

Andrée Mcleod
Anchorage, Alaska

July 20, 2009

Daniel Sullivan, acting Attorney General
1031 W. 4th Avenue, Suite 200
Anchorage, AK 99501

To acting Attorney General Daniel Sullivan:

Please consider this ethics complaint charging Governor Sarah Palin for violations of the Alaska Executive Branch Ethics Act. The charges are that she hasn't claimed all gifts received in a timely manner, if at all.

Sec. 39.52.130. Improper gifts.

(b) Notice of the receipt by a public officer of a gift with a value in excess of \$150, including the name of the giver and a description of the gift and its approximate value, must be provided to the designated supervisor within 30 days after the date of its receipt.

(f) A public officer who knows or reasonably ought to know that a family member has received a gift because of the family member's connection with the public office held by the public officer shall report the receipt of the gift by the family member to the public officer's designated supervisor if the gift would have to be reported under this section if it had been received by the public officer or if receipt of the gift by a public officer would be prohibited under this section.

Sec. 39.52.960. Definitions.

(11) "immediate family member" means

- (A) the spouse of the person;
- (B) another person cohabiting with the person in a conjugal relationship that is not a legal marriage;
- (C) a child, including a stepchild and an adoptive child, of the person;
- (D) a parent, sibling, grandparent, aunt, or uncle of the person; and
- (E) a parent or sibling of the person's spouse.

9 AAC 52.060. **GIFTS.** (a) As used in the Ethics Act and this chapter, a gift is a transfer or loan of property or provision of services to a public officer for less than full value.

FACTS: Sarah Palin has failed to disclose gifts of significant value received by her and her family as defined in the Ethics Act.

Unclaimed gift: White hand-crafted beaded vest received in 2007

In response to my January 22, 2009 public record request for a copy of a completed and signed gift disclosure form claiming receipt of a white hand-crafted beaded vest Sarah Palin received while attending the **September 2007** Institute of the North Alaska Dialogue conference in Talkeetna, the office of the governor replied on February 20, 2009 that they were working on generating an estimate of its value. I have yet to receive a completed and signed disclosure form that claims Palin's receipt of a white hand-crafted beaded vest. [Final Report on the 2007 Alaska Dialogue](#) (pg 8) [2007 Alaska Dialogue Photo Gallery](#) (PowerPoint Slide Show in pdf format)



Unclaimed and undisclosed gifts: Palin/Heath family travel received in 2008

Documents show Sarah Palin and her immediate family have claimed gifts of free travel between the end of August and the beginning of November of 2008. However, other members of the Palin/Heath family, as

defined by the Alaska Ethics Act, also received free travel during that same period. Inconsistently, those travel gifts received by Palin's family have not been claimed.

Unclaimed and undisclosed gift: John Coale professional services starting in 2008

On March 29th, 2009 Greta Van Susteren penned a piece for her GretaWire website titled [Huh?](http://gretawire.foxnews.com/2009/03/29/huh-5/) (attached) (<http://gretawire.foxnews.com/2009/03/29/huh-5/>) That website has since been changed and the article has been deleted. But, a copy of the original article is attached to the complaint. Here is an excerpt of Ms. Susteren speaking about her husband John Coale providing free professional consulting and legal advice to Governor Sarah Palin on how to deal with lawsuits, ethics complaints and unfair attacks by the media: Yes, he advised her - ***after the election*** - how to set up a PAC (big deal - it is common - routine - for politicians to set up a PAC - virtually every politician has one set up and there is nothing wrong with them.. and incidentally, ***the PAC was created to pay travel bills she had accumulated and would accumulate in the future and to contribute to other candidates ...and the Pac was not to be her chief political advisers which is what the article accuses.***) And yes, he thought it wrong the way she was attacked in the media. As a matter of fact, so did I think she was treated unfairly by the media (I don't like gratuitous attacks...issues, yes....but not gratuitous attacks) and I am not the only one who thought that in the media. My husband helped with the PAC - I did not - ***AFTER the election when she was not running for office but trying to dig herself out from lawsuits, ethics complaints and unfair attacks by the media.*** Big deal. So he was nice to her and wanted to help her and did help her. http://www.huffingtonpost.com/2009/03/20/greta-my-husband-is-not-a_n_177262.html
<http://voices.washingtonpost.com/thefix/eye-on-2012/palins-team.html>

