

THOMAS E. MEACHAM
ATTORNEY AT LAW

9500 PROSPECT DRIVE
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1971

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September 6, 2023

RECEIVED

SEP 11 2023

Attorney General's Office
Juneau

Stacie Kraly, Esq.
Director, Civil Division
Alaska Department of Law
P. O. Box 110300
Juneau, AK 99811-0300.

Re: Opposition to proposed regulation that would defend
certain public officials against ethical complaints at public
expense

Dear Ms. Kraly:

I am writing to express my very strong opposition to the proposed regulation that would obligate the public to pay, up-front, for the legal defense against ethical complaints brought against the Governor, Lieutenant Governor, and Attorney General, regardless of the outcome of the ethics investigation.

I have practiced civil law in Alaska for 52 years. For six years, from 1976 to 1982, I was the assistant attorney general supervising the Natural Resources Section of the Attorney General's Office in Anchorage. I believe my professional background and work experience give me sufficient perspective to express a strong opinion in opposition to this proposed regulation.

This regulation is a "revival" of an earlier-proposed regulation, in 2019, which had essentially the same content and purpose. The earlier proposed regulation was effectively countered by the legal opinion from the Office of Legislative Counsel, whose conclusions remain as relevant today as they did then. Those conclusions were that the proposed regulation contained incurable constitutional and statutory infirmities.

The legal opinion I am referring to was dated October 21, 2019, and had as its subject: Executive Branch Ethics Act – Proposed Regulations. It was written by Daniel C. Wayne, Legislative Counsel, Division of Legal and Research Services, Alaska Legislative Affairs Agency. For my opposition to the new proposed regulation, I adopt the analysis and conclusions contained in this legal opinion.

I have no objection to the public reimbursing these three state officials for their legal expenses incurred in *successfully* defending against an ethics complaint. In such a

Stacie Kraly, Esq.
Director, Civil Division
Alaska Department of Law
September 6, 2023
Page 2

situation, they will have been found to have been acting within the scope of their public duties, and should be reimbursed their legal expenses.

But these legal expenses should *not* be paid by the public, up-front and before it has been determined that these three officials were in fact acting within the scope of their public duties -- or were not. In the latter situation, they should certainly bear their own legal expenses, with no public payment -- either before or after the outcome of the ethics complaint has been determined.

Please include my letter in the record of public comments regarding this proposed regulation.

Sincerely yours,

A handwritten signature in black ink that reads "Thomas E. Meacham". The signature is written in a cursive style with a large initial 'T'.

Thomas E. Meacham

THOMAS E. MEACHAM
ATTORNEY AT LAW
9500 PROSPECT DRIVE
ANCHORAGE, ALASKA 99507-5924

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SEP 11 2023

Attorney General's Office
Juneau

Stacie Kraly, Esq.
Director, Civil Division
Alaska Department of Law
P. O. Box 110300
Juneau, AK 99811-0300

59811-030000



I oppose a change in regulations that would allow the Governor and Atty General to have their legal expenses covered by Alaska taxpayers if under investigation for dishonest or unethical misconduct.

Julie B. Gibeault
Eagle River, Alaska
(23650 Sunny Glen Dr.) 99577

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Alaska Gov. Regulations
Public Comments
P.O. Box 110300
Juneau, AK
99811-0300

From: Sen. Elvi Gray-Jackson
Sent: Tuesday, September 12, 2023 2:56 PM AKDT
To: AK99501; Ethics Regulation Public Comments (LAW sponsored); Galvin, Alyse S (LEG)
Subject: RE: Public comment re: Ethics Regulations Changes

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Dear Bonnie,

Thank you for writing and sharing your view on Ethics Regulations Changes. I am also opposed because tax dollars should not be used to cover legal expenses for the Governor, Attorney General, Lt. Governor, or Legislators.

Sincerely,

"Representing Your Interests"

SENATOR ELVI GRAY-JACKSON
District G
*Serving Spenard, Midtown,
and Campbell*
1500 W Benson Blvd, Room 328
Anchorage, AK 99503
907-269-0174



From: AK99501 [BOI]
Sent: Saturday, September 9, 2023 9:11 AM
To: Sen. Elvi Gray-Jackson <Sen.Elvi.Gray-Jackson@akleg.gov>;
ethics.regulation.public.comments@alaska.gov; Rep. Alyse Galvin <Rep.Alyse.Galvin@akleg.gov>
Subject: Public comment re: Ethics Regulations Changes

I am OPPOSED to changing the ethics regulations to cover legal costs for the governor, attorney general, and lieutenant governor, if they are under investigation.

Thank you for the opportunity to comment.
Bonnie Reese
2980 Lois Drive
Anchorage, AK. 99517

From: Michael Hostina
Sent: Monday, September 11, 2023 9:21 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Comment on DOL proposed regulations re Ethics Representation

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Stacie Kraly:

I am writing to provide my comments in opposition to the Department of Law's (DOL) proposed regulation change to allow the DOL to provide representation to the Governor, Lieutenant Governor and Attorney General (AG) in ethics complaints brought under the Alaska Executive Branch Ethics Act (AEBA) (AS 39.52.010 - AS 39.52.960.)

At the heart of the AEBA are prohibitions on misuse of official position (AS 39.52.120). Thus the regulation's suggestion that defense by DOL may be limited to actions taken "within the scope of the official's duties" is largely meaningless. That language and the required "certification" that defense be "in the public interest" provides no objective standard to bar public defense even in the face of obvious misconduct. Nor does the proposed regulation contain any limitation on providing public legal representation for appeals after violations are found.

Under the existing law and regulations, the Department of Law is removed from its typical implementation and enforcement responsibilities for complaints involving these same individuals (AS 39.52.310(c)). That statutory limitation recognizes the obvious conflict of interest when an appointed AG receives a complaint against the governor/Lt. governor, or when the complaint is against the AG. However, this proposed regulation change would put the attorney general, or governor if the complaint is against the AG, in the position of determining when representation by the DOL is in the public interest. It thus ignores the obvious conflict as well as the statutory framework that prevents conflict of interest in implementation of the AEBA itself. It also avoids the statutory mandate to construe the AEBA "to promote high standards of ethical conduct in state government." (AS 39.52.940), and does so with respect to the three most powerful public employees covered by the AEBA.

Under the existing law and regulations, each public employee, from clerks to commissioners, are and should be responsible for conducting their own official conduct in a manner that is reasonably above reproach. If complaints are frivolous or without foundation, the Personnel Board can dismiss them. (See AS 39.52.310(c & d) and AS 39.52.320.) However, if complaints are credible and substantive, these three highly paid public employees should defend their own actions just like any other public employee, rather than be singled out among all public employees for unlimited representation at public expense.

Thank you for your consideration,

Michael Hostina

Michael Hostina, Attorney at Law

Phone: 907-388-4296

email: mhostina@hostina.org

Mail: PO Box 61438, Fairbanks, AK 99706

From: I baker
Sent: Monday, September 11, 2023 7:43 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: No to State Legal Coverage for Ethics Breach

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Do not support legal coverage paid for by the State of Alaska for ethics breaches by administrative actors. This expense should be covered by the individual, not by the citizens of Alaska.

Linda Baker
Fairbanks, Alaska

From: Dawn Barron
Sent: Monday, September 11, 2023 6:45 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Opposition to proposed legal costs/State funds issue

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Good evening,

Elected public stewards should not function outside of the law. The proposal to publicly fund the legal defenses of our state leaders is nothing short of a free pass to continue passing unwanted and unconstitutional legislation. Governor Dunleavy has few checks remaining on his power now that he has exhausted his term limits. He has already proven to be a financial liability if this proposal should pass, having lost multiple court cases throughout his gubernatorial career. It would be a mistake to remove the remaining personal stake he and other state officials, present and future, still must weigh before throwing their power around indiscriminately.

Thank you for your time.

Dawn Barron

Sent from my iPhone

From: sxbarron
Sent: Monday, September 11, 2023 6:12 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Public Comment Against This Proposal

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Good evening,

Without getting into partisan politics, the head of the executive branch of this state should not be shielded from their actions while in office. If any particular lawsuit is unfounded, the remedy is to defend oneself and ask for attorney's fees. This request is asking that no matter the merit, the governor gets to do what is politically expedient without consequence.

Getting into partisan politics, this governor, and his various deviant attorneys general, have lost lawsuit after lawsuit because of their mentally deficient decisions. This is not opinion, as several courts have ruled that they overreached and violated the law.

Governor Dunleavy would like to spend his last few years in office establishing his hard right bona fides so that he may continue to make a living off of the the people he's supposed to represent. A life without consequences is not an Alaskan value. Please don't do this.

Thanks.

From: Ellen Wood
Sent: Monday, September 11, 2023 6:01 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed changes in the Regulations of the Dept. of Law

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I am strongly opposed to the proposed changes in regulation that would provide free legal representation, using public funds, to the gov., lt. gov, and AG in cases involving ethics violations. This would be an obvious conflict of interest, and is a shameful attempt to push through bad public policy. Please reject the proposed changes.

Thank you for considering my input,

Ellen Wood
PO Box 303
Ester, AK 99725

From: Tim Viavant
Sent: Monday, September 11, 2023 5:34 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Covering legal costs for elected officials

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The proposed change to allow the attorney general to defend the governor against ethics complaints should not be allowed.

This proposed change is against the public interest.

The proposed regulations themselves are unethical.

Thank you for considering my comment

Tim Viavant

From: Peter Van Flein
Sent: Monday, September 11, 2023 5:10 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Do not use State funds for illegal acts nor ethics violations!

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This would be using the State, and its pocketbook to defend individuals who have committed ethics violations or for illegal acts.

What happened to the concept of "Individual responsibility?"

Don't do the ethics violations if you can't afford the legal fees that will surely follow... or illegal acts.

Peter Van Flein
Fairbanks, Alaska

From: Christin Swearingen
Sent: Monday, September 11, 2023 4:58 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Oppose regulation changes in 9 AAC 52

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Hello,

I am writing to oppose regulation changes in 9 AAC 52. I do not want state money to pay for legal costs for the governor, attorney general and lieutenant governor if they are under investigation for dishonest and unethical misconduct.

Thank you,

--

Christin Swearingen (she/her)

BOI

1455 Justin Dr, Fairbanks AK

From: Joan Franz
Sent: Monday, September 11, 2023 4:51 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored); Bishop, Click (LEG); Representative.Mike.Cronk@akleg.gov; Representative.Ashley.Carrick@akleg.gov; Representative.Maxine.Dibert@akleg.gov; Senator.Scott.Kawasaki@akleg.gov; Representative.Jennie.Armstrong@akleg.gov; Representative.Andi.Story@akleg.gov
Subject: NO to Regulation Allowing the Alaska Department of Law Represent the Governor, Lt. Governor and Attorney General

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I am writing in opposition to any changes to 9AAC 52 of the Alaska Administrative Code that would allow the Department of Law to represent the Governor, Lt. Governor nor the Attorney General. This administration has repeatedly violated ethics codes, the Alaska Constitution and rules and regulations regarding contracts, opening new positions that are not needed and then hiring personal cronies and many more times has disregarded the current law or regulations. This regulation only encourages these illegal behaviors that each of these administrators have engaged in. I do not want state employees in the Department of Law supporting the illegal actions of these individuals by passing this regulation. There must be some financial consequences for each of these officials when they disregard laws, the constitution and current regulations. At this time the Department of Law would be so busy representing each of these officials they would not have time to focus on what their present job description is. Tammie Wilson was given a state job that she was not qualified for nor had she been out of office as a rep for the required time. This is just one example of this corrupt administration and certainly not the most egregious of the governors actions. Our attorney general violates the Alaska Constitution and should be charged for his violations and removed from office.

New departments have been opened, jobs created that have no real job description or place in our state government other than loyalty and fealty to these individuals regardless of their corrupt actions.

I ask each of the senators and representatives to oppose enactment of this regulation. It is a conflict of interest at the very least and does not serve the people of Alaska. Alaska citizens should not watch our state dollars go to supporting and defending the illegal acts of these government administrators.

Please do not approve nor allow any changes to the regulations that would allow the Department of Law to represent this administration. I would like to hear about the final action and discussions regarding this issue.

Thank you.

Sincerely,
Joan Franz

From: Brian Kassof
Sent: Monday, September 11, 2023 4:30 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed changes to 9 AAC 52

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To Whom It May Concern,

I am writing to voice my opposition to the proposed changes to regulations that would allow the state to provide legal representation in ethics complaints against the Governor, Lieutenant Governor, or Attorney General (9 AAC 52). Legislative Legal found that similar changes, put forward in 2019, violated numerous clauses of the Alaska State Constitution—the same problems still exist.

These changes would allow state funds to be used to defend an official even if they were ultimately found guilty of violating the Alaska Executive Branch Ethics Act. How is this in the public interest? Unethical acts by high-ranking officials are, by definition, against the public interest.

Nor is it clear what problem is being solved here, since there is no public information about the number of such complaints that have been filed over the past decade. The lack of transparency around this is extremely concerning—why is this administration so intent on passing these changes?

The proposed changes encourage the type of cronyism and back-scratching that has plagued our state government in recent years. The Attorney General would decide if defending the Governor, who appointed him/her, is in the public interest; the Governor would do the same for the Attorney General he/she appointed, without any clear guiding principles or definition of what constitutes “the public interest” that is allegedly being defended. This throws the door wide open to the exact type of violations the Ethics Act covers.

These changes should not be enacted.

