

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

DUNBAR FOR MAYOR,)

Complainant,)

v.)

BRONSON FOR MAYOR)

Respondent.)

APOC Case No. 21-01-CD

FINAL ORDER

On April 12, 2021, the Forrest Dunbar for Mayor campaign filed a complaint against the Dave Bronson for Mayor campaign (BFM) alleging violations of campaign contribution and disclosure laws in connection with the May 11, 2021 Anchorage mayoral runoff election. The Complaint alleges that BFM failed to report expenditures and debt when incurred; failed to provide accurate and sufficient details on expenditures and debts, including media, advertising, and consulting expenditures; failed to timely return over-the-limit contributions; and accepted prohibited contributions from businesses.¹ On April 15, 2021, the Commission denied Complainant's request for expedited consideration and referred the matter to APOC Staff for investigation.² In its order, the Commission referenced BFM's representation "that an audit is underway and

¹ See AS 15.13.040(a), 2 AAC 50.321(a) & (d) (reporting requirements); AS 15.13.070(b)(1) (contribution limits); AS 15.13.074(f), 2 AAC 50.250(c), 2 AAC 50.258 (prohibition on corporate contributions, true source requirement).

² AS 15.13.380(d)(3).

any violations will be expeditiously corrected with amendments to campaign disclosure reports.”³

Staff presented the case to the Commission at its regular meeting on September 29, 2021, explaining that certain reporting violations and over-the-limit contributions were not expeditiously corrected. BFM failed to file substantially compliant reports until June 2 and 3, 2021, well after the runoff election. BFM appeared at the meeting, acknowledging the violations but arguing for a reduction of the penalties. And although the Complainant is not a party to this non-expedited matter, it appeared through its treasurer and presented argument as contemplated by 2 AAC 50.891(d).

The Commission now finds that BFM violated AS 15.13.040(a) and associated regulations by failing to provide accurate campaign expenditure reports. The Commission also finds that BFM violated AS 15.13.070(a) and associated regulations by failing to timely return over-the-limit individual contributions, but does not impose a penalty for these violations due to the very high likelihood that the Ninth Circuit’s recent decision overturning that limit will stand.⁴ A penalty in the amount of \$38,500 for the reporting violations is imposed.

BACKGROUND

The Municipality of Anchorage held a regular municipal election on April 6, 2021, in which the mayoral office seat was up for election. BFM filed three reports before the

³ Order Denying Expedited Consideration (April 15, 2021).

⁴ See *Thompson v. Heddon*, 7 F.4th 811 (9th Cir. July 30, 2021) briefing pending regarding possible rehearing *en banc*).

April 6, 2021 election—year start, 30-day, and 7-day reports.⁵ Because no mayoral candidate secured more than 45 percent of the votes cast in the regular election, a runoff election was scheduled for May 11, 2021 between the top two candidates, David Bronson and Forrest Dunbar.⁶

The Complaint in this matter was filed after the regular election, and expedited consideration was denied about a month before the runoff. BFM filed one 7-day report before the runoff election. That election was certified on May 15, 2021, and Mayor David Bronson won the seat. Additional amendments to BFM's reports were filed after the election.

When the Commission denied expedited consideration and referred this matter to Staff for investigation, Staff spent more than 70 hours investigating. Staff prepared a report and presented its findings and recommendations to the Commission at its September 29, 2021 regular meeting. The facts presented by Staff are as follows:

A. Campaign Finance Reports

1. Year-Start Report

Year-start reports are filed on February 15 and cover the period from the start of the campaign through February 1 of that year.⁷ Because February 15, 2021 was a state holiday, BFM timely filed this report covering the period from August 25, 2020 through

⁵ See AS 15.13.110(a).

⁶ Anchorage Municipal Charter Section 11.02(b); ANC 28.20.010C. If no mayoral candidate receives more than 45 percent of the votes cast for mayor, a runoff election must be held between the top two candidates.

⁷ AS 15.13.110(a).

February 1, 2021 on February 16, 2021. BFM amended the report the same day. The amended report reflects a \$15,250 debt to Hackney and Hackney for "Marketing and event invites," a January 19, 2021 debt of \$636.36 to i360 for "Portal setup/Mega Plan," and a January 28, 2021 debt of \$100 to Old Time Distributors for "key rings."

