

**State of Alaska  
FY2014 Governor's Operating Budget**

**Department of Law  
Commercial and Fair Business  
Component Budget Summary**

**Component: Commercial and Fair Business**

**Contribution to Department's Mission**

The Commercial and Fair Business section exercises the Attorney General's authority to protect the public by enforcing consumer protection and antitrust laws and by providing advice and representation to agencies that encourage and regulate economic activity.

**Core Services**

- The Commercial and Fair Business section has one of the more diverse law practices within the civil division. This section enforces state consumer protection and antitrust laws. The section also provides representation, defense, and counsel to 16 different divisions, commissions, and corporations within the Departments of Revenue, Education and Early Development, Commerce, Community, and Economic Development and to 20 professional licensing boards and commissions.
- The section works with the agencies, boards, and commissions governing professional licenses, tobacco sales, alcoholic beverages, certified teachers and post-secondary education. The section provides legal services to agencies that monitor insurance companies and other insurance licensees, charitable gaming, public utilities, banks, securities, corporations, mortgage brokers and payday lenders.
- In addition to protecting the public, the section helps protect the integrity of the state's public finances through fair interpretation, implementation, enforcement, and adoption of statutes and regulations governing state revenue and taxation, the Permanent Fund Dividend, and various state lending programs.

**Major Component Accomplishments in 2012**Consumer Protection:

- The section participated in the national mortgage settlement, which resulted in a historic \$25 billion settlement with the nation's largest servicers: Bank of America, Chase, Citi, Ally/GMAC, and Wells Fargo. As a result of the settlement, the state will receive a total of \$4.3 million dollars. In addition, Alaskan homeowners will benefit through relief over the next three years that is estimated to include \$1 million in benefits from loan modifications and other direct relief, \$1.7 million in cash payments to homeowners who were foreclosed in 2008 through 2011, and \$4 million in refinanced loans to "underwater" borrowers. The section also participated in settlement of five other local and multi-state consumer protection cases in which the state obtained injunctive relief prohibiting conduct in violation of our consumer protection and antitrust statutes, and collected in excess of \$10 million in payments to the state for costs, attorney's fees, and consumer protection enforcement and education and in restitution for consumers. To obtain these benefits for Alaska the section expended \$1,039.1.
- The section processed 427 consumer complaints. Of those, 317 were resolved through the informal complaint process resulting in either direct or indirect assistance to consumers, launching of a formal investigation, or referral to other appropriate state and federal agencies. The remaining complaints are ongoing and the informal complaint process has not yet been completed.
- The Consumer Protection Unit of the section participated in, or completed eight consumer education initiatives. These initiatives included: 1) conducting training on Alaska's new Protection of Personal Information Act, AS 45.58; 2) posting seven consumer alerts on the consumer protection website and issuing three press releases to educate and warn consumers about current scams or questionable business practices affecting consumers; 3) providing information on a variety of consumer protection related topics to attendees of the Alaska Bar Association's free legal clinics, held in Anchorage and Fairbanks on Martin Luther King day; 4) distributing information about the Indian Arts and Crafts Act and Alaska's requirements for authentic arts and crafts at the World-Eskimo Indian Olympics in Fairbanks; 5) presenting information about current scams at the Alaska Association for Guardianship and Advocacy conference and at the United Way's Financial Fitness Day; 6) making a presentation to foster grandparents regarding identity theft, and 7) conducting trainings for small business owners on business identity theft and scams targeting small business.

- The section also registered 3,237 charitable organizations and 44 paid solicitors, and collected \$158,280 in fees for registration of charitable organizations, paid solicitors, and telemarketers.

#### Agency Work:

- Licensing: The section successfully prosecuted or negotiated settlements in 17 separate professional discipline, license denial and unlicensed activities matters, involving three real estate licensees, one real estate appraiser, two big game guides, one physician, three nurses, one out-of-state pharmacy, one marine pilot, one dentist, one physical therapist, one naturopath and two insurance licensees. These cases resulted in numerous actions including revocation, suspension, or denial of licenses, conditions on licenses, imposition of civil fines, and/or reprimands based on failure to prove fitness for a license, criminal convictions, violation of professional standards, substance abuse, violation of big game guide statutes, violation of consent agreements, or unprofessional conduct, failure to report disciplinary action in other states, or acting without an appropriate license. The section also successfully prosecuted an action against a retail store for sale of tobacco to underage minors and negotiated favorable settlements in three other tobacco matters.
- Appeals: The section successfully defended on appeal before the superior court an administrative decision of the Commissioner of the Department of Commerce, Community, and Economic Development. The case involved a final cease and desist order against a California real estate broker who was not licensed in Alaska, but who was negotiating sales transactions of Alaska property with Alaska clients and was accepting fees for her services. The superior court affirmed the Commissioner's cease and desist order with regard to the California broker holding herself out as a broker in Alaska and accepting a fee, but remanded the case to the Commissioner for additional briefing on the issue of negotiating a sales transaction. The remand is still pending. The section successfully defended on appeal all the way through the trial court to the Alaska Supreme Court two decisions by Department of Revenue to deny a permanent fund dividend to individuals who were unable to meet the requisite residency requirements and also successfully defended on appeal before the superior court a Board of Nursing decision.
- Insurance: The section successfully prosecuted five separate insurance fraud cases resulting in two felony convictions and three misdemeanor convictions for fraudulent and criminal insurance acts.
- Public Housing: The section pursued 48 forcible entry and detainer actions in FY 2012. Of these matters, the section successfully prosecuted 41 forcible entry and detainer actions against tenants in public housing on behalf of the Alaska Housing Finance Corporation (AHFC), one was denied, and in six matters the tenant(s) vacated their units before a complaint could be filed. The evictions in these cases are limited to cases where there is actual good cause. The good cause in these cases included nonpayment of rent, failure to pay utilities, interfering with neighbors' peaceful enjoyment of the premises, and public housing fraud or failure to report income and household composition. As a result of these successful prosecutions, the section obtained judgments totaling \$162,530 that AHFC will be able to collect. The total judgment amount, while fluctuating from year to year, has been on an upward trend in recent years. Judgments totaled \$25,940 in FY2008, \$6,125 in FY2009, \$19,112 in FY2010, and \$73,905 in FY2011. In many additional cases, the section attorneys were able to work with AHFC and its tenants to reach agreements allowing tenants to retain their housing while ensuring that AHFC received rent and other payments due under the tenants' leases.
- Contracts: The section successfully represented AHFC in a breach of contract action it brought against Bank of America for failing to properly service AHFC loans as required by its contract with AHFC. Bank of America ultimately agreed to pay AHFC over \$500,000 to repurchase two loans, to turn over missing files on other loans, to reimburse AHFC for shorted escrow funds, and to pay \$2,500 in attorney fees.
- Bankruptcy: On behalf of the Alaska Commission on Postsecondary Education, the section successfully defended against efforts to fully discharge student loans in two separate adversary proceedings in bankruptcy court. In both cases, the section attorney was able to negotiate reasonable settlements that will result in payment of substantial portions of the loans.

