

**Alaska Public Offices Commission Component**

**Mission**

Administer Alaska's disclosure statutes and publish financial information regarding the activities of election campaigns, public officials, lobbyists and lobbyist employers.

**Core Services**

- Disclose reported information for informed decision making by Alaskans
- Administer laws upholding the public's right to know the financial affairs of lobbyists and their employers, public officials, political groups, and candidates for state and municipal office.
- Interpret the disclosure laws and assist persons in complying, conduct training seminars, provide report information and manuals of instruction for candidates, groups, lobbyists, and public officials.
- Examine and compare reports for possible violations of the disclosure laws, and enforce the laws through compelling the filing of required reports, civil penalty assessments, and complaint investigation.

Results	Core Services
<p><b>A:</b> Administer Alaska's disclosure statutes</p>	<p><b>A1: Disclose information for informed decision making by Alaskans</b></p> <p><u>Target #1:</u> Increase number of reports filed electronically.</p> <p><b>A2: Administer laws upholding the public's right to know the financial affairs of lobbyists and their employers, public officials, political groups, and candidates for state and municipal office.</b></p> <p><u>Target #1:</u> Provide outreach and information to the public so that Alaskans are enabled to access information regarding their appointed and elected public officials</p> <p><b>A3: Interpret the disclosure laws and assist persons in complying, conduct training seminars, provide report information and manuals of instruction for candidates, groups, lobbyists, and public officials.</b></p> <p><u>Target #1:</u> Provide training to candidates, groups, lobbyists and employer of lobbyists and public officials.  <u>Target #2:</u> Provide timely advisory opinions.</p> <p><b>A4: Examine and compare reports for possible violations of the disclosure laws, and enforce the laws through compelling the filing of required reports, civil penalty assessments, and complaint investigation</b></p> <p><u>Target #1:</u> Audit at least 80% of all filings submitted to APOC under AS15.13, AS39.50, AS24.60, and AS24.45.  <u>Target #2:</u> Increase time spent auditing reports.  <u>Target #3:</u> Track the number of civil penalties assessed and number of complaints</p>

Mission Results	Core Services
<p><b>B:</b> Publish financial information regarding the activities of election campaigns, public officials, lobbyists and lobbyist employers</p>	<p><b>B1: Disclose information for informed decision making by Alaskans</b></p> <p><u>Target #1:</u> Make information available to the public electronically.</p> <p><u>Target #2:</u> Decrease public record requests</p>

**Performance Detail**

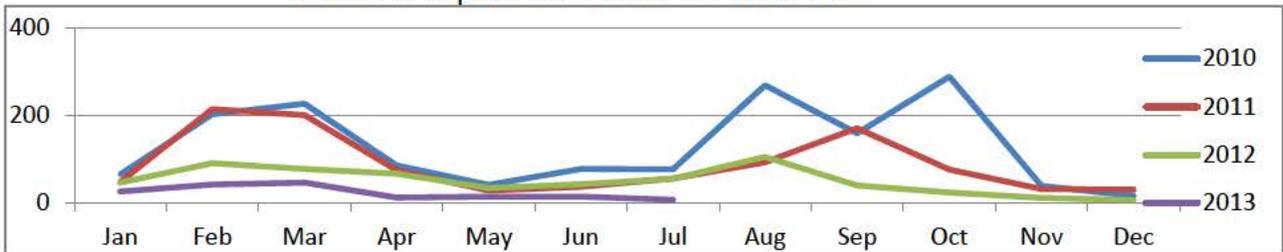
**A: Result - Accountable Election Campaigns**

