.2025

Type/Print Signer's Name: Miranda Strong



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Miranda Strong
2528 Winter Ridge Ct
Anchorage, AK 99507

RE: January Lobbyist Report Civil Penalty Assessment

Dear Ms. Strong:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 3, 2025 (3 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$30.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

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



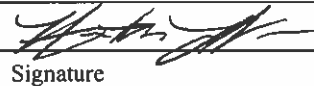
Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE:

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

Miranda Strong
2528 Winter Ridge Ct
Anchorage, AK 99507
mstrong@calistacorp.com

☒ Email
☒ Certified
Mail


Signature

3/6/25
Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1674 65

U.S. Postal Service[™]
CERTIFIED MAIL[®] RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com[®].

OFFICIAL USE

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$ _____
☐ Return Receipt (electronic) \$ _____
☐ Certified Mail Restricted Delivery \$ _____
☐ Adult Signature Required \$ _____
☐ Adult Signature Restricted Delivery \$ _____

Postage

\$

Total Postage and Fees

\$

Sent To

Miranda Strong

Jan
1st 11:20

Street and Apt. No., or PO Box No.

2528 Winter Ridge Ct

City, State, ZIP+4[®]

Anchorage, AK 99507

PS Form 3800, January 2023 PSN 7530-02-000-9047

See Reverse for Instructions

LOBBYIST REPORT FORM

COMPLETED

Signed **03/03/2025**

Year: **2025**

Report: **January**

Filer First Name: **Miranda**

Filer Middle Name: **L**

Filer Last Name: **Strong**

LOBBYIST INFORMATION

First Name: **Miranda**

Middle Name: **L**

Last Name: **Strong**

Business Name:

Voter Registration District: **17I - University**

Permanent Mailing Address: **2528 Winter Ridge Ct**

City, State Zip: **Anchorage, Alaska 99507**

Phone: **9077447454**

E-mail: **mstrong@calistacorp.com**

Fax:

Legislative Mailing Address: **2528 Winter Ridge Ct**

City, State Zip: **Anchorage, Alaska 99507**

Phone: **9077447454**

E-mail: **mstrong@calistacorp.com**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
Calista Corporation	No Activity		No Activity		No Activity	
	Totals		Totals		Totals	
	This Report	\$0.00	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$0.00	New Total	\$0.00	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



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 5, 2025

Miranda Strong
2528 Winter Ridge Ct
Anchorage, AK 99507
mstrong@calisacorp.com

Re: COMMISSION MEETING NOTICE

Ms. Strong:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Miranda Strong
2528 Winter Ridge Ct
Anchorage, AK 99507
mstrong@calisacorp.com



Paralegal II

6/5/25

Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Sarah Sumadi

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 3, 2025

DAYS LATE: 3

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: March 11, 2025

MAXIMUM STATUTORY PENALTY: \$30.00

PENALTY ASSESSED: \$30.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21076&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file her report. Based on this unique circumstance Ms. Sumadi requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Sarah Sumadi is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Ms. Sumadi reached out via email on February 28, 2025, at 12:24 pm and called at 9:44 am to alert staff of the outage and the website being down. Once the online filing system was accessible, Ms. Sumadi filed her report on March 3, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Sarah Sumadi has been a registered lobbyist since 2021. This is her first late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

MAR 11 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit
AS 24.45 Alaska Lobbying Law

Name of Appellant Sarah Sumadi
(Lobbyist or Employer): _____

Employer (if a lobbyist): Everytown for Gun Safety Action Fund

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

- ☒ Lobbyist Report for January _____ (month or quarter)
☐ Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

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

The January 2025 lobbyist activity report for Sarah Sumadi could not be timely filed due to a system-wide MyAlaska services outage on February 28, 2025 that prevented access to the electronic lobbying filing portal. The civil penalty should not be assessed since efforts were made to timely file this report and to seek assistance from APOC to timely file.

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: 3/7/2025

Type/Print Signer's Name: Sarah Sumadi



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Sarah Sumadi
PO Box 4184
New York, NY 10163

RE: January Lobbyist Report Civil Penalty Assessment

Dear Ms. Sumadi:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 3, 2025 (3 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$30.00.²

You have a number of options in this matter:

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- 2) Alternatively, you have the right to appeal staff's conclusion that a violation has occurred or the penalty amount assessed.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

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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.

