



Alaska Public Offices Commission

EXPEDITED COMPLAINT



EXPEDITED COMPLAINT REQUEST	ALL COMPLAINTS MUST INCLUDE:	<i>APOC case name/number/date</i>
<p>PRIOR to requesting expedited review, ensure your filing meets the factors required for expedited approval in AS 15.13.380(c). Those factors are whether the alleged violation:</p> <p><input type="checkbox"/> if not immediately restrained (stopped), could materially affect the outcome of an election or other impending event;</p> <p><input type="checkbox"/> could cause irreparable harm that penalties could not adequately remedy; and</p> <p><input type="checkbox"/> whether there is reasonable cause to believe that a violation has occurred or will occur</p> <p>Expedited review requires the complainant to prove the violation by a preponderance of the evidence.</p>	<ol style="list-style-type: none"> 1. Complainant's name + contact info 2. Respondent's name + contact info 3. Laws, regulations allegedly violated 4. Description of allegations 5. Basis of knowledge of alleged facts 6. Documentation to support allegations 7. Notarized signature of the complainant 8. Proof that complaint <i>and</i> all supporting documents were served on respondent 	
APOC LAWS ALLEGEDLY VIOLATED <i>Specify section of law or regulation</i>		
Campaign Disclosure Law <input checked="" type="checkbox"/> AS 15.13 <input checked="" type="checkbox"/> 2 AAC 50.250-405		Public Official Financial Disclosure <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799
Lobbying Regulation <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590		Legislative Financial Disclosure <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799

<input type="checkbox"/> APOC <input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group	COMPLAINANT		RESPONDENT <i>Person or group allegedly violating law</i>
	Virginia Bonnie Lembo		<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group Friends of House District 17 Opposing Zack Fields
Address City / Zip	1342 W. 12 th Ave, Anchorage AK 99501		Krystal Lunda, 8101 Peck Ave #B14, Anchorage AK 99504
Phone/Fax	(907) 278-2725		9073016061
E-mail	lembob@gci.net		Krystal.Lunda@outlook.com

COMPLAINANT'S REPRESENTATIVE	RESPONDENT'S REPRESENTATIVE
<i>If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info</i>	
Name/Title	
Address	
Phone/Fax	
E-mail	

DESCRIPTION or SUMMARY of ALLEGED VIOLATION	Use extra pages if needed	x SUPPORTING DOCUMENTS – DESCRIBE:
1. Illegal coordination (see attached details)		See extra pages below
2. Failure to disclose contributions timely		
3. Failure to disclose expenditures timely		
(see attached details on following pages)		

PROOF of SERVICE ATTACHED: Fax – receipt confirmation Certified mail – signed receipt
 Process server – return of service E-mail – delivery/read receipt Other:

COMPLAINANT'S SWORN STATEMENT: To the best of my knowledge and belief, these statements are true

Signature *Virginia Bonnie Lembo* Date *9/13/22*
 Subscribed and sworn to or affirmed by me at *Anchorage, Alaska* on *9/13/22*

Signature *Denal I* Title *Notary*

APOC COMPLAINTS, RESPONSES, INVESTIGATION REPORTS & COMMISSION ACTIONS ARE PUBLIC DOCUMENTS

APOC ANCHORAGE	APOC JUNEAU	APOC COMPLAINT PROCESS: 2 AAC 50.450 -476	
2221 E. NORTHERN LIGHTS #128	240 MAIN STREET #500	FILING COMPLAINTS: 2AAC 50.870	ANSWERING COMPLAINTS: 2AAC 50.880
ANCHORAGE, AK 99508	P.O. BOX 110222	APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870	
907-276-4176 / FAX 907-276-7018	JUNEAU, AK 99811	INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891	
TOLL-FREE 800-478-4176	465-4864 / FAX 465-4832	RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c)	
WEB: http://doa.alaska.gov/apoc/	APOC FORMS: http://doaalaska.gov/apoc/forms_all.html	APOC LAWS: http://doa.alaska.gov/apoc/apoclaws.html	

