BEFORE THE ALASKA PUBLICR OFFICES COMMISSION

Randy Ruedrich,	)	
Complainant,	)	
vs.	)	**Case No. 25-22-CD**
Louise Stutes,	)	
Respondent.	)	

PROPOSED CONSENT AGREEMENT

I. SUMMARY OF PROCEEDINGS LEADING TO CONSENT AGREEMENT

A. Parties

The parties to this Proposed Consent Agreement are the respondent Louise Stutes and the Alaska Public Offices Commission Staff ("APOC staff").

B. Complaint

The parties enter into this Proposed Consent Agreement regarding complaint 25-22-CD filed by Randy Ruedrich, relating to Stute's 2020, 2022, and 2024 campaigns for State House.[1] Alleged violations include:

1) Failing to properly correct excessive funding of her Future Campaign Account (FCA) (2020)
2) Failing to accurately disclose contributors (2022)
3) Failing to properly describe expenditures to an advertising agency (2022 and 2024)
4) Improperly reimbursing herself for campaign related and non-campaign related expenditures (2024)
5) Improperly using campaign funds for legislative business (2024)
6) Failing to disclose and accurately report contributions and expenditures (2024)

Respondent Stutes acknowledged making errors in her reporting, stating that while the insufficiencies were not intentional, she took "full responsibility for the inaccuracies" and requested to enter into a consent agreement.[2]

[1] Complaint, https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27298.
[2] Complaint Response, https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27360.

C. Intent of the Agreement

This Proposed Consent Agreement intends to resolve all pending matters related to 25-22-CD. The Parties understand this Proposed Consent Agreement is not effective unless and until it is approved by the Alaska Public Offices Commission.

II. BACKGROUND FACTS AND ANALYSIS OF ALLEGATIONS

Louise Stutes, a sitting legislator, ran for re-election in the 2020, 2022, and 2024 state primary and general elections and was required to disclose her financial activity. Complainant Randy Ruedrich filed complaint 25-22-CD alleging several violations of campaign disclosure law. As part of this Proposed Consent Agreement, APOC staff provides the below analysis and recommendations.

1) Failing to properly correct excessive funding of her Future Campaign Account (FCA) (2020)

APOC staff finds substantiated the allegation that Respondent initially overfunded but thereafter corrected her FCA account. In 2020, Respondent filed a year-end report that disclosed a transfer of $8,744.50 of unused campaign funds into an FCA, an overfunding of the $5,000 statutory limit by $3,744.50.[3] In a subsequently filed year-end report, she corrected the error by shifting an amount to her POET account and donating the remainder to charity as allowed by law. However, the corrections occurred after the statutory deadline for disbursement and rendered the correctly filed year-end report 13 days late.[4]

2) Failing to accurately disclose contributors (2022)

APOC staff finds this allegation substantiated. In 2022, Respondent reported two contributions s in her 30-day general report ($82.60 and $1,162.60)[5] and three contributions in her 7-day general report ($1,248.85, $1,162.60, and $902.92)[6] from Democracy Engine LLC, describing it as a "PAC." However, Respondent acknowledged in response to

[3] Year-end report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=33622&ViewType=CD.
[4] AS 15.13.116.
[5] 30-day report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=38422&ViewType=CD.
[6] 7-day general, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=38870&ViewType=CD.

APOC's requests for information that Democracy Engine is not a PAC but rather is an online donation platform, and identified the individual contributors that should have been disclosed on the reports.[7] The failure to accurately identify individual contributors who donated through Democracy Engine rendered Respondent's 2022 30-day and 7-day general reports incomplete. Respondent agrees to amend the reports with full information on the contributors within 10 days of the Commission's approval of this Proposed Consent Agreement.

3) Failing to properly describe expenditures to an advertising agency (2022 and 2024)

APOC staff finds this allegation substantiated. In her 2022 7-day general and year-end reports and 2024 year-end report, Respondent made expenditures to Hackney Communications, an advertising or consulting business for which candidates "must disclose 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."[8] Respondent's descriptions of the expenditures ($7,750 for "flyers, $6,000 for "flyers," and $1,500 for "Campaign lit.") were insufficient under the regulation, rendering her 2022 7-day general and year-end reports and 2024 year-end report incomplete. Respondent agrees to amend the reports with full descriptions of the expenditures, compliant with 2 AAC 50.321(d), within 10 days of the Commission's approval of this Proposed Consent Agreement.

