

[TAB 14]

**Complaint 25-29-CD,
Randy Ruedrich v. Kyle Walker**

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Randall Ruedrich,)	
)	
Complainant,)	
)	
vs.)	Case No. 25-29-CD
)	
Kyle Walker,)	
)	
Respondent.)	
_____)	

NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing in these cases will take place before the Alaska Public Offices Commission at approximately 10:00 a.m. on Wednesday June 3, 2026.

The Commissioners will be present in person, by telephone, or via Microsoft Teams and will receive evidence regarding this matter. You may be present at the hearing either by telephone (1-907-202-7104, Access Code: 269 275 710#), in-person (2221 E. Northern Lights Blvd, Ste 128, Anchorage, Alaska), or via [Microsoft Teams Meeting](#).¹ You may be, but are not required to be, represented by an attorney or agent.

If you wish to participate by telephone and are an individual who requires a special accommodation to participate, you must advise the Commission office on or before May 26, 2026, so that a special accommodation can be made.

PREHEARING AND HEARING PROCEDURES

- 1) **Parties.** The parties in this case are Commission Staff and Respondent.
- 2) **Issues.** At the hearing, the Commission will consider whether Respondent violated campaign disclosure law by creating a Limited Liability Corporation in the name of “Walker for Assembly,” not reporting state licensing fees as expenditures, and by accepting a cash donation over the legal limit.
- 3) **Procedural history.** Complainant Randy Ruedrich filed a complaint against Respondent Kyle Walker on December 23, 2025. Respondent Walker filed a Response on January 14, 2026. Staff’s investigation report recommending the complaint be upheld in part and dismissed in part was issued March 20, 2026.

¹ Meeting ID: 226 535 332 612 23, Passcode: wZ9Uy9wz

- 4) **Hearing procedures.** The hearing will be conducted as provided in AS 15.13.380, 2 AAC 50.891, and the Alaska Administrative Procedure Act, AS 44.62.330 – 44.62.630. All testimony must be presented or submitted under oath. A party may call witnesses, cross-examine witnesses, present and rebut evidence. If the respondent does not testify, the respondent may be called and examined as if under cross-examination.
- 5) **Evidence and exhibits.** All relevant evidence may be admissible at the hearing. In passing upon the admissibility of evidence, the Commission may consider, but is not bound to follow, the rules of evidence governing general civil proceedings in the courts of the State of Alaska. The Commission may exclude inadmissible evidence and order repetitive evidence discontinued.
- 6) **Prehearing filings.** No later than May 22, 2026, a party:
 - a) may file a list of witnesses expected to testify at the hearing;
 - b) may file copies of exhibits to be presented at the hearing that are marked and identified (for example, Resp.'s Ex. A);
 - c) may file a prehearing memorandum;
 - d) may file prehearing motions, including motions to dismiss, for summary judgment, or to exclude evidence, and
 - e) shall serve all parties and the Complainant with filings submitted.
- 7) **Response to motions and requests for subpoenas.** No later than May 29, 2026, a party
 - a) may respond to a motion; and
 - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing, and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) **Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) **Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

10) Order of proceedings. Matters considered at a hearing will ordinarily be disposed of in substantially the following order:

- a) pending motions, if any;
- b) complainant may present argument under 2 AAC 50.891(d)
- c) presentation of cases as follows, unless otherwise ordered by the Commission:
 - i) The Commission Staff's direct case, including the investigative report, evidence, and testimony of witnesses;
 - ii) Respondent's direct case;
 - iii) Rebuttal by the Commission Staff; and
 - iv) Closing statements, if any, by Respondent and Commission Staff.

10) Decision and Order. The Commission will issue an order no later than 10 days after the close of the record.

Dated: May 15, 2026



Heather Hebdon, Executive Director
Alaska Public Offices Commission

CERTIFICATE OF SERVICE:	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Kyle Walker 20633 Eagle River Road Eagle River, AK 99577 c.killgore@shipcreekgroup.com WalkerForAssembly@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Randall Ruedrich 1513 W. 13 th Avenue Anchorage, AK 99501 raraep@gci.net	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

Cari Rousselle

05/15/2026

Signature

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: walkerforassembly@gmail.com
Sent: Friday, May 15, 2026 1:20 PM
Subject: Relayed: Notice of Hearing and Procedural Hearing

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

[walkerforassembly@gmail.com \(walkerforassembly@gmail.com\)](mailto:walkerforassembly@gmail.com)

Subject: Notice of Hearing and Procedural Hearing



Notice of Hearing
and Procedur...

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: raraep@gci.net
Sent: Friday, May 15, 2026 1:20 PM
Subject: Relayed: Notice of Hearing and Procedural Hearing

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

[raraep@gci.net \(raraep@gci.net\)](mailto:raraep@gci.net)

Subject: Notice of Hearing and Procedural Hearing



Notice of Hearing
and Procedur...

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: c.killgore@shipcreekgroup.com
Sent: Friday, May 15, 2026 1:20 PM
Subject: Relayed: Notice of Hearing and Procedural Hearing

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:

c.killgore@shipcreekgroup.com (c.killgore@shipcreekgroup.com)

Subject: Notice of Hearing and Procedural Hearing



Notice of Hearing
and Procedur...



