

[TAB 3]

Lobbying Civil Penalty Appeals

Presented By:

Heather Dalberg, Paralegal



ALASKA PUBLIC OFFICES COMMISSION
STAFF RECOMMENDATION FOR COMMISSION ACTION

PREPARED BY: Heather Dalberg DATE: May 15, 2026

RESPONDENT: Alaska Yellow Dispatch, LLC

CIVIL PENALTY
ASSESSED UNDER: Lobbying: AS 24.45.141, 2 AAC 50.855

REASON FOR FILING: Employer of Lobbyist

LATE REPORT(S): Lobbyist and Employer of Lobbyist Reports
 Lobbyist Report
 Employer of Lobbyist Report¹
 Other

DUE DATE: February 2, 2026

FILED ON: February 6, 2026

DAYS LATE: 4

DATE DELINQUENCY NOTICE(S) SENT: February 6, 2026

CPA APPEAL RECEIVED: March 3, 2026

MAXIMUM STATUTORY PENALTY: \$40.00

PENALTY ASSESSED: \$40.00

RECOMMENDATION: Waive
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

Due to reminder emails from APOC staff going into the spam/junk folders, affiant was unaware of her reporting expectation. As this was a zero report, Alaska Yellow Dispatch, LLC requests a waiver of the penalty.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=35771&ViewType=LOEM>

STAFF’S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered employer of a lobbyist, Alaska Yellow Dispatch, LLC is required to file employer of lobbyist reports quarterly after registering with a lobbyist.² The report at issue was due on February 2, 2026.

APOC staff emails courtesy reminders throughout the month leading up to deadline. These emails were filtered into the affiant’s spam/junk folders, and they were unaware of the reporting requirement. APOC staff sent emails following the deadline to alert the affiant of the delinquent report. On February 6, 2026, APOC staff copied the affiant’s hired lobbyist on the email. The lobbyist received the email in his inbox and was able to reach his client to inform them of the late report. The affiant promptly filed the report.

Mitigation criteria allows for a reduction of up to 50% of the maximum civil penalty when the filer has a good filing history (no late filings in the previous 5 years).³ This is the filer’s first late filed report.

Mitigation criteria allows for a reduction of up to 50% of the maximum civil penalty when the filer is an inexperienced filer (a person required to file reports has been subject to a registration or reporting requirement for less than 365 days).⁴ The filer registered for the first time with APOC on July 2, 2026.

Mitigation criteria allows for a reduction of up to 50% of the maximum civil penalty when the reported information has a value of \$100.00 or less.⁵ The report had a value of \$0.00.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver when a late report did not cause significant harm to the public. A late report did not cause significant harm to the public when the dollar amount is \$100 or less or the missing information is readily available to the public through another forum.⁶ In this case, the report is less than \$100 in value and the filer’s lobbyist submitted his report timely to reflect the zero-activity report.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver when the civil penalty is significantly out of proportion to the degree of harm to the public for not having the information. An assessed penalty is significantly out of proportion if it exceeds the value of the transactions that were not reported or were reported late.⁷ In this case, the assessed penalty of \$40.00 exceeds the reported \$0.00.

Based on the foregoing, APOC staff recommends a full waiver of the associated penalty.

² AS 24.45.061(b)

³ 2 AAC 58.865(a)(1)(A)

⁴ 2 AAC 58.865(a)(1)(B)

⁵ 2 AAC 58.865(a)(3)

⁶ 2 AAC 58.865(b)(4)

⁷ 2 AAC 58.865(b)(5)

FILER'S REPORTING HISTORY:

This is the first late report from this filer.

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends a full waiver of the penalty based on a good filing history, an inexperienced filer, the reported information has a value of \$100.00 or less, no significant harm to the public, and the civil penalty is significantly out of proportion to the degree of harm to the public for not having the information.