July 18, 2009 Newsweek reports while speaking about official State of Alaska business: (attached) One of the main reasons Sarah Palin is stepping down as governor, say associates, is her large, unpaid legal bill. Her successor, Lt. Gov. Sean Parnell, says she is worried about "the cost of all the ethics investigations and the like." But is that really the reason? **John Coale, a Washington lawyer who helped Palin set up a legal-defense fund and PAC**, tells NEWSWEEK the fund is "well on its way" to paying off \$500,000 in legal debt from the campaign and another \$100,000 in bills incurred later, leaving questions about how big a part money woes played in her decision to resign. (Are Legal Bills To Blame) <http://www.newsweek.com/id/207398?from=rss>

Unclaimed and undisclosed gifts: UNKNOWN as per Sarah Palin June 15, 2009 letter (attached)

"There are boxes of unopened mail at this point, even mail that was delivered in 2008. Thus, as initially disclosed, 'we continue to open boxes' and we consider any parcel "received" at the time it is opened."

The AK Ethics Act mandates that gifts be claimed within 30 days of receipt. More than enough time has passed for these gifts received in 2008 to be claimed. Sarah Palin's blatant disregard for our laws must be addressed as the public's right to know has been infringed upon regarding gifts received by the governor. I ask that the following be strongly and seriously considered when reviewing this complaint:

Sec. 39.52.410. Violations; penalties for misconduct.

- (c) If the personnel board determines that a former public officer has violated this chapter, it shall
 - (1) issue a public statement of its findings, conclusions, and recommendation; and
 - (2) request the attorney general to exercise all legal and equitable remedies available to the state to seek whatever relief is appropriate.

Based on these facts, Governor Sarah Palin violated the AK Executive Branch Ethics Act by not claiming and disclosing gifts properly or timely. We deserve to know who plied their governor with gifts. The scope of the ethics code states that each public officer holds office as a public trust. For Sarah Palin to intentional and willfully hide those gifts is a violation of that trust. To blatantly refuse to comply with Alaska ethics and public financial disclosure laws and is a travesty. I'm requesting that this complaint be forwarded to the Alaska Personnel Board. Thank you for your prompt attention. Please don't hesitate to contact me with your concerns.

Sincerely,

Huh? By Greta Van Susteren March 29th, 2009 <http://gretawire.foxnews.com/2009/03/29/huh-5/>

Is *ABC's Clair Shipman* getting this - below - about her husband, former Time Magazine reporter and **now** Vice President Joe Biden's Chief of Staff Jay Carney? I hope not. *NBC's Andrea Mitchell* for her husband Alan Greenspan? I hope not. *CBS's Rita Braver*, wife of lawyer Bob Barnett, who has represented or is currently the Clintons, the Bushes, President Obama and even Governor Palin for book deals and more? I hope not. This is pretty silly....Politico has a story that is fanciful and silly. What is even more bizarre is that it is co-authored by Jonathan Martin who has been ON THE RECORD at 10pm and he never even called me to check one fact with me. Here is a picture of Jonathan Martin (yes, it is a nice picture) in case you have forgotten him from his many appearances on our show: Fact checking seems to be a lost art.

Usually I don't bother to answer stuff written about me - true, false or exaggerated - since I know no one dies from what is written and I shrug it off. But today....I want to give you an idea of something really silly and I won't bother to answer it all but to give you a taste of the silliness (and to try to stop others from likewise taking this and running with it!)