Further Description of Violations

Improper Coordination – AS 15.13.400(11)

AS 15.13.400(11) “independent expenditure” means an expenditure that is made without the direct or indirect consultation or cooperation with, or at the suggestion or the request of, or with the prior consent of, a candidate, a candidate's campaign treasurer or deputy campaign treasurer, or another person acting as a principal or agent of the candidate;

- Krystal Lunda is the Treasurer of Harriet Drummond’s campaign and the Treasurer of the IE group.
- Krystal Lunda is also being paid by the IE group for bookkeeping through “Clear Solutions – Krystal Lunda” in the IE report.
- Elstun is a deputy treasurer for Drummond’s campaign and gave the seed money for the IE group on 6/22, a day before the IE group was registered.

Violation of 10-day report for independent expenditures – AS 15.13.110(h); AS 15.13.135(a)

AS 15.13.110(h) An independent expenditure report required under [AS 15.13.040\(e\)](#) shall be filed with the commission not later than 10 days after an independent expenditure has been made. However, an independent expenditure that exceeds \$250 and that is made within nine days of an election shall be reported to the commission not later than 24 hours after the expenditure is made.

AS 15.13.135(a) An independent expenditure supporting or opposing a candidate for election to public office, except an independent expenditure made by a nongroup entity with an annual operating budget of \$250 or less, shall be reported in accordance with [AS 15.13.040](#) and 15.13.100 — 15.13.110 and other requirements of this chapter.

- Date of expenditures: 7/11/22
- Date of report filing: 8/30/22

Violation of 24-hour reporting by group for contributions exceeding \$2K – AS 15.13.110(k)

AS 15.13.110 (k) Once contributions from an individual, person, nongroup entity, or group to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent expenditures in one or more candidate elections in the current election cycle exceed \$2,000 in a single year, that entity shall report that contribution, and all subsequent contributions, not later than 24 hours after receipt. For purposes of this subsection, the entity is required to certify and report the true source, and all intermediaries, if any, of the contribution as defined by [AS 15.13.400\(18\)](#).

- Date of contributions: 6/22, 6/23, 6/26
- Date of report filing: 8/30/22

Violation of 24-hour reporting by contributor for contributions exceeding \$2K – AS 15.13.040(r)

(r) Every individual, person, nongroup entity, or group that contributes more than \$2,000 in the aggregate in a calendar year to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent



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expenditures in one or more candidate elections in the current election cycle shall report making the contribution or contributions on a form prescribed by the commission not later than 24 hours after the contribution that requires the contributor to report under this subsection is made. The report must include the name, address, principal occupation, and employer of the individual filing the report and the amount of the contribution, as well as the total amount of contributions made to that entity by that individual, person, nongroup entity, or group during the calendar year. For purposes of this subsection, the reporting contributor is required to report and certify the true sources of the contribution, and intermediaries, if any, as defined by [AS 15.13.400\(18\)](#). This contributor is also required to provide the identity of the true source to the recipient of the contribution simultaneously with providing the contribution itself.

- Dates of contributions: 6/22, 6/23, 6/26
- Date of report filing 8/30/22

Reason for Request for Expedited Consideration:

I address here statutory factors for Expedited Consideration under AS 15.13.380(c):

Could the alleged violation, if not immediately restrained, materially affect the outcome of an election?

The election is in less than two months and this IE has already raised a significant amount of money (enough for multiple rounds of mail and a large amount of digital ads), and has already transferred funds to purchase ads. Failure to grant expedited review would mean these negative ads will almost certainly have an impact on the election. Given the close margin in the primary between the two candidates (fewer than 100 votes separated the candidates), it is likely the negative and illegal ads could be decisive in the election.

Could the alleged violation could cause irreparable harm that penalties could not adequately remedy?