4) Improperly reimbursing herself for campaign related and non-campaign related expenditures (2024)

APOC staff finds this allegation substantiated. In her 2024 30-day general, 7-day general, and year-end reports,[9] Respondent noted reimbursements to herself as follows:

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[7] AS 15.13.040(a): "each candidate shall make a full report, upon a form prescribed by the commission, (1) listing (C) the name, address, date, and amount contributed by each contributor; and (D) for contributions in excess of $50 in the aggregate during a calendar year, the principal occupation and employer of the contributor; and (2) filed in accordance with AS 15.13.110 and certified correct by the candidate or campaign treasurer.
[8] 2 AAC 50.321(d).
[9] 30-day general report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=45201&ViewType=CD; 7-day report,

a.

09/23/2024	Check 504	**Stutes, Louise** 2230 Monashka Way Kodiak, Alaska 99615	Reimburse expenses for fund raiser on 9/16/24	**$736.19**

b.

10/20/2024	Check 507	**Stutes, Louise** 2230 Monashka Way Kodiak, Alaska 99615	Meet and Greet Expenses Cordova and Seward	**$453.12**

c.

10/30/2024	Check 508	**Stutes, Louise** 2230 Monashka Way KKodiak, Alaska 99615	Campaign expenses	**$1,118.95**

d.

11/09/2024	Check 509	**Stutes, Louise** 2230 Monashka Way Kodiak, Alaska 99615	Reimburse organizational expenses	**$1,151.96**
11/26/2024	Check 512	**Stutes, Louise** 223 Monashka Way Kodiak, Alaska 99615	Air fare reimbursement for organizational meeting	**$719.88**

e.

02/01/2025	Electronic Funds Transfer	**Stutes, Louise** 2230 Monashka Way kodiak, Alaska 99615	Reimburse. campaign expenses	**$2,699.38**

Campaign disclosure law allows candidates two options to reimburse themselves after using personal funds for campaign related expenses. A candidate may use the loan process outlined in AS 15.13.078, which requires a candidate to first record the use of personal funds as a contribution and then, "within five days of making the loan," submit an APOC reimbursement form.[10] Respondent took neither of these steps and is not eligible to be reimbursed via this provision.

Candidates also may be reimbursed after using their personal money for authorized campaign expenditures pursuant to 2 AAC 50.990 "if the amount is repaid no later than three days after the date of the expenditure."[11] For candidates using this option to reimburse themselves, APOC staff recommends they describe any purchases and identify the dates to make clear in their reporting that any subsequent personal reimbursement occurred within

https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=45185&ViewType=CD; Year-end report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=46425&ViewType=CD.

[10] AS 15.13.078, Contributions and loans from the candidate; AS 15.13.116(a)(4) (a candidate who holds unused campaign assets after the election may (4) repay loans from the candidate to the candidate's own campaign under AS 15.13.078(b)).

[11] 2 AAC 50.990 (a "contribution" does not include (x) "the use of personal money or credit by a candidate for an authorized campaign expenditure, if the amount is repaid no later than three days after the date of the expenditure.")

three days. Applying these principles and the regulation's three-day limit to Respondent's self-reimbursements alleged to be in violation:

a.

09/23/2024	Check 504	**Stutes, Louise** 2230 Monashka Way Kodiak, Alaska 99615	Reimburse expenses for fund raiser on 9/16/24	**$736.19**

Respondent's September 23rd reimbursement was not permissible because it occurred more than three days after Respondent incurred the September 16th fundraiser expenses. As the reimbursement was not authorized under campaign disclosure rules, Respondent must reimburse the campaign **($736.19**).

b.

10/20/2024	Check 507	**Stutes, Louise** 2230 Monashka Way Kodiak, Alaska 99615	Meet and Greet Expenses Cordova and Seward	**$453.12**

Concerning the October 20th reimbursement, it appears Respondent conglomerated more than one expenditure for self-reimbursement from more than one date in a single reporting entry. While Respondent's October 20th self-reimbursement for expenditures relating to the Seward "Meet and Greet" fall within the regulation's temporal restrictions (as the report indicates the Seward event occurred between October 18th and 20th), the report indicates the Cordova event occurred in early October, well outside the 3-day window for reimbursement. Because Respondent did not break down the expenditure by vendor or date or provide any details of their purpose, Respondent must reimburse the campaign for the amount (**$453.12**).

c.