Here is a sample from the article: ***"...Another former Palin ally still in touch with the governor was blunt when asked to explain Palin's missteps since the election: "Taking advice from Greta and her husband," said this source...."*** [*Politico.com is the website click here*]

Advice from me? huh? I am flattered someone would think people take advice from me but this is fanciful. Note that it is from a "source" — is that code for phoney? In this instance yes. This is why I hate "sources" and where journalism can be grossly unfair — in the law you have to step up on the witness stand and identify yourself and take an oath to tell the truth. You can't do a "hit and run!"

I have never given Governor Palin advice - she does not need it from me. I don't even have her phone number or her email address. I don't think I have ever had a conversation with her off camera and if I have, it was 45 seconds! The goal in TV is to get tape and as much as you can so you run the camera every second. (If you don't believe me, ask the camera people who are with us at all times!) When you do interviews with politicians, you interview and the politician runs to the next event or interview. Even when we did the interview at her home in Alaska post election, we did the interview in the home with her in her kitchen, another news organization was standing by and followed with their interview (I think it was the Anchorage Daily News) while we went outside to interview her husband on his snow machine.

As for booking her, the article is not only wrong but disses the On The Record staff who works this story hard. The producers are the ones who book her, who have made multiple trips to Alaska to work the story....staying there for days and days... and what I have done - which is not much compared to their heavy lifting - is follow up emails - at the direction of our staff on the ground - to her staff (yes, staff!)

As for my husband, everyone in the media sure has gotten themselves going with all sorts of wild imagination. We are laughing at it at home because with each story it gets wilder and wilder. You would think from the stories that my husband ran her VP campaign. Yes, he advised her - ***after the election*** - how to set up a PAC (big deal - it is common - routine - for politicians to set up a PAC - virtually every politician has one set up and there is nothing wrong with them.. and incidentally, ***the PAC was created to pay travel bills she had accumulated and would accumulate in the future and to contribute to other candidates ..and the Pac was not to be her chief political advisers which is what the article accuses.***) And yes, he thought it wrong the way she was attacked in the media. As a matter of fact, so did I think she was treated unfairly by the media (I don't like gratuitous attacks...issues, yes....but not gratuitous attacks) and I am not the only one who thought that in the media. My husband helped with the PAC - I did not - ***AFTER the election when she was not running for office but trying to dig herself out from lawsuits, ethics complaints and unfair attacks by the media.*** Big deal. So he was nice to her and wanted to help her and did help her.

Are Legal Bills To Blame NEWSWEEK

July 18, 2009 Mark Hosenball <http://www.newsweek.com/id/207398?from=rss>

One of the main reasons Sarah Palin is stepping down as governor, say associates, is her large, unpaid legal bill. Her successor, Lt. Gov. Sean Parnell, says she is worried about "the cost of all the ethics investigations and the like." But is that really the reason? John Coale, a Washington lawyer who helped Palin set up a legal-defense fund and PAC, tells NEWSWEEK the fund is "well on its way" to paying off \$500,000 in legal debt from the campaign and another \$100,000 in bills incurred later, leaving questions about how big a part money woes played in her decision to resign.

One thing is clear: Palin is fuming at the McCain camp, which she believes saddled her with all that debt. At the time John McCain tapped Palin, she was using Alaska state funds to pay the lawyer she hired to defend her against ethics charges. McCain aides, worried that that could raise ethical questions, put an end to the payments. Here's where things get testy: Coale says the McCain campaign, and later the Republican National Committee, led Palin to believe that they would pay her bills, but never did, causing Palin's debt to pile up. But two former senior McCain officials, who asked for anonymity to keep political peace, say there was no such promise (online finance records show no payments to Palin's lawyer). Palin's spokeswoman, her lawyer, and an RNC spokeswoman didn't respond to requests for comment.

URL: <http://www.newsweek.com/id/207398>

The Protectors of the Palin Brand

By Chris Cillizza | March 17, 2009 Washington Post

<http://voices.washingtonpost.com/thefix/eye-on-2012/palins-team.html>

There is no brand in Republican politics as powerful -- or as tenuous -- as that of Alaska Gov. **Sarah Palin**.