2. 30-day report

BFM timely filed its 30-day report for the period of February 2, 2021, through March 5, 2021 on March 8, 2021. That report reflects a March 2, 2021 debt to Starfish Enterprise for "campaign management" and a March 5, 2021 debt to David Bronson for "candidate loan to the campaign." The report shows no other debts, even though the investigation later revealed that the candidate signed a letter of engagement with Axiom Strategies, a political consulting firm, on February 4, 2021, calling for a \$5,000 monthly retainer to be paid each month for four months. Axiom agreed to provide a variety of services, including direct mail campaigns, television, radio, digital media, and social media advertising. The report reflects two \$5,000 payments to Axiom for "Campaign Consultant."

The report also shows a payment to Hackney and Hackney of \$18,250 for advertising on radio stations, the Must Read Alaska blog, and event invites. And the report shows payment of the key ring debt, plus two payments to i360 for "data subscription."

3. 7-day report

BFM filed its 7-day report on March 30, 2021, covering March 6, 2021 through March 27, 2021. This report includes no debts other than the previously reported

March 2021 \$5,000 “candidate loan.” The report shows a \$35,000 payment to Hackney & Hackney on March 25, 2021 for television and radio marketing, a March 18, 2021 \$29,500 payment to Hackney and Hackney for radio production and placement, Must Read Alaska advertising, office rent, endorsement ads, and invitations. And the report shows \$59,185 in three separate payments to Axiom for “campaign Consultant and mail outs.”

4. April 6, 2021 Amendment: year-start report

On April 6, 2021—the date of the regular election—BFM amended its year-start report again, to show an August 26, 2020 non-monetary contribution of website development in the amount of \$500.

5. April 15, 2021 Amendment: 7-day report

By April 15, 2021, the Complaint in this matter had been filed, and expedited consideration was denied in an order issued that day. BFM amended its 7-day report to show a March 8, 2021 payment of \$5,000 to Axiom and Remington Research Group for “Anchorage Mayoral Survey (person to person text).” The corresponding debt to Axiom/Remington was not reported until a later amendment.

6. 7-Day Runoff Report

On May 5, 2021, BFM filed its 7-day runoff election report, covering March 28, 2021 through May 1, 2021. The report was amended twice the day it was filed. In this report, a September 20, 2020 debt to Hackney and Hackney of \$95,000 for “Media/Marketing (local television and radio) (estimate)” was reported for the first time. Also for the first time, BFM reported a February 4, 2021 debt to Axiom of \$60,000 with

an unpaid balance of \$40,000 for “Campaign Consulting (consulting, management, development, strategy, guidance (Estimate).” That report was inconsistent with BFM’s having by that time already reported payments to Axiom totaling \$280,831. The report also included two debts to WPAL, one in the amount of \$1,000 incurred March 30, 2021 for a poll survey question and one in the amount of \$2,000 incurred April 30, 2021 for a runoff memo.

7. May 11, 2021 Amendments: 30-day and 7-day reports

Both the 30-day and the 7-day reports were amended on May 11, 2021 to show a March 1, 2021 debt of \$5,000 to Remington Research Group for “Anchorage Mayoral Survey (person to person text).” The 30-day report amendment also added a \$20,000 debt to Axiom, with an unpaid balance of that full amount, incurred February 4, 2021 for general consulting, management, strategy, and guidance. This amendment reflects the four months of \$5,000 monthly retainers in BFM’s contract with Axiom, but does not reflect the other services Axiom provided.

This amendment updated the February 7, 2021 and February 12, 2021 payments to i360 on the 30-day report. Instead of two payments for “data subscription,” the amended report shows the February 7 payment as a portal setup fee and mega plan, and the February 12 payment as “Call Minutes Predictive Dialer Minutes (1/1/2021-1/31/2021). Although the predictive dialer minutes covered January 2021, BFM never reported a debt to Axiom covering services in January.

The May 11 amendments also amended the 7-day report, in ways not consistent with the 30-day report amendments filed the same day. On the 7-day report, BFM

reported an \$80,000 debt to Axiom, with an unpaid balance of \$15,815, incurred February 4, 2021 for general consulting, management, development, strategy, and guidance. Reported payments to Axiom by that time still totaled \$240,831 for “campaign consulting and mailouts.”

