



Biennial Report of the Alaska Public Offices Commission

Covering Calendar Years 2011 and 2012

Dated: January 7, 2013

Commissioners:

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Kathleen King, Vice Chair
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Executive Summary

The Alaska Public Offices Commission (APOC) delivers services to the public and elected and other public officials in Alaska to encourage public confidence in the political process. It is required by AS 15.13.030(8) to “prepare and publish a biennial report concerning the activities of the commission, the effectiveness of this chapter, its enforcement by the attorney general’s office, and recommendations and proposals for change”.

Calendar year 2012 complaint and advisory opinion activity was below the 2010 level, a gubernatorial election year, and slightly below 2011, but well above the levels of previous years. The increased advisory opinion activity of 2012 may be attributed to contentious issues on municipal ballots, to the redistricting that took effect in 2012 and the resulting elections. The decreased complaint level may be due to the training and outreach efforts conducted by APOC staff in calendar year 2012.

A substantial revision to APOC regulations was also completed and became effective in December of 2011. The revised regulations will require attention from APOC staff and incumbents, experienced lobbyists, and others who may have been familiar with the old regulations, to become acquainted with the new regulations.

Major events in 2012 included meeting the statutorily mandated requirement to electronically file disclosures. This project, known as INSIGHT, became fully active in February of 2012 after a limited release in 2011. This made submitting reports to APOC considerably easier and enabled better public access to reports. The completion of the INSIGHT project precipitated considerable training for incumbents, candidates, and other filers and was conducted by APOC staff throughout calendar year 2012.

A municipality may opt out of the APOC Public Official Financial Disclosure (POFD) requirements. Haines, Seward, and Bethel each had an “opt out” ballot questions on their respective 2012 municipal ballots. The initiative passed in all three municipalities. Petersburg has previously opted out, but its December election to incorporate as a borough and concurrent borough elections have vacated that previous opt out. It is expected that if the area incorporates as a borough, an opt-out question will be on the next ballot for that new borough.

Challenges to APOC include retaining staff. There has been considerable staff turnover in the past two years and the current staff is somewhat inexperienced. Research into the matter of staff turnover indicates a mismatch between agency and employee expectations.

The redistricting effective in 2012 added to the workload of APOC as incumbents and new candidates sought guidance regarding campaign expenditures that may be impacted by the redistricting.

ACTIVITIES OF THE COMMISSION:

APOC's mission is to encourage the public's confidence in their elected and appointed public officials by administering Alaska's disclosure statutes and publishing financial information regarding the activities of election campaigns, public officials, lobbyists and lobbyist employers.

Core Services

- Disclose information to aid Alaskans in making informed decisions regarding their elected officials.
- Administer laws upholding the transparency of the financial affairs of public officials, lobbyists and their employers, political groups, and municipal and state candidates.
- Interpret the disclosure laws and assist in compliance by conducting training.
- Provide guidance and manuals for candidates, groups, lobbying activities, and public officials.
- Examine and compare reports for possible violations of the disclosure laws and compel the filing of required reports.

The Laws Administered by APOC

APOC administers four disclosure laws. These laws require the disclosure of information that enables citizens to identify the influence of private interests on public decision-making.

1 The Campaign Disclosure Law (AS 15.13) (CD) requires state and municipal candidates, and political groups, to file periodic, detailed reports disclosing all campaign contribution and expenditure activities. The campaign disclosure law directly limits the influence of contributors on candidates by limiting the size of campaign contributions.

2 The Regulation of Lobbying Law (AS 24.45) (LOB) requires lobbyists to register with APOC, and to file monthly reports of income from lobbying and lobbying expenditures during any month in which the legislature is in session, including special session. If the legislature is not in session, lobbyists file quarterly reports. Employers of lobbyists are required to file quarterly reports of lobbying payments and expenditures.

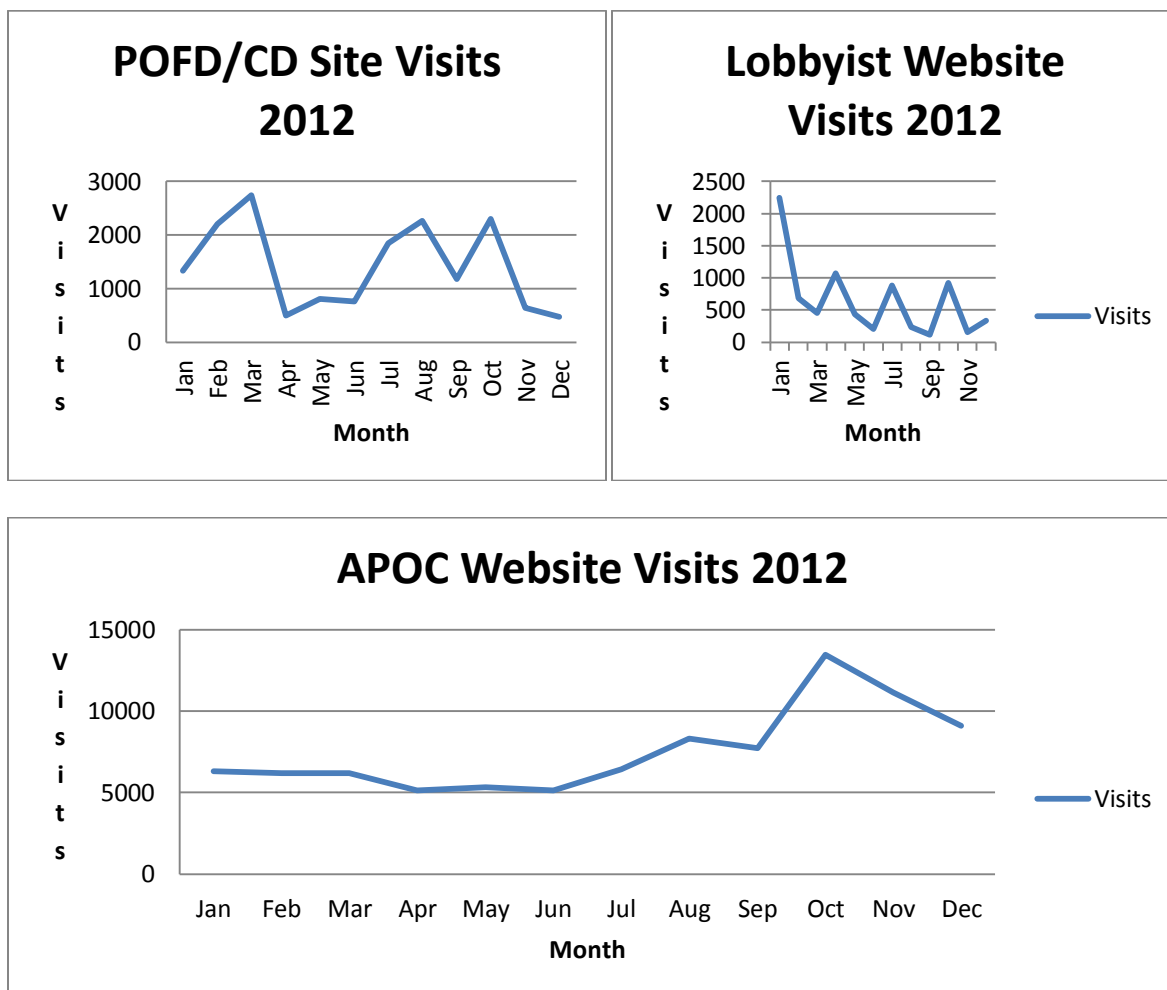
3 The Legislative Financial Disclosure Law (AS 24.60.200 - 260) (LFD) requires legislators, legislative directors, and the members of the Select Committee on Legislative Ethics, to file personal financial disclosure statements, listing business relationships, sources of income (and for legislators the amount of income), and indebtedness.