**A1: Core Service – Disclose information for informed decision making by Alaskans**

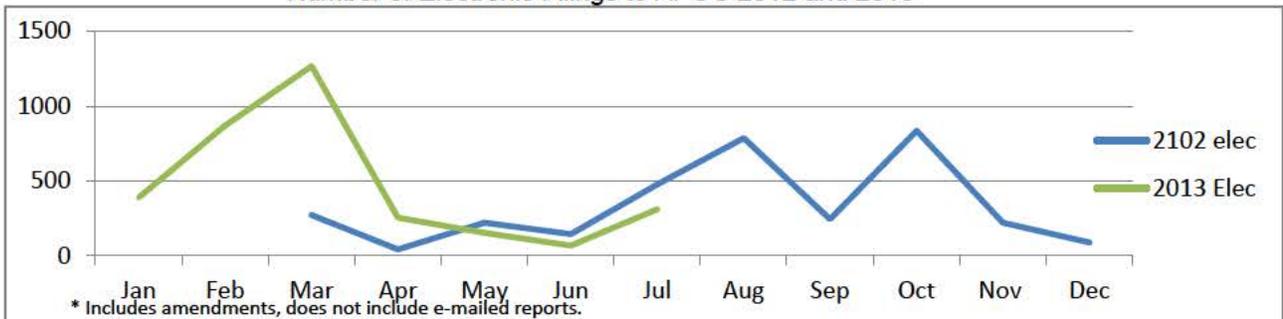
Target #1: Increase number of reports filed electronically.

**Analysis of results and challenges:** The implementation of electronic reporting has dramatically changed the agency’s work. Prior to electronic filing APOC staff was require to manually input to data on each report into a large data base within 48 hours. During busy filing periods near reporting deadlines staff, in pay ranges up to and including 19, would do little but transcribe data. Examining the number of reports received by FAX from 2010 to present provides an illustrative example. It is apparent that in 2010, a state-wide election year that included a gubernatorial election, hundreds of reports were received in March, August and October/November via FAX; March is the annual POFD reporting deadline, August was the deadline for the state-wide primary election and October/November reporting was tied to the state-wide general election. Those reports that were hand carried, mailed via USPS, or e-mailed are not included in this example. The year 2011 did not have state-wide elections, but one would expect 2012 which, because of redistricting, would have a similar level of FAX activity to 2010; but that was not the case because of electronic filing.

Number of Reports FAXed to APOC 2010 – 2013



Number of Electronic Filings to APOC 2012 and 2013\*



It is apparent that the number of FAXed reports has declined consistently since 2010; dropping by 60% from 2010 to 2012. From 2012 until the present the number filings completed via the electronic filing system tied to MyAlaska has increased dramatically with the total for 2013 as of July nearly equaling the entire 2012 year. Several months in 2013 have lower numbers of electronic filings than 2012, but 2012 was a state-wide general election and 2013 has none. As

people become more adept with the electronic system the expectation is that even more filings will be completed electronically. Discussions with several municipal clerks have shown that the many municipal clerks around the state are recommending that municipal officials utilize the electronic system even though it is not required of all municipalities.

The number of electronic reports has increased in 2012 and 2013 while the number of FAXed reports has decreased. Clearly, the number of reports filed electronically is increasing. In 2013 the levels of electronic reports filed is greater in March and April even though there were no state elections pending at that time, only municipal elections.

The challenge for the future is to ensure that as new public, elected, and municipal officials enter public service that they are provided ample opportunity for training and education so that electronic filings becomes a natural and easy process. More electronic submissions mean more effective and efficient auditing which decreases potential civil penalties and complaints. The less time spent investigating complaints enables more time to be spent on training which again helps to decrease the number and severity of reporting errors across the state.

**A2: Core Service – Administer laws upholding the public's right to know the financial affairs of lobbyists and their employers, public officials, political groups, and candidates for state and municipal office.**

Target #1: Provide outreach and information to the public so that Alaskans are enabled to access information regarding their appointed and elected public officials.

**Analysis of results and challenges:** In 2012 APOC began a program of public outreach to enable the public to better understand what the agency does and to enable greater public access to the information provided by candidates and others in reports. From March to September of that year 332 people attended APOC sessions provided at various Rotary Clubs, Lions Clubs, community councils, and other organizations throughout the state. Because the level of interest is considerably lower in 2013 the outreach efforts will continue, but be scaled back until 2014 when elections interest will increase as the gubernatorial election draws closer.