Staff finds the following mitigation criteria applicable to the respondent's appeal:

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- Good filing history (no late filings in the previous 5 years). 2 AAC 50.865(a)(1)(A)
- Inexperienced filer.⁸ 2 AAC 50.865(a)(1)(B)
- Technical error at APOC. 2 AAC 50.865(a)(2)
- Reported information had a value of \$100 or less. 2 AAC 50.865(a)(3)
- Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. 2 AAC 50.865(a)(4)

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- Personal catastrophe/emergency or incapacitating illness. 2 AAC 50.865(b)(1)
- APOC Staff error. 2 AAC 50.865(b)(2)
- Report included only administrative costs. 2 AAC 50.865(b)(3)
- No significant harm to the public and no aggravating factors.⁹ 2 AAC 50.865(b)(4)
- The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.¹⁰ 2 AAC 50.865(b)(5)
- A unique circumstance. 2 AAC 50.865(b)(6)

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- Relying on another person or mailroom to mail or submit the statement timely. 2 AAC 50.865(c)(1)
- Forgetting to file. 2 AAC 50.865(c)(2)

⁸ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁹ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

¹⁰ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions.

- Being a volunteer. **2 AAC 50.865(c)(3)**
- Having no change in data from previous statements on file. **2 AAC 50.865(c)(4)**
- Reliance on filer's own staff to remind him or her of the filing deadline. **2 AAC 50.865(c)(5)**
- Being too busy to file. **2 AAC 50.865(c)(6)**
- Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. **2 AAC 50.865(c)(7)**

Aggravating Factors [2 AAC 50.865(d)]:

- Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.¹¹ **2 AAC 50.865(d)(1)**
- More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

- Waived**
- Reduced by _____ to _____**
- Upheld at the assessed amount of _____**

¹¹ Value greater than \$1000.

ARRIVED

MAR 03 2026

APOC-JUNEAU
PM HC FAX-EM

Civil Penalty Appeal Affidavit
AS 24.45 Alaska Lobbying Law

Name of Appellant

(Lobbyist or Employer): Alaska Yellow Dispatch, LLC

Employer (if a lobbyist): _____

Penalty issued in connection with (check box or boxes):

- Lobbyist Report for _____ (month or quarter)
 Employer of Lobbyist Report for 4th quarter (quarter)

Specify Year: 2025

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of AS 24.45, the Alaska Lobbying Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

There were no transactions during the fourth quarter. I sincerely apologize for the delay in completing this report. Unfortunately, the emails from the State APOC were directed to my spam/junk folders, and I was therefore unaware of the reporting requirement. Again, I apologize for any inconvenience this may have caused and truly appreciate your understanding.

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date: 03/03/2026

Type/Print Signer's Name: Karen Chua



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

February 6, 2026

Alaska Yellow Dispatch L.L.C.
ATTN: Karen Chua
PO Box 241606
Anchorage, AK 99524

RE: 4th Quarter Employer of Lobbyist Report Civil Penalty Assessment

Dear Ms. Chua:

According to our records you did not file your 4th Quarter Employer of Lobbyist Report that was due on February 2, 2026. Instead, your report was filed on February 6, 2026 (4 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$40.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; or, you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.
- 2) Alternatively, you have the right to appeal staff's conclusion that a violation has occurred or the penalty amount assessed.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission to consider concerning the violation and the penalty amount. You will receive a copy of that recommendation and a notification of when the Commission will meet to consider the matter. When the Commission reviews the appeal and recommendation you will have the opportunity to participate in the meeting either in person or telephonically.

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General's Office.

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Alaska Yellow Dispatch LLC ATTN: Karen Chua PO Box 241606 Anchorage, AK 99524 karen@alaskayellowdispatch.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
 Signature	2/6/26 Date

Encl: Civil Penalty Appeal Affidavit

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee \$ _____

Extra Services & Fees (check box, add fee as appropriate)

Return Receipt (hardcopy) \$ _____

Return Receipt (electronic) \$ _____

Certified Mail Restricted Delivery \$ _____

Adult Signature Required \$ _____

Adult Signature Restricted Delivery \$ _____

Postage \$ _____

Total Postage and Fees \$ _____

Postmark
Here

Sent To *AK Yellow Dispatch* *City, State, ZIP+4*

Street and Apt. No., or PO Box No. *PO Box 241606*

City, State, ZIP+4 *Anchorage, AK 99524*

PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions

9589 0710 5270 2160 8317 74

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Alaska Yellow Dispatch
ATTN: K. Chua
PO Box 241606
Anchorage, AK 99524