4 The Public Official Financial Disclosure Law (AS 39.50) (POFD) requires all state and many municipal candidates, elected officials, and many appointed state and local officials, to file personal financial disclosure statements, listing business relationships, the source of all income, and indebtedness.

Disclose information for informed decisions

In 2012 Alaska newspapers used APOC data for source material regarding municipal elections, primary elections and ballot initiatives, and state wide general elections. Reporters found the data on the agency's website without the aid of APOC staff. Considerable coverage was devoted to sources for contributions to specific ballot questions and candidates' campaigns. APOC is providing readily accessible information to the public to enable informed decisions.

Figure 1
Visits to APOC website and specific interest websites of the agency, 2012



Source: https://webstats.state.ak.us/Nihuo3/Applications/Apoc_Forms/; https://webstats.state.ak.us/Nihuo3/Applications/Apoc_Insight/; <http://doa.alaska.gov/APOC/>; <https://webstats.state.ak.us/Nihuo3/doa.alaska.gov/APOC/>

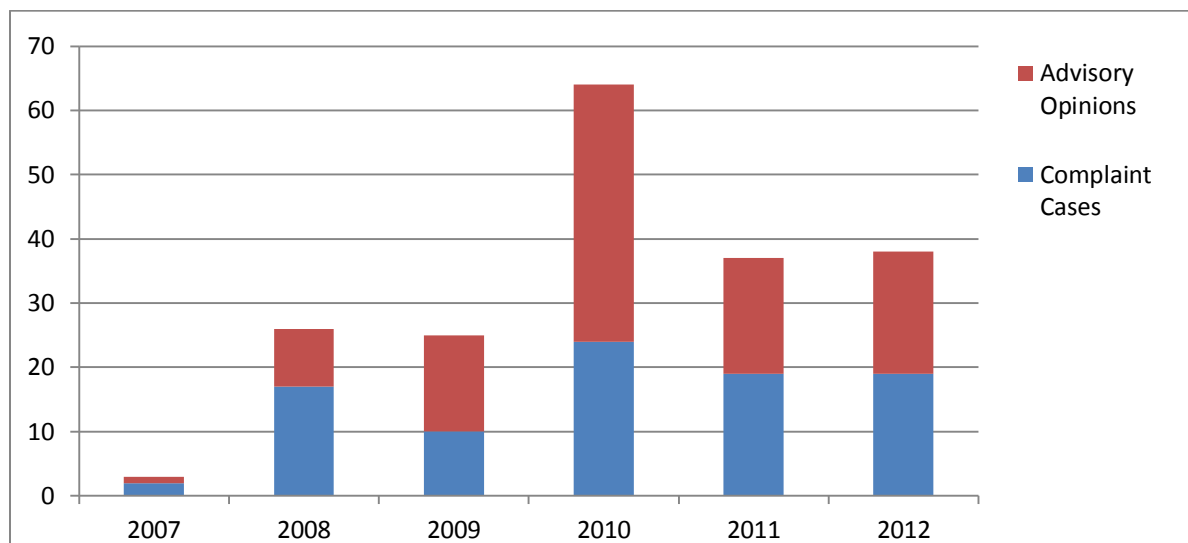
Website visit information is extremely useful in illustrating the use of on-line resources. Figure 1 illustrates how the website resources have been used by the public. February and March is a busy period when POFD and LFD filings are required. The months leading up to

the August 2012 primary and November 2012 general election reflect a pattern of increasing interest. The saw tooth pattern of the lobbyist website graph indicates how lobbyists use the website to file reports on a quarterly basis. The level of interest in the primary and general elections is apparent in the APOC website visits graph after August.

Administer laws upholding financial transparency

APOC activities include handling complaints and advisory opinions related to the four disclosure laws. The volume of both complaints and advisory opinions rose dramatically in calendar year 2010 since it was a gubernatorial election year. As of December 31, 2012 the volume for calendar year 2012 is less than that of 2010 and only slightly above 2011 as shown in Figure 2. That a busy election year such as 2012 had only the same number of complaints and one more advisory opinion than in a nonelection year such as 2011 appears to speak well of APOC's training and outreach efforts noted later in this report.