#### **Key Component Challenges**

- Consumer Protection: Alaska is a target state for many types of consumer fraud. Under the authority of the Consumer Protection Act (AS 45.50.471 et seq.), the Commercial and Fair Business section investigates and brings enforcement action against businesses that engage in unfair or deceptive trade practices.

The department has been able to increase enforcement activity because of additional statutory designated program receipt resources appropriated to this component. To help ensure receipt of statutory designated program receipt resources, the department needs to maintain the section's participation in multi-state investigation and enforcement activities involving national companies that have committed unfair or deceptive practices impacting Alaskan consumers.

In addition to consumer protection and antitrust enforcement, the section is responsible for the annual registration of approximately 2,000 charitable organizations, paid solicitors, and telemarketers. This is a challenging process that takes substantial section resources each year to complete. In 2004, the department received authority to collect a fee for each registration, which helps offset the costs of the annual registration process.

- Taxes: This section provides legal assistance to Department of Revenue (DOR) on non-oil and gas tax types, including tobacco tax, cruise ship gambling and passenger taxes, alcohol tax, motor fuel tax and an array of fish related taxes. Effective enforcement and collection of these taxes is imperative to minimize taxpayers' efforts to evade payment of taxes. The section attorneys advising DOR spend substantial time researching and advising the department every year in its enforcement efforts. DOR faces challenges particularly in the area of tobacco and fish related taxes, where efforts to avoid payment of taxes have recently become more pronounced.
- Gaming: Another area of work for Department of Revenue involves its Gaming Unit that deals with charitable gaming issues. This unit is often presented with creative interpretations of the charitable gaming laws that require continuing legal analysis by section attorneys to ensure that the laws are consistently, correctly, and fairly applied to the charitable gaming public.
- Agency Work: In the last five years, the section has seen an increased demand for legal services from the Department of Commerce, Community, and Economic Development (DCCED) related to securities regulation, mortgage lending, insurance regulation, payday lending, and various grants administered or issued by the department. In response to this increased demand, DCCED has increased its funding to Law to cover work in these areas. The section also has seen an increase related to the state film office that was established in 2008 within DCCED.

### **Significant Changes in Results to be Delivered in FY2014**

- Consumer Protection: The state and its citizens benefit significantly from the work done by the consumer protection program. The department's participation in consumer protection work not only protects Alaska's citizens, it receives a significant return on its investment. For example, as a result of participation in multistate consumer protection efforts or from consumer protection matters initiated locally, the state receives civil penalties, consumer restitution, and amounts for consumer protection education and enforcement. To further enhance the department's consumer protection program, the section anticipates hiring a contract investigator to assist with local consumer protection enforcement efforts. The contract investigator will initiate and assist with investigations where there is a pattern of illegal conduct including in-field investigations of suspect businesses or business practices, interviewing witnesses, drafting subpoenas or civil investigative demands, and providing intelligence information to section attorneys with recommendations on future action.
- Agency Work: The section anticipates a continued increase in services to be delivered to the Department of Commerce, Community, and Economic Development (DCCED) related to the regulation of mortgage lenders and brokers and payday lenders and related to the state film office. The section also will be providing increased services to DCCED because it has been assign to advise and represent the Alcoholic Beverage Control Board, which was transferred to DCCED's administrative control in FY2013.

**Statutory and Regulatory Authority**

AS 44.23.020

Contact Information
<p><b>Contact:</b> Signe Andersen, Chief Assistant Attorney General <b>Phone:</b> (907) 269-5100 <b>Fax:</b> (907) 276-8554 <b>E-mail:</b> signe.andersen@alaska.gov</p>

<b>Commercial and Fair Business Component Financial Summary</b>			
		<i>All dollars shown in thousands</i>	
	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
<b>Non-Formula Program:</b>			
<b>Component Expenditures:</b>			
71000 Personal Services	3,442.4	3,619.7	3,650.1
72000 Travel	49.1	78.0	78.0
73000 Services	705.7	1,454.1	1,654.1
74000 Commodities	72.2	85.9	85.9
75000 Capital Outlay	16.1	27.4	27.4
77000 Grants, Benefits	0.0	0.0	0.0
78000 Miscellaneous	0.0	0.0	0.0
<b>Expenditure Totals</b>	<b>4,285.5</b>	<b>5,265.1</b>	<b>5,495.5</b>
<b>Funding Sources:</b>			
1004 General Fund Receipts	985.6	1,325.5	1,338.7
1005 General Fund/Program Receipts	50.0	50.0	50.0
1007 Interagency Receipts	2,586.8	3,269.9	3,285.8
1108 Statutory Designated Program Receipts	647.6	453.4	654.4
1168 Tobacco Use Education and Cessation Fund	15.5	166.3	166.6
<b>Funding Totals</b>	<b>4,285.5</b>	<b>5,265.1</b>	<b>5,495.5</b>