**APOC Outreach Efforts, 2012**

<b>Date</b>	<b>Location</b>	<b>Group</b>	<b>Topic</b>	<b>Attending</b>
3/6/12	Wasilla	Sunrise Rotary Club	APOC Mission	20
3/8/12	Eagle River	Rotary Club	Electronic Filing demo	12
3/20/12	Soldotna	Kenai River Rotary	APOC Mission	11
3/22/12	Homer	Katchemak Bay rotary	Electronic Filing Demo	28
4/4/12	Wasilla	Susitna Rotary Club	APOC Mission	12
4/18/12	Anchorage	Muldoon Lions Club	APOC Mission	10
5/3/12	Anchorage	Basher Community Council	Electronic Filing Demo	27
5/14/12	Fairbanks	College Rotary Club	Electronic Filing Demo	28
6/14/12	Anchorage	Fairview Community Council	Electronic Filing Demo	24
6/22/12	Fairbanks	Fairbanks Sunrises Rotary	Electronic Filing Demo	26
8/14/12	Fairbanks	Golden Heart Rotary	Electronic Filing Demo	7
8/15/12	North Pole	North Pole Rotary	Electronic Filing Demo	7
8/16/12	Fairbanks	Fairbanks Downtown Rotary	Electronic Filing Demo	76
9/6/12	Anchorage	Scenic Foothills Community Council	Electronic Filing Demo	32
9/19/12	Juneau	United Way of Southeast Alaska	APOC Mission and Filing	12
<b>TOTAL</b>				<b>332</b>

**APOC Outreach Efforts, 2013**

<b>Date</b>	<b>Location</b>	<b>Group</b>	<b>Topic</b>	<b>Attending</b>
5/22/13	Anchorage	UAA Graduate Class in Ethics	APOC Mission and Filing	5
9/4/2013	Homer	Homer Downtown Rotary	APOC Mission/Ind. Exp./Data	
9/9/2013	Kenai	Rotary Club of Kenai	APOC Mission/Ind. Exp./Data	
9/17/2013	Wasilla	Wasilla Chamber of Commerce	APOC Mission/Ind. Exp./Data	
10/16/2013	Wasilla	Susitna Rotary Club	APOC Mission/Ind. Exp./Data	
10/16/2013	Wasilla	Rotary Club of Wasilla	APOC Mission/Ind. Exp./Data	
11/4/2013	Glennallen	Community & Chamber	APOC Mission/Ind. Exp./Data	
11/TBA/2013	Valdez	Community & Chamber	APOC Mission/Ind. Exp./Data	
11/12/2013	Fairbanks	Chamber Government Relations Cmte	APOC Mission/Ind. Exp./Data	
	Fairbanks	Chamber General Membership	APOC Mission/Ind. Exp./Data	
11/15/2013	Seward	Seward Chamber of Commerce	APOC Mission/Ind. Exp./Data	

State of Alaska

**TOTAL****A3: Core Service – Interpret the disclosure laws and assist persons in complying, conduct training seminars, provide reporting forms and manuals of instruction for candidates, groups, lobbyists, and public officials.**

**Target #1:** Provide training to candidates, groups, lobbyists and employer of lobbyists, and public officials.

**Analysis of results and challenges:** APOC provides training to all of its constituencies. In 2012 492 people attended APOC training either on-line or through in-person sessions held throughout the state. Training in 2013 has been less extensive than in 2012 because of the lower level of election activity. In addition to the number of people served by face-to-face training in 2013 as noted below, another 200 people have utilized on-line lobbying training. Each year lobbyists and employers of lobbyists are required to take and pass a training course concerning the lobbying laws and ethics. Other types of APOC filers are not required to complete any APOC training. APOC believes that the training provided in 2012 may have helped keep the number of complaints much lower than expected.

The agency endeavors to provide training in a variety of locations throughout the state. Travel costs may be a challenge in the future in continuing to bring APOC training to venues outside of Anchorage, Fairbanks, and/or Juneau.