Figure 2
Volume of APOC Complaints and Advisory Opinions 2007-2012



Source: APOC Records

This indicates that the public has confidence in APOC's ability to quickly and competently administer its laws. The increase in volume for advisory opinions suggests that APOC is meeting the public's expectations. Moreover, many of the advisory opinions requested in 2011 and 2012 relate to the 2012 election. This is a very positive sign showing that candidates and others seek guidance from APOC before embarking on potentially questionable actions. Similarly, it indicates a desire to comply with APOC's statutes and regulations. During 2012 APOC was able to decrease the time it took to deliver an advisory opinion from 2011. Appendix 1 contains a summary of advisory opinions.

Interpret disclosure laws and assist in compliance

The increased number of advisory opinions requested demonstrates that candidates have confidence in APOC's ability to provide accurate and timely information regarding

disclosure laws. It is important to note that not all interpretive information is provided via advisory opinions. APOC staff regularly works with the public to respond to a variety of questions that do not rise to the level of a formal advisory opinion. From January 1, 2012 to December 31, 2012 APOC staff spent a total of 306 hours working on 19 advisory opinions. The average advisory opinion takes just over eight staff hours to complete. During the same period, staff spent nearly seven times as many hours, 2,118 hours, in providing direct service to the public in responding to questions regarding APOC laws. APOC staff believes this is a direct result of an emphasis on training and outreach.

APOC is making a concerted effort to provide more training opportunities for candidates and lobbyists to develop education as a larger part of APOC's mission. Understanding the nuances of APOC statutes will lead to fewer complaints and more transparent campaign and lobbying activity. Where a complaint takes on average 50 hours to complete, the average advisory opinion requires approximately eight hours to complete. Providing quality interpretive information and timely advisory opinions enables APOC staff to provide more attention to assisting in compliance rather than recommending penalties.

During late 2011 and throughout 2012 APOC staff has undertaken a substantial outreach and education initiative to enable filers to better comply with APOC statutes and regulations and to enable the general public to better understand the information APOC collects. Appendix 3 contains data regarding training sessions and Appendix 4 contains information regarding outreach activities. These activities have been very cost effective. Providing 44 training sessions throughout the state and having 492 people attend cost \$3,081; or, \$70 per session or \$6.26 per attendee. The 15 outreach activities throughout the state cost \$1,522 for 15 sessions with 332 people attending; or, \$101 per session or \$4.58 per attendee. Over the course of the year through outreach and training activities APOC staff was able to directly work with 824 people at 59 activities; or 14 people per activity at a cost of \$5.60 per person. Considering the cost of completing complaint investigations and the lower number of complaints, this was money and time well spent.

Examine and compare reports

This is an important and ongoing part of staff's work. Over 370 staff hours, or 10 weeks, were expended on auditing and comparing reports between July 1, 2011 and December 31, 2011. With the advent of electronic filing in 2012, APOC staff was able to devote more than 689 hours to auditing and comparing reports, nearly double the time of the previous year. In many cases filers were found to be in substantial compliance, but with some errors, and they promptly amended their reports upon request. Others were found to have more substantial errors and either paid a civil penalty or a complaint was filed against them.

Other Activities

Major events in calendar year 2011

- Complaints: 19 total, 16 CD, 2 LOB, 1 POFD.
- Advisory Opinions: 18 total, 13 CD, 1 LOB, 4 POFD.
- INSIGHT campaign disclosure phase of the project brought on-line in December 2011.
- Lobbyist electronic data base filing completed and working in February 2011.

- Legislative and Public Official electronic filing data base completed in February 2011.
- Commission held 28 days of meetings. Fifteen days were dedicated to hearings and adjudicatory decision making, the remaining 13 dealt with the regulations project.
- 1,694 financial disclosure statements received.
- 2,420 filings from 120 lobbyists and 365 employers of lobbyists.
- 724 campaign disclosure filings from 341 candidates and 133 groups.

Major events in calendar year 2012

- Complaints: 19 total, 16 CD, 1 LOB, 2 POFD.
- Advisory Opinions: 19 total, 19 CD, 0 LOB, 0 POFD.
- Anchorage municipal election April, statewide primary elections August, statewide municipal elections October, statewide general election November.
- Commission held 13 days of meetings; all were dedicated to hearings.
- Over 1,700 financial disclosure statements were received from municipal and state filers; 1,127 were filed electronically.
- 2,433 electronic reports were filed by 129 lobbyists and 385 employers of lobbyists.
- 2,176 campaign disclosure filings were received from 168 state candidates, 276 municipal candidates and 199 groups. 1,510 campaign disclosure forms were received from candidates--1,459 candidate campaign reports were received electronically from 168 state candidates and 276 municipal candidates, the remaining 201 were submitted on paper. A total of 516 reports were received electronically from 199 groups.

Each year the Commission levies civil penalties to those filing late or incomplete reports. Figure 3 illustrates the Commission's assessment of civil penalties and the amount collected in 2012. Those penalties not yet collected have been referred to the Attorney General.

Figure 3
APOC Civil Penalty Assessment 2012

Category	Commission Amount Assessed	Amount Received	Amount Unpaid
Lobbying	\$ 4,000.00	\$ 3,910.00	\$ 90.00
Candidate Disclosure	\$ 6,855.00	\$ 8,839.19*	\$5,050.00
Group Disclosure	\$ 6,987.50	\$ 3,887.50	\$3,000.00
POFD/LFD	\$ 30,818.00	\$23,812.00	\$7,006.00
Complaints	\$ 27,996.42	\$23,959.00	\$3,037.42
Copy Income		\$ -	\$ -
Other		\$ -	\$ -
TOTALS	\$ 77,481.92	\$ 56,533.69	\$ 22,763.42

Source: APOC records

* The amount received is greater than the amount assessed as a portion of the amount received is not a fine but a forfeiture of funds from a POET account.