<b>Estimated Revenue Collections</b>				
<b>Description</b>	<b>Master Revenue Account</b>	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
<b>Unrestricted Revenues</b>				
General Fund Program Receipts	51060	91.6	0.0	0.0
Unrestricted Fund	68515	47.9	0.0	0.0
<b>Unrestricted Total</b>		<b>139.5</b>	<b>0.0</b>	<b>0.0</b>
<b>Restricted Revenues</b>				
Interagency Receipts	51015	2,586.8	3,269.9	3,285.8
General Fund Program Receipts	51060	50.0	50.0	50.0
Statutory Designated Program Receipts	51063	647.6	453.4	654.4
Tobacco Use Educ and Cessation Fund	51438	15.5	166.3	166.6
<b>Restricted Total</b>		<b>3,299.9</b>	<b>3,939.6</b>	<b>4,156.8</b>
<b>Total Estimated Revenues</b>		<b>3,439.4</b>	<b>3,939.6</b>	<b>4,156.8</b>

**Summary of Component Budget Changes  
From FY2013 Management Plan to FY2014 Governor**

*All dollars shown in thousands*

	<u>Unrestricted Gen (UGF)</u>	<u>Designated Gen (DGF)</u>	<u>Other Funds</u>	<u>Federal Funds</u>	<u>Total Funds</u>
<b>FY2013 Management Plan</b>	<b>1,325.5</b>	<b>216.3</b>	<b>3,723.3</b>	<b>0.0</b>	<b>5,265.1</b>
<b>Adjustments which will continue current level of service:</b>					
-FY2014 Salary and Health Insurance Increases	5.1	0.3	9.1	0.0	14.5
-Replace Unavailable Fund Sources for Personal Services Increases	8.1	0.0	-8.1	0.0	0.0
<b>Proposed budget increases:</b>					
-Interagency Receipt Authority for Existing Reimbursable Service Agreements	0.0	0.0	15.9	0.0	15.9
-Investigative Services for Consumer Protection Program	0.0	0.0	200.0	0.0	200.0
<b>FY2014 Governor</b>	<b>1,338.7</b>	<b>216.6</b>	<b>3,940.2</b>	<b>0.0</b>	<b>5,495.5</b>

Commercial and Fair Business Personal Services Information				
Authorized Positions			Personal Services Costs	
	FY2013 Management Plan	FY2014 Governor		
Full-time	29	29	Annual Salaries	2,493,254
Part-time	0	0	Premium Pay	0
Nonpermanent	0	0	Annual Benefits	1,329,811
			<i>Less 4.52% Vacancy Factor</i>	(172,965)
			Lump Sum Premium Pay	0
<b>Totals</b>	<b>29</b>	<b>29</b>	<b>Total Personal Services</b>	<b>3,650,100</b>

Position Classification Summary					
Job Class Title	Anchorage	Fairbanks	Juneau	Others	Total
Assoc Attorney I	2	0	1	0	3
Attorney III	3	0	1	0	4
Attorney IV	7	1	3	0	11
Attorney V	2	0	1	0	3
Attorney VI	1	0	0	0	1
Law Office Assistant I	4	0	1	0	5
Law Office Assistant II	1	0	0	0	1
Paralegal II	1	0	0	0	1
<b>Totals</b>	<b>21</b>	<b>1</b>	<b>7</b>	<b>0</b>	<b>29</b>

**Component Detail All Funds**  
**Department of Law**

**Component:** Commercial and Fair Business (AR13703) (2717)  
**RDU:** Civil Division (35)

	FY2012 Actuals	FY2013 Conference Committee	FY2013 Authorized	FY2013 Management Plan	FY2014 Governor	FY2013 Management Plan vs FY2014 Governor	
71000 Personal Services	3,442.4	3,619.7	3,619.7	3,619.7	3,650.1	30.4	0.8%
72000 Travel	49.1	78.0	78.0	78.0	78.0	0.0	0.0%
73000 Services	705.7	1,454.1	1,454.1	1,454.1	1,654.1	200.0	13.8%
74000 Commodities	72.2	85.9	85.9	85.9	85.9	0.0	0.0%
75000 Capital Outlay	16.1	27.4	27.4	27.4	27.4	0.0	0.0%
77000 Grants, Benefits	0.0	0.0	0.0	0.0	0.0	0.0	0.0%
78000 Miscellaneous	0.0	0.0	0.0	0.0	0.0	0.0	0.0%
<b>Totals</b>	<b>4,285.5</b>	<b>5,265.1</b>	<b>5,265.1</b>	<b>5,265.1</b>	<b>5,495.5</b>	<b>230.4</b>	<b>4.4%</b>
<b>Fund Sources:</b>							
1004 Gen Fund (UGF)	985.6	1,325.5	1,325.5	1,325.5	1,338.7	13.2	1.0%
1005 GF/Prgm (DGF)	50.0	50.0	50.0	50.0	50.0	0.0	0.0%
1007 I/A Rcpts (Other)	2,586.8	3,269.9	3,269.9	3,269.9	3,285.8	15.9	0.5%
1108 Stat Desig (Other)	647.6	453.4	453.4	453.4	654.4	201.0	44.3%
1168 Tob Ed/Ces (DGF)	15.5	166.3	166.3	166.3	166.6	0.3	0.2%
<b>Unrestricted General (UGF)</b>	<b>985.6</b>	<b>1,325.5</b>	<b>1,325.5</b>	<b>1,325.5</b>	<b>1,338.7</b>	<b>13.2</b>	<b>1.0%</b>
<b>Designated General (DGF)</b>	<b>65.5</b>	<b>216.3</b>	<b>216.3</b>	<b>216.3</b>	<b>216.6</b>	<b>0.3</b>	<b>0.1%</b>
<b>Other Funds</b>	<b>3,234.4</b>	<b>3,723.3</b>	<b>3,723.3</b>	<b>3,723.3</b>	<b>3,940.2</b>	<b>216.9</b>	<b>5.8%</b>
<b>Federal Funds</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0</b>	<b>0.0%</b>
<b>Positions:</b>							
Permanent Full Time	30	30	30	29	29	0	0.0%
Permanent Part Time	0	0	0	0	0	0	0.0%
Non Permanent	0	0	0	0	0	0	0.0%