Sincerely,

Brian Kassof
Fairbanks, AK 99709



ALASKA PUBLIC INTEREST RESEARCH GROUP

907-350-2286 | akpirg.org | P.O. Box 201416, Anchorage, AK 99520

September 10, 2023

Veri di Suvero
Executive Director
2522 Arctic Boulevard
Anchorage, AK 99503

RE: [Dept. of Law proposal to adopt regulation changes in 9 AAC 52 of the Alaska Administrative Code](#), dealing with representation of governors, lieutenant governors, or attorneys general in complaints alleging violations of the Alaska Executive Branch Ethics Act (AS 39.52) dated Aug. 2, 2023.

The [Alaska Public Interest Research Group](#) (AKPIRG), is extremely opposed to the Dept. of Law adopting these proposed regulation changes in 9 AAC 52 of the Alaska Administrative Code.

AKPIRG, founded in 1974, is Alaska's only non-profit public interest and consumer advocacy organization. We advocate in the public's interest for good government and against special interests controlling our public offices and public officials.

We believe the proposed ethics regulation changes remove all incentives for governors, lt. governors and attorneys general to act ethically, honestly, and to adhere to the [Alaska Executive Branch Ethics Act](#) (Ethics Act). Additionally, we believe these changes would create systemic conflicts of interest between these top officials, the Legislature and legislators, other executive branch public employees, and most importantly, the Alaskan public.

I. Context

The Ethics Act exists to bring about accountability and to promote and strengthen the faith and confidence of Alaskans in their public officials. The Attorney General and, when they have a conflict, the [Alaska State Personnel Board](#) is charged with making sure the Ethics Act is followed.

Although the primary client of the attorney general is the state of Alaska and the people of Alaska, as head of the Dept. of Law, the attorney general is responsible for issuing advice to public officials on compliance with the Ethics Act along with the investigation and initiation of complaints under the Act – **except for ethics complaints related to the governor, lt. governor or attorney general**. Those ethics complaints are referred to the State Personnel Board, who then retains independent counsel under contract by the State to investigate the charges and present and prosecute the charges before the board.

After a complaint is submitted, the ethics complaint process is conducted secretly as everything is kept confidential by the State.

AKPIRG has direct experience with this process as we have filed a [couple of ethics complaints](#) in the last few years. The state lost the first ethics complaint we filed and subsequently claimed they could not find it. It was never processed. We filed [another ethics complaint](#) after [Gov. Dunleavy and AG Taylor failed to follow the law](#) when former Dunleavy Chief of Staff Ben Stevens immediately jumped from the Office of the Governor to ConocoPhillips Alaska to take on the role of their lobbyist.

II. Background

AKPIRG objected to [the Dept. of Law's 2019 attempt to do the same thing – use public funds to defend the governor, Lt. governor and attorney general when they are subjects of ethics complaints](#) for misconduct, abuse of office or other serious conflicts of interest, which past legislatures have put in statutes.

Our reasons for objection now are partly the same as they were in our [Nov. 4, 2019 public comment letter](#) submitted to the Dept. of Law: The proposed ethics regulation changes harm the constitutional separations between both the legislative and executive branch as well as Alaska's citizens, erode confidence in the state's separation of powers, and would require the public to pay for private interests. ([Public Comments](#), Pg.306)

We add to the list of objections our belief that the proposed ethics regulation changes violate the spirit of the Ethics Act and the associated Alaska Administrative Code.

[9 AAC 52.040 UNWARRANTED BENEFITS OR TREATMENT](#) states that a public officer may not grant or secure an unwarranted benefit or treatment, **regardless of whether the result is in the public interest of the state.**

We also assert the ethics regulation changes border on an Ethics Act violation since the official record shows the intent for these changes are based on improper motivation, as described in [9 AAC 52.020. IMPROPER MOTIVATION](#). It states that a public officer may not take or withhold official action on a matter if the action is based on an improper motivation.

III. Analysis of Department of Law Responses

Moreover, the [Dept. Of Law's Sept. 8, 2023 responses](#) to [our questions](#) show the adoption of these ethics regulation changes are unnecessary. Although the requested information from the Dept. of Law was incomplete, as they repeatedly claimed confidentiality, we are able to affirm with confidence that the data supplied fails to bear out any urgency to use public funds, personnel and other official assets to defend governors, Lt. governors, and attorneys general for violations of the Ethics Act.

a. Question 1

These changes are based on the Dept. of Law's false premise, as stated in the first question [Proposed Regulations – FAQ](#), that *"the current regulations require the governor, Lt. governor and attorney general to hire outside counsel to represent them in complaints alleging a violation of the Alaska Executive Branch Ethics Act."* [AKPIRG asked](#) where that specific requirement could be found in the regulations.

Response pointed to [9 AAC 52.040\(c\)\(3\) and \(4\)](#). The current regulations allow public officers, in some circumstances, to seek reimbursement of reasonable expenses incurred for professional legal services to defend against a complaint.

The proposed ethics regulations are redundant as the ability to seek reimbursement for legal services already exists.

b. Question 2

AKPIRG asked how the proposed regulations **not** clash with our ethics laws that relate to prohibitions on gifts, favoritism, self-enrichment, use of state property and resources for personal benefit and financial interests, use of official actions for personal purposes, coercion of subordinates to perform services for private benefit of public officers, use of state resources for partisan political purposes, and intentionally securing unwarranted benefits or treatment.

The response claims that the regulations are consistent with the Ethics Act because the proposed ethics regulation changes have the intent to benefit the public interest at large through the normal performance of official duties.

However, AKPIRG again points to the Alaska Administrative Code. Specifically, [9 AAC 52.040 UNWARRANTED BENEFITS OR TREATMENT](#), which states that a public officer may not grant or secure an unwarranted benefit or treatment, **regardless of whether the result is in the public interest of the state.**

We also point to [9 AAC 52.020. IMPROPER MOTIVATION](#) which states that a public officer may not take or withhold official action on a matter if the action is based on an improper motivation.

AKPIRG accepts as true the intentions for the proposed ethics regulation changes, as revealed in an [Oct. 28, 2019 memo authored by then Deputy Attorney Treg Taylor](#) – to remove the private and personal burdens of being subjected to ethics investigations carried by the governor, Lt. governor and attorney general when they are named in ethics complaints for questionable wrongdoing, misconduct, and abuses of power while in office.

When the proposed ethics regulations were going through the public comment process in 2019, [Dept. of Law spokesperson Cori Mills said](#) the proposed changes would help lessen the risk the complaint process “is used to harass or becomes predatory.” When asked to provide examples of when this process was “used to harass or became predatory,” then [Deputy AG Taylor stated](#):

“The Attorney General is concerned that the current process could easily be used to harass or could become predatory. This process could cause an inordinate amount of expense to the subject of the complaint and become very distracting and time consuming for these public officials, even if the complaint is found baseless.”

To the question as to how these changes would mitigate this risk, then Deputy AG Taylor described the ethics complaints process and ended with this:

“... this process is currently expensive and time consuming for the subject of the complaint, even if the complaint is ultimately found baseless. While defending against one or two baseless complaints might be manageable and harassing, as the number of complaints increase, the process can quickly become unmanageable and predatory.” (Pg. 3)

AKPIRG maintains that these intentions are directly in conflict with the Ethics Act.

These regulation changes do nothing to prevent ethics complaints from being filed but do everything to bring about ease, convenience and financial invulnerability to these top officials when ethics complaints are filed.

We also take AG Taylor's statements as false as he mischaracterizes the intentions and motives of average Alaskans who turn to one of the only avenues available to them when they want to hold their governors, Lt. Governors, attorneys general, and other public officials to account for their unethical abuses and misuses of power and authority.

c. Question 3

AKPIRG asked why there wouldn't be any costs to comply with the proposed regulations. It appears that since adoption of the proposed regulation will not require an increase in appropriations, they did not have to include it.

d. Questions 4 & 5

We asked to be provided historical information and data that relate to the number of ethics complaints filed against governors, Lt. Governors, and attorneys general, as well as a total number of ethics complaints filed in the last 15 years, as well as an itemization of costs per each ethics complaint, per year, for the last 15 years. We also wanted to know how many were found to be baseless and which body determined each complaint as being baseless.

Information was provided that since Nov. 2007, the Dept. of Law has a total of 131 files dedicated to complaints filed under the Ethics Act at a cost to the State of nearly \$600,000. This includes complaints against governors, Lt. Governors, and attorneys general, as well as complaints against other public officials. (It was noted that this amount is higher than the actual costs given the Department of Law's rate has increased over the past 15 years.)

The response gives an account that the Dept. of Law has 29 files dedicated to complaints filed specifically against governors, Lt. Governors, and attorneys general since Nov. 2007.

This is important information as it confirms AKPIRG's opposition to the proposed ethics regulation changes.

As of July, 2009, [the number of complaints against Gov. Sarah Palin was roughly 20 and cost the State nearly \\$300,000. Almost \\$200,000 of that was spent on the ethics complaint former Gov. Palin filed on herself in the matter of her abuse of authority when she fired her Public Safety commissioner.](#)

That means that more than two-thirds of the 29 ethics complaints filed since 2007 were related then Gov. Palin. The Parnell, Walker and Dunleavy governorships are associated with the remaining 9 complaints, or an average of 3 ethics complaints per governorship.

If there ever was a solution searching for a problem that doesn't exist, it's these current proposed ethics regulation changes.

e. Question 7

AKPIRG asked for all and complete costs to the State to represent Gov. Dunleavy and former Chief of Staff Babcock. In the wrongful-firing lawsuits brought by former employees Dr. Blandford, Dr. Bellville, Kelly Parker, Ruth Botstein and Elizabeth Bakalar along with payouts and an itemization of state attorneys and outside counsel hired by the State to provide publicly-funded representation to the governor and former chief of staff in order to get a sense of how much it would cost to defend the governor, Lt. Governor or attorney general.

The response is that this question is not relevant to the proposed regulation and does not require a response.

f. Question 9

We asked how the governor and attorney general would certify each other and assess if public funds should be expended to defend the other, and if the 'public interest' assessment process would be publicly noticed for public review.

Confidentiality was asserted again as they stated they would not publicly notice the public interest determinations.

IV. Recommendations

We recommend the Ethics Act, its regulations and the AK Personnel Board mirror the complaint process used by the Alaska Public Offices Commission (APOC). APOC complaints are public, the process is transparent, and the public has the opportunity to review all documents, unlike the Ethics Act's complaint process, which is done under a cloak of secrecy and enables all sorts of corruption as misconduct and abuses of power and authority are kept from the public.

We recommend the way to mitigate ethics complaints, nefariously mischaracterized as harassment and predatory by AG Taylor, is for governors, Lt. governors and attorneys general to conduct themselves ethically and adhere to Alaska's code of ethics and statutes.

Public monies are better spent to advise the governor, Lt. governor and attorney general on how to prevent breaches of the Ethics Act before ethics complaints are filed, as they are currently, rather than to use scarce public dollars and overworked state attorneys to defend these top officials when they misuse and abuse the authority and position entrusted to them.

The Ethics Act declares high moral and ethical standards among public officers in the executive branch are essential to assure the trust, respect, and confidence of the people of this state. These proposed ethics regulation changes are neither highly moral or ethical.

They are not in the public's interest. Indeed, they are solely in the personal and private interests of Gov. Dunleavy, Lt. Gov. Dahlstrom and Atty. Gen. Taylor.

As we submit our public comments to oppose these self-serving proposed ethics regulation changes, we are left to wonder about the timing of these proposed changes and why Gov. Dunleavy and AG Taylor are forcing them to be adopted. Gov. Dunleavy and AG Taylor should not be allowed to clear the way as they continue to use public funds to serve their private partisan political interests while they insert themselves in [national partisan political campaigns](#) and [activities](#).

Like we did in 2019, we strongly urge the Dept. of Law to reject these changes and to not adopt them.

Sincerely,

A handwritten signature in black ink, appearing to read 'Veri di Suvero', with a long horizontal line extending to the right.

Veri di Suvero
Executive Director, AKPIRG

A handwritten signature in black ink, appearing to read 'Andrée McLeod', written in a cursive style.

Andrée McLeod
Good Government Expert, AKPIRG

From: Robin O'Donoghue
Sent: Monday, September 11, 2023 4:28 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
CC: Veri di Suvero; Andrée McLeod; Kraly, Stacie L (LAW); Birnbaum, Alan J (LAW); Dilg, Kevin M (LAW)
Subject: AKPIRG Comment RE: Proposed Changes to Ethics Regulations 9.11.2023
Attachments: AKPIRG.Reg.Changes.Comment.9.11.2023.pdf

You don't often get email from robin@akpirg.org. [Learn why this is important](#)

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Please see the attached comments from the Alaska Public Interest Research Group regarding DOL's proposed changes to executive branch ethics regulations.

Thank you.

--

Robin O'Donoghue ([he/him](#))
Policy & Communications Manager
Alaska Public Interest Research Group
www.akpirg.org

907.460.1445

Dena'inaq e'nen'aq' gheshtnu ch'q'u yeshdu. (Dena'ina)
I live and work on the land of the Dena'ina. (English)

Translation by J. Isaak and S. Shaginoff-Stuart



From: Allegory Smith
Sent: Monday, September 11, 2023 4:27 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Opposition to proposed changes allowing state funds to be used for legal defense of state officials

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Hey folks,

Thanks for doing what you do.

I'm not particularly well-informed about the intentions behind the ambitions of the governor regarding proposed changes allowing state funds to be used for the legal defense of state officials. Briefly however, I'm extremely critical of the idea: the amount of power already centralized in the offices of the governor and others is not wise or reasonable in my opinion, and if people as unscrupulous as the current holder are given more, the potential for ever-escalating breaches of community-minded conduct will become even more dangerous. I urge you to resist this ambition of the governor's by all the means within your scope of profession. For all that government is and can be, let it not be freedom to protect powerful individuals from the reality of the harm they do to the collective.