EFFECTIVENESS OF APOC LAWS:

It is difficult to assess the effectiveness of laws. Is effectiveness judged by the number of violations, or by no violations? The fact that APOC staff spends a considerable amount of time working with the public and writing advisory opinions indicates that at some level the laws are taken seriously; this by itself indicates that the laws are effective.

A more data driven assessment of effectiveness is the number of reports received compared to the number of actions; complaints or advisory opinions generated, for particular types of reports; or, how often an action takes place per the number of reports received. This is graphically depicted in Figure 4 below. The level of passion that ballot propositions or candidates excite affects any given year's activity.

Figure 4
Ratio of APOC Actions/Filings

Year	Report Type	Number of reports	Complaints & Advisory Opinions	Ratio
2011	POFD/LFD	1694	5	1 action per 339 reports
	Lobbyist/Employer	2420	3	1 action per 807 reports
	Campaign Disclosure	724	29	1 action per 25 reports
2012	POFD/LFD	1700	2	1 action per 850 reports
	Lobbyist/Employer	2433	1	1 action per 2,433 reports
	Campaign Disclosure	2026	35	1 action per 63 reports

Source: APOC Records

Two points become readily apparent in this analysis: 1) POFD/LFD and Lobbying disclosures have a significantly lower number of actions per report filed than campaign expenditures and have been reduced from 2011 to 2012; and, 2) POFD/LFD and Lobbying reports have a much higher number of filings than campaign expenditures. Both POFD/LFD and Lobbying reports are meant to provide transparency to the public regarding the financial interests of public officials and how public officials and legislators interact with lobbyists and those who employ lobbyists. The laws requiring transparency appear to be effective given the number of reports submitted and the low level of actions taken. These laws are very closely tied to financial transactions.

Campaign disclosure appears to provide a different outcome in terms of more actions per report in both 2011 and 2012. The year 2012 saw a significantly higher number of reports than 2011, but the number of advisory opinions and complaints has remained nearly constant. It would appear that the outreach and training done by APOC has resulted in better compliance than in 2011. Campaign disclosures, while requiring a type of financial disclosure, are less tied to financial transactions and somewhat related to issues of expression, a much more difficult concept to define.

ENFORCEMENT BY THE ATTORNEY GENERAL'S OFFICE:

The Attorney General's Office represents APOC staff in the complaint process. A person who believes a violation has occurred under the laws APOC administers can file an administrative complaint with the Commission. In 2012, nineteen complaints were accepted and two rejected as not meeting the requirements of AS 15.13.380. Four of the nineteen complaints were brought to the Commission as expedited complaints. Three open complaints remain at end of 2012. In calendar year 2012 one complaint was referred and assigned to the Office of Administrative Hearings for assignment to an Administrative Law Judge (ALJ). The Attorney General's Office filed many procedural documents on behalf of the staff in each of these cases as well as reviewing the staff reports.

The Attorney General's Office also assists in the issuance of advisory opinions. Under APOC statutes (AS 15.13.374), an individual or group may ask the Commission to issue a formal letter of advice regarding the propriety of specific activities under the law. In consultation with the Attorney General's Office the staff proposes a written advisory opinion for Commission consideration. An affirmative vote of four Commission members is required to approve the advisory opinion. Following an affirmative vote, staff prepares a final letter of advice, and the opinion is placed in the Commission's records and published on the agency's website. During calendar year 2012 there were 19 requests for advisory opinions. In addition the Attorney General's Office assists in the review of numerous informal requests for information from APOC staff.

CHALLENGES, RECOMMENDATIONS, AND PROPOSALS FOR CHANGE:

Staffing:

It is easy to see that APOC is an experientially young agency with few long-term employees; see Figure 5 (an organizational chart is presented in Appendix 2). One reason for this is that the analyst/programmer position is a new position for APOC as of fall 2012. A more substantial reason for the short tenure of APOC employees are the expectations with which employees come to the agency. Several departing incumbents cited the heavy workload as the reason for departing. Since 2009 APOC has had 10 individuals in its two Associate Attorney II positions. While the position does not require a law degree five of those individuals were licensed attorneys. At this time one of the Associate Attorney II positions has a licensed attorney as an incumbent; the Assistant Director is the only other licensed attorney on staff.

In calendar year 2012 there have been five employee resignations: one from an employee with less than one year of experience; two from employees with just over a year of experience; one from a four year employee; and, a resignation from a twenty year employee. Three of these resignations appear to have been the result of a mismatch in expectations between the agency and the employees. By contacting other employees who have left in the past several years it became apparent that many resignations were a result of incongruent expectations about the work of APOC and the reality of the work. Deadlines, the level of work required, treatment by constituencies, and autonomy have been cited a significant concerns in resignations. Agency management has become more aware of the issues

surrounding work expectations and is working to make the reality of the agency more apparent to applicants during the interview process. One new position was created to provide support to the electronic filing system and another position description was significantly revised to make the duties of the position more congruent with the needs of the agency in regard to the electronic filing system. This will hopefully enable both management and interviewees to make better decisions regarding agency fit and expectations resulting greater longevity in the future.

Figure 5
APOC Staff Longevity as of December 2012

Position	With Agency		In Position	
	Months	Years	Months	Years
ANC Law Office Asst. I	435	36.25	435	36.25
ANC Law Off Asst. II	63	5.25	63	5.25
JNU Proj Coordinator II	56	4.66	16	1.33
Assistant Director	49	4.08	44	3.67
ANC Assoc. Atty II	36	3	4	.33
JNU Paralegal I	30	2.5	16	1.33
ANC Law Off Asst. I (P/T)	26	2.16	26	2.16
Executive Director	22	1.83	22	1.83
ANC Paralegal I	16	1.33	16	1.33
Analyst/Programmer IV*	3	.25	3	.25
ANC Assoc. Atty II	3	.25	3	.25
ANC Paralegal I	3	.25	3	.25
JNU Law Off Asst. I	2	.17	2	.17
ANC Assoc. Atty I ⁺	1	.08	1	.08
Average	54	4.5	46.4	3.87
Median	24	2	16	1.33

*New position as of October 2012, was a paralegal position previously. Change made to deal with electronic filing system.