**Change Record Detail - Multiple Scenarios With Descriptions**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)

**RDU:** Civil Division (35)

Scenario/Change Record Title	Trans Type	Totals	Personal Services	Travel	Services	Commodities	Capital Outlay	Grants, Benefits	Miscellaneous	Positions		NP
										PFT	PPT	
***** Changes From FY2013 Conference Committee To FY2013 Authorized *****												
<b>FY2013 Conference Committee</b>												
ConfCom		5,265.1	3,619.7	78.0	1,454.1	85.9	27.4	0.0	0.0	30	0	0
1004 Gen Fund		1,325.5										
1005 GF/Prgm		50.0										
1007 I/A Rcpts		3,269.9										
1108 Stat Desig		453.4										
1168 Tob Ed/Ces		166.3										
<b>Subtotal</b>		<b>5,265.1</b>	<b>3,619.7</b>	<b>78.0</b>	<b>1,454.1</b>	<b>85.9</b>	<b>27.4</b>	<b>0.0</b>	<b>0.0</b>	<b>30</b>	<b>0</b>	<b>0</b>
***** Changes From FY2013 Authorized To FY2013 Management Plan *****												
<b>Transfer Associate Attorney I/II (03-0109) to Labor and State Affairs to Allow for Promotion</b>												
Trout		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-1	0	0
Transfer an Associate Attorney I/II position (03-0109) in Anchorage to Labor and State Affairs to promote an Associate Attorney I in Juneau, who has been designated as the Statewide Paralegal Coordinator. A corresponding transfer of the Associate Attorney I position (03-0365) from Labor & State Affairs in Juneau to Commercial and Fair Business in Anchorage also occurred. These transfers resulted in a net zero effect to position count in each location.												
<b>Transfer Associate Attorney I (03-0365) from Labor and State Affairs to Allow for Promotion</b>												
Trin		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1	0	0
Transfer an Associate Attorney I position (03-0365) from Labor and State Affairs in Juneau. A corresponding transfer of an Associate Attorney I/II position (03-0109) to Labor & State Affairs in Juneau also occurred to promote the Associate Attorney I in Juneau, who has been designated as the Statewide Paralegal Coordinator. These transfers resulted in a net zero effect to position count in each location.												
<b>Transfer Attorney V (03-0158) to Oil, Gas and Mining for Required Legal Expertise</b>												
Trout		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-1	0	0
Transfer Attorney V (03-0158) to Oil, Gas and Mining to keep pace with the required level of legal expertise needed within the section.												
Department of Law attorney positions are partially exempt (PX) and flexibly-ranged positions. Attorneys' I - VI are transferred in accordance with attorney salary placement, allowing positions to be sub-filled at lower levels. Positions are also transferred to accommodate promotions. Because of constant movement of positions, authority is not transferred unless necessary.												
<b>Transfer Attorney IV (03-0316) from Oil, Gas and Mining for Required Legal Expertise</b>												
Trin		0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	1	0	0
Transfer Attorney IV (03-0316) from Oil, Gas and Mining to keep pace with the required level of legal expertise needed within the section.												
Department of Law attorney positions are partially exempt (PX) and flexibly-ranged positions. Attorneys' I - VI are transferred in accordance with attorney salary												

**Change Record Detail - Multiple Scenarios With Descriptions**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)

**RDU:** Civil Division (35)

Scenario/Change Record Title	Trans Type	Totals	Personal Services	Travel	Services	Commodities	Capital Outlay	Grants, Benefits	Miscellaneous	Positions		NP
										PFT	PPT	
placement, allowing positions to be sub-filled at lower levels. Positions are also transferred to accommodate promotions. Because of constant movement of positions, authority is not transferred unless necessary.												
<b>Transfer Law Office Assistant I/II (03-0171) to Child Protection to Address Workload Demands</b>												
	Trout	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	-1	0	0
Transfer Law Office Assistant I/II (03-0171) to Child Protection to accommodate the workload and section demands. Because of constant movement of positions within the Department of Law, authority is not transferred unless necessary.												
<b>Subtotal</b>		<b>5,265.1</b>	<b>3,619.7</b>	<b>78.0</b>	<b>1,454.1</b>	<b>85.9</b>	<b>27.4</b>	<b>0.0</b>	<b>0.0</b>	<b>29</b>	<b>0</b>	<b>0</b>
***** <b>Changes From FY2013 Management Plan To FY2014 Governor</b> *****												
<b>FY2014 Salary and Health Insurance Increases</b>												
	SalAdj	14.5	14.5	0.0	0.0	0.0	0.0	0.0	0.0	0	0	0
1004 Gen Fund		5.1										
1007 I/A Rcpts		8.1										
1108 Stat Desig		1.0										
1168 Tob Ed/Ces		0.3										
FY2014 Salary and Health Insurance increase : \$14.5												
FY2014 Health Insurance increase of \$59.00 per month per employee - from \$1,330 to \$1,389 per month Non-covered: \$14.5												
<b>Replace Unavailable Fund Sources for Personal Services Increases</b>												
	FndChg	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0	0	0
1004 Gen Fund		8.1										
1007 I/A Rcpts		-8.1										
To fund baseline increases as a result of personal services and benefits that are associated with unavailable fund sources that have not been budgeted for in our client agencies.												
<b>Interagency Receipt Authority for Existing Reimbursable Service Agreements</b>												
	Inc	15.9	15.9	0.0	0.0	0.0	0.0	0.0	0.0	0	0	0
1007 I/A Rcpts		15.9										
Increase interagency receipt authority to budget for existing reimbursable services agreements:												
\$15.9 - Department of Commerce and Community Economic Development, Banking and Securities: Legal Services												
This will avoid the need to add unbudgeted interagency receipt authority in FY2014.												