**APOC Training Sessions by Date and Location, 2012**

<b>Date</b>	<b>Location</b>	<b>Topic</b>	<b>Attending</b>
12/6/11	Fairbanks	Lobbying	8
12/7/11	Anchorage	Lobbying	23
	Anchorage	Lobbying	15
12/8/11	Anchorage	Lobbying	6
	Anchorage	Lobbying	6
12/14/11	Anchorage	POFD	9
	Anchorage	Campaign Disclosure	19
1/6/12	Anchorage	Groups	28
1/9/12	Juneau	Lobbying	5
	Juneau	Lobbying	5
1/11/12	Anchorage	Lobbying	5
	Anchorage	Lobbying	6
1/12/12	Anchorage	Lobbying	9
	Anchorage	Lobbying	5
1/13/12	Anchorage	POFD	10
	Anchorage	Campaign Disclosure	30
1/17/12	Juneau	Lobbying	6
1/20/12	Juneau	POFD/Campaign Disclosure	20
	Juneau	POFD/Campaign Disclosure	20
	Juneau	POFD/Campaign Disclosure	8
1/26/12	Wasilla	Campaign Disclosure	18
1/27/12	Anchorage	POFD	5
2/3/12	Anchorage	Groups	5
2/7/12	Anchorage	POFD	15
2/10/12	Anchorage	Campaign Disclosure	5
2/16/12	Anchorage	POFD	3
2/17/12	Anchorage	Groups	2
2/21/12	Juneau	POFD/Campaign Disclosure	18
3/1/12	Anchorage	POFD	5
3/6/12	Anchorage	POFD	11
3/8/12	Anchorage	POFD	7
3/16/12	Anchorage	Campaign Disclosure	9
4/8/12	Lake & Penn Borough	Campaign Disclosure	8
4/13/12	Anchorage	General	1
4/20/12	Anchorage	Campaign Disclosure	13
4/26/12	Anchorage	Campaign Disclosure	30
5/7/12	Anchorage	Campaign Disclosure	11
6/27/12	Anchorage	Follow the Money	28

6/29/12	Anchorage	Groups	7
7/13/12	Anchorage	Groups	7
7/18/12	Anchorage	Follow the Money	12
7/20/12	Anchorage	Campaign Disclosure	19
7/27/12	Anchorage	Groups	8
9/5/12	Anchorage	Groups	1
<b>Total</b>			<b>492</b>

#### Cost of Training Activities by APOC 2012

Location	Number of trainings	Number of attendees	Total Cost	Cost per session	Cost per attendee
Fairbanks	3	8	\$733	\$244	\$92
Wasilla	1	18	\$ 56	\$ 56	\$ 3
Anchorage*	25	275	\$830	\$ 33	\$ 3
Juneau	10	82	\$814	\$ 81	\$10
Lake and Pen Boro	1	8	\$648	\$648	\$81

\*Anchorage was the point of origin for many of the telephonic and web based trainings.

#### APOC Training Sessions by Date and Location, 2013

Date	Location	Topic	Attending
12/11/12	Fairbanks	Lobbyist	6
12/12/12	Anchorage	Lobbyist	22
12/13/12	Anchorage	Lobbyist	14
12/18/12	Juneau	Lobbyist	2
1/8/13	Anchorage	Lobbyist	22
1/9/13	Anchorage	Lobbyist	13
1/14/13	Juneau	Lobbyist	14
2/5/13	Juneau	POFD/LFD	1
2/6/13	Juneau	POFD/LFD	1
	Juneau City and Borough	POFD/LFD	6
2/8/13	Anchorage	Groups	12
7/16/13	Wasilla	POFD/Candidate Disclosure	5 <sup>1</sup>
7/25/13	Anchorage	Candidate Disclosure	12
7/30/13	Fairbanks	POFD/Candidate Disclosure	12
8/15/13	Juneau	Candidate Disclosure	6
8/16/13	Anchorage	Groups	24
8/22/13	Soldotna	Candidate/Group Disclosure	
8/27/13	Fairbanks	Candidate/Group Disclosure	

Target #2: Provide timely advisory opinions.

**Analysis of results and challenges:** Staff are charged with preparing advisory opinions in seven days per AS 15.13.374. During 2012 there were 19 requests for advisory opinions. Seventeen of the 19 were provided in less than 7 days for an 89% success rate. The two advisory opinion requests which were not completed in a timely manner concerned aspects of the 2010 U.S. Supreme Court case called Citizens United and were quite complex. The average time to completion for advisory opinion requests in 2012 was 6.27 days; in 2011 the average was 6.62 days for 18 advisory opinion requests. In 2013 the agency has received 4 advisory opinion requests as of July 31. Three of the four requests were responded to in seven days or less. The fourth request, which asked a total of 24 questions, required substantial research and took 18 days to complete. Three of the four requests address aspects of the ballot initiative or referendum process. Each of these processes has different requirements under AS 15.13, and there are particular nuances between parties seeking signatures for a referendum and those opposing the referendum. Similarly, those supporting a ballot initiative or a ballot measure have different requirements from those sponsoring such a measure. Finally, signature gathering for a referendum or ballot initiative are significantly different processes than what occurs after a question or proposition has been placed on the ballot.