⁺Substantial revision of this position description conducted in November of 2012 to make position more congruent with the needs of the agency's use of an electronic filing system

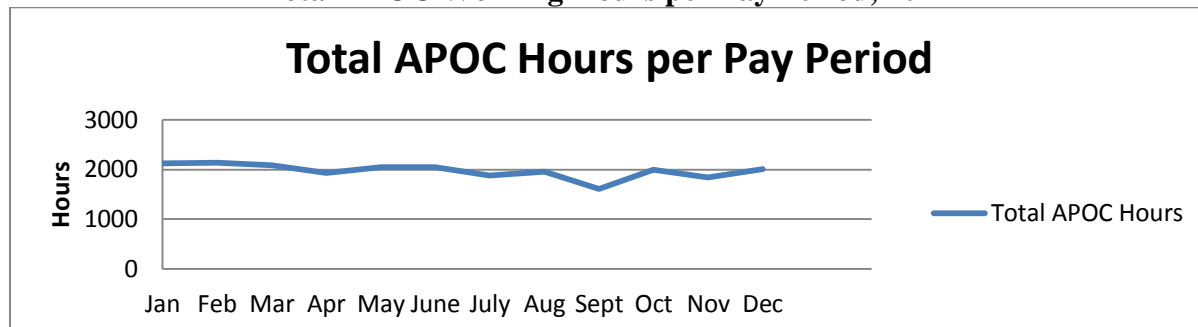
The major short-term challenge for 2012 was the state-wide election in the fall. With redistricting and several controversial measures on a variety of ballots even a stable staff was sometimes hard pressed to keep up with the volume of advisory opinions and complaints. *Citizens United*, the 2010 U.S. Supreme Court decision enabling corporate expenditures to influence elections, added to the burden of the agency in dealing with independent expenditures by entities.

The major long-term challenge for APOC is transitioning to a more electronically oriented office where more and better auditing and review of submissions will become the norm. This transition has and will continue to change the work environment of the agency and will require training for APOC staff and the constituencies APOC serves.

The effective use of staff time is of considerable interest to the Commission. With 13 full time employees and a single part-time employee, each pay period at APOC constitutes 1025

working hours. Figure 6 shows this level of hours is generally the rule yet can vary with work schedules, holidays, and as positions are vacant or filled. The hours per pay period is very much affected by a holiday, such as Labor Day in early September which decreased the hours worked by nearly 100 hours during that period, and the number of staff vacancies in a given period. In 2012 all positions in APOC other than the Executive Director, Assistant Director, and Project Coordinator II were classified as overtime eligible.

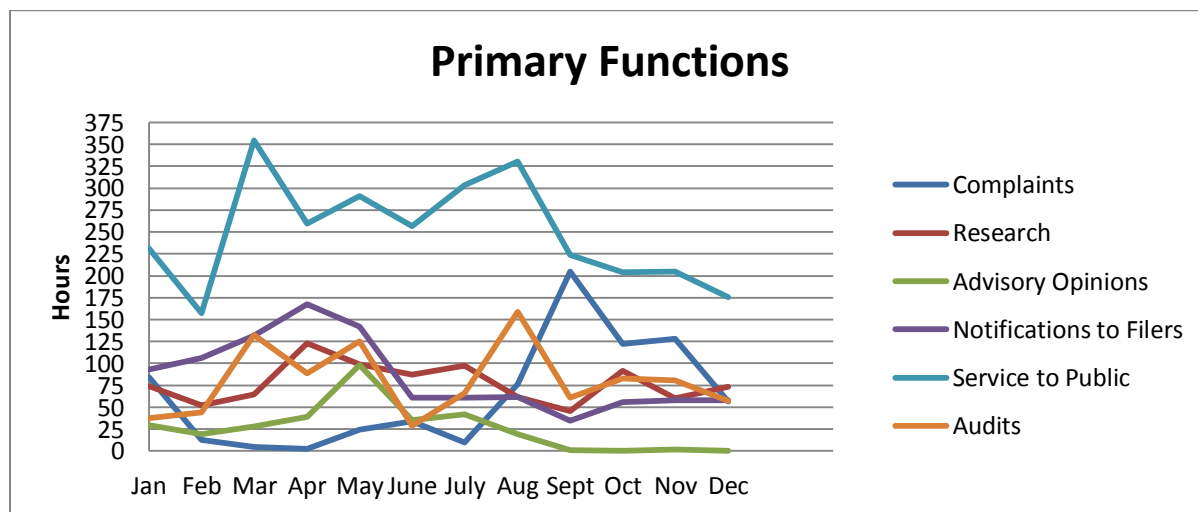
Figure 6
Total APOC Working Hours per Pay Period, 2012



Source: APOC records

Figure 7 illustrates the time taken to accomplish core mission elements such as working on complaints, advisory opinions, notifying filers of erroneous reports, responding to questions from the public and press, completing audits, and conducting research essential to accomplishing the mission of the agency.¹ It is important to note the relationship between complaint work, direct service to the public, and audits.