9590 9402 6609 1028 5129 45

2. Article Number (Transfer from service label)

9589 0710 5270 2160 8317 74

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent Addressee
x Colleen Antorako

B. Received by (Printed Name) C. Date of Delivery
COLLEEN M. TORRALBA *2-12-26*

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below:

3. Service Type
- Adult Signature Priority Mail Express®
- Adult Signature Restricted Delivery Registered Mail™
- Certified Mail® Registered Mail Restricted Delivery
- Certified Mail Restricted Delivery Signature Confirmation™
- Collect on Delivery Signature Confirmation Restricted Delivery
- Collect on Delivery Restricted Delivery Signature Confirmation Restricted Delivery

Domestic Return Receipt

EMPLOYER OF LOBBYIST REPORT FORM

AMENDMENT

Amendment Description: removing municipal lobbying cost

COMPLETED

Signed **05/12/2026**
Year: **2025**
Report: **4th Quarter**

Filer First Name: **TERESITA**
Filer Middle Name:
Filer Last Name: **ANGGO**

EMPLOYER INFORMATION

Employer Name: **Alaska Yellow Dispatch L.L.C.**

Mailing Address: **PO BOX 241606**
City, State Zip: **Anchorage, Alaska 99524**
Phone: **(907) 222-2233**
E-mail: **karen@alaskayellowdispatch.com**
Fax:

GIFTS

Date	Name	Position	Nature of Gift	Value
No Gifts Given				

NOTICE OF TERMINATION

Lobbyist Name	Termination Date
No Notice of Terminations	

INTERESTS OF EMPLOYER

General description of the legislative and administrative action the employer of lobbyist attempted to influence during the period. Report specific bill numbers when possible. AS 24.45.061(a)(5).

Title 11 of the Muni code

Nature and interest of the entity employing or retaining lobbying services:
Transportation and Fees

SCHEDULE A (COMPENSATION AND EXPENSES PAID TO OR ON BEHALF OF THE LOBBYIST)

Lobbyist Name	Compensation		Expenses	
2025 - Parish, David (David Parish & Associates, LLC)	No Activity		No Activity	
	Totals		Totals	
	This Report	\$0.00	This Report	\$0.00
	Previous Total	\$0.00	Previous Total	\$0.00
	New Total	\$0.00	New Total	\$0.00

SCHEDULE B (COSTS RELATED TO LOBBYING)

In-House Costs Related to Lobbying

Employee Name	Lobbying Activity	Support of Lobbying	Amount
No In-House Lobbying Costs			

Outsourced Costs Related to Lobbying

Date	Payee/Vendor	Address	Purpose	Amount
No Outsourced Lobbying Costs				

Costs Related to Lobbying Totals

This Report	\$0.00
Previous Total	\$0.00
New Total	\$0.00



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

May 15, 2026

Alaska Yellow Dispatch, LLC
ATTN: Teresita Anggo
PO Box 241606
Anchorage, AK 99524
teresita@alaskayellowdispatch.com

Re: COMMISSION MEETING NOTICE

Ms. Anggo:

At its June 2, 2026 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Employer of Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 269275710#, Phone Conference ID: 269 275 710#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **1:00 p.m. on Tuesday, June 2, 2026**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

Alaska Yellow Dispatch, LLC
ATTN: Teresita Anggo
PO Box 241606
Anchorage, AK 99524
teresita@alaskayellowdispatch.com



Paralegal II

5/15/26

Date



**ALASKA PUBLIC OFFICES COMMISSION
STAFF RECOMMENDATION FOR COMMISSION ACTION**

PREPARED BY: Heather Dalberg **DATE:** May 15, 2026

RESPONDENT: City of King Cove

**CIVIL PENALTY
ASSESSED UNDER:** **Lobbying: AS 24.45.141, 2 AAC 50.855**

REASON FOR FILING: Employer of Lobbyist

LATE REPORT(S): **Lobbyist and Employer of Lobbyist Reports**
 Lobbyist Report
 Employer of Lobbyist Report¹
 Other

DUE DATE: February 2, 2026

FILED ON: February 9, 2026

DAYS LATE: 7

DATE DELINQUENCY NOTICE(S) SENT: February 9, 2026

CPA APPEAL RECEIVED: February 10, 2026

MAXIMUM STATUTORY PENALTY: \$70.00

PENALTY ASSESSED: \$70.00

RECOMMENDATION: Waive
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

The person responsible for filing the employer of lobbyist reports for City of King Cove was in an accident on Saturday, January 31st, and was out of work for a week to recover.