10/30/2024	Check 508	**Stutes, Louise** 2230 Monashka Way KKodiak, Alaska 99615	Campaign expenses	**$1,118.95**

It is possible that Respondent's October 30th reimbursement, reported on her 2024 year-end report, satisfies campaign disclosure rules relating to timeliness for reimbursement. Respondent, however, provided no details on what was purchased, when they were purchased, or what they related to. "Campaign expenses" fails to meet the minimal descriptive requirements which still require, at minimum, "the purpose of the expenditure and rendered the report inomplete."[12] Respondent must reimburse the campaign for the amount **($1,118.95)**.

11/09/2024	Check 509	**Stutes, Louise** 2230 Monashka Way Kodiak, Alaska 99615	Reimburse organizational expenses	**$1,151.96**

d.

11/26/2024	Check 512	**Stutes, Louise** 223 Monashka Way Kodiak, Alaska 99615	Air fare reimbursement for organizational meeting	**$719.88**

Respondent's November 9th and 26th reimbursements on her 2024 year-end report violate campaign disclosure rules because neither are campaign expenses but instead relate to legislative business. Such expenditure reimbursements may be allowed for elected candidates like Respondent, but only where the funds are reimbursed from an established Public Office Expense Term (POET) account; they cannot be taken directly from a campaign account. Confounding the issue is that Respondent, after her 2024 campaign and consistent with regulation, *did* place $5,000 in her POET account, funds that potentially could have been used for these expenses. However, her self-reimbursement of legislative expenses – outside of an established POET account – were not campaign-related and therefore not an appropriate use of campaign funds. Respondent must reimburse the campaign for these disallowed reimbursements to herself **($1,871.84)**.

e.

02/01/2025	Electronic Funds Transfer	**Stutes, Louise** 2230 Monashka Way kodiak, Alaska 99615	Reimburse. campaign expenses	**$2,699.38**

Respondent's self-reimbursement of February 1, 2025 is invalid given the extreme unlikelihood that campaign related expenditure(s) could have occurred within the previous three days for a campaign that ended 88 days earlier. The entry also fails to meet the minimal standards for describing expenditures, which requires at minimum "the purpose of the expenditure."[13] The expenditure renders Respondent's <u>2024 year-end report inaccurate</u>. Respondent must reimburse the campaign for this disallowed reimbursement **($2,699.38)**.

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[12] 2 AAC 50.321(a)(5)(D). A description of "campaign expenses" cannot meet even this minimal descriptive standard, as any campaign expenditure must be assumed to be for campaign expenses.
[13] 2 AAC 50.321(a)(5)(D).

In total, the expenditures described above amount to **$6,849.48.** Respondent agrees to reimburse the campaign that amount, less any amounts for expenditures as described in sections b. and c. for which Respondent provides receipts showing reimbursement occurred within three days of the expenditure.[14]

5) Improperly using campaign funds for legislative business (2024)

APOC staff finds this allegation substantiated. Respondent's 2024 year-end report[15] described many expenditures that did not relate to her campaign but rather related to legislative business (similar to the earlier described expenditures for which Respondent reimbursed herself). They include:

11/10/2024	Debit Card	**Louies Douglas Inn** 915 3rd Douglas, Alaska 99824	Meals	**$93.54**
11/12/2024	Debit Card	**McGivneys** 9105 Mendenhall Mall Rd Juneau, Alaska 99801	Meals with staff	**$39.87**
11/25/2024	Debit Card	**Alaska Airlines** 19300 Internatoinal blvd Sea-Tac, Washington 98188	Staffing trip to Juneau for organization	**$594.70**
11/25/2024	Debit Card	**Alaskaair** 19300 International Blvd Seattle, Washington 98188	Begin House Org in rules office	**$554.70**
11/25/2024	Debit Card	**Captain cook hotel** 939 West 5th Anchorage, Alaska 99501	Organizational meeting expense	**$61.90**
11/25/2024	Debit Card	**Lakefront Hotel** 4800 Spenard Road Anchorage, Alaska 99517	Hotel for organization meting	**$152.32**
11/25/2024	Debit Card	**The Lakefront** 4800 Spenard Road Anchorage, Alaska 99517	Hotel for organization meeting	**$274.26**
11/29/2024	Debit Card	**Juneau Real Estate** 8800 Glacier Highway Jneau, Alaska 99801	Housing for organization rules trip to Juneau	**$269.16**
12/05/2024	Electronic Funds Transfer	**Bank of America** PO Box 15019 Wilmington, Delaware 19886-5019	Trip to Juneau as rules chair	**$1,505.49**
12/25/2024	Electronic Funds Transfer	**Alaska Marine Highway** Marine Wayy Kodiak, Alaska 99615	Legislators trip out the chai	**$2,346.00**
01/02/2025	Debit Card	**Alaska Marine** Marine Way Kodiak, Alaska 99615	Legislative visit with AMHS	**$952.00**
01/14/2025	Debit Card	**Island Pub** 1102 2nd street Juneau, Alaska 99824	Staff dinner	**$176.02**