Figure 7
Core Mission Element Time on Task, 2012



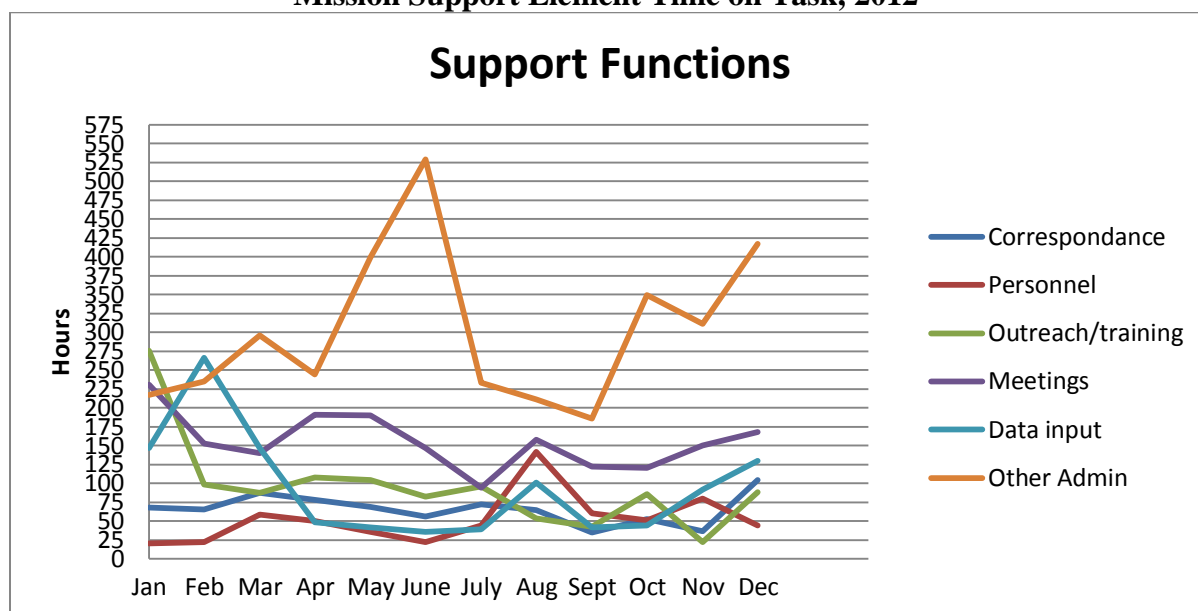
Source: APOC Records

¹ A state employee works 75 hours in a pay period on average. As a result the graphs in Figures 7 and 8 are divided at increments of 25. The activities depicted do not include all APOC activities.

Similarly, advisory opinion requests also take time away from auditing functions. It is worth noting that in 2012 the emphasis on training and outreach included individuals calling APOC with a question before engaging in questionable activity. This has paid dividends in that the level of Direct Service to the Public has increased dramatically.

The tasks required to support the mission of APOC are graphically represented in Figure 8. Several points should be readily apparent: 1) data input time dramatically decreased after February 2012 with the initiation of electronic filing for campaign disclosure statements; 2) Commission meeting time has been more streamlined in 2012 through scheduling changes; 3) Personnel time was considerably less in 2012 than in 2011 with fewer recruitments being conducted. The spike in Other Admin work is due to an effort to make all records electronically available and enable better access to older reports and files. This has required considerable time from administrative staff and has led to an office with less paper and more readily available access to filings. This project is over 50% completed and should be finished in calendar 2013.

Figure 8
Mission Support Element Time on Task, 2012



Source: APOC Records

There are nuances of the support elements of APOC's work that require some level of explanation. "Other Admin" encompasses a number of activities from creating binders, producing large copy jobs, preparing and mailing items, dealing with the agency's INSIGHT project, and scanning historical paper documents. Outreach and training includes both training for the constituencies APOC serves and for APOC personnel. "Data input" is placing documents into APOC's report data base so that the material can be accessible to the general public. The decline in time spent inputting data after February 2012 when the

electronic filing system went into effect is noticeable as is the small “bump” in data input time in August when the primary election was held.

INSIGHT Project:

The INSIGHT project envisioned three modules: Lobbyist, Public Official and Legislative Official Financial Disclosure (POFD/LFD), and Campaign Disclosure (CD) modules. The Lobbyist Module is complete, has received favorable reviews, and is in a maintenance mode. The POFD/LFD was introduced in early 2011 and favorably received. The CD module was delivered in the fall of 2011. The project went “live” through limited release in December 2011. The project was readily available in February 2012.

The project has led to a variety of reactions from different constituencies. Some people are not technically adept and had some difficulty early in adjusting to the new reporting system. After some initial difficulties there has been a general consensus that electronic reporting is easier and less time consuming than paper filing. Upload and download capabilities were added to enable filers to upload spreadsheet information into the reporting files rather than re-enter huge amounts of information line by line.

One letter from a veteran campaign treasurer was particularly illustrative regarding the overall impression of the new system and APOC staff:

Re: Reflections from the end of the campaign trail

Dear Mr. Dauphinais,

With the 2012 election finally over, the time has arrived for some reflection. This is the third State Senate campaign (in the last ten years) for which I have served as treasurer. I’ve learned over the years that working with APOC can be a bit sketchy at times. However, I’m pleased to say this cycle was a marked improvement over prior experiences.

Three areas are particularly noteworthy. First, the online reporting system - while still a little awkward in places - is a vast improvement over the old manual method no question about it. Second, the training opportunities leading up to Campaign Season were a big plus. This was a good investment in time and materials (the binder was an invaluable resource). And third, your staff was very helpful. We didn’t always agree, but they were never disagreeable. This has not always been my experience with APOC.

I would also like to pass along a couple constructive observations as well as one issue I’m hopeful will be queued up for a solution. Respectively, these pertain to: reliability of the regulations; overnight stays vis-à-vis volunteers, and; an anomaly within APOC’s database of contributors.

APOC Website and Information Searchable by the Public:

APOC is working closely with staff from the Department of Administration- Enterprise Technology Services (ETS) to explore more efficient ways to post information for the public on line via the APOC website. Making Commission orders, advisory opinions, reports, and disclosures available to the public remains a very high priority of the Commission. APOC staff and ETS personnel have continued efforts to upgrade the APOC website to provide information for filers and the public under each of the laws administered by the Commission. One particular effort is to provide for information that is searchable by the website users.