Yes. If the illegal ads (illegal by virtue of impermissible coordination, grossly delayed reporting of major contributions, and grossly delayed IE expenditures) go forward and influence the election in a decisive manner, whatever fines are issued later will fail to maintain integrity of our elections, which is the purpose of the statute.

Is there reasonable cause to believe that a violation has occurred or will occur?

As outlined above, it is clear the IE group has violated the law and is violating the law based on impermissible coordination and grossly delayed reporting of income and expenditures.

Primary Documents, All Copied Directly From Submissions to APOC:

Impermissible Coordination, Specifically Overlapping Treasurers and Deputy Treasurers Between Campaign and IE on the following APOC reports.

CANDIDATE REGISTRATION FORM

AMENDMENT

Amendment Description: Add deputy treasurers

COMPLETED

Submission Date: **08/01/2022**
Filer First Name: **Harriet**
Filer Middle Name: **A**
Filer Last Name: **Drummond**
Election: **2022 - State Primary**
Office Type: **Did Not Report**

CANDIDATE INFORMATION

Previously Registered (From MJE or LOI Form)
Exemption Status: **None**

Election Year: **2022**
Candidate Display Name: **Harriet A. Drummond**
Candidate Legal First Name: **Harriet**
Candidate Legal Last Name: **Drummond**

Campaign Committee Name:
Campaign Mailing Address: **2139 Solstice Circle**
City, State Zip: **Anchorage, Alaska 99503**

CHAIR

Name: **Sheila Selkregg**
Address: **307 West 12th Avenue**
City, State Zip: **Anchorage, Alaska 99501**
Phone: **907-830-5653**
E-mail: **SheilaSelkregg@gmail.com**
Fax (Optional): **Did Not Report**

TREASURER

Name: **Krystal Lunda**
Address: **8101 Peck Ave # B14**
City, State Zip: **Anchorage, Alaska 99504**
Phone: **907-301-6060**
E-mail: **Krystal.Lunda@outlook.com**
Fax (Optional): **Did Not Report**

DEPUTY TREASURERS

Name	Address
Elstun W. Lauesen	2139 Solstice Circle Anchorage, Alaska 99503
Kristian Dahl	3151 Horizon street Anchorage, Alaska 99517
Kelly Merritt	1241 Inlet Place Anchorage, Alaska 99501
Owen G. Ascott	3306 Lois Drive Anchorage, Alaska 99517
Sarah Sue Evans	1900 Wickersham Avenue Juneau, Alaska 99801
Leila E. Wise	1228 G Street Anchorage, Alaska 99501
Alexander A. Drummond	2139 Solstice Circle Anchorage, Alaska 99503

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Northrim Bank**

Bank Address: **P.O.Box 241489**

City, State, Zip: **Anchorage, Alaska 99524-1489**

GROUP REGISTRATION FORM

AMENDED

COMPLETED

Submission Date: **06/23/2022**Filer First Name: **Martin**

Filer Middle Name (Optional):

Filer Last Name: **Hansen**Filer's Title with Group: **Chair**

GROUP INFORMATION

Previously Registered: **No**Election Year: **2022**Group Name: **Friends of District 17**

Abbreviation:

Purpose: **To influence the outcome of the primary election in District 17**Group Type: **Independent Expenditure**Group Mailing Address: **1352 Inlet Pl**City, State Zip: **Anchorage, Alaska 99501**Additional Email Addresses to Notify: **bikeskifish@gmail.com;deborah.L.hansen@gmail.com;krystal.lunda**

CHAIR

Name: **Martin Hansen**Address: **1352 Inlet Pl**City, State Zip: **Anchorage, Alaska 99501**Phone: **19079805333**E-mail: **bikeskifish@gmail.com**Fax (Optional): **Did Not Report**

TREASURER

Name: **Krystal Lunda**Address: **8101 Peck Ave #B14**City, State Zip: **Anchorage, Alaska 99504**Phone: **9073016061**E-mail: **Krystal.Lunda@outlook.com**Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
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Name	Address	Title
No Deputy Treasurers / Co-chairs / Nothing to Report		

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

CAMPAIGN PLANS

Disbanding: No plans to re-form. Closing out campaign account.