Thanks again,

From: ramonalongacre
Sent: Monday, September 11, 2023 4:12 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: I object to the proposed regulations that would require the State to pay for the legal defense for the Governor, Ltd. Governor and AG concerning lawsuits for ethical, serial harassment, and other alleged similar conduct.

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Ramona Longacre
Sent from my Galaxy

From: Putt Clark
Sent: Monday, September 11, 2023 4:01 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Attorney General's Changes to investigating officials

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I just happened to hear a quick blurb about the Attorney Generals proposed changes to investigating officials in the State Government. This has been slyly traveling underground, as today is the last day to comment.

I am totally against the AG's proposal. If this were to be allowed, government officials would rule with impunity. This is flat wrong, and the public already said so four years ago. Why is this being proposed again? What foul purpose could this serve that is apparently already being plotted?

I am against this.

Sincerely,

Elizabeth Putt Clark
Fairbanks, AK

From: PKoutchak
Sent: Monday, September 11, 2023 3:52 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: FINANCIAL INVESTIGATIVE COSTS NOT TO BE SHOULDERED BY RESIDENTS OF ALASKA

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Investigative financial costs belongs ONLY on the shoulders of Governor Dunleavy AND individuals associated with unethical and criminal acts under his past/current governorships.

Changing AND/OR altering administrative codes/regulatory guardrails IS PROHIBITED and MUST NOT OCCUR !!!

Sent with [Proton Mail](#) secure email.

From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 3:30 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 3:30:27 PM

Andrew Josephson

BOI

Anchorage, AK, US
Anonymous User

Comment:

I oppose the draft regulations. I find the draft proposal far too all-encompassing. Why, for example, could we not conceive of a system where an independent body might conclude that one complaint is truly frivolous and another is not truly frivolous? In the former instance, the AG might provide free counsel to the Governor, Lt. Gov, or Attorney General. In the latter, the AG would be precluded from doing so. For instance, depending upon what the governor was told and the advice he received, requiring the swearing of allegiance to the governor from exempt and partially exempt employees was deemed unconstitutional. Should the public be required to pay for the defense of those claims I think not. In other instances, however, it may very well be in the public interest to afford the governor, Lt. governor, and AG free assistance of counsel.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 3:12 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 3:12:48 PM

Janet Daley

BOI

Fairbanks, AK, US
Anonymous User

Comment:

Under no circumstances do I want public money used to defend senior government officials, including the governor, for ethics violations or other situations of potential wrong-doing. Using Alaska State money to defend illegal actions puts those officials above the law. Do not change the regulations!

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Jetta Whittaker
Sent: Monday, September 11, 2023 3:10 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: say no to proposed regulations amendments Project/Regulation #: 2023200127

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Regarding proposed regulations amendments 2023200127, I agree with former Alaska Attorney General Jahna Lindemuth's analysis: "the attorney general is charged with representing the state of Alaska. The governor is not the client except to the extent he represents the state. Allowing the attorney general in his sole discretion to defend ethics complaints against the governor or lieutenant governor, or the Department of Law to defend the AG, is inappropriate and inherently inconsistent with the attorney general's role. It is also an inappropriate use of state resources."

The Department of Law is already underfunded to the point of not being able to compete with private sector salaries to retain as many high-quality attorneys as it used to. The proposed regulations would cut into the DOL's limited/available time and money in order to defend the governor instead of working on other, more important and worthy cases.

Please do not move these regulations forward.

Jetta Whittaker
502 W 10th
Juneau AK 99801

BOI

From: Ellen Weiser
Sent: Monday, September 11, 2023 2:57 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Regulation change

You don't often get email from BOI [Learn why this is important](#)

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I am writing to express my disapproval to changes to 9 AAC 52 of the Alaska Administrative Code, dealing with representation of the governor, lieutenant governor, or attorney general in a complaint alleging a violation of the Alaska Executive Branch Ethics Act (AS 39.52).

If one of our elected officials breaks the law and is being prosecuted for that act, no way should the public have to bear the financial burden of their legal representation. Let the official follow the law or accept ALL the consequences.

Ellen Weiser
3293Rosie Creek Road
Fairbanks AK 99709

BOI

“We do not have government by the majority. We have government by the majority who participate.”

~Thomas Jefferson~

From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 2:34 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 2:34:28 PM

Oscoda, MI, US
Anonymous User

Comment:

I don't have a problem with the state defending these three positions from ethics complaints. However if they are found to be in violation of the ethics act or settle without admission of guilt, then they should be required to reimburse the state for their defense costs, including any fines.

If they are found to be in compliance with the ethics act, then this would be a legitimate cost that the State should cover.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Michael Eastman
Sent: Monday, September 11, 2023 2:17 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Covering legal costs of the gov or his cronies

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BOI

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Revisiting this attempt to change regulations seems a bit underhanded. The public clearly spoke to the matter, when that model-of-ethical-Attorney-Generalness, Kevi Clarkson, tried to run it through in 2019.

So now we have another model of ethics, morality and Law - that would be Treg - working to get the Guv, Lt. Guv, and ...

wait for it...

Attorney General!...

off the hook for legal fees they might owe when they are investigated for illegal or unethical conduct.

The Legislature has been advised the changes are violations of the Constitution. In other words, illegal. Anyone else find it interesting (ethically, morally, legally speaking), that the Tippet Top Law Guy in Alaska is proposing this?

This citizen says fugetaboutit.

Michael T Eastman, voter

Talkeetna, Alaska

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From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 2:04 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 2:04:38 PM

Patricia Seifert

BOI

North Pole, AK, US
Anonymous User

Comment:

I find this proposed action very suspicious because it assumes that the said officials have already knowingly committed unethical/unlawful behavior(s) or plan to in the future. I am against this proposal because the people of the State of Alaska should not be monetarily responsible for the defense of officials who act in an unethical or unlawful manner. We assume our elected officials will conduct themselves in an ethical, legal manner. If they do not do this, the cost of their defense should be out of their pockets, not ours.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Andrea Leigh
Sent: Monday, September 11, 2023 1:50 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Oppose the people's money being used to pay for misconduct

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It is grossly negligent to propose that the public should pay for the misconduct of individuals elected or appointed to serve the public. I wish that instead of spending time proposing this the executive cabinet would have spent time studying the ethics code so that they can avoid violating it and thereby avoid being sued. The public should not have to pay for incompetence, negligence or misconduct

From: mary lee Guthrie
Sent: Monday, September 11, 2023 1:45 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Public comment on proposed change to regulations regarding public payment of legal expenses in cases of ethical violations and other misconduct by persons holding high state positions

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I am strongly opposed to this change.

I have not read a persuasive argument for why the proposed charges are necessary or advisable. And instances of misconduct by prominent state office holders over the past five or six years is, to my mind, strong evidence against change to the regulations.

Thank you,
Mary Lee Guthrie

From: John Davies
Sent: Monday, September 11, 2023 1:40 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: 9 AAC 52

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The proposed changes are a travesty for an ethics code. I am strongly opposed. Do not adopt.

John Davies
1998 Kittiwake Drive
Fairbanks, AK 99079

Sent from John Davies' iPhone

From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 1:36 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 1:36:14 PM

Fairbanks, AK, US
Anonymous User

Comment:

I am opposed to the proposal to change regulations on representation by the Department of Law in a complaint alleging a violation of the Alaska Executive Branch Ethics Act by the governor, lieutenant governor, or attorney general.

Ethics are serious and so are ethics violations. Better an ethical Executive Branch than one giving grounds for complaints of violation.
Let the consequences stay with the Executive Branch. Using public money to 'pay the tab' is both wrong and wasteful.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: BOI
Sent: Monday, September 11, 2023 1:14 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed Law Dept. Regulation Changes (9 AAC 52 AK Admin. Code)

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Department of Law:

I am writing to oppose the changes to regulations that the AK Dept. of Law is proposing that are related to representation by the Department of Law in a complaint alleging a violation of the Alaska Executive Branch Ethics Act by the governor, lieutenant governor or attorney general. (Re: 9 AAC 52 of the Alaska Administrative Code)

All persons who work for the people of Alaska need to follow the same code of conduct and ethical standards, whether they are elected officials or ongoing state employees. Persons who are now or who may be in the elected positions specifically mentioned in the proposed regulation changes should not be treated any differently, being any more favored or any less favored in their ability to be represented by the AK Dept. of Law if and when a complaint is made against them.

Please take no action on this proposed change and allow regulations to stay as they are currently.

Thank you,
Sheri Whitethorn

Anchorage

Brief Description

The Department of Law proposes to change regulations on representation by the Department of Law in a complaint alleging a violation of the Alaska Executive Branch Ethics Act by the governor, lieutenant governor, or attorney general.

From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 1:08 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 1:08:11 PM

Heather Koponen

BOI

Anchorage, AK, US
Anonymous User

Comment:

I urge the Alaska Dept of Law to reject the proposal by the Dunleavy administration for changes to Alaska Executive Branch Ethics Act (AS 39.52).

This proposal would have Alaskans pay for defense of misdeeds by those in positions of power, even if found guilty, making it easier for those performing ethical breaches to do so and costing the state dearly.

Such a subversion of democracy would encourage self-interested, unethical people to act as if they are above the law.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Savannah Fletcher
Sent: Monday, September 11, 2023 12:57 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Comment on Notice of Proposed Regulatory Change: Ethical complaints against governor represented by DOL

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Good afternoon,

I am writing in my personal capacity as an Alaskan citizen and an attorney: I am strongly opposed to the Department of Law changing its regulations to begin representing our governor, lieutenant governor, or attorney general when ethical complaints are brought against them.

Violating one's ethics is not within the scope of one's job. And, even more worrisome, to claim that there is no fiscal impact by adding this responsibility to the DOL is disingenuous at best. If DOL is claiming this will have no fiscal impact, that means it is doing less work in its many other responsibilities of representing the State of Alaska.

I do not want other work and priorities to slide to the backburner so that our elected officials can have their own, free, personal attorneys through the DOL. Our State's limited resources are better spent elsewhere.

Thank you,
Savannah Fletcher
Fairbanks, AK

From: nick shier
Sent: Monday, September 11, 2023 12:53 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Ethics Complaints Regulation Changes.

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To Whom It May Concern,

My name is Nick Shier and I am offering my public comments, as a private citizen of the State of Alaska, against the proposed rule change concerning ethics complaints in the State of Alaska. I believe the proposed regulation change to allow the Alaska state attorney general to represent the governor, lieutenant governor, and the attorney general in complaints alleging violations of Alaska Executive Branch Ethics is a bad idea, inherently illegal per the State of Alaska Constitution, and should not be adopted. The proposed regulation change is an inappropriate use of state resources, violates the separation of powers clause in the Alaska State Constitution, and inconsistent with the Attorney General's role. Passing the proposed regulation would negatively affect myself, as well as every other private citizen of Alaska by further draining valuable state resources and time from the Department of Law by having to defend our current ethically challenged governor using state (PUBLIC) money and time. This regulation change was already proposed in 2019, and was soundly rejected by the citizens of Alaska, the Legislative Legal counsel, and the Attorney General Jahna Lindemuth as a very bad idea then, and remains so today, Please do not pass the proposed regulation changes, again. The Attorney General should not, or ever, be the free legal defense for unethical members of the State of Alaska Executive Branch. Thank you for your time and consideration in this matter.

Annoyed and Perplexed,
Nick Shier

From: Laureen Leonard
Sent: Monday, September 11, 2023 12:19 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Funding unethical behavior

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To Whom It May Concern:

Our state funds, scraped from our lands, should not be used to fund the defense of any government official who has committed or been accused of committing an unethical or illegal act.

Our leaders should always be aware and always be diligent to act legally and ethically in all manner of decisions and actions. That is their duty.

If they fail, all costs and all fault should be carried by that individual and not by our state funds.

Sincerely,
Laureen Leonard

BOI

From: Randi Sweet
Sent: Monday, September 11, 2023 12:11 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Fwd: Public Comment -
oppose use of public funds to defend against unethical action by Governor or AG or other state employees

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Resend to correct address

----- Forwarded message -----

From: **Randi Sweet** <BOI>
Date: Mon, Sep 11, 2023, 12:03 PM
Subject: Public Comment - oppose use of public funds to defend against unethical action by Governor or AG or other state employees
To: <regulation.public.comments@alaska.gov>

It is critical the Governor's behavior sets a tone and expectation of keeping politics separated from administration. Thus, the government administration is impartial and the work environment is safe for all employees. The Governor must behave as a public servant.

The last few years have seen the Governor and Chief of staff violate the Constitutional rights of state employees, as judged by Alaska courts. The behavior caused turmoil in state government and undue stress on employees.

Apparently, the API doctors fired by Governor Dunleavy have not been paid because the legislature did not fund the settlement payment. This is not justice. If the Governor committed an unethical act that negatively impacted employees and the state does not pay, the fine must fall back to the responsible parties, the Governor and his co-defendant.

In 2020, the Governor was found to have violated ethics rules by an independent counsel for improperly using state funds for political ads. He reimbursed the state \$2,800 and staff were to take ethics training. Has this been done? Is the Governor's and the staff's behavior now consistent with ethics rules? Who is responsible for assuring behavior is in line with ethical requirements? In these cases, presumably ethics training was taken ahead of time, state executives and staff did not make every effort to keep a bright line between political activities and executive responsibilities for operating state government.