This effort is expanding searchable documents from the current limited advisory opinions, campaign disclosures, and select POFD filings. PDF images of many of the Commission documents are slated to appear on the APOC website to provide greater government transparency and easier public access. While there have been some successes in this area, the public remains somewhat dissatisfied with the agency's website. This dissatisfaction stems from difficulty in navigating to the various features of the page. A recent review of the reporting capabilities of the INSIGHT project and a redesign of the website provide hope for the future in this area. The agency webpage contains an enormous amount of information. Considerable thought will be required to make the page more intuitive for the general public to use effectively.

2014 Redistricting

The redistricting that was accomplished in 2012 was a challenge for the agency and will continue to be in the near future. The recently mandated redistricting for the 2014 election may prove to be equally challenging.

APPENDIX 1
Summary of APOC Advisory Opinions 2011 and 2012

AO Number	Name/Subject	Date received	Date Issued	Total Days
<u>2011</u>				
AO-11-01-CD	Gardner	1/4/11	1/10/11	6
AO-11-02-POFD	Jebicek	1/13/11	1/27/11	14
AO-11-03-CD	Edgmon	1/20/11	1/27/11	7
AO-11-04-CD	Giessel	2/7/11	2/11/11	4
AO-11-05-LOB	MACC	3/22/11	4/1/11	10
AO-11-06-POFD	Alsworth	4/11/11	4/19/11	8
AO-11-07-CD	Young Republicans	5/27/11	6/22/11	26
AO-11-08-CD	Petersburg	7/20/11	7/27/11	7
AO-11-09-CD	Gillam	8/8/11	8/12/11	4
AO-11-10-POFD	Gruenberg	8/16/11	8/19/11	3
AO-11-11-CD	Stone	8/17/11	8/18/11	1
AO-11-12-CD	Lindeke	8/8/11	8/15/11	7
AO-11-13-POFD	Stienkruger	8/23/11	8/26/11	3
AO-11-14-CD	Lynn	8/30/11	9/1/11	2
AO-11-15-CD	Dunleavy	WITHDRAWN		
AO-11-16-CD	North Slope Borough	9/30/2011	10/03/11	3
AO-11-17-CD	AK Business PAC	10/17/2011	10/24/2011	7
AO 11-18-CD	Tichostsky	12/07/2011	12/14/2011	7

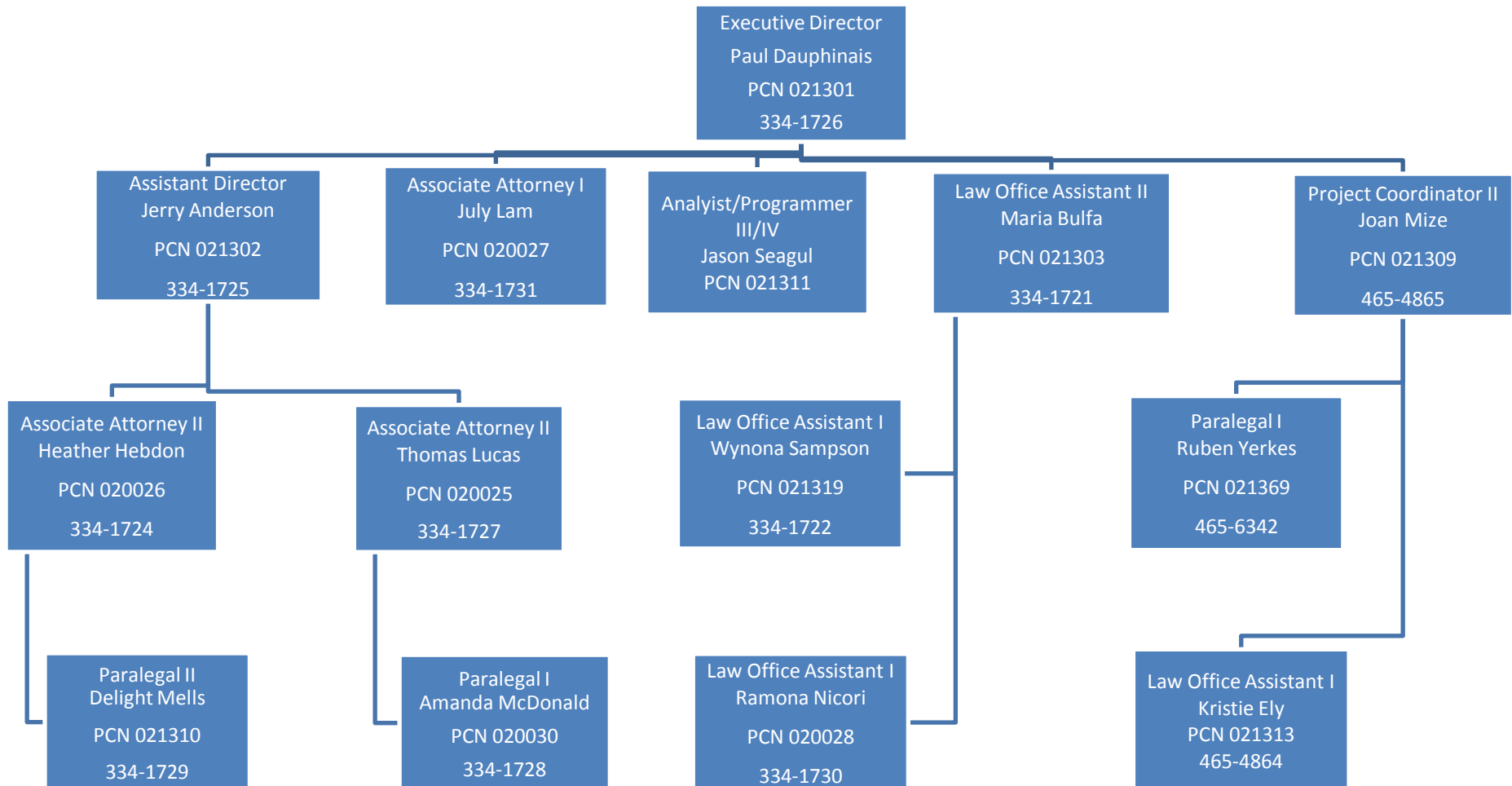
Average days between receipt of request and issuance of AO in 2011 **6.62 Days**