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Credit Union 1**Bank Address: **1941 Abbot Rd**City, State Zip: **Anchorage, Alaska 99507**

INDEPENDENT EXPENDITURES FORM 15-6

COMPLETED

Submission Date: **08/30/2022**

FILER INFORMATION

Filer First Name: **Krystal**
Filer Middle Name:
Filer Last Name: **Lunda**
Filer Full Address: **8101 Peck Ave B-14 Anchorage, Alaska 99504**
Filer Occupation: **Bookkeeper**
Filer Employer: **Self**
Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**
Election Year: **2022**
Report Type: **Ten Day**
Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Friends of District 17 Opposed to Zack Fields "Friends of District 17"**
Type of Business or Organization: **Registered Group**
Address: **1352 Inlet Pl**
City: **Anchorage**
State: **Alaska**
99501
Country: **United States**
Business/Other Entity Contact Person: **Krystal Lunda**
Contact E-mail: **Krystal.Lunda@outlook.com**
Contact Phone: **9073016061**

ELECTION INFORMATION

Election: **Anchorage Municipal Election**

OFFICERS

Name	Full Address	Title
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Name	Full Address	Title
Martin Hansen	1352 Inlet PI Anchorage, Alaska 99501	Chair
Krystal Lunda	8101 Peck Ave #B14 Anchorage, Alaska 99504	Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
07/11/2022	Clear Solutions - Krystal Lunda 8101 Peck Ave B-14 Anchorage, Alaska 99504	Check Check Number: 1003	Friends of Election: Anchorage Municipal Election Bookkeeping	\$500.00
07/11/2022	D'Zine Alaska 3705 Arctic Blvd # 2445 Anchorage, Alaska 99503	Check Check Number: 1002	SUPPORT: Friends of Election: Anchorage Municipal Election Advertising	\$5,000.00
07/11/2022	Kasha Smith-Poynter 3705 Arctic Blvd # 2445 Anchorage, Alaska 99503	Check Check Number: 1001	SUPPORT: Friends of Election: Anchorage Municipal Election Advertising	\$1,250.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
06/22/2022	Type: Individual Name: Lauesen, Elstun 2139 Solstice Circle Anchorage, Alaska 99503	Occupation: Consultant Employer: Self Employed , Alaska	\$5,000.00
06/23/2022	Type: Individual Name: Constantine, Maria 14601 Tahoe Canyon Rd Bakersfield, California 93306	Occupation: Retired Employer: Retired , Alaska	\$2,500.00
06/26/2022	Type: Individual Name: Anagnostis, Stephen 60 Elizabeth Rd Belmont, Massachusetts 02178	Occupation: Retired Employer: Retired , Alaska	\$5,000.00

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 3	
Total of paid Expenditures:	\$6,750.00
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report: 3	
Total of Contributions Reported with this Report:	\$12,500.00
Cumulative Contribution Amounts:	\$12,500.00
Number of Officers:	2
Number of Debts Reported with this Report: 0	
Total of Debts Incurred but not yet paid:	\$0.00

Expenditures reported late:

INDEPENDENT EXPENDITURE: EXPENDITURES

Report Year: **Status:** **Filed After:** **Filed Before:** **Filer Type:**

Date	Recipient	Payment Type	Payment Detail	Amount	Submitted	Status
07/11/2022	Clear Solutions - Krystal Lunda	Check	1003	\$500.00	08/30/2022	<u>Filed</u>
07/11/2022	D'Zine Alaska	Check	1002	\$5,000.00	08/30/2022	<u>Filed</u>
07/11/2022	Kasha Smith-Poynter	Check	1001	\$1,250.00	08/30/2022	<u>Filed</u>

Note: There are additional features and columns available by right-clicking the column headers. You may add and remove columns under the 'Additional Fields' submenu.