8. June 2, 2021 Amendments: 30-day report

After the runoff election was certified, BFM amended the payment descriptions in its 30-day report. The original report listed two \$5,000 payments to Axiom for “Campaign Consultant.” That description had been amended on April 15 to add “Mailouts.” Then on June 2, 2021, the description was expanded again to cover “general consulting, management, development, messaging, strategy and guidance.” And this amendment increased the amount of the March 1, 2021 debt to Remington from \$5,000 to \$5,500, still unpaid.

9. June 3, 2021 Amendments: 7-day report and 7-day runoff report

The 7-day and 7-day runoff reports were both amended on June 3, 2021, changing the March 8, 2021 Remington expenditure to \$5,500 rather than \$5,000. The amendment to the 7-day report also made several changes relevant to Axiom. The \$20,125 payment from March 15, 2021 was amended from “campaign consultant and direct mail” to direct mail only, and for the first time, the amendment named AT Publishing as a subcontractor for direct mailing. Similarly, the \$34,060 payment previously reported for general consulting, management, development, messaging, strategy and guidance was amended to direct mail only, and AT Publishing was added as the subcontractor.

In addition, the amendment to the 7-day report changed the dates and combined the WPAI services previously reported as having been incurred on March 30, 2021 (\$1,000 for poll survey question) and April 30, 2021 (\$2,000 for runoff memo) to reflect an earlier date of March 9, 2021 for both expenditures. And the total amount was increased to \$4,500 with an unpaid balance of \$3,000.

BFM also amended the 7-day runoff report to include seven changes in payments to Axiom from “campaign consulting and mailouts” to name AT Publishing as subcontractor for the mailings.

B. Over-the-Limit Contributions

The Complaint alleged that four individuals made contributions to the BFM campaign in excess of the \$500 annual limit and that BFM did not refund the overages. Staff’s investigation revealed that one of these—a \$100 excess donation—had in fact been refunded on the day it was donated, but BFM’s reporting had not reflected the refund. Another apparent over-the-limit donation of \$500 was shown to have occurred in a separate reporting year, and therefore was not a violation.

However, the investigation showed that a \$25 excess contribution made on December 31, 2020 was not returned. And a \$500 excess contribution was returned on April 14, 2021, only after the filing of the Complaint and 31 days after the excess contribution was made.

C. Additional Allegations in the Complaint

Several other allegations raised by the Complainant were investigated by Staff. Staff investigated the hosting of a fundraising reception at a private business and other in-

kind contributions to determine whether they were prohibited corporate contributions, but did not find sufficient evidence to show that such prohibited contributions had been made. In addition, Staff considered Mayor Bronson's administration's use of the campaign's website and social media to promote the new administration after the election. Staff concluded that such use is consistent with AS 15.13.112(a) because an elected official can retain and use property having a value of less than \$5,000 that was acquired for and used by the campaign. Finally, Staff investigated whether certain polling data reflected in a March 31, 2021 campaign post might have been acquired via an expenditure or non-monetary contribution that was never reported. Staff did not find evidence to support a finding that the data had been acquired via an unreported expenditure or contribution.

LAW AND ANALYSIS

A. Failure to File Full and Complete Reports

Candidates must file full reports of expenditures made and contributions received, in compliance with AS 15.13.040(a) and following the schedule set forth in AS 15.13.110(a). Reportable contributions include any nonmonetary contribution with a value greater than \$100.⁸

An expenditure is "a purchase or transfer of money or anything of value, or promise or agreement to purchase or transfer money or anything of value, incurred or

⁸ 2 AAC 50.321(a)(2).

made for the purpose of . . . influencing the . . . election of a candidate.”⁹ Candidates must report “the date and amount of all expenditures made.”¹⁰ And for expenditures incurred, but not yet paid, reports must include the date the expenditure was incurred, the name and address of the person to whom the debt was incurred, the purpose of the incurred expenditure, and the amount of the incurred expenditure.¹¹

For expenditures made to advertising agencies or to individuals or businesses that provide “campaign consultation or management services,” Alaska campaign disclosure regulations require candidates to report “in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed, and the amount of the expenditure.”¹² These rules apply to the four reports challenged in the Complaint as follows.