AO Number	Name/Subject	Date received	Date Issued	Total Days
<u>2012</u>				
AO 12-01-CD	Gardner	1/10/12	1/17/12	7
AO 12-02-CD	Hughes	1/23/12	1/30/12	7
AO 12-03-CD	City of Cordova	2/7/12	2/13/12	6
AO 12-04-CD	Bostrom/ACT Right	2/13/12	3/12/12	28*
AO 12-05-CD	Alaska Deserves Better	4/25/12	5/7/12	13*
AO 12-06-CD	Mackie	5/8/12	5/11/12	3
AO 12-07-CD	Gillam, RBG, RRC	5/11/12	5/18/12	7
AO 12-08-CD	Gazaway	5/22/12	5/24/12	2
AO 12-09-CD	Alaska Deserves Better	2 5/17/12	5/24/12	7
AO 12-10-CD	Edgmon	5/31/12	6/1/12	1
AO 12-11-CD	Giessel	6/04/12	6/05/12	1
AO 12-12-CD	Klein	6/13/12	6/18/12	5
AO 12-13-CD	Moran	WITHDRAWN		
AO 12-14-CD	Shilling	6/18/12	6/25/12	7
AO 12-15-CD	Alaska Care	WITHDRAWN		
AO 12-16-CD	Gruenberg	6/29/12	7/6/12	7

AO 12-17-CD Bachmeier	7/20/12	7/25/12	5
AO 12-18-CD Brannon-Young	7/26/12	8/1/12	6
AO 12-19-CD Beck	7/30/12	8/6/12	7
Average days between receipt of request and issuance of AO in 2012			6.29 Days

* These two advisory opinions were exceptionally complex and dealt with issues contained in *Citizens United*.

APPENDIX 2
APOC Organization Chart 2013



Appendix 3
Training Data

Date	Location	Topic	Attending
12/6/11	Fairbanks	Lobbyist	8
12/7/11	Anchorage	Lobbyist	23
	Anchorage	Lobbyist	15
12/8/11	Anchorage	Lobbyist	6
	Anchorage	Lobbyist	6
12/14/11	Anchorage	POFD	9
	Anchorage	Campaign Disc	19
1/6/12	Anchorage	Groups	28
1/9/12	Juneau	Lobbyist	5
	Juneau	Lobbyist	5
1/11/12	Anchorage	Lobbyist	5
	Anchorage	Lobbyist	6
1/12/12	Anchorage	Lobbyist	9
	Anchorage	Lobbyist	5
1/13/12	Anchorage	POFD	10
	Anchorage	Campaign Disc	30
1/17/12	Juneau	Lobbyist	6
1/20/12	Juneau	POFD/Campaign Disc	20
	Juneau	POFD/Campaign Disc	20
	Juneau	POFD/Campaign Disc	8
1/26/12	Wasilla	Campaign Disc	18
1/27/12	Anchorage	POFD	5
2/3/12	Anchorage	Groups	5
2/7/12	Anchorage	POFD	15
2/10/12	Anchorage	Campaign Disc	5
2/16/12	Anchorage	POFD	3
2/17/12	Anchorage	Groups	2
2/21/12	Juneau	POFD/Campaign Disc	18
3/1/12	Anchorage	POFD	5
3/6/12	Anchorage	POFD	11
3/8/12	Anchorage	POFD	7
3/16/12	Anchorage	Campaign Disc.	9
4/8/12	Lake & Penn Borough	Campaign Disc	8
4/13/12	Anchorage	General	1
4/20/12	Anchorage	Campaign Disc	13
4/26/12	Anchorage	Campaign Disc	30
5/7/12	Anchorage	Campaign Disc	11
6/27/12	Anchorage	Follow the Money	28
6/29/12	Anchorage	Groups	7
7/13/12	Anchorage	Groups	7
7/18/12	Anchorage	Follow the Money	12
7/20/12	Anchorage	Campaign Disclosure	19
7/27/12	Anchorage	Groups	8
9/5/12	Anchorage	Groups	1
TOTAL			492

Appendix 4
Outreach data

Date	Location	Group	Topic	Attending
3/6/12	Wasilla	Sunrise Rotary	APOC Mission	20
3/8/12	Eagle River	Rotary Club	Electronic Filing Demo	12
3/20/12	Soldotna	Kenai River Rotary	APOC Mission	11
3/22/12	Homer	Katchemak Bay Rotary	Electronic Filing Demo	28
4/4/12	Wasilla	Susitna Rotary Club	APOC Mission	12
4/18/12	Anchorage	Muldoon Lions Club	APOC Mission	10
5/3/12	Anchorage	Basher Community Council	Electronic Filing Demo	27
5/14/12	Fairbanks	College Rotary Club	Electronic Filing Demo	28
6/14/12	Anchorage	Fairview Community Council	Electronic Filing Demo	24
6/22/12	Fairbanks	Fairbanks Sunrises Rotary	Electronic Filing Demo	26
8/14/12	Fairbanks	Golden Heart Rotary	Electronic Filing Demo	7
8/15/12	North Pole	North Pole Rotary	Electronic Filing Demo	7
8/16/12	Fairbanks	Fairbanks Downtown Rotary	Electronic Filing Demo	76
9/ 6 /12	Anchorage	Scenic Foothills CC	Electronic Filing Demo	32
9/19/12	Juneau	United Way of SE Alaska	APOC Mission & Filing	12
TOTAL				332