

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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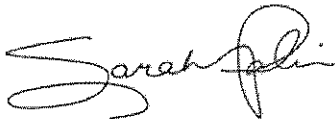
exact amount of the discount is confidential as a proprietary trade secret. In part, this appears to relate to maintaining manufacturer pricing structures and retail pricing. In other words, Todd Palin is allowed to buy a snowmachine at manufacturer cost, without retail markup, but the manufacturer cost 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 dark ink and is positioned to the left of the typed name.

Sarah Palin

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