The State of Alaska should not be on the hook for unethical behavior by its leaders or employees. If leaders and employees are liable for wrongdoing, perhaps they will be more circumspect in their behavior.

Suggestion:

Executives should individually carry errors and omissions insurance policies. This would cover mistakes but not intentional wrong doing for which they would continue to be liable.

Suggestion:

Update ethics rules to give clearer guidance for what is and what is not allowed/appropriate for state leaders and for employees.

The Governor, in particular, should receive leadership development, training and coaching on expected behavior as a government executive vs. a political partisan. A key factor should include implementing the Constitution, statutes, regulations as they are written, not for political preference. The onboarding/development should be done prior to taking office and throughout term.

Suggestion:

Evaluate the efficacy of ethics training; is employee behavior consistent with requirements and why or why not?

Evaluate if ethics training is actually being completed.

Benchmark with other states which have best ethical practices and how they implement training and oversight. Continuously improve State of Alaska ethics regulations and training.

Overall, the focus must be on being a public servant vs. a political partisan.

From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 11:40 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 11:40:14 AM

Richard Seifert

BOI

North Pole, AK, US
Anonymous User

Comment:

This proposition to use the state's legal resources and staff to defend a governor or LT. Governor in ethics violation cases is absurd and corrupting in the extreme. No sensible person, let alone a legal advisor would allow such a conflict of interest and misuse of public resources. Just another typical corrupt idea from the Dunleavy Administration. The legislature should not even consider such a concept.
Richard Seifert

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Laura Herman
Sent: Monday, September 11, 2023 11:25 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Fwd: Please reject proposed changes to ethics regulation

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----- Forwarded message -----

From: **Laura Herman** BOI >
Date: Mon, Sep 11, 2023 at 10:11 AM
Subject: Please reject proposed changes to ethics regulation
To: <regulation.public.comments@alaska.gov>

As a lifelong Alaskan and a young adult planning on raising kids in this state, please reject the proposed changes to the ethics regulations that would allow for the state to represent the Governor, Lt Gov or AG in ethics violations. I agree with AKPIRG that you should give up this change, just as Alaskans overwhelmingly suggested in 2019.

It is critical that our leaders and elected officials follow ethics laws, not only because it's good for our state and the work that happens on behalf of the people, but also because it's good for democracy. We have to rebuild trust in our leaders and to do that, create more stringent, not more lenient, ethics rules.

Please reject the proposed regulation change and keep the Gov and AG personally accountable for their missteps.

Laura Herman
1845 Parkside Dr.
Anchorage AK 99501

From: Anne & Bill
Sent: Monday, September 11, 2023 11:12 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Comment opposing proposed ethics reg change

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CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I oppose this change. It will encourage unethical behavior by state officials. Current rules and policy allow that the public pay for legal expenses incurred defending the accused but the employee must pay the state back if they are not exonerated. Employees need not worry about the cost of frivolous or dishonest accusations. Neither should the public be forced to pay for the futile defense of employees found guilty of ethics violations.

Bill Witte
Alaskan voter

From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 11:07 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 11:07:41 AM

Jean James

BOI

Anchorage, AK, US
Anonymous User

Comment:

Stacie Kraly, Treg Taylor

Unethical behavior should not be rewarded by the public paying for legal counsel for violations of the AK Executive Branch Ethics Act by the governor, lieutenant governor or attorney general . Representation by the Dept of Law for these violations seems like a major conflict of interest. Do not adopt the proposed regulation changes. Adopting the proposed regulation changes would negatively impact me as a long time resident of Alaska and also seems like a conflict of interest

Sincerely, Jean W James, Fairbanks AK

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Patricia Young
Sent: Monday, September 11, 2023 10:42 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed Regulation Amendment, Executive Branch Ethics

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The amendment proposed is a bad idea. The Office of the Attorney General was established to represent the interests of the entire state, not to be the governor's personal lawyer.

Representation by the Department of Law for the governor, the lieutenant governor, and the attorney general in cases of possible ethics violations would not only be a misuse of state funds and resources but would obscure the public's view and recognition of conflicts of interest and other acts of malfeasance. Should the proposed amendment go into effect, "transparency" would mean that unethical behavior would "invisible" to the public.

The proposed amendment should be withdrawn.

Sincerely,
Patricia Young
Juneau, AK

From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 10:38 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 10:38:48 AM

Martha Raynolds

BOI

Anchorage, AK, US
Anonymous User

Comment:

No, the public should not pay to defend public officials against ethics violations.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Alaska Online Public Notices
Sent: Monday, September 11, 2023 10:27 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/11/2023 10:27:06 AM

David McAlpin

BOI

Fairbanks, AK, US
Anonymous User

Comment:

Proposed changes to 9 AAC 52 of the Alaska Administrative Code, regarding representation of the governor, lieutenant governor, or attorney general against allegations of violating the Alaska Executive Branch Ethics Act (AS 39.52) is a shameless example of self-dealing, and should be withdrawn. These changes will allow powerful incumbent politicians to violate provisions of the Ethics Act with impunity. Worse, they will force taxpayers to defend the conduct of high-office holders, even in cases where clear and convincing evidence of unethical conduct exists. These changes are a license for office holders not only to engage in unethical conduct, but to conceal that conduct at taxpayer expense. The changes are poorly written, and only thinly veiled attacks on the need for integrity and transparency in conducting public affairs.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Anjuli Grantham
Sent: Monday, September 11, 2023 9:58 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Ethics rule

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I oppose the State of Alaska financing the defense of the Governor and/ or Lieutenant Governor when charged with ethics complaints. The role of the Executive is not to protect the Executive, it is to protect the best interest of the state. These do not necessarily correlate, which is a good thing for democracy. It is especially unacceptable for the State to finance defending unethical behavior on the part of the Executive Office, as it runs counter to good governance and transparent democracy.

Sincerely,
Anjuli Grantham
3251 Douglas Hwy
Juneau, AK 99801

From: Lisa Bricker
Sent: Monday, September 11, 2023 9:55 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Opposition to proposed changes in administrative code

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To Whom it May Concern:

I am opposed to the proposed changes to regulation 9 AAC 52 of the Alaska Administrative Code.

"Alaska Executive Branch Ethic Act prohibits the misuse of an official position, the solicitation, acceptance, or receipt of improper gifts, the improper use or disclosure of information, improper influence in state grants, contracts, leases, or loans, and employment outside the state government which may conflict or influence a public employee's official duties."

If the governor or attorney general have so many ethical complaints that they're trying to make taxpayers foot the bill for their defense, there are fundamental issues of fitness for position that ought to be addressed.

I am absolutely opposed to paying for the defense of corruption at the highest level in the state.

Thank you,

Lisa Bricker

Anchorage resident

From: David Weissman
Sent: Monday, September 11, 2023 9:52 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Ethics

You don't often get email from BOI [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am opposed to allowing the Alaska government legal department to represent any elected official if the are accused is any illegal and or ethical activities

David Weissman

--

David Weissman (he/him)

BOI

"Service to others is the rent you pay for your room on this earth" Muhmmad Ali,
1978

From: Cooper Freeman
Sent: Monday, September 11, 2023 9:45 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Public Comments re: proposed ethics regs changes

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Sept. 11, 2023
Department of Law
P.O. Box 110300
Juneau, AK 99811-0300
Attn: Stacie Kraly

Dear Ms. Kraly,

The proposed changes to the regulations of the Dept. of Law regarding legal representation in ethics complaints that name the governor, lieutenant governor, or attorney general are in opposition with our ethics laws. I am writing to voice my opposition to these proposed changes.

Thank you,

Cooper Freeman
Homer, AK

From: Timbi Barron
Sent: Monday, September 11, 2023 9:35 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Pay for your own ethics violation

You don't often get email from BOI [Learn why this is important](#)

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I am against paying any legal bills incurred by the governor and/or his attorney general. They have created these messes through their inept and illegal actions and this is on them, not the people of Alaska. If they are allowed to continue criming with no consequences, the criming will just continue and you will have endorsed it. Please say no to paying criminals' legal bills.

Thank you,
Timbi Barron
Anchorage, AK

From: Toby
Sent: Monday, September 11, 2023 9:21 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: No changes to regulations for ethics complaints

You don't often get email from BOI [learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Alaska,

I am opposed to any changes to Alaska state regulations that would allow the State of Alaska to cover legal costs for the governor, lieutenant governor if they are under investigation of dishonest and unethical conduct. If the governor or lieutenant governor is under an ethics complaint, they must not be allowed to use the attorney general as their personal attorney. Also when the attorney general is under an ethics complaint, the Alaska department of law must not be used to defend the AG. Public monies must not be spent to defend ethics complaints against any elected official.

Thank you.

Art Allen
3528 Knik
Anchorage, AK 99517

From: Laura Schneider
Sent: Monday, September 11, 2023 9:18 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Alaska Executive Branch Ethics Ac

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The Department of Law's proposed regulation to have Alaskan residents foot the bill for the executive branch's immoral and/or unethical behavior is absolutely ridiculous. Perhaps the knowledge that the governor, Lt. governor and attorney general will have to pay their own legal costs will encourage them to make better choices. The governor has a history of pushing the limits of the law and giving him a get out of jail free card paid by residents is immoral and unethical in itself.

Laura Schneider
1750 Meyeres Rd
Fairbanks, AK 99712

From: Joan
Sent: Monday, September 11, 2023 8:40 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Use of public money to defend ethics complaints

You don't often get email from BOI [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello: I strongly object to changing regulations to allow the use of unlimited state money (our money) and state personnel (our employees) to defend officials accused of corrupt behavior. Obviously there are frivolous complaints, but if an allegation is intake investigated and found worthy of further investigation, the public official should foot the bill. To do otherwise, does not deter an official from embarking on "questionable" behavior--to the contrary. I know this came up before and the non-partisan Legislative Affairs Agency found the proposed changes unconstitutional. It is still unconstitutional now. Thank you for considering my opinion. Joan Clover

From: gulogulo
Sent: Monday, September 11, 2023 4:51 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Legal fees

You don't often get email from BOI [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Greetings,

Don't be deceived and loose your common sense ! The governor has proven he likes to manipulate 'others' money by his history with what he's been allowed to do with the PFD. The state has no reason to pay for any of the personal liabilities of any individual in the state of Alaska.

I only hope you vote to do the 'right' thing and not give into to the group mentality of those who use others money for the benefit of those in power...

Thank you,

Sent from Proton Mail for iOS

From: Alaska Online Public Notices
Sent: Sunday, September 10, 2023 8:51 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/10/2023 8:51:21 PM

Mandy Wild

BOI

Eagle River, AK, US
Anonymous User

Comment:

Please do not adopt these regulatory changes to the Alaska Administrative Code regarding representation of the governor, Lt. governor, and AG in ethics complaints.

Alaskans are fed up with self-serving, grifter politicians here in our state. We deserve & demand some accountability. We know that both the governor & AG have engaged in some questionable activities that resulted in settlements that have been paid for using public funds.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Alaska Online Public Notices
Sent: Sunday, September 10, 2023 8:40 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/10/2023 8:40:33 PM

John Gruber

BOI

Eagle River, AK, US
Anonymous User

Comment:

Do NOT adopt regulation changes in 9 AAC 52 of the Alaska Administrative Code, dealing with representation of the governor, lieutenant governor, or attorney general in complaints alleging a violation of the Alaska Executive Branch Ethics Act (AS 39.52).

Alaska and her decent citizens should not have to foot the bill for disgraceful elected and appointed officials. Perhaps they'll do better if they have to use their personal resources when violating ethics laws.

John Gruber

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Gary Pindras
Sent: Sunday, September 10, 2023 7:33 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Government official's legal costs

You don't often get email from BOI [Learn why this is important](#)

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Regardless of a government official's position or status, there is no acceptable or legal reason that the state of Alaska or its citizens should be forced to pay an official's legal costs.

Sincerely,
Gary Pindras

From: Paula Williams
Sent: Sunday, September 10, 2023 6:22 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Should the public pay to represent top officials

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Should we pay the Alaska State Attorney General to defend top officials in ethics complaints?
NO! Absolutely not. The Attorney General of the State of Alaska represents me and all other Alaska citizens. If top officials are corrupt and break the law, I don't want that coming out of the state budget.

This is a loony idea.

Paula Williams
1910 Shadetree Circle
Anchorage, AK 99502
Sent from my iPad

From: Alaska Online Public Notices
Sent: Sunday, September 10, 2023 4:54 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/10/2023 4:54:56 PM

Kathleen Menke

BOI

Haines, AK, US
Anonymous User

Comment:

Hell, no.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Eric Knudtson
Sent: Sunday, September 10, 2023 4:03 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: funding legal cost for ethics complaints

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I do not support changes in state regulations to cover unlimited legal costs for ethics complaints against the governor, attorney general, and the governor.

Thank you,

Eric Knudtson

Homer, AK 99603

From: Alaska Online Public Notices
Sent: Sunday, September 10, 2023 12:10 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/10/2023 12:10:52 PM

Tam Aqosti-Gisler

BOI

Anchorage, AK, US
myAlaska User

Comment:

Changing State regulations to cover legal costs for the governor, attorney general and/or Lt. governor if any are under investigation for dishonest and unethical misconduct negates any checks and balance in our system. How many ethics lawsuits are filed against these three officials? How much money does one investigation cost our State?

The authority to use INEXHAUSTIBLE state funds, resources and personnel to foot legal bills is what is being proposed. Isn't the very nature of a dishonesty or ethics complaint against the governor, attorney general or Lt. governor an assertion that person acted OUTSIDE of his or her official capacity? Obviously, there are frivolous complaints filed, but for those that are investigated and deemed credible, what accountability for misconduct is there if not financial?