**Change Record Detail - Multiple Scenarios With Descriptions**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)

**RDU:** Civil Division (35)

Scenario/Change Record Title	Trans Type	Totals	Personal Services	Travel	Services	Commodities	Capital Outlay	Grants, Benefits	Miscellaneous	Positions		NP
										PFT	PPT	
<b>Investigative Services for Consumer Protection Program</b>												
1108 Stat Desig	Inc	200.0	0.0	0.0	200.0	0.0	0.0	0.0	0.0	0	0	0
<p>Increase statutory designated program receipts for consumer protection recoveries to allow the Civil Division's consumer protection program to obtain investigative services. Alaska is a target state for many types of consumer fraud. Under the authority of the Consumer Protection Act (AS 45.50.471 et seq.), the Commercial and Fair Business section investigates and brings enforcement action against businesses that engage in unfair or deceptive trade practices.</p> <p>The Department of Law has increased enforcement activity due to additional statutory designated program receipt resources appropriated to this component beginning in FY2000 and increased again in FY2004. To help ensure receipt of this resource, the department needs to maintain the section's participation in multi-state investigation and enforcement activities involving national companies that have committed unfair or deceptive practices impacting Alaskan consumers.</p> <p>To further enhance the department's consumer protection program, the section anticipates hiring a contract investigator to assist with local consumer protection enforcement efforts. The contract investigator will initiate and assist with investigations where there is a pattern of illegal conduct including in-field investigations of suspect businesses or business practices, interviewing witnesses, drafting subpoenas or civil investigative demands, and providing intelligence information to section attorneys with recommendations on future action.</p> <p>The state and its citizens benefit significantly from the work done by the consumer protection program. The department's participation in consumer protection work not only protects Alaska's citizens, but also receives a significant return on the investment. For example, as a result of participation in multi-state consumer protection efforts or from consumer protection matters initiated locally, the State of Alaska receives civil penalties, consumer restitution, and amounts for consumer protection education and enforcement.</p>												
<b>Totals</b>		<b>5,495.5</b>	<b>3,650.1</b>	<b>78.0</b>	<b>1,654.1</b>	<b>85.9</b>	<b>27.4</b>	<b>0.0</b>	<b>0.0</b>	<b>29</b>	<b>0</b>	<b>0</b>

**Personal Services Expenditure Detail**  
**Department of Law**

**Scenario:** FY2014 Governor (10289)  
**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

PCN	Job Class Title	Time Status	Retire Code	Barg Unit	Location	Salary Sched	Range / Step	Comp Months	Split / Count	Annual Salaries	COLA	Premium Pay	Annual Benefits	Total Costs	GF Amount
03-0033	Attorney V	FT	A	XE	Anchorage	NAA	25L / M	12.0		124,882	0	0	59,129	184,011	0
03-0044	Attorney IV	FT	A	XE	Juneau	NAA	24F / J	12.0		102,762	0	0	52,172	154,934	0
03-0054	Law Office Assistant I	FT	A	GP	Juneau	205	11E / F	12.0		41,091	0	0	30,807	71,898	71,898
03-0055	Attorney IV	FT	A	XE	Anchorage	NAA	24K / L	12.0		110,268	0	0	54,766	165,034	0
03-0057	Law Office Assistant II	FT	A	SS	Anchorage	600	13A	12.0		40,200	0	0	29,993	70,193	70,193
03-0063	Law Office Assistant I	FT	A	GP	Anchorage	200	11C / D	12.0		36,606	0	0	29,258	65,864	0
03-0094	Attorney IV	FT	A	XE	Anchorage	NAA	24L / M	12.0		115,996	0	0	56,604	172,600	0
03-0114	Law Office Assistant I	FT	A	GP	Anchorage	200	11F / G	12.0		40,383	0	0	30,563	70,946	0
03-0139	Attorney V	FT	A	XE	Juneau	NAA	25O	12.0		136,476	0	0	62,424	198,900	99,450
03-0142	Attorney IV	FT	A	XE	Anchorage	NAA	24K	12.0		109,584	0	0	54,529	164,113	0
03-0174	Attorney VI	FT	A	XE	Anchorage	NAA	26N	12.0		136,272	0	0	62,366	198,638	99,319
03-0195	Attorney IV	FT	A	XE	Anchorage	NAA	24K	12.0		109,584	0	0	54,529	164,113	0
03-0212	Attorney III	FT	A	XE	Anchorage	NAA	22F / J	12.0		89,047	0	0	47,434	136,481	136,481
03-0224	Assoc Attorney I	FT	A	XE	Juneau	NAA	17L	12.0		71,136	0	0	41,245	112,381	112,381
03-0233	Attorney IV	FT	A	XE	Anchorage	NAA	24M	12.0		117,948	0	0	57,159	175,107	0
03-0234	Law Office Assistant I	FT	A	GP	Anchorage	200	11G	12.0		41,436	0	0	30,926	72,362	0
03-0264	Attorney III	FT	A	XE	Anchorage	NAA	22E / F	12.0		86,092	0	0	46,413	132,505	0
03-0267	Attorney IV	FT	A	XE	Juneau	NAA	20E / F	12.0		77,717	0	0	43,519	121,236	121,236
03-0269	Law Office Assistant I	FT	A	GP	Anchorage	200	11A	12.0		34,440	0	0	28,509	62,949	0
03-0289	Attorney IV	FT	A	XE	Anchorage	NAA	24O	12.0		126,960	0	0	59,720	186,680	0
03-0316	Attorney IV	FT	A	XE	Anchorage	NAA	24F / J	12.0		104,034	0	0	52,612	156,646	156,646
03-0325	Attorney III	FT	A	XE	Juneau	NAA	22E / F	12.0		86,220	0	0	46,457	132,677	0
03-0342	Attorney V	FT	A	XE	Anchorage	NAA	25L / M	12.0		122,590	0	0	58,478	181,068	0
03-0343	Paralegal II	FT	A	GP	Anchorage	200	16A / B	12.0		48,862	0	0	33,492	82,354	0
03-0350	Attorney III	FT	A	XE	Anchorage	NAA	22A	12.0		75,060	0	0	42,601	117,661	117,661
03-0360	Attorney IV	FT	A	XE	Fairbanks	NEE	24J	12.0		122,040	0	0	58,322	180,362	0
03-0365	Assoc Attorney I	FT	A	XE	Anchorage	NAA	17A / B	12.0		54,924	0	0	35,644	90,568	90,568
03-0372	Attorney IV	FT	A	XE	Juneau	NAA	24L	6.0		56,844	0	0	27,974	84,818	0
03-0376	Assoc Attorney I	FT	A	XE	Anchorage	NAA	17M	12.0		73,800	0	0	42,166	115,966	115,966

Note: If a position is split, an asterisk (\*) will appear in the Split/Count column. If the split position is also counted in the component, two asterisks (\*\*) will appear in this column. [No valid job title] appearing in the Job Class Title indicates that the PCN has an invalid class code or invalid range for the class code effective date of this scenario.