¹ <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=35262&ViewType=LOEM>

STAFF’S ANALYSIS OF FACTS FOR COMMISSION REVIEW

As a registered employer of a lobbyist, City of King Cove is required to file employer of lobbyist reports quarterly after registering with a lobbyist.² The report at issue was due on February 2, 2026.

APOC staff emails courtesy reminders throughout the month leading up to deadline. Following the deadline, APOC staff sent the City of King Cove delinquent report emails daily. On February 6, 2026, APOC staff copied the lobbyist on the email. The lobbyist reached out to the person responsible for filing and she responded to APOC staff to inform them that she had been in a car accident over the weekend before the final due date of the report. She was home recovering and would file the report as soon as she was back in the office. On February 9, 2026, the filer returned to the office and filed the report promptly.

Mitigation criteria allows for a reduction of up to 50% of the maximum civil penalty when the filer has a good filing history (no late filings in the previous 5 years).³ This is the filer’s first late filed report in the previous 5 years, and their second since 2009.

Mitigation criteria allows for a reduction of greater than 50%, up to a complete waiver when there is a unique circumstance.⁴ In this case, the filer was unable to access her work computer and accounting information while out of the office recovering from an accident.

Based on the foregoing, APOC staff recommends a full waiver of the associated penalty.

FILER’S REPORTING HISTORY:

This is the second late report from this filer, but the first in the previous 5 years.

STAFF’S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff recommends a full waiver of the penalty based on a good filing history and unique circumstance.

Staff finds the following mitigation criteria applicable to the respondent’s appeal:

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- Good filing history (no late filings in the previous 5 years). **2 AAC 50.865(a)(1)(A)**
- Inexperienced filer.⁵ **2 AAC 50.865(a)(1)(B)**
- Technical error at APOC. **2 AAC 50.865(a)(2)**
- Reported information had a value of \$100 or less. **2 AAC 50.865(a)(3)**
- Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. **2 AAC 50.865(a)(4)**

² AS 24.45.061(b)

³ 2 AAC 58.865(a)(1)(A)

⁴ 2 AAC 58.865(b)(6)

⁵ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- Personal catastrophe/emergency or incapacitating illness. 2 AAC 50.865(b)(1)
- APOC Staff error. 2 AAC 50.865(b)(2)
- Report included only administrative costs. 2 AAC 50.865(b)(3)
- No significant harm to the public and no aggravating factors.⁶ 2 AAC 50.865(b)(4)
- The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.⁷ 2 AAC 50.865(b)(5)
- A unique circumstance. 2 AAC 50.865(b)(6)

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- Relying on another person or mailroom to mail or submit the statement timely. 2 AAC 50.865(c)(1)
- Forgetting to file. 2 AAC 50.865(c)(2)
- Being a volunteer. 2 AAC 50.865(c)(3)
- Having no change in data from previous statements on file. 2 AAC 50.865(c)(4)
- Reliance on filer's own staff to remind him or her of the filing deadline. 2 AAC 50.865(c)(5)
- Being too busy to file. 2 AAC 50.865(c)(6)
- Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. 2 AAC 50.865(c)(7)

Aggravating Factors [2 AAC 50.865(d)]:

- Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁸ 2 AAC 50.865(d)(1)
- More than one late filing in the preceding 5 years. 2 AAC 50.865(d)(2)(A)
- Evidence suggesting deliberate non-reporting. 2 AAC 50.865(d)(2)(B)
- Failure to cooperate with staff. 2 AAC 50.865(d)(2)(C)
- A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. 2 AAC 50.865(d)(2)(D)

⁶ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

⁷ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions.

⁸ Value greater than \$1000.