She is simultaneously the hottest commodity on the Republican fundraising circuit and a figure of ridicule among Democrats (and even many Independents) who believe that her status as a national figure is entirely undeserved.

Even Palin and her political team seem to be struggling somewhat with how much or little to expose her at the national level.

Witness the odd back and forth over the past 24 hours regarding her involvement in the annual Republican House-Senate fundraising dinner in June.

Yesterday afternoon the National Republican Congressional Committee and National Republican Senatorial Committee issued a joint press release touting Palin as the keynote speaker at their fundraising dinner on June 8 in Washington. Then the governor's spokesman told the Anchorage Daily News [that the NRSC and NRCC were mistaken](#) in announcing Palin as the keynoter, insisting that she had agreed to no such thing.

The misunderstanding appeared to be the result of a miscommunication (or lack of communication) between Palin's office in Alaska and her still-forming political team running Sarah PAC. (The dinner, as we understand it, is on.)

"A lot of people may be able to overlook the campaign, because the McCain team was calling the shots," said one D.C.-based source familiar with Palin's political operation. "But even since the election she has not been served well by her inner circle. Going forward, there needs to be a seamless operation if they want to position her as a serious contender for 2012."

So, who are the figures charged with guiding Palin's political image in Washington? Here's the lineup based on our conversations with informed strategists.

- **John Coale:** Coale, a well-known Washington lawyer and the husband of Fox News Channel's Greta Van Susteren, drew national media attention when [he endorsed Sen. John McCain's presidential bid](#) in protest of the way in which Sen. **Hillary Rodham Clinton**, who he backed in the primary, was treated. Coale, in an interview with the Fix, described himself simply as a "friend" of the Alaska governor but acknowledged that he suggested she start a leadership PAC and helped her navigate through some of the questions surrounding her family that lingered after the campaign. Others familiar with Palin's political team insist that Coale has far more power than he is letting on -- essentially helping to run Sarah PAC. Coale demurred on that front, noting only that he talks to Palin regularly and that she is a "fascinating person" who is "definitely not what the right thinks or the left thinks."
- **Meg Stapleton:** Stapleton serves as the Alaska spokeswoman for Sarah PAC after having played a similar role for the governor during the vice presidential campaign and in the governor's office. Stapleton has been the lead defender of Palin from barbs thrown at her -- often from those allied with McCain -- in the aftermath of the 2008 campaign and, generally, wins positive reviews from Washington insiders not directly allied with the governor.
- **Pam Pryor:** Pryor is the Washington spokesperson for Sarah PAC after serving as a senior adviser to the Republican National Committee during last year's general election campaign. Pryor has previously served in a variety of political jobs in Washington including as press secretary and chief of staff to former Oklahoma Rep. **J.C. Watts**.
- **Becki Donatelli:** Donatelli, [as we reported a few weeks ago](#), is officially running Sarah PAC. She is the chairman of [Campaign Solutions](#), a fundraising and Internet strategy firm based in Virginia.

[Greta: My Husband Is Not A Paid Palin Adviser, But He Gives Her Advice](#)

http://www.huffingtonpost.com/2009/03/20/greta-my-husband-is-not-a_n_177262.html

Huffington Post | Danny Shea | March 20, 2009 06:31 AM



Fox News' Greta Van Susteren responded on her blog to [the story that her husband, Washington lawyer John Coale, is an adviser to Sarah Palin](#).

[Van Susteren wrote on GretaWire:](#)

I am getting lots of inquires about my husband John Coale -- no, he is not a paid adviser to Governor Palin and never has been. And no, he does not want a job with her or with the other women he has helped.

Yes, he has given Governor Palin advice and helped her. He met her through me when I interviewed her....I did not meet her through him. I have gotten interviews with her not through him but through our staff on OTR. It is that simple.