**Personal Services Expenditure Detail**  
**Department of Law**

**Scenario:** FY2014 Governor (10289)  
**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

PCN	Job Class Title	Time Status	Retire Code	Barg Unit	Location	Salary Sched	Range / Step	Comp Months	Split / Count	Annual Salaries	COLA	Premium Pay	Annual Benefits	Total Costs	GF Amount
													<b>Total Salary Costs:</b>	2,493,254	
													<b>Total COLA:</b>	0	
													<b>Total Premium Pay:</b>	0	
													<b>Total Benefits:</b>	1,329,811	
													<b>Total Pre-Vacancy:</b>	3,823,065	
													<b>Minus Vacancy Adjustment of 4.52%:</b>	(172,965)	
													<b>Total Post-Vacancy:</b>	3,650,100	
													<b>Plus Lump Sum Premium Pay:</b>	0	
													<b>Personal Services Line 100:</b>	3,650,100	
<b>Total Component Months:</b>		342.0													

<b>PCN Funding Sources:</b>	<b>Pre-Vacancy</b>	<b>Post-Vacancy</b>	<b>Percent</b>
1004 General Fund Receipts	1,141,050	1,089,426	29.85%
1007 Interagency Receipts	2,360,017	2,253,244	61.73%
1108 Statutory Designated Program Receipts	271,249	258,977	7.10%
1168 Tobacco Use Education and Cessation Fund	50,749	48,453	1.33%
<b>Total PCN Funding:</b>	<b>3,823,065</b>	<b>3,650,100</b>	<b>100.00%</b>

Note: If a position is split, an asterisk (\*) will appear in the Split/Count column. If the split position is also counted in the component, two asterisks (\*\*) will appear in this column. [No valid job title] appearing in the Job Class Title indicates that the PCN has an invalid class code or invalid range for the class code effective date of this scenario.

**Line Item Detail**  
**Department of Law**  
**Travel**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

Line Number	Line Name		FY2012 Actuals	FY2013 Management Plan	FY2014 Governor
72000	Travel		49.1	78.0	78.0
Expenditure Account	Servicing Agency	Explanation	FY2012 Actuals	FY2013 Management Plan	FY2014 Governor
<b>72000 Travel Detail Totals</b>			<b>49.1</b>	<b>78.0</b>	<b>78.0</b>
72110	Employee Travel (Instate)	Attorney travel to provide counsel for departments and agencies of state government, including hearings, board meetings and legal counsel in court cases. Investigations and taking depositions for court actions.	37.1	73.0	73.0
72120	Nonemployee Travel (Instate Travel)	Witness travel costs.	0.0	5.0	5.0
72410	Employee Travel (Out of state)	Travel costs and expenses for professional staff to attend training, conferences and meetings.	12.0	0.0	0.0

**Line Item Detail**  
**Department of Law**  
**Services**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

Line Number	Line Name		FY2012 Actuals	FY2013 Management Plan	FY2014 Governor
73000	Services		705.7	1,454.1	1,654.1
Expenditure Account	Servicing Agency	Explanation	FY2012 Actuals	FY2013 Management Plan	FY2014 Governor
<b>73000 Services Detail Totals</b>			<b>705.7</b>	<b>1,454.1</b>	<b>1,654.1</b>
73025	Education Services	Conferences, training, memberships	5.0	11.5	11.5
73075	Legal & Judicial Svc	Depositions, research costs, expert witnesses, consultants and investigative services.	286.7	1,035.2	1,223.9
73156	Telecommunication	Local Service, long distance telephone toll charges and cellular phones paid to third party telephone utilities.	20.0	20.0	20.0
73225	Delivery Services	Freight and messenger services. Movement of materials, exhibits, legal documents and courier services.	5.4	5.0	5.0
73450	Advertising & Promos	Publication of Public Notices and promotional information.	10.8	11.0	11.0
73650	Struc/Instruct/Land	Rentals/Leases - records and evidence storage.	6.9	7.0	7.0
73675	Equipment/Machinery	Repairs/Maintenance and Rentals/Leases office equipment - copiers & postage meters.	24.5	24.5	24.5
73750	Other Services (Non IA Svcs)	Printing forms, briefs and legal notices.	8.0	10.0	10.0
73805	IT-Non-Telecommunication	Admin - Enterprise Technology Services RSA Administration, ETS - Computer Services EPR	16.6	17.0	17.0
73805	IT-Non-Telecommunication	Law - Administration and Support RSA Law, Administration and Information Services & Procurement support.	60.9	58.0	58.0
73806	IT-Telecommunication	Admin - Enterprise Technology Services RSA Administration, ETS -Telecommunication EPR.	40.6	38.5	38.5
73809	Mail	Admin - Central Mail RSA Administration, Central Mailroom	2.0	2.0	2.0
73810	Human Resources	Administrative Services RSA Law, Human Resource Position	0.0	3.5	3.5

**Line Item Detail**  
**Department of Law**  
**Services**

**Component:** Commercial and Fair Business (2717)

**RDU:** Civil Division (35)

<b>Expenditure Account</b>		<b>Servicing Agency</b>	<b>Explanation</b>	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
<b>73000 Services Detail Totals</b>				<b>705.7</b>	<b>1,454.1</b>	<b>1,654.1</b>
73811	Building Leases	Admin - Leases	RSA Administration, GS&S - Leased Office Space - AG's Offices.	203.5	196.2	200.0
73814	Insurance	Admin - Risk Management	RSA Administration, Risk Management	0.6	0.6	0.6
73815	Financial	Admin - Finance	RSA Administration, Finance Chargeback (AKSAS / AKPAY)	1.4	1.3	1.3
73815	Financial	Law - Administration and Support	RSA Law, Timekeeping administration and litigation support.	12.2	12.5	20.0
73816	ADA Compliance	Personnel	RSA Administration, Personnel - Americans With Disabilities Act.	0.3	0.3	0.3
73819	Commission Sales (IA Svcs)	State Travel Office	Travel fees	0.3	0.0	0.0