<sup>1</sup> In some instances the number of attendees may appear to be small; however, in the cases of candidates and groups, there are professional report preparers who deal with multiple campaigns, candidates and groups. The actual number of campaigns or candidates affected is greater than the number of attendees.

Providing high quality timely responses to advisory opinion requests will always be a challenge. Single straightforward questions will require less time than multi-tiered complex questions.

### Summary of APOC Advisory Opinions 2012 and 2013

#### 2012

AO Number	Name/Subject	Date received	Date Issued	Total Days
AO 12-01-CD	Gardner	1/10/12	1/17/12	7
AO 12-02-CD	Hughes	1/23/12	1/30/12	7
AO 12-03-CD	City of Cordova	2/7/12	2/13/12	6
AO 12-04-CD	Bostrom/ACT Right	2/13/12	3/12/12	28
AO 12-05-CD	Alaska Deserves Better	4/25/12	5/7/12	13
AO 12-06-CD	Mackie	5/8/12	5/11/12	3
AO 12-07-CD	Gillam, RBG, RRC	5/11/12	5/18/12	7
AO 12-08-CD	Gazaway	5/22/12	5/24/12	2
AO 12-09-CD	Alaska Deserves Better 2	5/17/12	5/24/12	7
AO 12-10-CD	Edgmon	5/31/12	6/1/12	1
AO 12-11-CD	Giessel	6/04/12	6/05/12	1
AO 12-12-CD	Klein	6/13/12	6/18/12	5
AO 12-13-CD	Moran	WITHDRAWN		
AO 12-14-CD	Shilling	6/18/12	6/25/12	7
AO 12-15-CD	Alaska Care	WITHDRAWN		
AO 12-16-CD	Gruenberg	6/29/12	7/6/12	7
AO 12-17-CD	Bachmeier	7/20/12	7/25/12	5
AO 12-18-CD	Brannon-Young	7/26/12	8/1/12	6
AO 12-19-CD	Beck	7/30/12	8/6/12	7

Average days between receipt of request and issuance of AO in 2012 **6.29 Days**

#### 2013

AO Number	Name/Subject	Date received	Date Issued	Total Days
AO 13-01-CD	Walker/ Candidate hosting TV show	5/3/13	5/9/13	6
AO 13-02-CD	Lavin/ Reporting requirements when gathering signatures for referendum	5/8/13	5/15/13	7
AO 13-03-CD	Limoge/ Reporting requirements for those opposing referendum	5/9/13	5/16/13	7
AO 13-04-CD	Renewable Resources Foundation Reporting requirements for 501(c)3, educational activities, etc, 24 questions total.	5/13/13	5/31/13	18

#### **A4: Core Service – Examine and compare reports for possible violations of the disclosure laws, and enforce the laws through compelling the filing of required reports, civil penalty assessments, and complaint investigation**

Target #1: Audit at least 80% of <sup>2</sup> filings submitted to APOC under AS15.13, AS39.50, AS24.60, and AS24.45.

**Analysis of results and challenges:** In 2012 APOC's ability to audit reports was hampered by the requirement for staff to transcribe reports that were not filed electronically. As seen in the figure titled Comparison of APOC Report Auditing 2012 and 2013 APOC has done considerably better at auditing in 2013. In 2013 all reports submitted to close out the 2012 elections have been audited; all year end reports by lobbyists and employers of lobbyists have been audited and reconciled, and over 1,000 POFD/LFD filings have been audited. This is a far greater number and percentage of audits than was completed in 2012 and exceeds the overall goal of over 80% of all filings. Many of these audits revealed minor discrepancies that have required amendments and the vast majority of those issues have been remedied. Because staff is able to audit in a more timely manner some reports are handled quickly and are amended before filing deadlines; in other cases the audits reveal issues that would not have been found until after the filing

<sup>2</sup> All would include amendments to reports as well as the reports themselves.

deadline and trigger civil penalty assessments. The reasons for the significant increase in auditing for 2013 are discussed later in this section under Target #2. The agency is meeting its auditing target.