In 2019, the non-partisan Legislative Affairs Agency found these proposed changes to be illegal as they potentially violate numerous clauses of the Alaska Constitution; they issued a lengthy 300+ page document that included public comments vastly in opposition. So why is this being proposed again? I am opposed.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Tam Agosti-Gisler
Sent: Sunday, September 10, 2023 10:37 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: proposed ethics regulation change - NO!

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Changing State regulations to cover legal costs for the governor, attorney general and/or Lt. governor if any are under investigation for dishonest and unethical misconduct negates any checks and balance in our system. How many ethics lawsuits are filed against these three officials? How much money does one investigation cost our State?

The authority to use INEXHAUSTIBLE state funds, resources and personnel to foot legal bills is what is being proposed. Isn't the very nature of a dishonesty or ethics complaint against the governor, attorney general or Lt. governor an assertion that person acted OUTSIDE of his or her official capacity? Obviously, there are frivolous complaints filed, but for those that are investigated and deemed credible, what accountability for misconduct is there if not financial?

In 2019, the non-partisan Legislative Affairs Agency found these proposed changes to be illegal as they potentially violate numerous clauses of the Alaska Constitution; they issued a lengthy 300+ page document that included public comments vastly in opposition. So why is this being proposed again? I am opposed.

Tam Agosti-Gisler
Anchorage

BOI

From: Alaska Online Public Notices
Sent: Sunday, September 10, 2023 10:10 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/10/2023 10:10:28 AM

Wade Wahrenbrock

BOI

Anchorage, AK, US
Anonymous User

Comment:

I am totally opposed to this Regulation in 9 AAC 52. If the Governor makes politically motivated hiring or firings that are against Alaska laws -- he should be fiscally responsibly personally for such actions.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Autumn Amy
Sent: Sunday, September 10, 2023 9:43 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
CC: Fields, Zack (LEG)
Subject: Regulation changes in 9 AAC 52 of the Alaska Administrative Code

[You don't often get email from amyconsulting907@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Northwest Regional Relative and Kinship Providers the largest virtual support group for BIPOC families in CINA (Child In Need of Aid) cases and amy_ consulting a human rights advocacy firm in Anchorage serving statewide 300 individuals and families and 23 Tribes fundamentally disagrees with the proposed change of regulation 9 AAC 52 of the Alaska Administrative Code.

At the base of this disagreement is the Department of Law aka the 'AG's office' primary roles are to protect Alaskans from base violations of their rights that impact their and their communities safety, security, wellness, and access to all civil liberties for the purpose of thriving in Alaska and government employees within their official capacity serving state agencies when doing legal and approved business for the State.

Attorney General Taylor by and through his official position on behalf of the State of Alaska seems to seek to change the Administrative code to protect bad actors who abuse and/or misalign with their official capacity at the cost and detriment of Alaskan citizens who entrust his office to protect them from those who abuse their position of power in a role of public service with specific ethics and legal ramifications attached.

When State employees operate outside of the bounds of their official capacity and ethics designed to protect Alaskans and break their fiduciary duty to the citizens of the State of Alaska; they have chosen to no longer be of service to Alaska and its citizens and should be held personally liable for their actions and the harm it has caused the citizens those regulations, laws, and rules are at their base designed to protect. The alleged victims of a State employees serious breach of fiduciary duty should not be footed with the bill.

In addition, as opposed to the Attorney General's Office actively seeking to weed out these bad actors that harm Alaskan citizens; it appears the position is to protect them from the natural consequences of their own actions by providing them with a free pass and no accountability for the damage they will cause every day Alaskans for their duplicity and personal liability in not following the very fundamental ethics of the position of trust that they have asserted and in some cases, sworn to uphold.

I urge the Legislature on behalf of the most vulnerable Alaskan citizens to ask yourself why the State of Alaska Attorney Generals office would like you to change rules, laws, and codes and divert state funds to protect bad actors who have willfully chosen to breach the public's trust by not performing their official capacity ethically and legally?

Please vote no on this code change as it brings up many more questions for Alaskan citizens regarding the top office for their protection then it does answers.

Best,

Autumn Smith-Amy
Amy Consulting and Northwest Regional Relative and Kinship Providers

Sent from my iPhone

From: Alaska Online Public Notices
Sent: Sunday, September 10, 2023 8:08 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/10/2023 8:08:19 AM

Dolores Collins

BOI

Eagle River, AK, US
Anonymous User

Comment:

Please do not make these changes. Alaska's public funds and resources should not be used to pay for the personal legal costs of its governor, lieutenant governor, and attorney general.

We demand and expect better of all elected and appointed officials.

Dolores Collins

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Cassandra Stevens
Sent: Saturday, September 9, 2023 8:28 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Department of Law proposed changes: 9 AAC 52

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The State of Alaska should not foot the bill if the Governor, Lt. Governor, and the Attorney General were found to be liable for unethical misconduct. If they are found to have conducted themselves unbecoming of the position, then they are personally at fault.

Their legal matters should be, like it is constitutionally spelled out, burdened as a personal matter, with personal funds. An ethics complaint is at its heart, a matter of personal actions performed outside the scope, breadth, and intent of the office of position.

It's very hypocritical that those who wax poetic about adhering to the constitution, state or otherwise, are routinely trying to skirt constitutional provisions and protections.

The Department of Law should not attempt to codify these changes. All it would do, would waste resources for things that are ultimately personal matters. Attempting to change these policies is unconstitutional.

From: John & Jo Ann Gruber
Sent: Saturday, September 9, 2023 6:27 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed Regulation Changes in 9 AAC 52 of the Alaska Administrative Code - Please Do NOT Adopt

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Dear Department of Law,

Please do NOT adopt the proposed regulation changes in 9 AAC 52 (Alaska Administrative Code) that deals with representation of the governor, lt. governor, or attorney general in complaints alleging a violation of the Alaska Executive Branch Ethics Act (AS 39.52).

If any public official, whether elected or appointed, finds themselves under investigation for dishonest and unethical conduct, the State of Alaska should not spend precious public funds and resources to cover their legal costs.

It's time that we demand some accountability and decency from elected officials. Holding them accountable and financially responsible for the consequences of their transgressions while in their official capacity would be a step in the right direction. I am tired of self-serving, deceitful public officials who expect to utilize public funds to cover expenses caused by their illegal & unethical actions.

We need to let the governor, lt. governor, and attorney general know that they should be serving Alaskans and Alaska's interests and not themselves. If AG Taylor's proposed changes to the ethics regulations are approved, they would be able to use our state's funds, resources, and employees to defend themselves and pay for their legal bills even if they are found to have violated ethics laws.

I no longer have any confidence or trust in our governor and his attorney general. We, the public, are not informed of how many ethics complaints are filed and the costs associated with investigating them. We also don't know how many of them result in some type of action. It would be like handing them a blank check with no accountability.

Therefore, I am asking that you NOT adopt the proposed regulation changes.

Respectfully,

Jo Ann Gruber
Eagle River, AK

September 2023
Comments on proposed changes to ethics regulations

As they were in 2019, the proposed changes to the state's ethics regulations are a bad idea. The changes would create a substantial possibility of conflicts of interests for the Department of Law. And the process of proposing and adopting those changes may itself violate the ethics act.

The proposed changes would allow the Department of Law to defend the governor or lieutenant governor against an ethics complaint if the attorney general certified that providing that defense would serve the public interest. See Proposed 9 AAC 52.140(f). The changes would also allow the Department of Law to defend the attorney general against an ethics complaint if the governor certified that defending the attorney general would serve the public interest. See Proposed 9 AAC 52.140(f). The changes would make confidential any "information received by the Department of Law and the attorney general related to the defense" against such ethics complaints. See Proposed 9 AAC 52.140(h).

Existing regulations already provide public officers state-paid defense against ethics complaints whenever the officers are exonerated. See 9 AAC 52.040(c)(3), (c)(4), and (d). By contrast, the proposed changes would allow state-paid defense of the governor, lieutenant governor, and attorney general regardless of whether they are ultimately exonerated.

Consequently, the proposed regulations would directly benefit only the governor, lieutenant governor, and attorney general. And for that reason, the process of proposing and adopting these changes may violate the ethics act.

The ethics act prohibits public officers from using or attempting to use their official positions for personal gain. See AS 39.52.120(a). The act also prohibits public officers from taking official action to affect matters in which they have personal or financial interests. See AS 39.52.120(b)(4). Receiving state-paid defense against ethics complaints almost certainly constitutes "personal gain" for purposes of the ethics act. See 9 AAC 52.035; AS 39.52.960(3) and (10). Defense against an ethics complaint may also constitute a matter in which a public officer has a "financial interest" under the act. See AS 39.52.960(9)(A). The ethics act defines "official action" very broadly, to include "advice, participation, . . . assistance, . . . recommendation, decision, approval, . . . or other similar action . . . by a public officer." See AS 39.52.960(14). So to the extent that the governor, lieutenant governor, or attorney general participates --- or has participated --- in proposing or adopting the proposed changes to the ethics regulations, that participation may violate the ethics act.

I do not know whether the governor or attorney general participated in proposing the regulation changes, although that seems likely. The lieutenant governor may also have participated in proposing the changes. And if the Department of Law adopts the proposed changes, the governor would be obligated to review those changes --- a review that, by statute, the governor cannot delegate to anyone other than the lieutenant governor. See AS 44.62.040(c).

Thus even if the governor and lieutenant governor have not already participated in proposing the regulation changes, they could not avoid an ethics act violation by recusing themselves from the process and delegating their authority concerning the proposed regulations to other officers. If the governor, lieutenant governor, or attorney general has already participated in proposing the changes, they might nonetheless be able to mitigate the problem by making the changes effective only for future holders of their offices and not for themselves.

Still, even if the proposed changes applied only to future officeholders, the changes would be a bad idea because they would create conflicts with the Department of Law's statutory responsibility for enforcing the ethics act. If the department were responsible for defending the governor, lieutenant governor, and attorney general against ethics complaints, the assistant attorneys general assigned to represent them might need, for example, to argue for interpretations of the ethics act that benefit those individual officers but are contrary to the public interest. Although the proposed regulations provide for representation only when it is in the public interest, it may be impossible to determine what arguments are necessary for defending a public officer until an assistant attorney general undertakes representation and discusses the matter with the officer. After assuming representation of the governor, lieutenant governor, or attorney general, an assistant attorney general may learn that his or her client committed an egregious violation of the ethics act and yet be obligated to continue representing the officer and be prevented by duties of confidentiality from disclosing the violation.

Furthermore, ethics complaints sometimes accuse more than one public officer of violating the ethics act, and sometimes separate ethics complaints against different public officers concern the same events. In those instances, having the Department of Law defend the governor, lieutenant governor, or attorney general against the ethics complaints while also prosecuting the complaints against the other public officers named would create difficult conflicts.

Of course, dealing with conflicts of interests is not completely foreign to the Department of Law's practice; the department sometimes represents multiple agencies with conflicting interests in a particular matter. But establishing a new system that would create even more conflicts is unwise --- especially when reimbursement of legal fees is already available to exonerated public officers.

Perhaps having assistant attorneys general defend the governor, lieutenant governor, and attorney general would be somewhat less expensive than reimbursing them for private attorneys' fees. But that potential savings is not worth compromising the Department of Law's role in enforcing the ethics act.

The ethics complaint process is admittedly vulnerable to abuse. Those who disagree with a public officer's policies or actions might use ethics complaints to harass that officer. But as I learned during my service in the Department of Law, that sort of hazard comes with public

service; people who disagree with your decisions may sometimes unfairly accuse you of misconduct, impugn your character, or blame you for things you are not responsible for.

Responding to such accusations can require public officers to spend time on matters they believe are unworthy of their attention. But the proposed changes would not prevent that. Even if the Department of Law defended the governor, lieutenant governor, and attorney general against ethics complaints, those officers would still need to devote time to responding to the complaints by, for example, explaining the relevant facts to the assistant attorneys general representing them.

For all of these reasons, I urge the Department of Law to abandon the proposed changes to the ethics regulations.

From: Dave Jones
Sent: Saturday, September 9, 2023 3:54 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed changes to ethics regulations
Attachments: Comments on proposed changes to ethics regulations (September 2023).docx

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Attached are my comments on the proposed changes to the ethics regulations. I have also submitted my comments online.

Thank you.

Dave Jones
4718 Kershner Avenue
Anchorage, AK 99517

BOI

From: Alaska Online Public Notices
Sent: Saturday, September 9, 2023 3:36 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/9/2023 3:36:26 PM

David Jones

BOI

Anchorage, AK, US
Anonymous User

Comment:

As they were in 2019, the proposed changes to the state's ethics regulations are a bad idea. The changes would create a substantial possibility of conflicts of interests for the Department of Law. And the process of proposing and adopting those changes may itself violate the ethics act.

The proposed changes would allow the Department of Law to defend the governor or lieutenant governor against an ethics complaint if the attorney general certified that providing that defense would serve the public interest. See Proposed 9 AAC 52.140(f). The changes would also allow the Department of Law to defend the attorney general against an ethics complaint if the governor certified that defending the attorney general would serve the public interest. See Proposed 9 AAC 52.140(f). The changes would make confidential any "information received by the Department of Law and the attorney general related to the defense" against such ethics complaints. See Proposed 9 AAC 52.140(h).