[14] 2 AAC 50.990(7)(C)(x).
[15] Year-end report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=46425&ViewType=CD.

With limited exceptions, campaign contributions held by a candidate may be used only to pay the expenses of the candidate that reasonably relate to election campaign activities.[16] After the date of the election, a candidate with remaining unused campaign contributions may transfer all or a portion of the funds to a public office expense term (POET) account.[17] The POET account may be used for expenses associated with the candidate's serving as a member of the legislature, and candidates must report all amounts expended from the POET account in their annual APOC reporting.[18]

None of Respondent's above-noted expenditures (totaling $7,019.96), occurring after the date of the November 5, 2024 election, appear related to Respondent's 2024 campaign; all appear to be associated with Respondent's legislative duties. And, although Respondent had $2,560.20 remaining in an existing POET account at the time of these legislative expenditures[19] –

POET ACCOUNT SUMMARY

		Starting Balance	**$2,560.20**
		[plus] ⇓	
Total Interest Earned	**$0.00**	Total Income	**$0.00**
Total of Transfers from Campaign Account	**$0.00**		
		[minus] ⇓	
		Total Expenditures	**$2,560.20**
		[equals] ⇓	
		Closing Balance	**$0.00**

– she did not use the remaining POET funds to pay these expenses. Respondent subsequently (February 1, 2025) established a *new* $5,000 POET from existing leftover campaign funds[20]

02/01/2025	POET Account	**Poet Acct** FNB Alaska Kodiak, Alaska 99615	Start new poet acct	**$5,000.00**

which she also could have used for these legislative expenses, had she established the account earlier.

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[16] AS 15.13.112(a).
[17] AS 15.13.116. The amount is limited under AS 15.13.116(a)(8)(D).
[18] AS 15.13.(a)(8)(B) and (C).
[19] Annual POET form submitted December 28, 2024.
[20] Year-end report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=48463&ViewType=CD.

Respondent's use of campaign funds outside of an established POET account, for legislative business, was not permitted. APOC staff recommends Respondent be allowed to use any funds remaining in her most recent POET account to reimburse the campaign for that much of the $7,019.96 total legislative expenses described above, and that Respondent reimburse the campaign with personal funds any remaining amounts.

6) Failing to accurately report contributions and expenditures (2024)

APOC staff finds these allegations generally substantiated. The complaint points out inaccuracies and errors throughout Respondent's 2024 primary and general election reporting. Additionally, because each regularly scheduled report builds on information from the previous, any unreconciled error in one report necessarily renders the subsequent report inaccurate.

For each campaign cycle, standard candidate reports include a year-start report, a 30-day report, a 7-day report, and a year-end report.[21]

The following is an APOC staff overview of the general discrepancies in Respondent's 2024 reporting period, beyond those noted previously, based upon the complaint allegations as well as independent review (with discrepancies noted in *italics*):

3/14/2024 – Filed Year Start Report[22]

- *Filed 28 days late*
- Reported $3,300 as total income

7/22/2024 – Filed 30-Day primary Report[23]

- *Did not report $3,300 of previous income in total income*
- *Reported $0.00 in Previous Campaign Income for entire campaign*
- Reported $15,350 of new income
- Reported $1,604.50 in expenditures
- Total for report was $13,745.50

[21] AS 15.13.110(a).
[22] Year start report, https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43187?Type=570.
[23] 30-day primary report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=43593&ViewType=CD.