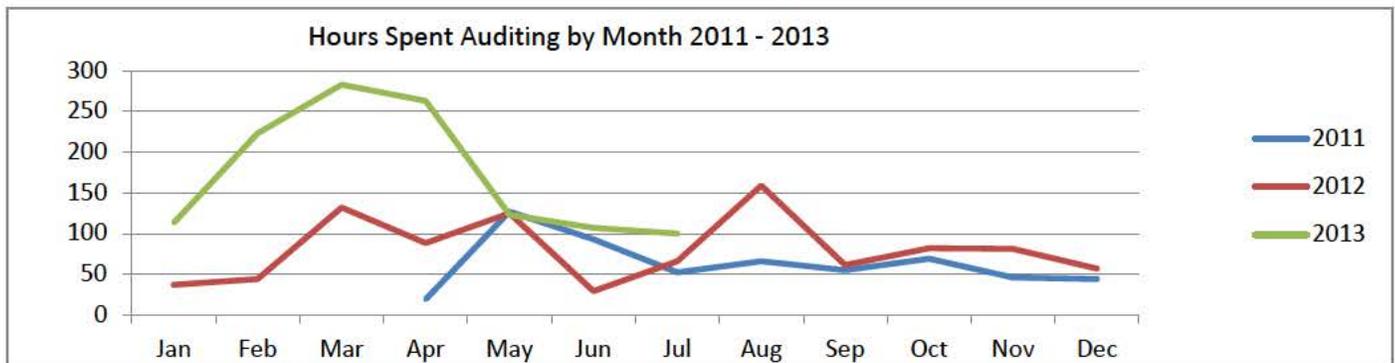
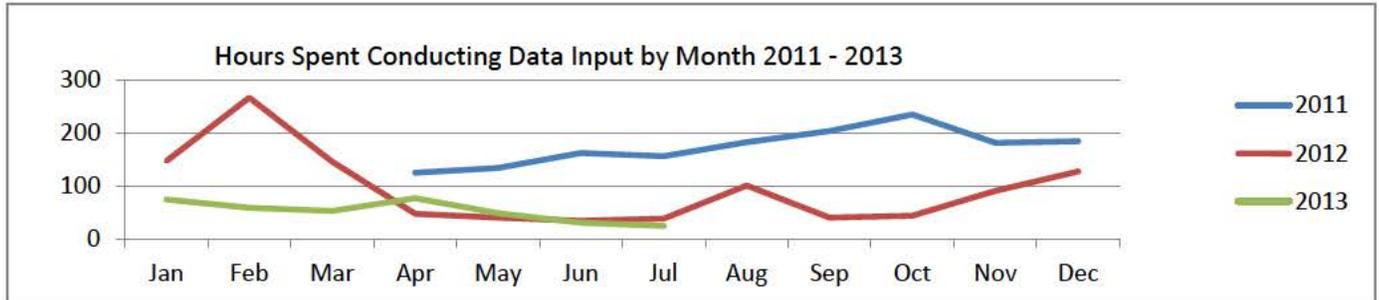
**Comparison of APOC Report Auditing 2012 and 2013**

Type of Report	2012			2013 (to July 31)		
	Total number	Audited	% audited	Total number	Audited	% audited
<b>POFD</b>						
Legislative	88	88	100%	81	79	98%
Judicial	135	79	59%	141	121	86%
Executive Branch	267	136	51%	262	169	65%
Board/Commission	337	164	49%	319	266	83%
Local Municipal Gov't	658	28	4%	549	502	91%
	1579	585	37%	1352	1137	81%
<b>Campaign Disclosure<sup>3</sup></b>	643	223	35%	460	460	100%
<b>Lobbying Disclosure<sup>4</sup></b>	501	501	100%	522	522	100%

**Target #2:** Increase time spent auditing reports.

**Analysis of results and challenges:** Substantially more time is being spent auditing reports. Electronic filing has greatly aided this effort. As noted above, much time was spent transcribing reports into APOC’s database by staff. As electronic filing became mandatory staff was freed from this duplicative burden and enabled to conduct more audits in a timely manner. There is a direct correlation between the amount of time spent conducting data input and the ability to audit reports as seen in the two charts below.