1. Year-Start Report

This first report should have included BFM’s debt incurred September 20, 2020 to Hackney and Hackney for “Media/Marketing (local television and radio) (estimate).” But the debt was first reported on BFM’s 7-day runoff report on May 5, 2021, as \$95,000 with a balance of \$12,250. The debt appeared on the May 11, 2021 amendment to the year-start report, but the June 3, 2021 amendment to the 7-day report increased the September 20, 2020 debt to \$150,000 with a balance of \$67,250. By failing to timely

⁹ AS 15.13.400(7)(A)(i).

¹⁰ AS 15.13.040(a)(1)(A).

¹¹ 2 AAC 50.321(a)(6).

¹² 2 AAC 50.321(d).

report the Hackney and Hackney debt on the year-start report, and by failing to accurately report the true amount of the debt, BFM violated AS 15.13.040 and 2 AAC 50.321.

The year-start report also failed to name the local television and radio stations that would be the subcontractors on the Hackney and Hackney services. This information was not provided on any of the three subsequent amendments to the year-start report. By failing to name the subcontractors, BFM violated 2 AAC 50.321(d).

Finally, the year-start report as originally filed did not include the non-monetary contribution of website design added on the April 6, 2021 amendment. By failing to report that contribution, BFM violated 2 AAC 50.321(a)(2).

The year-start report was originally due on February 16, 2021 and was never substantially compliant. The maximum civil penalty for failure to timely file a full and complete year-start report is \$50 per day while the violation continues.¹³ Staff made an equitable decision to stop assessing penalties as of May 17, 2021, the date Staff's report in this matter was originally due. The violation, so calculated, continued for 90 days, resulting in a maximum civil penalty of \$4,500.

2. 30-day report

BFM's May 11, 2021 amendment to the 30-day report reflects that BFM failed to carry over its then-reported \$95,000 debt to Hackney and Hackney, failed to report its February 4, 2021 debt of at least \$20,000 to Axiom, and failed to report its \$5,000 debt to

¹³ AS 15.13.390(a).

Remington in its original March 8, 2021 30-day report. Those failures constitute violations of AS 15.13.040 and 2 AAC 50.321.

BFM's 30-day report showed payment to Hackney and Hackney for "Advertising KENI, KASH, KGOT, KYMG, KAFC, KLEF, KMXS, KBRJ, KEAG & KFQD, Must Read, Event Invites." But BFM did not provide a full description of the services rendered until it amended its report on June 2, 2021. The amended report added the production of two ads that played on the stations originally listed, the production of the event invites, and a February 2, 3, and 4 ad run on KENI, KBRJ, KEAG, and KFQD.

BFM's 30-day report showed two payments to i360 with the description "data subscription." BFM added somewhat more information about those services when it amended its report on May 11, 2021. In the amended report, BFM shows the services rendered for one of the payments as "Portal setup/setup fee and mega plan." In the other, BFM shows the services rendered as "Call - Minutes Predictive Dialer Minutes." By failing to describe all services rendered and failing to name subcontractors where media was placed, BFM violated 2 AAC 50.321(d).

The 30-day report was due March 8, 2021, and was not made substantially compliant until the June 2, 2021 amendment. 30-day reports are also subject to a \$50 per day maximum civil penalty.¹⁴ Again applying Staff's equitable tolling of the running of this violation on May 17, the violation continued for a period of 70 days resulting in a maximum civil penalty of **\$3,500**.

¹⁴ *Id.*

3. 7-Day Report

On this report too, BFM failed to carry over its reported \$95,000 debt to Hackney and Hackney. That omission was not corrected until BFM filed its May 11, 2021 amendment to the report. Moreover, the original 7-day report omitted the debt to Axiom entirely. That was not corrected until the May 11, 2021 amendment, in which BFM showed a February 4, 2021 debt to Axiom of \$80,000 with a balance of \$15,815. Moreover, the original 7-day report shows no debt to WPAI. That error was not corrected until the June 3, 2021 amendment, when BFM reported a \$4,500 debt to WPAI incurred March 9, 2021. The June 3 amendment also showed a debt of \$3,500 to i360 incurred April 13, 2021.