TO: APOC Commissioners
DATE: March 20, 2026
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report 25-29-CD, *Randolph Ruedrich v. Kyle Walker*

SUMMARY OF COMPLAINT AND RESPONSE

Complainant Randolph Ruedrich alleges Respondent Kyle Walker violated campaign disclosure law by creating a Limited Liability Corporation (LLC) in the name of “Walker for Assembly,” not reporting state licensing fees as expenditures, and by accepting a cash donation over the legal limit.¹ Respondent Kyle Walker admits he accepted the excessive cash donation but disputes the remainder of the allegations and asks the Commission to dismiss them.²

SUMMARY OF STAFF RECOMMENDATIONS

Respondent accepted a \$240 cash donation, \$140 over the \$100 cash limit. APOC staff recommends a finding of violation but also recommends a reduced penalty as it is Respondent’s first violation and mitigating factors apply.

Respondent did not violate campaign disclosure law by creating an LLC in the name of his campaign or in not reporting state licensing fees as expenditures. APOC staff recommends the Commission dismiss the complaint relating to these allegations.

¹ [Complaint 25-29-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27379), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27379>.

² [Complaint Answer](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27382), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27382>.

BACKGROUND FACTS

On January 29, 2025, Respondent registered as a candidate for the April 1, 2025 Anchorage Municipal Election.³ The day before registering as a candidate, Walker formed a single member Limited Liability Corporation (LLC) in the name of Walker for Assembly. In his Answer to the complaint, Respondent stated that he formed the LLC based on what he now believes was incorrect advice from his banker when he opened his campaign account.⁴

On his 30-day report, Respondent reported a cash contribution of \$240.⁵

02/27/2025	Cash	Ryan, Patrick 6351 Farpoint Drive Anchorage, Alaska 99507	Occupation: Civil Engineer Employer: HDR Inc	\$240.00
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LAW AND ANALYSIS

a) Failing to return a cash contribution in excess of \$100

A person or group may not make a cash contribution that exceeds \$100.⁶ A candidate who receives and accepts a contribution in excess of the limitation on contributions must return the excess to the contributor upon discovery of the prohibited excess contribution.⁷

Respondent concedes he mistakenly accepted a \$240 cash contribution and did not return the excess \$140 and asks for APOC guidance on how to remedy the error.⁸

APOC staff recommends a finding of violation.

b) Creating an LLC in the name of a campaign and not reporting associated filing fees as a campaign expenditure

³ [Candidate registration form](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7680&ViewType=CR>.

⁴ Complaint Answer, p. 1.

⁵ [30-day report](#), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47292&ViewType=CD>.

⁶ AS 15.13.174(e).

⁷ AS 15.13.114(a).

⁸ Complaint Answer, p. 2.

Under Alaska campaign disclosure law, a corporation or business cannot contribute to a candidate. Alaska Statute 15.13.074(f) reads, in its entirety:

(f) **A corporation**, company, partnership, firm, association, entity recognized as tax-exempt under 26 U.S.C. 501(c)(3) (Internal Revenue Code), organization, business trust or surety, labor union, or publicly funded entity that does not satisfy the definition of group or nongroup entity in [AS 15.13.400](#) **may not make a contribution to a candidate**, group, or nongroup entity.⁹

Complainant premises his allegations of Respondent’s wrongdoing entirely upon this statute, arguing that “[n]o LLC may engage in any Alaskan Campaigns.”¹⁰ According to Complainant, Respondent’s initial act of forming an LLC was wrongful, setting into motion a series of additional violations of campaign disclosure law. Complainant posits that each of Walker’s contributions and expenditures therefore violates campaign law because they were “processed through an entity that is categorically prohibited from participating in campaign finance.”¹¹

Alaska Statute 15.13.074(f) clearly prohibits a candidate from accepting a contribution from a corporation, and the law defines “contribution” very broadly. It includes a purchase, payment for, or gift of money or services for which charge is ordinarily made, for the purpose of influencing the election of a candidate.¹²

But Complainant points to no evidence that Respondent’s act of forming an LLC constituted the acceptance of a contribution from it or otherwise violated AS 15.13.074(f). While Complainant bases his complaint on the argument that “[u]nder AS 15.13.074(f) . . . LLCs cannot function as campaign committees,” the statute makes no reference to the role of LLCs in campaigns beyond prohibiting contributions from them. If Respondent identified his campaign account with the name Walker for Assembly LLC, the action also would not have violated campaign disclosure law, which requires only that a candidate

⁹ AS 15.13.074(f) (emphasis added).

¹⁰ Complaint, p. 1.

¹¹ Complaint, p. 3.

¹² AS 15.13.400(4)(A)(i).

identify an account as a campaign depository and does not dictate the form of or name on that account.¹³

Complainant also posits that Respondent’s State of Alaska business filing and reporting fees violated campaign disclosure law because Respondent paid the registration fee the day before registering his candidacy and because Respondent did not report subsequent licensure fees as campaign expenditures.