**The Effect of Electronic Filing on Staff Effort**



<sup>3</sup> Includes both groups and candidates.

<sup>4</sup> Year-end lobbying report auditing and reconciliation for lobbyists and the employers of lobbyists is done at the beginning of the following year. Hence, 2011 reports were audited in 2012 and 2012 reports were audited in 2013.

Electronic filing became generally mandatory in February of 2012. The hours spent conducting data input drops off rapidly after that date. Hours spent auditing grew unevenly during 2012, but blossomed in the first part of 2013 and has remained above previous years' levels. The early year activity is explained not only from the decreased need to conduct data input, but more reports are received during this period in odd numbered years; January is the deadline for municipal 105 day reports, February is the month of end of year reports for candidates and POET reports for incumbents, March is the deadline for annual POFD/LFD statements, and the April Anchorage municipal election triggers reports due in March and April. Candidates for state office are already beginning to announce intentions and file reports later in the year. Municipal candidates in areas other than Anchorage are beginning to announce their intentions and will also be reporting prior to the October elections. While a vast majority of reports have been audited to date, there will be continued auditing to be done throughout the year including an emphasis on municipal candidates.

In addition to auditing more reports APOC staff is working to make the audits more sophisticated by matching transactions from previous reports and tracking activity in more detail than could be done previously. An in-house developed notification system also alerts APOC staff to reports as they come in so that auditing can take place almost immediately thereby helping filers to correct any potential errors quickly.

It is readily apparent the APOC is meeting this measure. Since 2011 the time spent auditing has more than doubled while the time spent completing data input has been cut by nearly 80%. These dramatic changes in where APOC staff places its effort is largely due to electronic filing. The time spent in data input decreased greatly after February 2012 when electronic filing became generally mandatory enabling staff to conduct more audits. While 2012 was a state-wide general election year the decrease in data input time is remarkable; equally remarkable is the consistent increase in time spent auditing in 2013. By the end of July the time spent auditing for the year had already exceeded the total time spent auditing in 2012 and was nearly equal to the total time spent auditing in 2011 and 2012 combined. The spike in August of 2012 can be explained by knowing that that this is the filing period for many municipal elections where candidates may not be required to file electronically and it is also the period for 7 day and 24 hour reports for candidates in the state-wide primary election.

The number of audits and the types of audits conducted are directly tied to civil penalty assessments in that by conducting timely audits filers are enabled to correct errors quickly and avoid civil penalties. This may encourage those who may be otherwise hesitant because of reporting requirements to run for office at the municipal and state levels. The time spent auditing is also evident in the number of audits conducted as noted in Target 1 above.

Target #3: Track the number of civil penalties assessed and number of complaints

**Analysis of results and challenges:** APOC enforces the statutes and regulations that require timely and complaint filing of financial reports. When a filer is seen to be non-compliant either a complaint is filed in the case of statutory violations or a civil penalty is assessed for late, inaccurate, or incomplete reports. During 2012 all complaints but one were filed by members of the public. In 2013 to date (July 31) all complaints have been filed by members of the public. Some complaints are more complex than others and either run into the next calendar year or are appealed in superior court. APOC staff is required to quickly assess whether a complaint can be accepted based on process oriented criteria. The requirement for accepting a complaint based on the information provided is "an allegation which if true would constitute a violation". If accepted, a staff investigation report must be completed within 30 days. APOC staff also receives complaints requesting expedited consideration. These requests must be accepted or rejected quickly. If accepted the Commission must meet within 2 days to hear and decide on having an expedited complaint. APOC staff also assesses civil penalties which are reviewed by the Commission. Filers who do not pay or appeal their civil penalty are referred to the Attorney General's office for processing.

Lobbying reports were the first to be required to be filed on-line. After several years of electronic filing it seems that this area of APOC reporting has become the most mature and the number of civil penalty assessments relating to lobbying may be dropping, the level of auditing is the highest, and complaints related to lobbying are fewest. As other areas, POFD, candidates, and groups, become more experienced and comfortable with electronic filing the number of complaints and civil penalty assessments will hopefully likewise decline. Group disclosure rules are very complex and aspects of Citizens United make group disclosure even more nuanced. In calendar years 2103 and 2014 the numerous ballot propositions, ballot questions, and referendum activities make group reporting even more complex.

