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**APOC - ANCH
PM HC FAX **ELE****

October 5, 2021

Thomas R. Lucas
Campaign Disclosure Coordinator
Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149

Dear Mr. Lucas:

I. INTRODUCTION

- II.** Please accept this letter from Open for Business Anchorage (formerly Open for Business with Bronson) as our Answer to the allegations in the complaint 21-03-CD, *Paula DeLairro v. Open for Business Anchorage*. **BACKGROUND**

On April 19, 2021, the undersigned registered the group "Open for Business with Bronson" as a group seeking to participate in the mayoral runoff election to be held on May 11, 2021.¹ On April 23, 2021, the undersigned filed an amended group registration form clarifying that the group was an independent expenditure group.²

On June 30, 2021, the undersigned filed an amended group registration form changing the name of the group to "Open for Business Anchorage."³ On September 7, 2021, another amended group registration form was filed to allow the group to participate in the upcoming Anchorage Municipal Special Election to be held on October 26, 2021.⁴

Days later, the Complainant filed her complaint in this matter.

III. ANSWER

Ms. DeLairro alleges that the group Open for Business Anchorage has violated five campaign-finance requirements, as follows:

- Late filing of a 10 Day Report
- Failure to file other required 10 Day IE reports
- Made an expenditure before registering (Open for Business Anchorage)
- Failure to file a 24-hour report
- Incorrect Donor Information/Missing Donor

With regard to late filing of a 10-day report and failure to file other required 10-day IE reports:

Our team of volunteers was focused on complying with the new Ballot Measure 2 requirements listed on the front page of the APOC website with regard to correctly reporting income and completing the reports

¹ Group Registration Form (April 19, 2021).

² Group Registration Form (April 23, 2021).

³ Group Registration Form (June 30, 2021).

⁴ Group Registration Form (Sept. 7, 2021).

that were highlighted on our account. We were not aware of the requirements to file a 10-day report, therefore, no 10-day reports were filed.

Complainant has failed to show that Open for Business Anchorage has violated any requirement as to its Independent Expenditure Form 15-6 dated May 20, 2021.

With regard to expenditure before registration:

The law as I understand it requires a group to register with APOC before making expenditures in support of or in opposition to a candidate or before making an expenditure in support of or in opposition to a ballot proposition. Our group registered with APOC on April 19, 2021, and the Complainant is complaining about a domain purchase on June 10, 2021. See Attachment E to Complaint. Because our group registered with APOC almost two months before it purchased the domain, there is no violation.

With regard to failure to file 24-hour report:

The expenditures to Optima Public Relations expenditures of May 5 and May 11, 2021, were reported on the group's May 20, 2021, filing with APOC. We were not aware of the requirement to file a 24-hour report for these expenditures, therefore, no 24-hour reports were filed.

With regard to true sources allegations:

There were multiple data entry errors with regard to check numbers and addresses that have been corrected on forms filed with APOC on October 4, 2021

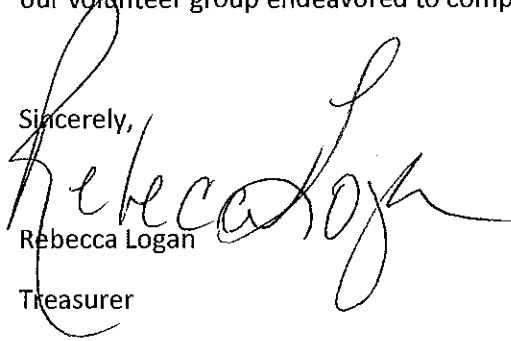
There was no missed reporting of a contribution. The 5/3/21 contribution from WEKA, LLC on the 24-hour reported was reported on the 105-day report, however, WEKA LLC was incorrectly listed as WEKA Tactical. That has been corrected.

- *There was only one contribution of \$2,000 from WEKA, LLC.*
- *The addresses for Nutrition Express, LLC and TC Leasing, LLC have been corrected on these forms from "PO Box 244027, Wasilla" to "PO Box 240474, Anchorage." The incorrect PO Box was merely a typo.*
- *Crystal Herring's address has likewise been changed to correct the typo from "PO Box 244027, Wasilla" to "PO Box 240474, Anchorage."*
- *The references to "Tactical LLC" have been changed to "WEKA Tactical" with the correct address of "PO Box 240474."*

IV. CONCLUSION

We properly registered with APOC in April 2019, before making any expenditures. Unfortunately, our group did incorrectly report mistyped PO boxes, but correctly listed the contributors of those funds. There is no allegation that the group did not disclose contributions or expenditures. As a first-time filer, our volunteer group endeavored to comply with all filing requirements.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca Logan". The signature is written in a cursive style with a large initial "R".

Rebecca Logan

Treasurer

Open for Business