Existing regulations already provide public officers state-paid defense against ethics complaints whenever the officers are exonerated. See 9 AAC 52.040(c)(3), (c)(4), and (d). By contrast, the proposed changes would allow state-paid defense of the governor, lieutenant governor, and attorney general regardless of whether they are ultimately exonerated.

Consequently, the proposed regulations would directly benefit only the governor, lieutenant governor, and attorney general. And for that reason, the process of proposing and adopting these changes may violate the ethics act.

The ethics act prohibits public officers from using or attempting to use their official positions for personal gain. See AS 39.52.120(a). The act also prohibits public officers from taking official action to affect matters in which they have personal or financial interests. See AS 39.52.120(b)(4). Receiving state-paid defense against ethics complaints almost certainly constitutes "personal gain" for purposes of the ethics act. See 9 AAC 52.035; AS 39.52.960(3) and (10). Defense against an ethics complaint may also constitute a matter in which a public officer has a "financial interest" under the act. See AS 39.52.960(9)(A). The ethics act defines "official action" very broadly, to include "advice, participation, . . . assistance, . . . recommendation, decision, approval, . . . or other similar action . . . by a public officer." See AS 39.52.960(14). So to the extent that the governor, lieutenant governor, or attorney general participates --- or has participated --- in proposing or adopting the proposed changes to the ethics regulations, that participation may violate the ethics act.

I do not know whether the governor or attorney general participated in proposing the regulation changes,

although that seems likely. The lieutenant governor may also have participated in proposing the changes. And if the Department of Law adopts the proposed changes, the governor would be obligated to review those changes --- a review that, by statute, the governor cannot delegate to anyone other than the lieutenant governor. See AS 44.62.040(c).

Thus even if the governor and lieutenant governor have not already participated in proposing the regulation changes, they could not avoid an ethics act violation by recusing themselves from the process and delegating their authority concerning the proposed regulations to other officers. If the governor, lieutenant governor, or attorney general has already participated in proposing the changes, they might nonetheless be able to mitigate the problem by making the changes effective only for future holders of their offices and not for themselves.

Still, even if the proposed changes applied only to future officeholders, the changes would be a bad idea because they would create conflicts with the Department of Law's statutory responsibility for enforcing the ethics act. If the department were responsible for defending the governor, lieutenant governor, and attorney general against ethics complaints, the assistant attorneys general assigned to represent them might need, for example, to argue for interpretations of the ethics act that benefit those individual officers but are contrary to the public interest. Although the proposed regulations provide for representation only when it is in the public interest, it may be impossible to determine what arguments are necessary for defending a public officer until an assistant attorney general undertakes representation and discusses the matter with the officer. After assuming representation of the governor, lieutenant governor, or attorney general, an assistant attorney general may learn that his or her client committed an egregious violation of the ethics act and yet be obligated to continue representing the officer and be prevented by duties of confidentiality from disclosing the violation.

Furthermore, ethics complaints sometimes accuse more than one public officer of violating the ethics act, and sometimes separate ethics complaints against different public officers concern the same events. In those instances, having the Department of Law defend the governor, lieutenant governor, or attorney general against the ethics complaints while also prosecuting the complaints against the other public officers named would create difficult conflicts.

Of course, dealing with conflicts of interests is not completely foreign to the Department of Law's practice; the department sometimes represents multiple agencies with conflicting interests in a particular matter. But establishing a new system that would create even more conflicts is unwise --- especially when reimbursement of legal fees is already available to exonerated public officers.

Perhaps having assistant attorneys general defend the governor, lieutenant governor, and attorney general would be somewhat less expensive than reimbursing them for private attorneys' fees. But that potential savings is not worth compromising the Department of Law's role in enforcing the ethics act.

The ethics complaint process is admittedly vulnerable to abuse. Those who disagree with a public officer's policies or actions might use ethics complaints to harass that officer. But as I learned during my service in the Department of Law, that sort of hazard comes with public service; people who disagree with your decisions may sometimes unfairly accuse you of misconduct, impugn your character, or blame you for things you are not responsible for.

Responding to such accusations can require public officers to spend time on matters they believe are unworthy of their attention. But the proposed changes would not prevent that. Even if the Department of Law defended the governor, lieutenant governor, and attorney general against ethics complaints, those officers would still need to devote time to responding to the complaints by, for example, explaining the relevant facts to the assistant attorneys general representing them.

For all of these reasons, I urge the Department of Law to abandon the proposed changes to the ethics regulations.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Lynda Giguere
Sent: Saturday, September 9, 2023 1:26 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Oppose proposed regulations

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I oppose the Department of Law's proposed regulation changes to provide legal representation when the governor, lieutenant governor or attorney general are facing ethics complaints.

Behave ethically, and you won't require legal representation. Simple as that. But it's not the responsibility nor purpose of public servants to provide legal cover to public officials accused of unethical behavior.

This maneuver was tried before and resoundingly opposed by the public. What's changed? I'm offended that the Department of Law is trying to sneak this past the public yet again.

Respectfully,
Lynda Giguere
217 5th Street
Douglas, AK 99824

Sent from my iPhone

From: Janet Johnston
Sent: Saturday, September 9, 2023 12:37 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Object to Use of Public Funds for legal fees related to unethical conduct

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I am writing to express my objection to changing regulations such that the state of Alaska would cover legal costs for the governor, attorney general and/or lieutenant governor if they are under investigation for dishonest and unethical misconduct.

Thank you.

Janet Johnston

Anchorage resident

--

From: Laurie Radzinski
Sent: Saturday, September 9, 2023 11:56 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: proposed change in ethics regulations

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I do not think that the regulations should be allowed to be changed to cover legal costs for the governor, attorney general or lieutenant governor if they are under investigation for dishonest or unethical conduct.

Laurie Radzinski
Cooper Landing

From: Pam Weaver
Sent: Saturday, September 9, 2023 11:51 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed Changes to Ethics Regulations

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I am vehemently opposed to changing the regulations of our Dept. of Law in ethics complaints concerning our governor, lieutenant governor or our attorney general.

This very same change was floated in 2019-2020 and was deemed a violation of state law as well as unconstitutional by legislative legal opinion. Public funds must not be used to defend ethics complaints against these offices. Who determines what a valid ethics complaint is? AG Taylor maintains this will not cost the state anything, yet he provides no history or context for past ethics complaints. Since when is any legal aid free? This is pure fantasy.

This whole proposal smacks of collusion and protecting one another for whatever they choose to do, legal or not. This is an outright conflict of interest and must not be allowed.

Thank you,
Pamela S Weaver
1305 Eriophorum Drive
Fairbanks, AK 99709

BOI

Sent from my iPad

From: Michael Neussl
Sent: Saturday, September 9, 2023 10:06 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Opposition to Regulations Change

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I am fully opposed to changing the regulations to allow state provided legal assistance to the Governor, LT Governor, and Attorney General for ethics violations. We need to incentivize doing the right and ethical thing, not make it easier for people to commit ethics violations with the promise of free legal assistance to defend them. Please do not approve such a change in regulations.

Michael Neussl
Juneau

From: Alaska Online Public Notices
Sent: Saturday, September 9, 2023 9:37 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/9/2023 9:37:59 AM

Mary A Calmes

BOI

Anchorage, AK, US
Anonymous User

Comment:

This change should NOT be implemented. Legal representation cost should not be paid for by the state for ethics violations by the governor, lieutenant governor or the attorney general of Alaska. These costs should be borne by the individuals charged with ethics violations NOT by the state. Individuals in these positions of power should be well informed of the code of ethics and should maintain the highest level of ethical conduct. Any ethical breach carries with it a personal responsibility. These individuals are entrusted with a responsibility to act in the best interest of all Alaskans and should honor that trust by the people of this state to not incur costs to the state through unethical actions.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: AK99501
Sent: Saturday, September 9, 2023 9:11 AM AKDT
To: Senator.Elvi.Gray-Jackson@akleg.gov; Ethics Regulation Public Comments (LAW sponsored); Galvin, Alyse S (LEG)
Subject: Public comment re: Ethics Regulations Changes

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I am **OPPOSED** to changing the ethics regulations to cover legal costs for the governor, attorney general, and lieutenant governor, if they are under investigation.

Thank you for the opportunity to comment.

Bonnie Reese

2980 Lois Drive

Anchorage, AK. 99517

From: Stephen Actor
Sent: Saturday, September 9, 2023 7:43 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Ethics violations

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I am opposed to the Department of Law representing the Governor, Lt Governor or Attorney General for personal ethics violations. The citizens of Alaska should not be paying for that.

Stephen Actor
Angoon

From: Misty Ott
Sent: Saturday, September 9, 2023 6:58 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: No tax payer defense on ethics violations

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Alaskans should not fund expenses to defend ethics violations. The governor and his team can use the 20% raise they gave themselves to pay for their misdeeds.

Misty Ott
14014 E Cabbage Patch Ave
Palmer, AK 99645

From: Donald Witzel
Sent: Saturday, September 9, 2023 4:14 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Oppose regulation changes

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My wife and I oppose the proposed changes to the state ethics regulations. It seems to us that these changes provide a blank check for the governor, Lt. governor and attorney general to act unethical without any consequences to keep them in check. Similar changes were found to be unconstitutional in 2019 by the Legislative Affairs Agency and we ask what has changed that would make them constitutional today? As shown by his behavior, the governor would like free rein to do as he pleases without accountability or consequences. Every government official needs to be accountable to the public for their choices and behavior. If they violate ethics regulations, they need to pay for their defense, not we the citizens of Alaska. We oppose these changes.

Don Witzel

From: Emma Jackson
Sent: Friday, September 8, 2023 8:38 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Alaskan opposed to changing regulations re: legal costs

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Hello,

I am opposed to the proposed changes to regulations to cover legal costs for the governor, attorney general and lieutenant governor if they are under investigation for dishonest and unethical misconduct.

In the case of dishonest or unethical misconduct, I believe it is NOT the responsibility of taxpayers to adequately defend the most senior of AK state government officials. If this issue has arisen, the onus should be on the individual. I would like to hold the elected or appointed person accountable, not the Alaskan people.

Cordially,
Emma Jacobson

From: Shari Durocher
Sent: Friday, September 8, 2023 2:41 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Alaskans shouldn't pay for governor's legal fees

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The state of Alaska should not have to cover the legal costs for the governor, attorney general, and / or the lieutenant governor if they are under investigation for dishonest and / or unethical conduct!

Sincerely,
Shari Durocher

Sent from my iPad

From: Andrée McLeod
Sent: Friday, September 8, 2023 1:19 PM AKDT
To: BOI Ethics Regulation Public Comments (LAW sponsored)
CC: Veri di Suvero; Robin O'Donoghue
Subject: Fwd: Public funds for defense of Governor, an attorney general

You don't often get email from andree@akpirg.org. [Learn why this is important](#)

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Dear Mr. Titzel,

I'm forwarding your email to the Dept. of Law email address for public comments.

I would suggest you also send your public comment on the proposed ethics regulation changes directly to them, so there won't be any question as to its validity.

The email address is:

ethics.regulation.public.comments@alaska.gov

Your time and interest on this important matter is much appreciated. Please let us know should you have any questions or concerns.

Thank you.

Sincerely,

Andrée McLeod

----- Forwarded message -----

From: Mark Titzel <BOI >
Date: Fri, Sep 8, 2023 at 12:33 PM
Subject: Public funds for defense of Governor, an attorney general
To: <info@akpirg.org>

To whom it may concern,

I want to voice my objection to the change in regulations that would allow public funds to be used for defending ethics violation allegations for the Attorney General, and for the governor.

Mark Titzel

--



Andrée McLeod

Good Government Director

Alaska Public Interest Research Group

www.akpirg.org

Dena'inaq e'nen'aq' gheshtnu ch'q'u yeshdu. (Dena'ina) I live
and work on the land of the Dena'ina. (English)

Translation by J. Isaak and S. Shaginoff-Stuart

From: Debbie Hinchey
Sent: Friday, September 8, 2023 11:30 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Governor and others: You Break the Law you pay the price

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Breaking the law should cost the offender just like the rest of us.

What else will deter them from doing risky things if they have no repercussions?

If they do damage against the population and THEN the population has to pay for their defense? NO WAY is this ethical! This only makes sense for unethical people!

Ethics used to be a guiding principle for leaders, but not anymore. Requiring Alaskans to pay legal expenses for people that have no scruples SHOULD NOT happen. (Next, they will want to be exempted for stealing and drunk driving!)

They made the calculated decision to do certain damaging (and selfish) things, so they should also add the costs for legal defense to their calculations. MAYBE they will think again and be honest - or work with others to get consensus for the greater good of Alaskans.

Debbie Hinchey
Anchorage

From: Lulu
Sent: Friday, September 8, 2023 8:27 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Ethics Complaints Proposed Regulation

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Hello,

I'm strongly against the proposed regulations to allow the AG and Governor to use public funds for free legal help when ethics complaints are filled against them.

Alaska is already struggling financially and is unable to meet the needs of everyday Alaskans needing legal assistance for much more important life changing situations.

Please do not allow this proposed regulation change to be adopted.

Thank you.

From: Tanner Hetz
Sent: Friday, September 8, 2023 7:04 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Public comment AS 39.52

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Good morning,

I am writing to say that I oppose the proposed regulation change to AS 39.52 posted by AG Treg Taylor August 2, 2023.

I do not support the State paying for legal fees associated with ethics complaints. If this were eliminated, it would get rid of any and all motivation the gov, Lt gov or atty general have to perform their jobs in an ethical manner that is best for the state.

Elimination of this will result in non-ethical behavior from our top elected officials, who will try to advance their own personal beliefs on the people of the state of Alaska, rather than doing what is right even if they do not personally "agree" with something.