**Line Item Detail**  
**Department of Law**  
**Commodities**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

<b>Line Number</b>	<b>Line Name</b>		<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
74000	Commodities		72.2	85.9	85.9
<b>Expenditure Account</b>	<b>Servicing Agency</b>	<b>Explanation</b>	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
		<b>74000 Commodities Detail Totals</b>	<b>72.2</b>	<b>85.9</b>	<b>85.9</b>
74200	Business	Library materials including Alaska Statutes, Alaska Code, Advanced Legislative Service and Court Rules; subscriptions, office supplies; software applications, printer cartridges, paper and misc. data processing supplies; computer supplies - desktop refresh, non-capital.	72.2	85.9	85.9

**Line Item Detail**  
**Department of Law**  
**Capital Outlay**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

Line Number	Line Name		FY2012 Actuals	FY2013 Management Plan	FY2014 Governor
75000	Capital Outlay		16.1	27.4	27.4
Expenditure Account	Servicing Agency	Explanation	FY2012 Actuals	FY2013 Management Plan	FY2014 Governor
<b>75000 Capital Outlay Detail Totals</b>			<b>16.1</b>	<b>27.4</b>	<b>27.4</b>
75830	Info Technology	Computer equipment, printers and modems.	16.1	27.4	27.4

**Unrestricted Revenue Detail**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

<b>Master Account</b>	<b>Revenue Description</b>				<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
51060	General Fund Program Receipts				91.6	0.0	0.0
<b>Detail Information</b>							
<b>Revenue Amount</b>	<b>Revenue Description</b>	<b>Component</b>	<b>Collocation Code</b>	<b>AKSAS Fund</b>	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
51060	GF Program Receipts		03203002	11100	91.6	0.0	0.0
	Costs and fees collected by the Consumer Protection Unit from national consumer protection settlements used to defray part of the unit's cost.						

**Unrestricted Revenue Detail**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

<b>Master Account</b>	<b>Revenue Description</b>			<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>	
68515	Unrestricted Fund			47.9	0.0	0.0	
<b>Detail Information</b>							
<b>Revenue Amount</b>	<b>Revenue Description</b>	<b>Component</b>	<b>Collocation Code</b>	<b>AKSAS Fund</b>	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
64090	Legal Sevices Judgment & Settlement awards for attorney fees and legal costs.		03203001	11100	0.8	0.0	0.0
65040	Judgement Settlement Fines & Forfeitures.		03203001	11100	27.5	0.0	0.0
65090	Misc Pen & Late Fees Fines & Forfeitures		03203001	11100	19.6	0.0	0.0

**Restricted Revenue Detail**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

<b>Master Account</b>	<b>Revenue Description</b>				<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
51015	Interagency Receipts				2,586.8	3,269.9	3,285.8
<b>Detail Information</b>							
<b>Revenue Amount</b>	<b>Revenue Description</b>	<b>Component</b>	<b>Collocation Code</b>	<b>AKSAS Fund</b>	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
51015	Interagency Receipts Unprogrammed I/A Receipt Authority		03203500	11100	0.0	14.1	0.0
59040	Revenue Funding for legal services provided on behalf of the Department of Revenue, Charitable Gaming Division.	Tax Division	03203517	11100	28.1	73.5	73.5
59040	Revenue Funding for legal services provided to the Alaska Housing Finance Corporation for commercial law, loan collections and public housing programs.	AHFC Operations	03203527	11100	384.4	359.8	359.8
59040	Revenue Funding for legal services provided on behalf of the Permanent Fund Dividend Division.	Permanent Fund Dividend Division	03203529	11100	97.0	69.1	69.1
59040	Revenue Outside counsel provided to the Alaska Housing Finance Corporation for commercial, real estate, construction, insurance and employment law purposes.	AHFC Operations	03203531	11100	157.5	247.8	247.8
59050	Education Legal services provided on behalf of the Commission on Postsecondary Education.	ASLC Education Loan Fund	03203519	11100	39.7	29.0	29.0
59050	Education Legal services provided on behalf of the Professional Teaching Practices Commission	Professional Teaching Practice	03203558	11100	1.0	35.0	35.0
59060	Health & Social Svcs Legal Services provided to the Community Health and Emergency Medical Services program aiding in prohibiting the sale of tobacco to minors.	Community Health/EMS Services	03203559	11100	31.2	118.6	118.6
59080	Commrc & Economc Dev Funding for legal services provided to the Division of Occupational Licensing.	Corp, Bus & Prof Licensing	03203530	11100	734.8	932.0	932.0
59080	Commrc & Economc	Reg Comm of AK	03203537	11100	244.2	435.0	435.0

**Restricted Revenue Detail**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

<b>Master Account</b>	<b>Revenue Description</b>				<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
51015	Interagency Receipts				2,586.8	3,269.9	3,285.8
<b>Detail Information</b>							
<b>Revenue Amount</b>	<b>Revenue Description</b>	<b>Component</b>	<b>Collocation Code</b>	<b>AKSAS Fund</b>	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
	Dev Funding for legal services for the Alaska Regulatory Commission to fund an attorney to provide advice to the Commission.						
59080	Commrc & Econmc Dev Legal services provided to the Division of Insurance, insurance fraud.	Insurance Operations	03203542	11100	412.1	476.0	476.0
59080	Commrc & Econmc Dev Funding for legal services provided to the Division of Economic Development, loan collections.	Economic Development	03203543	11100	106.8	120.0	120.0
59080	Commrc & Econmc Dev Requested funding for legal services to be provided to the Division of Banking, Securities and Corporations.	Banking and Securities	03203552	11100	267.8	250.0	280.0
59080	Commrc & Econmc Dev Unbudgeted RSA, DCCED, RCA Outside Counsel.	Reg Comm of AK	03203632	11100	0.0	0.0	0.0
59080	Commrc & Econmc Dev Unbudgeted RSA, Regulatory Commission of Alaska, Outside Counsel	Reg Comm of AK	03203688	11100	3.1	0.0	0.0
59100	Natural Resources Legal services provided to Agricultural Revolving Loan Fund Program collections.	Agr Revolving Loan Pgm Admin	03203551	11100	79.1	110.0	110.0