8/11/2024 – Filed 7-Day Primary Report[24]

- *Reported $0.00 in Previous Campaign Income for entire campaign*
- *Reported $0.00 in Previous Campaign Expenses for entire campaign*
- Reported previous $13,745.50 of income
- Reported $1,200 of new income
- Reported $2,816 in expenditures
- Total for report was $12,129.50

10/7/2024 – Filed 30-Day General Report[25]

- *Reported $0.00 in Previous Campaign Income for entire campaign*
- *Reported $0.00 in Previous Campaign Expenses for entire campaign*
- Reported previous $12,129.50 of income
- Reported $7,197.01 of new income
- Reported $2,348.22 in expenditures
- Total for report was $16,978.29

10/27/2024 – Filed 7-Day General Report[26]

- Reported $19,006.45 beginning cash on hand – *reflecting a $2,028.16 discrepancy from the previous 30-day report*
- Reported $9,742.10 of new income
- Reported $4,663.83 in expenditures
- Total for report was $24,084.72

In sum, each of Respondent's reports in the 2024 election cycle required by AS 15.13.110 – the year-start, 30-day and 7-day primary, 30-day and 7-day, and year-end reports – was inaccurate in some manner. Some inaccuracies can be characterized as minor, for example, listing $0.00 for "entire year" previous campaign income and expenses, where an interested member of the public could ascertain that number by reviewing Respondent's previous reports. Other inaccuracies, however, appear to reflect several thousands of dollars in unreported campaign income: $3,300 of income that disappeared between Respondent's year-start and 30-day primary report and $2,028.16 that inexplicably appeared between her 30-day and 7-day reports.

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[24] 7-day primary report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=44358&ViewType=CD.
[25] 30-day report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=44538&ViewType=CD.
[26] 7-day report, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=45185&ViewType=CD.

III. MAXIMUM POTENTIAL CIVIL PENALTIES

The maximum civil penalty for failing to timely file complete and accurate year-start, 30-day and year-end reports is $50 per day for each day the violation continues.[27] The maximum civil penalty for failing to timely file complete and accurate 7-day reports is $500 per day for each day the violation continues through the date of the election and $50 per day thereafter.[28] Tolling the running of the penalties for allegations as of the day that complaint was filed October 27, 2025 results in a maximum civil penalty of **$264,350**.

Report	Dates of Violation	Penalty Days	Max Penalty
2020 Year-end[29]	2/16/20 – 2/28/20	12 x$50	$600
2022 30-day general[30] 7-day general[31] year-end[32]	 10/11/22 – 10/27/25 11/1/22 – 11/8/22 11/9/22 – 10/27/25 2/15/23 – 10/27/25	 1112 x$50 7 x$500 1083 x$50 985 x$50	 $55,600 $3,500 $54,150 $49,250
2024 Year-start[33] 30-day primary[34] 7-day primary[35] 30-day general[36] 7-day general[37] year-end[38]	 N/A 7/22/24 – 10/27/25 8/13/24 – 8/20/24 8/21/24 – 10/27/25 10/7/24 – 10/27/25 10/29/24 – 11/5/24 11/6/24 – 10/27/25 2/18/25 – 10/27/25	 462 x$50 7 x$500 432 x$50 385 x$50 7 x$500 355 x$50 251 x$50	 $23,100 $3,500 $21,600 $19,250 $3,500 $17,750 $12,550
		Total	**$264,350**

27 AS 15.13.390(a)(1).
28 AS 15.13.390(a)(1); 2 AAC 50.855(b)(5).
29 Correct 2020 year-end report was filed late due to errors in overfunding FCA in timely-filed year-end report (paragraph 1)
30 Failing to report contributors (paragraph 2).
31 Failing to report contributors (paragraph 2), failing to properly describe expenditures to advertising or consulting business Hackney Communications (paragraph 3).
32 Failing to properly describe expenditures to advertising or consulting business Hackney Communications (paragraph 3).
33 Late filed year-start report (paragraph 6). APOC staff previously issued a Notice of Violation concerning the late-filed report.
34 Failing to carry over $3,300 in previous income, reported $0.00 in previous campaign income (paragraph 6).
35 Reported $0.00 in previous campaign income and expenses (paragraph 6).
36 Reported $0.00 in previous campaign income and expenses (paragraph 6).
37 Failing to report $2,028.16 of cash on hand (paragraph 6).
38 Failing to properly describe expenditures to advertising or consulting business Hackney Communications (paragraph 3).