Again I do not support this and would like the current state of accountability stay in place, although it doesn't seem to do much to stop our governor from wasting money on frivolous legal fees.

Thank you

Tanner Hetz

Anchorage, AK

Tanner Hetz

Frigid Air LLC

BOI

Typed with my thumbs

From: Ann Sugrue
Sent: Thursday, September 7, 2023 9:08 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: No to Changing Regulations to cover Governors costs

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I write to oppose any changes to the current regulations that would allow for using State funds to cover costs incurred by the Governor, the AG or any state employees who are under investigation for illegal and/or unethical misconduct, as previously occurred. Costs incurred that are prompted by ethics complaints must be borne by the individual(s) whom the complaint is brought against and found to have violated the State ethics or laws, etc. This squandering of State money on illegal and unethical behavior by the Governor and his administration must stop.

Thank you.

Ann SUGRUE

BOI

Sent from my iPhone

From: Dr Di CHADWELL
Sent: Thursday, September 7, 2023 7:12 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Ethics Rules Under Threat

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Governor: we're still not interested in footing the bill!

Dr. Chadwell

A&P Hon., C.TDNN, Ret.

BOI

HC60 BOX4358

Delta Junction, Alaska 99737

From: Max Kritzer
Sent: Thursday, September 7, 2023 6:38 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: I oppose regulation changes

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Hello,

I am writing to express my opposition to the proposal to change regulations so that the state of Alaska has to cover legal costs for the governor, attorney general and lieutenant governor if they are under investigation for dishonest and unethical misconduct.

Thanks,

Max Kritzer

From: Gary Jacobsen
Sent: Thursday, September 7, 2023 5:09 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Public funds to defend governor.

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The governor and lieutenant governor should use their own funds for their ethics violations defense.

From: BOI
Sent: Thursday, September 7, 2023 4:19 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: No public money to defend unethical behavior

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Hello-

I'm a lifelong Alaskan and am disturbed by the attempts of Gov Dunleavy and his AG to change state regulations to allow unlimited state money to be used in any defense against allegations of their unethical behavior. State money should only be used to defend the state or the offices representing the state, not the personalities currently occupying those offices. State regulations should not be changed in this instance.

Thank you.

Respectfully,
Clint Hammer

From: Lesley Hammer
Sent: Thursday, September 7, 2023 4:08 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: No for plan to use tax dollars for legal defense

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I am wholeheartedly against changing laws or rules that allow the governor or other officials to use tax dollars to pay for their legal defense even if they are found to have violated ethics rules!

Lesley Hammer

BOI
10601 Prospect Dr
Anchorage 99507

Sent from my iPhone

From: Colleen Bridge
Sent: Thursday, September 7, 2023 3:59 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed changes 9AAC52

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I am writing against the proposed regulation changes to the Administrative Code, Alaska Executive Branch Ethics Act.

These proposed changes are very similar to those proposed in 2019, which were found to be illegal by the nonpartisan Legislative Affairs Agency.

The governor, lieutenant governor and attorney general are hired to work on behalf of the state. If any one or all of them require legal representation for actions taken while working on behalf of the state, the department of Law represents them. That's where the attorney general's duties end. If any of those senior officers act outside of the law, or the Code of Ethics, they're responsible for their own legal representation.

As a lifelong Alaskan I find these proposed as offensive as I did the 2019 proposed regulation changes, which did not move forward.

In reviewing the current proposed regulation changes, I note the disingenuous remark on the Fiscal impact: "not expected to increase appropriation". Taking on the additional role of defending senior state officers for their acts prompting ethics complains would surely have many costs, both directly and indirectly such as the deferral of other state legal work

I am against moving forward with these proposed regulations

Colleen Bridge
PO Box 231087
Anchorage, AK. 99523

BOI

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From: Carmen Olito
Sent: Thursday, September 7, 2023 2:52 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Public monies should NOT be used to defend Dunleavy and Taylor!

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When the public pays for the defense against dishonesty and unethical conduct, it only encourages this outrageous behavior. If Dunleavy and his ilk choose to violate our trust and serve only their interests, they should pay for their own defense.

Carmen Olito
Alaskan Supervoter

From: john sonin
Sent: Thursday, September 7, 2023 1:41 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: NO public payment for personal corruption!

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I cannot let the corruptive deceit of a private gain prioritizing public employee squatting in the Governors Mansion 'scam' his personal deception through crony nominations on my State! DO NOT change Ethics rules/laws for a supposed public servant, who should have been recalled were it not for COVID, concurring with his WANT for my public purse!

John Sonin
2201-A6 row Hill Dr.
Douglas, AK 99824

From: John W Blaine
Sent: Thursday, September 7, 2023 11:08 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Change in "who pays"

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The proposed change in ethics rules for the state of Alaska which would make the Stater liable for legal costs when state officials are under investigation for dishonest and unethical misconduct is not a good idea.

I hope this proposed change in regulations will not go forward.

John Blaine
2200 Susitna Drive
Anchorage, AK. 99517

From: Carolyn Thomas
Sent: Thursday, September 7, 2023 11:07 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Legal Fees

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It should not be and IS NOT the responsibility of State of Alaska residents to pay legal fees for State of Alaska politicians, governors or anyone holding any other position. Period.

Carolyn A Thomas
7240 Kiska Cir, Anchorage, AK 99504

From: Paul E. Turner Ph.D.
Sent: Thursday, September 7, 2023 10:55 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Opposition to Change Regulations 9 AAC 52.140 & 9 AAC 52.160

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To Whom it May Concern -

I strenuously object proposed changes to these regulations for the following reasons.

The 2019 Legislative Affairs Agency legal opinion found the changes illegal and likely a violation of numerous aspects of the Alaska Constitution.

The 2019 Department of Law 321 page document found the proposed changes “violate the spirit if not the letter of the Alaska Executive Branch Ethics Act.”

Last, the attorney general is charged with representing the state of Alaska. The governor, attorney general, lieutenant government are not the clients. Such changes in the regulations are incompatible and inappropriate with the proposed changes. It is wrong to use state resources to defend elected and appointed officials for misconduct and unethical behavior when such officials act outside their official capacity.

Respectfully,

Paul E. Turner, Ph.D.

BOI

Box 270

Kenai AK 99611

From: Debbie Anderson
Sent: Thursday, September 7, 2023 6:05 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Stop proposed change

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As an Alaskan for more than 47 years I have witnessed more shady dealings since Dunleavy and his "people" have been in office. Stop the proposed change that would fund his defense of ethics charges with "OUR State funds. We need to fund our schools, and help our elderly instead of paying to defend a person who does not care what the people of Alaska want. Thank you
Deborah Anderson, Delta Junction, Alaska

From: Donald Witzel
Sent: Thursday, September 7, 2023 4:13 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: No to using state money

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Don Witzel

From: Lisa Fitzpatrick
Sent: Wednesday, September 6, 2023 10:33 PM AKDT
To: Regulations, Law (LAW sponsored); regulation.public.comments@alaska.gov
Subject: AGO representing top executive branch officials under investigation for dishonest or unethical conduct

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I'm writing to voice my opposition to the proposal that would authorize the Office of the Attorney General (AGO) to represent the Governor and Lt. Governor when faced with allegations of unethical conduct, simply because the Attorney General - who is appointed by that same Governor - deems that representation to be in the public interest. Similarly, I oppose the proposal to allow the AGO to represent an Attorney General charged with ethical violations based solely on the Governor's "certification" that representation by the AGO is in the public interest. Allowing reimbursement of legal fees if the complaint is later determined to be unfounded is one thing. Under the current proposal, however, the AGO could well be in the position of defending valid complaints which would be a wholly inappropriate use of state resources. I also question the "good faith" basis for a proposal that is limited to authorizing representation of only the highest ranking members of the executive branch when no other government official would receive the same protections.

If I have sent this to the wrong email address, I ask that you please forward it to the correct address or notify me of the correct address so I can do so. Thank you for doing so and for considering my comments.

Lisa Fitzpatrick

From: BOI
Sent: Wednesday, September 6, 2023 6:51 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: People who violate ethics are personally liable

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Good evening,

I did not violate any ethics rules. My husband didn't. My children didn't. My neighbors and friends didn't.

We should not have to pay for the ethical violations of our elected, appointed or hired officials.

It would be an additional ethics violation to waste public money for officials' personal flaws and gains.

What deters me from violating ethics at work if I believe the state will defend my violations?

See how it makes no sense for a hired state employee?

It also makes no sense for the elected and appointed officials.

Please uphold the spirit of the principles of ethics by holding the violating individuals accountable for their individual violations.

Please do not undermine the very foundation of ethics by punishing the citizenry for corruption in our leadership.

Sarah

28-year voter in Alaska

From: Jennifer Beckmann
Sent: Wednesday, September 6, 2023 5:06 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Regulation Change

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I am against changing the regulation so that the state of Alaska has to cover the legal costs for the governor, attorney general, and lieutenant governor if they are under investigation for dishonest and unethical misconduct.

It's the attorney general's job to represent the state of Alaska. The governor isn't the client, just in the sense that he represents the state. This is an inherently inconsistent and inappropriate use of the attorney general's role if he can defend ethics complaints against the governor and lieutenant governor in his sole discretion, or if the Department of Law is allowed to defend the AG. This should not be changed in regulation.

From: Alaska Online Public Notices
Sent: Wednesday, September 6, 2023 5:05 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/6/2023 5:05:16 PM

Jeffry Schmitz

BOI

Seattle, WA, US
Anonymous User

Comment:

This proposal is a stunning example of self interest, lack of ethics, arrogance and completely lopsided public policy. It's hard to even know where to start. The highlights:

1. The proposal frees those covered to completely disregard any and all rules, norms, discretion's or boundaries and feel free to engage in any kind of partisan politicking they desire, knowing the State will pick up the tab for any violations.
2. Speaking of partisan politicking, those proposing this reg mod already have a track record of just exactly why not to change the regs, the infamous "loyalty pledge" debacle. THAT THE STATE HAS PAID THE SETTLEMENTS FOR IN DISREGARD OF THE JUDICIAL MANDATE NOT TO.
3. There is the consideration of equal representation - why should the Three Amigos get a pass and not the rest of State government or even citizenry for that matter?
4. The assertion that no funding impact would be incurred is utterly laughable, it patently violates the fundamental tenet of No Free Lunch. Sorry, even the movers and shakers can't skirt that one.
5. It's also patently obvious that the Three Amigos have not learned nor taken to heart the fact they violated the law already, just the fact that they have to prearrange for the planned eventuality when they do so next so as to have a prepaid defense in place. Stunning. Stupid.

Let the proposed change die the undignified death it so richly deserves and never resurrect it again.

Jeff Schmitz
Anchorage

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Karen Bendler
Sent: Wednesday, September 6, 2023 3:56 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Comments on proposed regulations regarding payment of legal fees

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I'm a resident of Anchorage, Alaska, and am strongly opposed to regulation changes that would make the State of Alaska cover legal costs for the governor, attorney general and lieutenant governor if they are under investigation for dishonest and unethical misconduct. They should be required to pay their own legal bills.

Karen Bendler

From: James Dryden
Sent: Wednesday, September 6, 2023 2:05 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Fwd: Defending ethics complaints

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- - James Dryden (iPhone) [redacted]

Begin forwarded message:

From: James Dryden <[redacted]>
Date: September 6, 2023 at 10:11:54 AM AKDT
To: info@akpirg.org, regulation.public.comments@alaska.gov
Subject: Defending ethics complaints

I would fault the recent Anchorage Daily News commentary regarding the Dunleavy administration's proposal to have the Department of Law defend ethics complaints against officials such as the governor. I fault the article for not explaining the current status which, I believe, is essentially that the state would reimburse the official if they were found innocent. An excellent 2009 missive written by Dan Sullivan to Sean Parnell can be seen at https://law.alaska.gov/pdf/opinions/opinions_2009/09-008_AN2009102807.pdf. Like Mr. Sullivan, I agree with the balance in that policy.

- - James Dryden (iPhone) [redacted]
6951 Viburnum Dr, Anchorage 99507

From: David Bennett
Sent: Wednesday, September 6, 2023 12:50 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Paying for investigations of dishonest or unethical misconduct

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Don't try to change the rules. Don't try to fix something that ain't broke. Instead, act honestly, ethically and transparently and then there shouldn't be any investigations or legal cases that need to be paid for. It's that simple.

David Bennett
1328 H St
Anchorage, AK 99501

From: Matt Frankforter
Sent: Wednesday, September 6, 2023 12:11 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Public should not pay for defense of wrongdoing or ethics violation

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We the public should not pay for the legal defense of public figures who have ethics complaints and /or wrong doing. The public figures have gone outside their official duties to the detriment of their office and the public. The public should not then have to pay to defend their lapses. That is like asking the victim to pay for the thieves defense! It also takes resources away from other matters that need attention. And finally it pits the Attorney Generals Office against the public since it is in the public's interest to eliminate wrong doing in public office and government.

Sincerely,
Kate Frankforter
Anchorage, Alaska

From: Aaron Sandone
Sent: Wednesday, September 6, 2023 11:47 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed Changes to 9 AAC 52.140

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Please find below my comments on the proposed changes to 9 AAC 52.140.

I do not see the need for any such change. It appears that this would be a waste of State resources to pay to defend an elected official from charges that they violated the Alaska Executive Branch Ethics Act. Additionally, I believe that it is inappropriate and unconstitutional for the State to defend an executive where it is being claimed that they acted outside of their official capacity and acted in an unethical and potentially unlawful manner. I do not see how it could be in the public interest of the State, for the State pay to defend an executive officer who is alleged to have acted in a way that is contrary to the public interest. This proposed regulation should not be enacted.