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Contributions Reported Late, Lead IE Contributor (Lauesen) Overlapping With Drummond Campaign Treasurer; Note Lauesen Contributed First to IE Before It Was Registered, Suggesting He Played Lead Role in Creating IE (Lauesen Is Drummond's Husband)

See APOC report on next page.

INDEPENDENT EXPENDITURES FORM 15-6

COMPLETEDSubmission Date: **08/30/2022**

FILER INFORMATION

Filer First Name: **Krystal**

Filer Middle Name:

Filer Last Name: **Lunda**Filer Full Address: **8101 Peck Ave B-14
Anchorage, Alaska 99504**Filer Occupation: **Bookkeeper**Filer Employer: **Self**Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**Election Year: **2022**Report Type: **Ten Day**Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Friends of District 17 Opposed to Zack Fields "Friends of District 17"**Type of Business or Organization: **Registered Group**Address: **1352 Inlet Pl**City: **Anchorage**State: **Alaska****99501**Country: **United States**Business/Other Entity Contact Person: **Krystal Lunda**Contact E-mail: **Krystal.Lunda@outlook.com**Contact Phone: **9073016061**

ELECTION INFORMATION

Election: **Anchorage Municipal Election**

OFFICERS

Name	Full Address	Title
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Name	Full Address	Title
Martin Hansen	1352 Inlet Pl Anchorage, Alaska 99501	Chair
Krystal Lunda	8101 Peck Ave #B14 Anchorage, Alaska 99504	Treasurer

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07/11/2022	Kasha Smith-Poynter 3705 Arctic Blvd # 2445 Anchorage, Alaska 99503	Check Check Number: 1001	SUPPORT: Friends of Election: Anchorage Municipal Election Advertising	\$1,250.00

CONTRIBUTIONS


Contribution Date	Contributor	Details	Amount
06/22/2022	Type: Individual Name: Lauesen, Elstun 2139 Solstice Circle Anchorage, Alaska 99503	Occupation: Consultant Employer: Self Employed , Alaska	\$5,000.00
06/23/2022	Type: Individual Name: Constantine, Maria 14601 Tahoe Canyon Rd Bakersfield, California 93306	Occupation: Retired Employer: Retired , Alaska	\$2,500.00
06/26/2022	Type: Individual Name: Anagnostis, Stephen 60 Elizabeth Rd Belmont, Massachusetts 02178	Occupation: Retired Employer: Retired , Alaska	\$5,000.00

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			


REPORT SUMMARY

Number of Expenditures Reported with this Report: 3	
Total of paid Expenditures:	\$6,750.00
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report: 3	
Total of Contributions Reported with this Report:	\$12,500.00
Cumulative Contribution Amounts:	\$12,500.00
Number of Officers: 2	
Number of Debts Reported with this Report: 0	
Total of Debts Incurred but not yet paid:	\$0.00

From: Robert Bundy robundy626@gmail.com 
Subject: APOC Expedited Complaint
Date: September 13, 2022 at 8:26 PM
To: Krystal.Lunda@outlook.com



Please see attached

 Sender notified by
Mailtrack



APOC
ExComplaint.pdf

From: Mailtrack Notification notification@mailtrack.io
Subject: Krystal.Lunda@outlook.com has just read «APOC Expedited Complaint»
Date: September 13, 2022 at 8:27 PM
To: rcbundy626@gmail.com



APOC Expedited Complaint [open email](#)

Krystal.Lunda@outlook.com read your
email less than a minute after it was sent

✈ Sent on Sep 14, 2022 at 12:26 AM

✓ Read on Sep 14, 2022 at 12:27 AM by Krystal.Lunda@outlook.com

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Recipients

✓ Krystal.Lunda@outlook.com [\(invite to Mailtrack\)](#)

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