By failing to report the Axiom and Hackney and Hackney debts, and failing to timely report the WPAI debts, BFM violated AS 15.13.040 and 2 AAC 50.321. The maximum civil penalty for failure to file a complete 7-day report is \$500 per day while the violation continues.¹⁵ The 7-day report was due March 30, 2021 and was not substantially compliant until the June 3, 2021 amendment. Employing the May 17 tolling date, the violation continued for 48 days, resulting in a maximum civil penalty of \$24,000.

4. 7-day runoff report

In this report, originally filed May 5, 2021, BFM shows the Axiom debt as \$60,000 with a balance of \$40,000. And, on both this report and the June 3, 2021

¹⁵ *Id.*

amendment to it, the WPAI debt was shown with lower amounts and later service dates than reported on the May 11, 2021 amendment to the 7-day report. Moreover, the 7-day runoff report failed to name AT Publishing as Axiom's subcontractor for seven different instances of payments for mailings. That error was not corrected until BFM amended the report on June 3, 2021.

These inconsistent reports of debt amounts and expenditure dates and missing subcontractor information establish violations of AS 15.13.040 and 2 AAC 50.321. The 7-day runoff report was due May 4, 2021 and was never substantially compliant until the June 3, 2021 amendment. Again using Staff's May 17 tolling date for the running of penalties, this violation continued for 13 days, resulting in a maximum civil penalty of **\$6,500**.¹⁶

In sum, the maximum civil penalties for BFM's campaign finance reporting violations total **\$38,500**.

B. Over-the Limit Contributions

An individual may not contribute more than \$500 per year to a candidate.¹⁷ A campaign's treasurer is required to use "best efforts" to ascertain whether a contribution is prohibited, and if so, to return it no later than 10 days after receipt.¹⁸ The maximum penalty for violating this provision is \$50 per day after the grace period ends.¹⁹

¹⁶ *See id.*

¹⁷ AS 15.13.070(b)(1).

¹⁸ 2 AAC 50.266.

¹⁹ *See* AS 15.13.390(a)(4) (setting penalty at \$50 per day).

The Commission finds that BFM violated these provisions with respect to two contributions. First, BFM received a \$25 excess contribution on December 31, 2020, which should have been returned by January 10, 2021. But the contribution was not returned before the May 17, 2021 date Staff selected to equitably toll the running of assessed penalties, 127 days later. Second, a \$500 excess contribution made on March 14, 2021 should have been refunded no later than March 24, 2021. But that contribution was not returned to the contributor until April 14, 2021, 21 days late.

BFM argued that no penalties should be imposed for these violations because a panel of the Ninth Circuit recently declared the individual-to-candidate contribution limit unconstitutional.²⁰ Because the Commission recognizes the high likelihood that the ruling striking down AS 15.13.070(b)(1) could soon become final, the Commission does not impose penalties for these violations.

C. Mitigating and Aggravating Factors Analysis

The maximum civil penalty for the reporting violations established in this case totals **\$38,500**. 2 AAC 50.855 requires APOC Staff to calculate the maximum penalty as a starting point, and 2 AAC 50.865(a) and (b) set forth certain mitigating factors that may be applied to reduce or waive the penalty. The regulation also provides a list of aggravating factors that support imposition of the statutory maximum.²¹

At the hearing before the Commission, Staff argued that none of the mitigating factors apply, and advocated imposition of the full amount. Staff emphasized the

²⁰ *Thompson v. Hebdon*, 7 F.4th 811 (9th Cir. July 30, 2021).

²¹ 2 AAC 50.865(d).

pervasiveness of the violations and the fact that the Commission gave BFM an opportunity at the time of the expedited consideration hearing to “expeditiously correct” the issues before the runoff election. But Staff pointed out that despite filing a total of seventeen amendments to the four reports, BFM never fully complied with its reporting obligations.