IV. MITIGATION CRITERIA

When staff assesses penalties, the starting point is found in AS 15.13.390, which outlines applicable penalties for violations of Alaska’s campaign disclosure laws, and 2 AAC 50.855, which outlines the penalty assessment procedure and available reductions. Once the statutory assessment is calculated under 2 AAC 50.855, APOC staff looks to 2 AAC 50.865 to recommend potential mitigation criteria that may apply for further reductions of the assessed penalty.

A penalty reduction of more than 50% and up to a complete waiver is appropriate when the penalty is significantly greater or out of proportion to the degree of harm suffered by the public for not having the information.[39] A civil penalty is considered significantly out of proportion if it exceeds the value of the reported transactions or, in the case of a 7-day report, exceeds twice the value of the reported transactions.[40] Here, for the all of the reports, the assessed penalties exceed the values of transactions reported inaccurately, and the majority by great margin.

Unique circumstances may also justify reducing or waiving the penalty.[41] Here, when faced with the complaint, Stutes immediately acknowledged the mistakes in her reporting and has worked with APOC to bring her reporting into compliance.[42] APOC staff independently observes that Respondent utilized the same individual as treasurer in all of her campaigns from 2014 through 2022. For 2024, however, that individual was no longer Respondent’s treasurer, which may have contributed to the 2024 reporting errors constituting the bulk of the allegations in this complaint.

APOC staff also considers the financial impact of the **$13,869.44**[43] Respondent must pay in reimbursement, particularly since Respondent could have used campaign funds for most or all of these expenses had she reported them timely and correctly. Nothing in APOC

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39 2 AAC 50.865(b)(5).
40 2 AAC 50.865(b)(5).
41 2 AAC 50.865(c).
42 Complaint Response, https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27360..
43 $6,849.48 + $7,019.96 for improper self-reimbursements and use of campaign funds for legislative expenses.

staff's investigation indicates Respondent's untimely self-reimbursements or use of campaign funds for legislative expenses was intentional or provided a personal benefit to the candidate, but they were nonetheless improper and campaign disclosure laws require she reimburse the campaign. These reimbursements are significant and Respondent will bear the direct financial burden of what appear to have been unintentional errors.

But the penalty must also reflect the serious lapses of accountability created by several of Respondent's errors, including the failure to identify several contributors in her 2022 30-and 7-day general reports and failure in 2024 to account for $3,300 in her 30-day primary report and $2,028.16 in her 7-day general report.

Considering the above noted factors, for the penalties associated with Respondent's 2020, 2022 and 2024 reporting, the parties agree to a 99% reduction of the $264,350 total penalty to $2,643.50.[44]

V. TERMS OF PROPOSED CONSENT AGREEMENT

APOC Staff and Respondent agree to a proposed consent agreement in which:

1. The above facts and conclusions are acknowledged.

2. Respondent will pay a penalty of **$2,643.50** within 30 days of the date of approval of this agreement.

3. Respondent must reimburse the campaign for improper reimbursements totaling **$13,869.44** within 30 days of the date of approval of this agreement. The total may come entirely from personal funds but Respondent may also utilize funds remaining in her POET account. Because the statutory deadline for disbursement under AS 15.13.116 has passed, the funds reimbursed to Respondent's campaign must thereafter be forfeited to the state.[45]

The parties also agree the Commission's investigation and adjudication costs will not be imposed because the matter did not involve extensive investigation or other pre-

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[44] 2 AAC 50.865(b)(5) and (6).

[45] AS 15.13.116(c) (Property remaining after disbursements are made under (a) – (b) of this section is forfeited to the state.)

hearing discovery costs, and because Respondent cooperated fully with the investigation and resolution of the matter.

This proposed agreement is subject to approval by the Commission.

Dated: 7/28/26 By: Louise Stutes
Louise Stutes
Respondent

Dated: 7/28/2026 By: Heather R. Hebdon
Heather Hebdon, Executive Director
Alaska Public Offices Commission

I hereby certify that on this date a true and correct copy of the foregoing was served as follows:	
Rep. Louise Stutes 2230 Monashka Way Kodiak, AK 99615 stutes@gci.net p.delaiarro@shipcreekgroup.com	☒ Email ☒ U.S. Mail
Randolph (Randy) Ruedrich 1513 W. 13th Ave Anchorage, AK 99501 raraep@gci.net	☒ Email

KIM STONE 7.28.26
Signature Date