Sincerely,
Aaron Sandone

From: Doreen Toller
Sent: Wednesday, September 6, 2023 11:06 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Opposed to Proposed change

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I am writing to add my name and vote to the list of those who OPPOSE the AGs pursuit of change in ethics regulations that would then allow them to cover legal costs for the governor, attorney general and lieutenant governor if they are under investigation for dishonest and unethical misconduct.

We the people opposed this once already. You should not be utilizing the “try, try again” model. Accept and respect the decisions made for once.

Sincerely,

Doreen Toller

From: Jimmy Tohill
Sent: Wednesday, September 6, 2023 10:09 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Governor Dunleavy using state funds to defend his unethical decisions

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Hello,

I am writing because I am getting quite disappointed and losing respect for our state government due to Governor Dunleavy and his administration using state funds to defend their unethical and often illegal decisions on a continual basis. It seems that the far right extreme so called conservatives these days think they are above ethics, the laws and constitution. It is getting quite disheartening to see this in the United States of America and especially in Alaska. There is nothing conservative about this extremism in the Republican Party and they have lost my respect until they clean up their act and become responsible again.

Thoughts from a very concerned Alaska citizen and business owner of 30 years ~ Thanks for your time,

Jimmy Tohill

Healy, AK

From: jim akers
Sent: Wednesday, September 6, 2023 8:37 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: use of public funds to defend ethics complaints in aK POLITICS

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here in Alaska we have had far too many transgressions of ethical behavior by our top elected officials over the last several years

we the citizens are plumb tired of waking up to new revelations of malfeasance of the anchorage and state of Alaska executive branches of government

Please put forward resistance to any efforts to get us, the taxpayers, to foot the bill for this misbehavior

Jim akers

S anchorage.

From: Judith Meidinger
Sent: Wednesday, September 6, 2023 4:47 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Who pays for public ethics complaints defense for state administrators

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I'm with AKPIRG—the governor, Lt. governor and other state administrators should pay their own legal expenses in ethics cases. Dunleavy and his cohorts must be held accountable for their disreputable behavior in office, setting the example for future officeholders.

If you stray, you pay for your own defense, just like other citizens. It's the only fair way to make officials responsible for their actions, not the rest of us.

Thank you for this opportunity to comment.

Judith Meidinger
Wasilla, AK

Sent from my iPhone

From: Starlee Counts
Sent: Tuesday, September 5, 2023 11:47 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: No public funds to pay legal fees for Dunleavy

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I will keep my comments brief as to allow time for other voices and comments but I would like to voice my complaint against the proposed changes to AK state law which would allow the use of state funds toward legal costs for Governor Dunleavy as proposed by Deputy AH Treg Taylor

Thank you for the opportunity to provide my opinion .
Starlee Counts

From: Courtney Moore
Sent: Tuesday, September 5, 2023 9:39 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: No

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No I don't want to foot the bill for your corrupt behavior and legal fees. Since I'm here- you are a slimy slum lord maga bootlicking pathetic excuse for a leader.

We voted no on pebble mine over and over, drop your lawsuit to the epa. You are the worst, most shameful, ickiest person.

Courtney Moore

BOI

From: Michael Boshears
Sent: Tuesday, September 5, 2023 8:11 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Re: Regulation change Re covering legal costs associated with dishonesty/ unethical conduct S

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BOI

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I am adamantly opposed to any regulation change that would require and/or allow the State of Alaska to cover legal costs for the Governor, attorney general and lieutenant governor if they are under investigation for illegal, dishonest and/or unethical conduct. Or partisan political conduct for that matter.

I am stunned that Governor Dunleavy and Attorney General Taylor are once again attempting to change regulations to that effect. That to do so is the definition of self-serving, a misuse of state funds and completely antithetical to the best interests of Alaskans. In my opinion by supporting this regulation change both Governor Dunleavy and Mr. Taylor demonstrate questionable fitness for public office. I agree with former Alaska AG Jahna Lindemuth that "The attorney general is charged with representing the state of Alaska. The governor is not the client except to the extent he represents the state. Allowing the attorney general in his sole discretion to defend ethics complaints against the governor or lieutenant governor, or the Department of Law to defend the AG, is inappropriate and inherently inconsistent with the attorney general's role. It is also an inappropriate use of state resources."

I also agree with the Alaska Public Interest Research Group, or AKPIRG, opposition to these proposed changes to Alaska's ethics regulations "that would authorize the use of inexhaustible state funds, assets, resources and personnel to foot their [the Governor, Lieutenant Governor and Attorney General] legal bills and defend them - even if they're found to have violated the ethics law. Alaskans should not be discouraged from our few remaining avenues of holding our highest elected offices accountable." (Andree McLeod and Robin O'Donoghue, Opinion ADN 9/5/2023)

Why in the world I or any law-abiding Alaskan want to provide an incentive for the State's top leaders to engage in illegal, immoral and ethical behavior, especially given their records of doing exactly that?

Thank you.

Michael B. Boshears

cc: File

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From: Austin Stevenson
Sent: Tuesday, September 5, 2023 7:43 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: AG representing gov

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Hello,

I am steadfastly opposed to the use of public funds and the attorney generals office to defend the governor and his staff from complaints levied against him. As a tax payer I am opposed to paying branches of government to fight against each other generally and specifically opposed to paying the government to fight against citizens acting in good faith.

The governor has not demonstrated bad faith complaints are an issue and has in fact been held personally liable for actions his government has undertaken. Therefore proceeding with this proposed change is not justified.

Sincerely,

Austin Stevenson

Sent from my iPhone

From: Robert Anderson
Sent: Tuesday, September 5, 2023 6:57 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Dunleavy use of public funds for litigation

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The corrupt governor can pay his own legal bills. It's not the job of the residents of Alaska to pay for his terrible decisions and corrupt behavior. He should have been removed but covid saved him, he deserves to be sued and he deserves to pay for his own legal fees
Robert Anderson

From: Guido Casciano
Sent: Tuesday, September 5, 2023 6:53 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Opposed

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I am opposed to the proposed legislation which would allow the use of state money to defend our governor and attorney general against ethics complaints.

Richard Casciano Cordova, Alaska

Sent from my iPad

From: k9play
Sent: Tuesday, September 5, 2023 6:51 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: The governor should be held accountable

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Please don't allow Dunleavy and Attorney General Treg Taylor to change regulations so that the state of Alaska has to cover legal costs for the governor, attorney general and lieutenant governor if they are under investigation for dishonest and unethical misconduct.

Sincerely
Kyle Mielke

From: Casey Chandler
Sent: Tuesday, September 5, 2023 4:16 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: NO to use of public funds for ethics violation defense

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Hello,

I am putting in my formal comment on this matter. No public funds should be utilized in the defense of Gov. Dunleavy or AG Taylor for their ethics violations.

The amount of current ethics violations in our government right now is already too high, and undoubtedly costing taxpayers money due to turnover and poor management - all this without the use of public funds supporting the case/defense of the individuals causing the issues in the first place. Naughty to even consider this!

As an Alaskan, I am sincerely concerned by the current leaders in our state. We need more funding for supporting our state to support our natural resources amid a climate crisis, underpaid/overtaxed teachers, families working to thrive etc- NOT supporting criminal behavior that is excessively perpetuated by our government's leaders.

Thank you.

Casey Chandler
Dillingham, AK

BOI

--

[art website & portfolio](#)

a

nd whether or not it is clear to you,
no doubt the universe is unfolding as it should.

From: Alaska Online Public Notices
Sent: Tuesday, September 5, 2023 1:50 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: New Comment on Notice of Proposed Changes in the Regulations of the Department of Law

A new comment has been submitted on the public notice [Notice of Proposed Changes in the Regulations of the Department of Law](#).

Submitted:

9/5/2023 1:50:50 PM

Brandon Phillips

BOI

Anchorage, AK, US
Anonymous User

Comment:

I oppose the Department of Law's proposed regulation changes to 9 AAC 52.

You can review all comments on this notice by [clicking here](#).

[Alaska Online Public Notices](#)

From: Bill Bocast
Sent: Sunday, September 3, 2023 9:31 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Legal bills should be paid by Dunleavy, etc. not Alaska

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Thank you for this opportunity to submit an opinion. Governor Dunleavy and Tuckerman Babcock's conduct was so egregious the Court ordered them to pay their own legal bills.

When your actions are deemed illegal/unethical, you should be responsible to pay your own legal expenses.

Dermot Cole has it nailed. Read his column.

Thank You

William F Bocast
4059 S Andrea Dr
Wasilla AK
99623

From: Ray Imel
Sent: Thursday, August 31, 2023 12:07 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Proposed regulation Regarding Representation...

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What are we to make of this? What are the trio planning to do that might require state money to defend them? They are shielded significantly in their acts from penalty and expense already, why the rule change to evade accountability? The track record for this administration is well populated with actions of dubious competence and legality. 'Remember that time we screwed up? Well It might happen again and we need someone else to pay the bill'. This is an exaggeration, but only slightly. Challenging the acts of government already involves a high cost for individuals or groups. This plan seems to consolidate power in the executive branch at the expense of citizens. I hope I am making a case that the context of these proposed changes make them suspect. Do they serve to increase democracy or reduce the rights and privileges of all Alaskans, not just those who wish to impose their agenda free of checks and balances. Hard no.
Sincerely,
Ray Imel

From: Emily Cohen
Sent: Friday, August 25, 2023 2:25 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Opposition to public funds usage for personal legal fees

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Hello,

I am writing to express my opposition to Governor Dunleavy's [proposed regulation changes](#) to 9 AAC 52 of the Alaska Administrative Code. It is unethical for public funds to be used for the personal legal fees of the governor, the lieutenant governor, or the attorney general.

Please do not misuse the money entrusted to you by the taxpayers of Alaska.

Respectfully,

Emily Cohen

Resident of Anchorage, AK

From: Mail Office
Sent: Thursday, August 10, 2023 10:01 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Ethics

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No one is above the law. State officials should not use public funds for their defense.

From: Scott Miller
Sent: Thursday, August 10, 2023 7:30 AM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: funding the personal legal fees of the Governor, the Lieutenant Governor and the Attorney general with public funds.

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I oppose this proposal. The citizens of Alaska should not be on the hook for public officials ethical lapses. How about just behave ethically.

From: Sf Mistress
Sent: Wednesday, August 9, 2023 7:35 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Oppose Police to pay for public officials mistakes

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Dear Public Comments,
We oppose the policy that would allow public officials to have a fund to pay for their violations. To do so, would be a conflict of interest and would incentivize public officials to make mistakes. This bad policy would remove the consequences from public officials and put it on the public and we don't that.
Thank You
Maxine Doogan
Community United For Protection

From: Skywalker Payne
Sent: Wednesday, August 9, 2023 3:10 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: The State Should Not Pay Individual's Legal Fees

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I am writing to express my opposition for any move to allow the state of Alaska to pay legal fees for any sitting public government official. Alaska struggles to pay for education and medical care, we cannot afford to pay legal fees for individuals. Plain and simple.

Sincerely,
Mrs. Skywalker Payne
166 Bunnell Ave. #12
Homer, AK 99603

BOI

From: John Jensen
Sent: Sunday, August 6, 2023 7:26 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
Subject: Public pays?

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This is to oppose any regulations that would have the public pay for any governor, lieutenant governor, or attorney general's legal expenses that they may incur outside of the scope of their job descriptions.

It is my understanding that such regulations have been rejected before and that they are actually unconstitutional.
Sent from my iPhone

From: Elisabeth Brennan
Sent: Saturday, August 5, 2023 5:04 PM AKDT
To: Ethics Regulation Public Comments (LAW sponsored)
CC: Olson, Donny (LEG); Foster, Neal W (LEG); Elisabeth Brennan
Subject: PROPOSED CHANGES IN THE REGULATIONS OF THE DEPARTMENT OF LAW REGARDING REPRESENTATION IN AN ETHICS COMPLAINT AGAINST THE GOVERNOR, LIEUTENANT GOVERNOR, OR ATTORNEY GENERAL

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To Whom it may concern,

I would like to express my written comments about the proposed changes in regulations of the Dept of Law regarding representation in an ethics complaint against the governor, lieutenant governor, or attorney general of the State of Alaska. I would like these recorded for the public record. My comments are not positive. I am very much against these proposed changes.

In 2019, these same regulations were proposed and all public comments were negative. Part of the reason I oppose these changes have to do with the legislative legal opinion in 2019 that concluded the idea of state officials getting free legal help was a violation of state law and unconstitutional. These same regulations that were proposed in 2019 and recycled now in 2023 are a bad idea. State employees who are exonerated from ethics complaints can already get reimbursed for their expenses under current law. The top officials of the state should not get to use state funding to defend themselves if they violate ethics laws.

These proposed changes are a horrible idea and should not be changed at all. As one person who opposed these regulations 4 years ago wrote "The drafters of this proposal are simply trying to change the statutory process, enacted into law by the legislature, by means of a regulation, which is not within their statutory authority. The governor and attorney general may not unilaterally change a statute"

Here is another comment about the proposed regulations changes 4 years ago I agree with: " I am concerned that the adoption of these regulations will encourage corruption, malfeasance, lack of transparency, and an erosion of public trust in the Office of the Attorney General, the Department of Law, and the Governor's Office"

This is a bad idea that was recycled from four years ago. It's still a bad idea four years later.

Sincerely,
Elisabeth L Brennan
PO Box 1623
708 East 5th Ave
Nome, AK 99762