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

Waived

Reduced by _____ to _____

Upheld at the assessed amount of _____

ARRIVED

FEB 10 2026

APOC-JUNEAU
PM HC FAX EM

Civil Penalty Appeal Affidavit
AS 24.45 Alaska Lobbying Law

Name of Appellant
(Lobbyist or Employer): CITY OF KING COVE

Employer (if a lobbyist): _____

Penalty issued in connection with (check box or boxes):

Lobbyist Report for _____ (month or quarter)
 Employer of Lobbyist Report for 4TH QUARTER (quarter)

Specify Year: 2025

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths and must be mailed or faxed to APOC within thirty (30) days of your notice of civil penalty assessment.

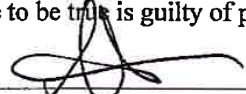
Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of AS 24.45, the Alaska Lobbying Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

AS ASST CITY ADMINISTRATOR
FOR THE CITY OF KING COVE, I AM RESPONSIBLE
FOR FILLING OUT THE QUARTERLY LOBBYING
REPORTS. I WAS IN AN ACCIDENT ON
SATURDAY, JANUARY 31ST AND WAS OUT OF
WORK FOR A WEEK. PUBLIC CRASH REPORT 56791
INCIDENT 55178

Certification: I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date:  2/10/2026

Type/Print Signer's Name: AMBER JOSEFOWYTCH



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

P.O. Box 110222
240 Main Street, Room 201
Juneau, Alaska 99811-0222
Main: 907.465.4864
Toll Free in Alaska: 866.465.4864
Email: doa.apocjnu@alaska.gov
www.doa.alaska.gov/apoc

February 9, 2026

City of King Cove
ATTN: Amber Jusefowytch
3380 C St, Suite 250
Anchorage, AK 99503-3952

RE: 4th Quarter Employer of Lobbyist Report Civil Penalty Assessment

Dear Ms. Jusefowytch:

According to our records you did not file your 4th Quarter Employer of Lobbyist Report that was due on February 2, 2026. Instead, your report was filed on February 9, 2026 (7 days late). By law a maximum penalty of \$10.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$70.00.²

You have a number of options in this matter:

- 1) You may pay this penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; or, you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.
- 2) Alternatively, you have the right to appeal staff's conclusion that a violation has occurred or the penalty amount assessed.³ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁴

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission to consider concerning the violation and the penalty amount. You will receive a copy of that recommendation and a notification of when the Commission will meet to consider the matter. When the Commission reviews the appeal and recommendation you will have the opportunity to participate in the meeting either in person or telephonically.

¹ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

² 2 AAC 50.855(a).

³ AS 15.13.390(a); AS 39.50.135; AS 24.60.240; AS 24.45.141.

⁴ 2 AAC 50.831(a).


Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General's Office.

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION



Heather Dalberg
Paralegal II
heather.dalberg@alaska.gov
(907) 465-4864

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
City of King Cove ATTN: Amber Jusefowytch 3380 C St, Suite 250 Anchorage, AK 99503-3952 amberj@kingcoveak.org	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
 Signature	2/19/26 Date

Encl: Civil Penalty Appeal Affidavit

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com™.

OFFICIAL USE

9589 0710 5270 2160 8317 81

Certified Mail Fee \$	Postmark Here
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy) \$	
<input type="checkbox"/> Return Receipt (electronic) \$	
<input type="checkbox"/> Certified Mail Restricted Delivery \$	
<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
Total Postage and Fees \$	
Sent To <u>City of King Cove</u> 471 a.m. 1st Hr	
Street and Apt. No., or PO Box No. <u>3380 C St Ste 250</u>	
City, State, ZIP+4® <u>Anchorage AK 99503-3952</u>	
PS Form 3800, January 2023 PSN 7530-02-000-9047 See Reverse for Instructions	

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

City of King Cove
ATTN Jusefowytch
3380 C St, Suite 250
Anchorage, AK 99503-3952



9590 9402 6609 1028 5129 21

2. Article Number (Transfer from service label)

9589 0710 5270 2160 8317 81

COMPLETE THIS SECTION ON DELIVERY

A. Signature

[Signature]