**Civil Penalties Assessed, 2011 - 2013**

	2011		2012		2013 (to July 31)	
	Total	Referred to AG	Total	Referred to AG	Total	Referred to AG
Lobbying	167	0	139	0	39	0
Financial Disclosure	51	4	111	14	99	3
Candidate Disclosure	26	1	22	4	23	4
Group Disclosure	20	0	31	0	54	0

**Complaints Filed and Disposition 2011 – 2013**

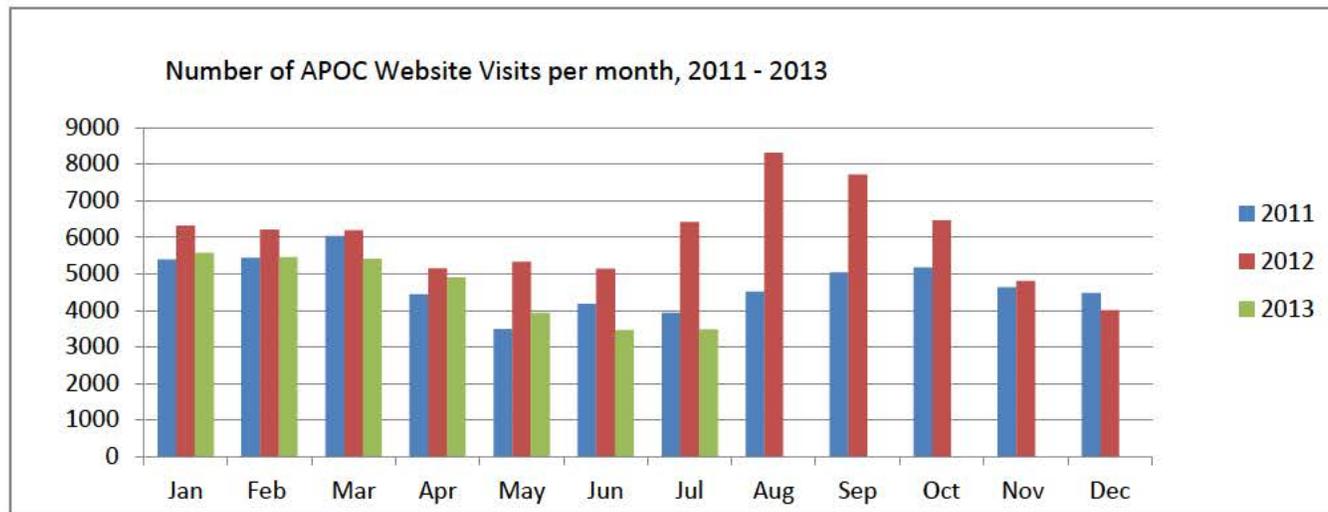
	2011		2012		2013 (to July 31)	
	Total	Status	Total	Status	Total	Status
Lobbying	2	all closed	1	closed	0	
Financial Disclosure	1	all closed	2	both closed	1	closed
Campaign Disclosure	16	1 on appeal	16	1 on appeal	5	all closed

**B: Result – Publish Information**

**B1: Core Service – Publish financial information regarding the activities of election campaigns, public officials, lobbyists and lobbyist employers.**

**Target #1:** Make information available to the public.

**Analysis of results and challenges:** Electronic filing and the posting of reports on the internet through the agency’s website has increased the amount of information readily available to the public. The number of website visits has increased significantly since 2011. The year 2012 has the highest level of website visits as people were reviewing material regarding candidates in the state-wide elections. In 2013 the level of visitation will be lower than 2012, but is generally trending higher than in 2011 indicating that people are finding the information on the APOC web page accessible and useful.



**Target #2:** Decrease public record requests

**Analysis of results and challenges:** Because reports are now posted electronically and are more available to the public there are fewer public records requests. There will always be some level of public records requests as not all information is available on-line as per commission policy. In 2013, eight of the 16 requests involved the public official financial disclosure statements of judicial filers or members of boards and commissions which are not electronically available; three of the requests were for lobbying reports not electronically available; three others were for prior years’

material regarding former or current POFD filers now involved in federal elections.