**Restricted Revenue Detail**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

<b>Master Account</b>	<b>Revenue Description</b>				<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
51060	General Fund Program Receipts				50.0	50.0	50.0
<b>Detail Information</b>							
<b>Revenue Amount</b>	<b>Revenue Description</b>	<b>Component</b>	<b>Collocation Code</b>	<b>AKSAS Fund</b>	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
51060	GF Program Receipts		03203002	11100	50.0	50.0	50.0
	Costs and fees collected by the Consumer Protection Unit from national consumer protection settlements used to defray part of the unit's cost.						

**Restricted Revenue Detail**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

<b>Master Account</b>	<b>Revenue Description</b>				<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
51063	Statutory Designated Program Receipts				647.6	453.4	654.4
<b>Detail Information</b>							
<b>Revenue Amount</b>	<b>Revenue Description</b>	<b>Component</b>	<b>Collocation Code</b>	<b>AKSAS Fund</b>	<b>FY2012 Actuals</b>	<b>FY2013 Management Plan</b>	<b>FY2014 Governor</b>
55922	Stat Desig -Contract		03203400	11100	647.6	453.4	654.4
	Statutory Designated Program Receipt authority arising from judgments, settlements, agreements, or consent decrees stipulating that in part or in total, proceeds to the State arising from the aforementioned are to be used to further the efforts of the Attorney General in protecting Alaskans from consumer fraud. Also includes Consumer Protection and antitrust.						

**Restricted Revenue Detail**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

Master Account	Revenue Description	FY2012 Actuals	FY2013 Management Plan	FY2014 Governor
51438	Tobacco Use Educ and Cessation Fund	15.5	166.3	166.6

**Detail Information**

Revenue Amount	Revenue Description	Component	Collocation Code	AKSAS Fund	FY2012 Actuals	FY2013 Management Plan	FY2014 Governor
51438	Tobacco Use Educ & Cessation Fund		03203005	11100	15.5	166.3	166.6

Tobacco Use Education and Cessation Fund (AS 37.05.580), an account within the general fund where Alaska's share of the Master Settlement Agreement (MSA) money is deposited. While this money is typically used to fund tobacco cessation efforts in Alaska, use of a portion of this money to fund these arbitration expenses is appropriate to avoid a significant loss of MSA proceeds.

**Inter-Agency Services**  
**Department of Law**

**Component:** Commercial and Fair Business (2717)  
**RDU:** Civil Division (35)

Expenditure Account	Service Description	Service Type	Servicing Agency	FY2012 Actuals	FY2013		
					Management Plan	FY2014 Governor	
73805	IT-Non-Telecommunication	RSA Administration, ETS - Computer Services EPR	Inter-dept	Admin - Enterprise Technology Services	16.6	17.0	17.0
73805	IT-Non-Telecommunication	RSA Law, Administration and Information Services & Procurement support.	Intra-dept	Law - Administration and Support	60.9	58.0	58.0
				<b>73805 IT-Non-Telecommunication subtotal:</b>	<b>77.5</b>	<b>75.0</b>	<b>75.0</b>
73806	IT-Telecommunication	RSA Administration, ETS -Telecommunication EPR.	Inter-dept	Admin - Enterprise Technology Services	40.6	38.5	38.5
				<b>73806 IT-Telecommunication subtotal:</b>	<b>40.6</b>	<b>38.5</b>	<b>38.5</b>
73809	Mail	RSA Administration, Central Mailroom	Inter-dept	Admin - Central Mail	2.0	2.0	2.0
				<b>73809 Mail subtotal:</b>	<b>2.0</b>	<b>2.0</b>	<b>2.0</b>
73810	Human Resources	RSA Law, Human Resource Position	Intra-dept	Administrative Services	0.0	3.5	3.5
				<b>73810 Human Resources subtotal:</b>	<b>0.0</b>	<b>3.5</b>	<b>3.5</b>
73811	Building Leases	RSA Administration, GS&S - Leased Office Space - AG's Offices.	Inter-dept	Admin - Leases	203.5	196.2	200.0
				<b>73811 Building Leases subtotal:</b>	<b>203.5</b>	<b>196.2</b>	<b>200.0</b>
73814	Insurance	RSA Administration, Risk Management	Inter-dept	Admin - Risk Management	0.6	0.6	0.6
				<b>73814 Insurance subtotal:</b>	<b>0.6</b>	<b>0.6</b>	<b>0.6</b>
73815	Financial	RSA Administration, Finance Chargeback (AKSAS / AKPAY)	Inter-dept	Admin - Finance	1.4	1.3	1.3
73815	Financial	RSA Law, Timekeeping administration and litigation support.	Intra-dept	Law - Administration and Support	12.2	12.5	20.0
				<b>73815 Financial subtotal:</b>	<b>13.6</b>	<b>13.8</b>	<b>21.3</b>
73816	ADA Compliance	RSA Administration, Personnel - Americans With Disabilities Act.	Inter-dept	Personnel	0.3	0.3	0.3
				<b>73816 ADA Compliance subtotal:</b>	<b>0.3</b>	<b>0.3</b>	<b>0.3</b>
73819	Commission Sales (IA Svcs)	Travel fees	Inter-dept	State Travel Office	0.3	0.0	0.0
				<b>73819 Commission Sales (IA Svcs) subtotal:</b>	<b>0.3</b>	<b>0.0</b>	<b>0.0</b>
				<b>Commercial and Fair Business total:</b>	<b>338.4</b>	<b>329.9</b>	<b>341.2</b>
				<b>Grand Total:</b>	<b>338.4</b>	<b>329.9</b>	<b>341.2</b>