Staff specifically highlighted that “BFM never gave a realistic estimate of its original debt to Axiom.” The amount reported “has fluctuated from \$20,000 with a balance of \$20,000 to \$80,000 with a balance of \$15,815 and finally to \$60,[000] with a balance of \$40,000 per a February 4, 2020 Letter of Agreement whereby Axiom would essentially be running the campaign up to and including ‘integrating and building the existing campaign team to include all vendor selections, staff recommendations, reassignments, terminations, and pay schedules.’”²² Staff also pointed to BFM’s report amendment dates in relationship to the April 6, 2021 and May 11, 2021 election dates, arguing that “after wading through BFM’s utterly confusing reports for many days, it is clear . . . that the public had no idea of what was going on in the BFM campaign until well after” those elections.²³

BFM’s counsel acknowledged at the hearing that the facts as presented by Staff are undisputed and stated that the only open issue was the legal analysis regarding the imposition of the penalty. BFM argued that imposing the maximum would be inconsistent with prior cases before the Commission, and emphasized that the regulation

²² Amended Staff Report. 21-01-CD. 20-21 (July 23, 2021).

²³ *Id.* at 21.

empowers the Commission to exercise discretion and impose penalties below the statutory maximum.

The prior orders cited by BFM carry minimal weight with respect to this case. In *McCoy v. Vazquez*, the Commission applied a mitigating factor—the disproportionate size of the maximum penalty with respect to the campaign’s total contributions and the harm to the public.²⁴ And in *APOC Staff v. Brower*, Staff similarly recommended applying the mitigating factor regarding the maximum penalty’s disproportion to the degree of harm.²⁵ The Commission accepted that mitigation recommendation, but to a lesser degree due to the “egregious” and “uncorrected” violations there. Ultimately, the Commission imposed a penalty similar to the statutory maximum here.²⁶

The Commission agrees with Staff’s analysis that the mitigating factors in 2 AAC 50.865(a) and (b) do not apply to this case. Nevertheless, BFM implicitly received a substantial reduction in the maximum penalties based on Staff’s tolling the running of penalties on May 17, 2021 during its investigation of BFM’s confusing reporting history.

The absence of mitigating factors alone can suggest that a maximum penalty is appropriate. That conclusion is only bolstered by analysis of the aggravating factors set

²⁴ *McCoy v. Vazquez*, APOC No. 16-06-CD, 4-5 (Feb. 28, 2017), available at <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=13550> (reducing maximum fine greater than \$1,000,000).

²⁵ *APOC Staff v. Charlotte Brower*, APOC No. 15-02-CD, Staff Report at 8-9, available at <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=9879> (recommending reduction of maximum fine greater than \$170,000).

²⁶ *APOC Staff v. Brower*, APOC No. 15-02-CD, 3 (Sept. 24, 2015) available at <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=10328> (assessing \$34,460 penalty).

forth in 2 AAC 50.865(d). BFM's reports omitted large expenditures far exceeding \$1,000.²⁷ BFM had two late filings during the Anchorage mayoral campaign, and the reporting history here contains many violations of AS 15.13.²⁸ As Staff persuasively argued, the Commission gave BFM an opportunity to provide the public with accurate reports after expedited consideration was denied and in advance of the runoff election, yet BFM did not do so.²⁹ Moreover, the Commission concludes that a penalty less than the maximum here would not serve the important function of encouraging campaigns to employ campaign treasurers with the skills and training to comply with APOC regulations. The public deserves timely and accurate reporting of a campaign's financial activity.

CONCLUSION

For these reasons, BFM is ordered to pay a civil penalty of \$38,500.

This is a final Commission order that may be appealed to the superior court within 30 days from the date of the order.³⁰ A request for the Commission to reconsider this order must be filed within 15 days from the date this order is delivered or mailed.³¹

Dated: October 11, 2021.

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION³²

²⁷ See 2 AAC 50.865(d).

²⁸ See 2 AAC 50.865(d)(2)(A), (D).

²⁹ See 2 AAC 50.865(d)(2)(B).

³⁰ AS 15.13.380(g), AS 44.62.560, Alaska R. App. P. 602.

³¹ 2 AAC 50.891(g).


Certificate of Service:

I hereby certify that on this date, I served, by certified mail and email a true and correct copy of the foregoing in this proceeding on the following:

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 10/11/21
Paralegal Date

³² Commissioners Anne Helzer, Richard Stillie, Suzanne Hancock, Dan LaSota, and Van Lawrence participated in this matter. The decision was made on a 5-0 vote.