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



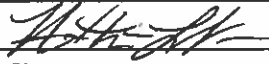
Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE:

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

Sarah Sumadi
PO Box 4184
New York, NY 10163
registrationcompliance@venable.com

☒ Email
☒ Certified
Mail



Signature

3/6/25

Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1674 58

U.S. Postal Service CERTIFIED MAIL® RECEIPT Domestic Mail Only	
For delivery information, visit our website at www.usps.com ®.	
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Certified Mail Fee \$	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
Total Postage and Fees \$	
Sent To <u>Sarah Sumad,</u> Jan. 1st 11c	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4®	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> 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. 	<p>A. Signature <u>[Signature]</u> <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <u>PHILIP LANGO</u> C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input type="checkbox"/> No If YES, enter delivery address below: <u>4184</u></p>
<p>1. Article Addressed to: <u>Sarah Sumad:</u> <u>PO Box 4184</u> <u>New York, NY 10163</u></p>	<p>3. Service Type</p> <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery </div> <div> <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery </div> </div>
<p>2. Article Number (Transfer from service label) <u>9589 0710 5270 1274 1674 58</u></p>	<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>

Domestic Return Receipt

LOBBYIST REPORT FORM

COMPLETED

Signed **03/03/2025**

Year: **2025**

Report: **January**

Filer First Name: **Sarah**

Filer Middle Name:

Filer Last Name: **Sumadi**

LOBBYIST INFORMATION

First Name: **Sarah**

Middle Name:

Last Name: **Sumadi**

Business Name:

Voter Registration District: **Out of state**

Permanent Mailing Address: **P.O. Box 4184**

City, State Zip: **New York, New York 10163**

Phone: **(646) 324-8250**

E-mail: **registrationcompliance@venable.com**

Fax:

Legislative Mailing Address: **P.O. Box 4184**

City, State Zip: **New York, New York 10163**

Phone: **(646) 324-8250**

E-mail: **registrationcompliance@venable.com**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

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Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
Everytown for Gun Safety Action Fund	Fee / Salary	\$79.38	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$79.38	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$79.38	New Total	\$0.00	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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Fax: 907.276.7018
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June 5, 2025

Sarah Sumadi
PO Box 4184
New York, NY 10163
registrationcompliance@venable.com

Re: COMMISSION MEETING NOTICE

Ms. Sumadi:

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You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Sarah Sumadi

PO Box 4184

New York, NY 10163

registrationcompliance@venable.com



Paralegal II

6/5/25 Date



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

PREPARED BY: Heather Dalberg

DATE: June 5, 2025

RESPONDENT: Michael Zimmer

CIVIL PENALTY

ASSESSED UNDER: ☒ Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports

☒ Lobbyist Report - January¹

☐ Employer of Lobbyist

☐ Other

DUE DATE: February 28, 2025

FILED ON: March 3, 2025

DAYS LATE: 3

DATE PENALTY ASSESSMENT SENT: March 6, 2025

CPA APPEAL RECEIVED: April 4, 2025

MAXIMUM STATUTORY PENALTY: \$30.00

PENALTY ASSESSED: \$30.00

RECOMMENDATION: Waive

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

BACKGROUND

On Thursday, February 27, 2025, following damage to a subsea fiber cable, Southeast Alaska, particularly Juneau, experienced widespread internet and phone outages. This disruption impacted state of Alaska websites, including APOC's online filing system, and phones. Services were restored on Sunday, March 2, 2025.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=21112&ViewType=LOQM>

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to the internet and phone outage, affiant was unable to timely file his report. Based on this unique circumstance Mr. Zimmer requests a waiver of the penalty.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered lobbyist, Michael Zimmer is required to file lobbyist reports monthly while the legislature is in session.² The report at issue was due on February 28, 2025.

The outage affected people who received internet and cell phone services from ACS and AT&T, creating a communication blackout until the late evening of March 1, 2025. The outage also affected the state of Alaska websites, and all filers were also unable to access the online filing system to submit reports. On Monday, March 3, 2025, APOC staff tracked all the communication attempts from filers during the outage. Mr. Zimmer reached out via email on February 28, 2025, at 5:53 am to alert staff of the outage and the website being down. Once the online filing system was accessible, Mr. Zimmer filed his report on March 3, 2025.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver for a unique circumstance.³ Here, the internet outage precluded the filer from accessing the online filing system on and immediately before the due date. Based on this unique circumstance, APOC staff recommends a full waiver of the associated penalty.

FILER'S REPORTING HISTORY:

Michael Zimmer has been a registered lobbyist since January of 2025. This is his first late filing.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends the penalty be waived based on the filer's good filing history and a unique circumstance.

² AS 24.45.081

³ 2 AAC 50.865(b)(6)

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.⁴ **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.⁵ **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.⁶ **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 or submit the statement timely. **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)**
- ☐ Reliance on filer's own staff to remind him or her of the filing deadline. **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)**

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ 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.

⁶ 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.

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.⁷ **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 _____ to _____**
- ☐ **Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

ARRIVED

APR 04 2025

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit
AS 24.45 Alaska Lobbying Law

Name of Appellant Michael Zimmer
(Lobbyist or Employer): _____

Employer (if a lobbyist): World Education Services _____

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

- ☒ Lobbyist Report for January _____ (month or quarter)
☐ Employer of Lobbyist Report for _____ (quarter)

Specify Year: 2025 _____

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 and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

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 AS 24.45, the Alaska Lobbying Law.