APOC staff is unaware of any Commission decision or advisory opinion specific to whether a state licensing fee constitutes a campaign expenditure, defined by Alaska Statute 15.13.400(7) as a purchase made for the purpose of influencing the election of a candidate.¹⁴ Respondent argues that because the law specifically excludes “a candidate’s filing fee or the cost of preparing reports and statements required by this chapter,”¹⁵ he did not need to report his state licensure fees as an expenditure. Respondent’s comparison is imprecise, however, as the statute references “a candidate’s filing fee” in the singular, which must be understood to mean a filing fee paid by candidates to run for office¹⁶ and not state business license filing fees.

The exception for filing fees is instructive, however, in that it demonstrates that the administrative costs of becoming a candidate (the filing fee) and maintaining that status (the costs of preparing reports and statements) as outside the definition of “expenditure.” The state licensing fees paid by Respondent to register his campaign – incurred by Respondent because he thought election law required it – are more akin to a filing fee than a campaign expenditure.

A comparable circumstance might be that of the Alaska Republican Party, an APOC registered group to which expenditure rules apply. The group maintains an LLC business

¹³ 2 AAC 50.282(5); 2 AAC 50.298.

¹⁴ AS 15.13.400(7): “expenditure” (A) means a purchase or a transfer of money or anything of value, or promise or agreement to purchase or transfer money or anything of value, incurred or made for the purpose of (i) influencing the nomination or election of a candidate or of any individual who files for nomination at a later date and becomes a candidate.”

¹⁵ AS 15.13.400(7)(B): “expenditure” (B) does not include a candidate’s filing fee or the cost of preparing reports and statements required by this chapter.”

¹⁶ For example, AS 15.25.050, requiring a \$30 filing fee for the offices State Senate or State Representative.

license with the State of Alaska. But although the group pays yearly fees to the state to maintain its licensure, it does not report its annual license fees as an APOC expenditure. Similarly, a topical review of state business licenses show numerous candidates and groups who maintain or have maintained a business license, yet they – like the Alaska Republican Party – do not report those expenses as campaign expenditures. Anecdotally, Staff is aware that banking personnel sometimes advise persons to acquire a business license or an Employee Identification Number in order to open a campaign depository, as happened with Respondent and perhaps others license holders as well.

For all of the above reasons, APOC staff finds Respondent did not violate campaign disclosure law by registering a business in his campaign's name or by failing to report the license fees as campaign expenditures and recommends the Commission dismiss the complaint relating to these allegations.

MAXIMUM POTENTIAL CIVIL PENALTIES

The maximum civil penalty for receiving and failing to return an excessive campaign contribution is \$50 per day for each day the violation continues.¹⁷ For purposes of calculating the penalty for failing to return the excessive and prohibited contribution, the penalty runs from the deadline to return the February 27, 2025 prohibited contribution 10 days after receipt¹⁸ (March 9, 2025) through the date of the complaint filing, December 23, 2025, which results in an accrual period of 289 days and a maximum penalty of \$14,450.

MITIGATION CRITERIA

When APOC staff assesses a penalty, the starting point for calculating the penalty is 2 AAC 50.855. Here, the regulation enables staff to reduce the maximum statutory

¹⁷ AS 15.13.390(a)(1).

¹⁸ 2 AAC 50.266(a).

assessment to 50% of the maximum penalty, to \$7,225, as the election cycle was Respondent's first.¹⁹

Once the statutory assessment is calculated under 2 AAC 50.855, APOC staff may recommend mitigation criteria to reduce or waive the penalty under 2 AAC 50.865. While many mitigating factors of the regulation refer to filings, violations resulting in penalty assessments nevertheless are subject to appeal, and mitigation under the regulation is appropriate. Here, APOC staff recommends a reduction based upon the unique circumstances²⁰ that the \$7,225 penalty is significantly disproportional to an acceptance of the excessive \$140. Respondent was an inexperienced filer participating in his first election cycle. APOC staff also considers the minimal campaign activity; Respondent collected contributions of approximately \$3,300, of which approximately one third were personal funds.²¹

Given the above considerations, APOC staff recommends the following: A 98% reduction of the \$7,225 penalty to \$143.75. Respondent must also return the excess \$140 from the cash contribution and amend his reports within 30 days of any Commission order in this matter. Walker carried forward \$76.50 in future campaign account funds;²² because a candidate cannot retain prohibited contributions, the \$76.50 must be disgorged for Walker to disburse them to the contributor as part of the full \$140 to be returned.²³

¹⁹ 2 AAC 50.855(b)(2)(C)(i).

²⁰ 2 AAC 50.865(b)(6)

²¹ [105-day report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47734&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47734&ViewType=CD>.

²² *Id.*

²³ [AO 11-12-CD Lindeke](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4794), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4794>, pp. 2-3.

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Kyle Walker 20633 Eagle River Road Eagle River, AK 99577 c.killgore@shipcreekgroup.com WalkerForAssembly@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Randall Ruedrich 1513 W. 13 th Avenue Anchorage, AK 99501 raraep@gci.net	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

Cari Rousselle

03/20/2026

Signature

Date