- Agent
 Addressee

B. Received by (Printed Name)

Glennora Doshian

C. Date of Delivery

6/21/26

D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type

- Adult Signature
 Adult Signature Restricted Delivery
 Certified Mail®
 Certified Mail Restricted Delivery
 Collect on Delivery
 Collect on Delivery Restricted Delivery
 Insured Mail
 Mail Restricted Delivery
- Priority Mail Express®
 Registered Mail™
 Registered Mail Restricted Delivery
 Signature Confirmation™
 Signature Confirmation Restricted Delivery

PS Form 3811, July 2020 PSN 7530-02-000-9053

Domestic Return Receipt

EMPLOYER OF LOBBYIST REPORT FORM

COMPLETED

Signed 02/09/2026

Year: 2025

Report: 4th Quarter

Filer First Name: Amber

Filer Middle Name:

Filer Last Name: Jusefowytsh

EMPLOYER INFORMATION

Employer Name: City of King Cove

Mailing Address: 3380 C St, Suite 250

City, State Zip: ANCHORAGE, Alaska 99503-3952

Phone: 9072687300

E-mail: Smason@kingcoveak.org

Fax: 907-777-1648

GIFTS

Date	Name	Position	Nature of Gift	Value
No Gifts Given				

NOTICE OF TERMINATION

Lobbyist Name	Termination Date
No Notice of Terminations	

INTERESTS OF EMPLOYER

General description of the legislative and administrative action the employer of lobbyist attempted to influence during the period. Report specific bill numbers when possible. AS 24.45.061(a)(5).

Provide lobbying services to the City as agreed upon to be in the best interest of the City.

Nature and interest of the entity employing or retaining lobbying services:

Lobbying efforts on behalf of the City for municipal interests

SCHEDULE A (COMPENSATION AND EXPENSES PAID TO OR ON BEHALF OF THE LOBBYIST)

Lobbyist Name	Compensation		Expenses	
	2025 - Hickey, Mark (Hickey & Associates)	Fee / Salary	\$12,500.00	Food / Beverage
Other		\$0.00	Living	\$0.00
		Travel	\$0.00	
		Other	\$0.00	
Totals		Totals		
This Report		\$12,500.00	This Report	\$0.00
Previous Total		\$37,500.00	Previous Total	\$0.00
New Total		\$50,000.00	New Total	\$0.00

SCHEDULE B (COSTS RELATED TO LOBBYING)

In-House Costs Related to Lobbying

Employee Name	Lobbying Activity	Support of Lobbying	Amount
No In-House Lobbying Costs			

Outsourced Costs Related to Lobbying

Date	Payee/Vendor	Address	Purpose	Amount
No Outsourced Lobbying Costs				

Costs Related to Lobbying Totals

This Report	\$0.00
Previous Total	\$0.00
New Total	\$0.00



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

May 15, 2026

City of King Cove
ATTN: Amber Jusefowytch
3380 C St., Suite 250
Anchorage, AK 99503-3952
amberj@kingcoveak.org

Re: COMMISSION MEETING NOTICE

Ms. Jusefowytch:

At its June 2, 2026 Commission Meeting in Anchorage, the Commission will review the matter of your delinquent Employer of Lobbyist Report. I have enclosed the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting by telephone (1-907-202-7104, Access Code 269275710#, Phone Conference ID: 269 275 710#) or by Microsoft Teams.¹ Please notify our office if you intend to participate. CPAs for Lobbyist and Employer of Lobbyist Reports are expected to begin at **1:00 p.m. on Tuesday, June 2, 2026**. Staff will send you a copy of the final decision by the Commission. If you have any questions, contact APOC.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

A handwritten signature in black ink, appearing to read "Heather Dalberg".

Heather Dalberg
APOC Paralegal II

Encl: Staff Recommendation

¹ If you choose to participate via Microsoft Teams, please contact our offices so that we may send you a meeting invitation.

Certificate of Service I emailed and certified mailed a true and correct copy of the foregoing to:

City of King Cove
ATTN: Amber Jusefowytch
3380 C St., Suite 250
Anchorage, AK 99503-3952
amberj@kingcoveak.org



Paralegal II

5/15/22 Date