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

Dear Alaska Public Offices Commission,

I am respectfully requesting a waiver of the civil penalty and removal of the violation record tied to my late filing. The delay was caused by my inability to access the APOC filing portal from February 28 to March 3, 2025. As confirmed in your March 6, 2025, communication and publicly available news sources, this issue resulted from significant internet and phone outages in Juneau due to damage to an undersea cable, as reported by Alaska Communications. I promptly reported the issue to APOC and took all reasonable steps to address it, but the outage made it impossible to file on time. I kindly request your understanding of these circumstances and hope you will consider granting my request.

Thank you for your time and attention to this matter.

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:  4/4/25 _____

Type/Print Signer's Name: Michael Zimmer _____



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

March 6, 2025

Michael Zimmer
One Battery Park Plaza, Floor 3
New York, NY 10004

RE: January Lobbyist Report Civil Penalty Assessment

Dear Mr. Zimmer:

According to our records you did not file your January Report that was due on February 28, 2025. Instead, your report was filed on March 3, 2025 (3 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$30.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; 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.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

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

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

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.

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



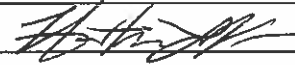
Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE:

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

Michael Zimmer
One Battery Park Plaza, Floor 3
New York, NY 10004
mzimmer@wes.org

☒ Email
☒ Certified
Mail



Signature

3/6/25

Date

Encl: Civil Penalty Appeal Affidavit

9589 0710 5270 1274 1675 19

U.S. Postal Service
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	
\$	
Total Postage and Fees	
\$	

Postmark
Here

Sent To	Jan 1st / 12v
Michael Zimmer	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4®	

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

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:

Michael Zimmer
 One Battery Park Plaza, Floor 3
 New York, NY 10004



9590 9402 6609 1028 5114 43

2. Article Number (Transfer from service label)

9589 0710 5270 1274 1675 19

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

3/18/23

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

Mail Restricted Delivery
01

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

Domestic Return Receipt

LOBBYIST REPORT FORM

COMPLETED

Signed **03/03/2025**

Year: **2025**

Report: **January**

Filer First Name:

Filer Middle Name:

Filer Last Name:

LOBBYIST INFORMATION

First Name: **Michael**

Middle Name:

Last Name: **Zimmer**

Business Name:

Voter Registration District: **Out of state**

Permanent Mailing Address: **One Battery Park Plaza, Floor 3**

City, State Zip: **New York, New York 10004**

Phone: **5172584126**

E-mail: **mzimmer@wes.org**

Fax:

Legislative Mailing Address: **One Battery Park Plaza, Floor 3**

City, State Zip: **New York, New York 10004**

Phone: **5172584126**

E-mail: **mzimmer@wes.org**

Fax:

GIFTS AND EXCHANGES

Gave one or more legislators or legislative employees tickets or donations to charity events?

No

Gave one or more legislators or legislative employees a compassionate gift as defined in AS 24.60.075?

No

Presented a gift, or a series of gifts, of more than \$100 in value to any public official during this reporting period? (The cost of tickets to charity events must be included in calculating the total value of a series of gifts)

No

Any exchange of more than \$100 in value, of money, goods, or services, with any public official or a member of the immediate family of a public official?

No

Any exchange of more than \$100 in value with a business entity that is owned or controlled by a public official?

No

Date	Name	Business	Business Address	Description	Amount
No Gifts/Exchanges					

NOTICE OF TERMINATION

Employer Name	Termination Date
No Notice of Terminations	

SCHEDULE A (COMPENSATION AND EXPENSES)

Employer Name	Compensation		Reimbursable Expenses		Non-Reimbursable Expenses	
World Education Services	Fee / Salary	\$396.76	Food / Beverage	\$0.00	Food / Beverage	\$0.00
	Other	\$0.00	Living	\$0.00	Living	\$0.00
			Travel	\$0.00	Travel	\$0.00
			Other	\$0.00		
	Totals		Totals		Totals	
	This Report	\$396.76	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$396.76	New Total	\$0.00	New Total	\$0.00

SCHEDULE A-1 (FOOD AND BEVERAGES > \$15)

Date	Recipient	Recipient Detail	Reimbursed By	Reimbursable Amount	Non-Reimbursable Amount
No Food or Beverages Greater than \$15.					



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 5, 2025

Michael Zimmer
One Battery Park Plaza, Floor 3
New York, NY 10004
mzimmer@wes.org

Re: COMMISSION MEETING NOTICE

Mr. Zimmer:

At its June 25, 2025 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 233147607#, Phone Conference ID: 233 147 607#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **11:00 a.m. on Wednesday, June 25, 2025**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Michael Zimmer
One Battery Park Plaza, Floor 3
New York, NY 10004
mzimmer@wes.org



Paralegal II

6/5/25

Date