The inquiries came following a [Washington Post story](#) that listed Coale among the "protectors of the Palin brand" — without ever suggesting, however, that Coale was a paid adviser. Rather, Chris Cilizza wrote:

Coale, in an interview with the Fix, described himself simply as a "friend" of the Alaska governor but acknowledged that he suggested she start a leadership PAC and helped her navigate through some of the questions surrounding her family that lingered after the campaign. Others familiar with Palin's political team insist that Coale has far more power than he is letting on -- essentially helping to run Sarah PAC. Coale demurred on that front, noting only that he talks to Palin regularly and that she is a "fascinating person" who is "definitely not what the right thinks or the left thinks."

Van Susteren has enjoyed unparalleled access to Palin and her family, conducting several interviews from Alaska — most recently with [new mom Bristol Palin](#). But, as she writes on her blog, she insists her access to the Governor and her family does not come through her husband's relationship but rather through her own staff, and that her husband met Palin through her.

SARAH PALIN
716 Calhoun
Juneau, Alaska 99811

June 15, 2009

Holly Hill, Executive Director
Alaska Public Offices Commission
2221 East Northern Lights, Rm 128
Anchorage, Alaska 99508

Re: Supplemental Information for 2009 APOC
Financial Disclosure Statement

Dear Ms. Hill:

The following supplemental information is submitted in response to the Commission's letter of inquiry dated April 29, 2009.

Q. Are there gifts which have been received by you or your family in your personal capacity during calendar year 2008, which have not been reported on your 2009 public official financial disclosure statement, covering the period January 1, 2008 through December 31, 2008? If so, please amend your most recent disclosure statement to reflect this information.

Response: As described in my March 13, 2009 disclosure, we have received boxes of cards, letters and some gifts. Mail is sent to Juneau, Anchorage and Wasilla. Some people direct their mail to me or my family in our personal capacities and others appear to direct their mail to me as the Governor *es* qualité. Mail continues to arrive. There are boxes of unopened mail at this point, even mail that was delivered in 2008. Thus, as initially disclosed, "we continue to open boxes" and we consider any parcel "received" at the time it is opened. I have reported those gifts received thus far that are required to be disclosed.

Q. You have reported a "discount on snow machines" by Arctic Cat for Todd Palin. Was this discount exercised during the calendar year 2008 and what was the amount of it?

Response: Yes. As initially stated in the March 13, 2009 report, Todd Palin is entitled to discounts on purchases (as he has received the last 16 years as an Iron Dog racer). However, according to the terms of his sponsorship agreement, the

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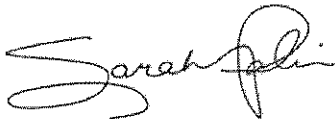
exact amount of the discount is confidential as a proprietary trade secret. In part, this appears to relate to maintaining manufacturer pricing structures and retail pricing. In other words, Todd Palin is allowed to buy a snowmachine at manufacturer cost, without retail markup, but the manufacturer cost is proprietary information. Public disclosure of this information is expressly prohibited by the sponsorship agreement. This would also apply to any discounts offered on wear.

Accordingly, Todd Palin requests an exemption from disclosing the exact amount of the discount under 2 AAC 50.100 (i). In support of the exemption request, we can turn for comparison to the same exemption under the Public Records Act, wherein records that are proprietary, privileged, or constitute a trade secret are not disclosable. *See* AS 40.25.120(12)(a); *cf.* AS 43.90.150 or 43.90.220. In my opinion, the key information has been disclosed, namely, the source of the discount and the reason for the discount.

Further, if the Commission agrees to maintain the confidentiality of the sponsorship agreement, I can submit a copy of the agreement under seal for its review so the Commission can see for itself the contract. Please let me know if the Commission would like to do so.

Thank you for following up with me and please let me know if there is anything else you need regarding my 2009 Disclosure Statement.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Palin". The signature is written in black ink and is positioned to the left of the typed name.

Sarah Palin

JUN 15 2009