[TAB 3]

Complaint 26-13-POFD, *Borgquist v. Wilson*

Presented By:

Heather Hebdon, Executive Director

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Joel Borgquist,	)	
	)	
Complainant,	)	
	)	
vs.	)	Case No. **26-13-POFD**
	)	
Bernadette Wilson,	)	
	)	
Respondent.	)	
	)	

NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing in these cases will take place before the Alaska Public Offices Commission at approximately 10:30 a.m. on Tuesday, October 6, 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: 133 537 561#), 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 September 29, 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 public official financial disclosure law by failing to disclose her ownership interest in Denali Disposal, Inc and the clients of the business as sources of income.
3) **Procedural history.** Complainant Joel Borgquist filed an expedited complaint against Respondent Bernadette Wilson on September 8, 2026. Respondent filed an opposition to expedited consideration on September 10, 2026. The Commission held a hearing and denied the request for expedited consideration on September 10, 2026. On September 14, 2026 the Commission issued its written order and directed staff to investigate the allegations, issue a

[1] Meeting ID: 249 420 002 013 246, Passcode: Zc3Cb3Ju

report of its findings on or before September 21, 2026 and to schedule a hearing on the merits to be held on or before October 8, 2026. Staff's investigation report recommending the complaint be upheld in part and dismissed in part was issued September 21, 2026.

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 September 30, 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 October 4, 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: September 25, 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:	
Zachary Wallen Chalmers, Adams, Backer & Wallen, LLC 301 South Hills Village Dr., Ste. LL200-420 Pittsburgh, PA 15241 zwallen@chalmersadams.com Robert Stone rob@stonelawalaska.com	☒ Certified Mail ☒ Email ☒ Email Only
Joel Borgquist 18730 Mills Bay Road Eagle River, AK 99577 Joel.gjj@gmail.com	☒ First Class Mail ☒ Email

Cari Rousselle 09/25/2026

Signature Date

THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Administration
ALASKA PUBLIC OFFICES COMMISSION
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TO: APOC Commissioners
DATE: September 21, 2026
FROM: Heather Hebdon, Executive Director
SUBJECT: Staff Report, Complaint 26-13-POFD, *Joel Borgquist v. Bernadette Wilson*

SUMMARY OF COMPLAINT AND RESPONSE

On September 8, 2026, Joel Borgquist filed a complaint against candidate for Governor, Bernadette Wilson, requesting expedited consideration.[1] The complaint alleges that Ms. Wilson's 2026 Candidate Public Official Financial Disclosure ("POFD") Statement failed to list her ownership interest in Denali Disposal, Inc. ("DDI") and failed to identify, as sources of income, clients that paid DDI more than $1,000 during calendar year 2025.[2]

On September 10, 2026, Ms. Wilson filed an opposition to the request for expedited consideration relying largely on procedural and due process concerns.[3]

On September 10, 2026, the Commission held a special hearing to consider whether the complaint set forth sufficient grounds to merit consideration on an expedited basis. After consideration of the arguments presented by complainant and respondent, the Commission declined to grant expedited consideration.[4] The Commission ordered an

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[1] Complaint 26-13-POFD, https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28147.
[2] *Id.*
[3] Opp to Request for Expedited Consideration, https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28166.
[4] Order Denying Expedited Consideration, https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28167

abbreviated timeline for investigation and a hearing on the merits to occur on or before October 8, 2026.[5]

FACTS

On May 29, 2026, Ms. Wilson filed a 2026 Candidate POFD Statement for her candidacy in the 2026 state election.[6]

Ms. Wilson's POFD disclosed salaried income from DDI, Alaska Policy Forum, and Alaskans for Nick Begich, a real property interest, and a beneficial interest.[7] The POFD did not disclose any business interests.[8]

Mr. Borquist's complaint provided a copy of DDI's 2026 Biennial Report filed with the State of Alaska's Division of Corporations, Business, and Professional Licensing demonstrating Ms. Wilson's 75% ownership in DDI and alleges that Ms. Wilson failed to disclose DDI as a business interest and that she failed to disclose DDI's clients as sources of income.[9]

LAW AND ANALYSIS

Alaska's POFD statutes require state candidates to file a statement disclosing personal business and financial interests at the time they declare for office.[10] The statement must be an accurate representation of the candidate's financial affairs, covers the preceding year, and must disclose all sources of income over $1,000, to the extent that is ascertainable.[11] Reportable income includes compensation from an employer as well as self-employment income.[12] When the person is "self-employed" by a corporation, such as

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[5] *Id.*
[6] 2026 Candidate POFD, https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=34142&ViewType=POFD.
[7] *Id.*
[8] *Id.*
[9] Complaint 26-13-POFD at Ex. B.
[10] AS 39.50.020(a).
[11] AS 39.50.030(b)(1). The statement must disclose the same information for the candidate's spouse and dependent children; AS39.50.030(b)(2).
[12] 2 AAC 50.685.

DDI, and the filer holds a controlling interest in the corporation, the source of income is the client or customer of the business.[13]

Here, Ms. Wilson reported salaried income from DDI. Mr. Borgquist alleged that based on her 75% controlling interest in DDI, she was also required to identify each client or customer that paid DDI more than $1,000. This is correct only if Ms. Wilson was "self-employed" by DDI.

The terms "self-employed" or "self-employment" are specifically defined and includes a two-part test to determine if a person is self-employed.[14] First, the person must have an ownership interest in the business entity from which that person derives income. The second part states that the person must be directly and actively involved with clients or customers of the business by soliciting the business of the client or customer or; by personally providing services to the patient or customer. Here, Ms. Wilson meets the first part of that test; she has ownership interest in DDI and also derives salaried income from DDI as the General Manager.[15] However, through her affidavit, she states that she does not engage in sales for DDI or solicit new or potential clients or customers and that she does not personally provide any services to clients or customers.[16] Rather, she explains that her role with DDI is strictly back office support and focuses on administrative and operations support.[17] Her duties and responsibilities include route management, scheduling equipment maintenance, maintaining schedules for ordering parts, monitoring accuracy for route data and driver paperwork, payroll, human resources, and other administrative functions for the business.[18] She states that sales, soliciting new customers, customer support and client services are all performed by other DDI employees.[19] Given this dynamic, and that Staff found no evidence to the contrary of the facts provided through her affidavit, Ms. Wilson

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[13] AS 39.50.200(a)(10).
[14] 2 AAC 50.799(a).
[15] Exhibit 1, Wilson Affidavit at ¶¶ 6 and 11.
[16] *Id*. at ¶¶ 8-9.
[17] *Id*. at ¶ 7.
[18] *Id*.
[19] *Id*. at ¶¶ 8-9.

does not meet the second part of the "self-employment" test. Accordingly, she was not required to disclose DDI's clients and customers as sources of self-employment income.

In addition to income, a POFD statement must also identify by name and address, each business in which the filer held an interest or was an owner, director or partner and the nature of the interest held.[20] DDI's 2026 Biennial Report identifies Ms. Wilson as 75% owner, President, Director, and Stockholder of DDI.[21] As such, Ms. Wilson was required to disclose her ownership interest in DDI. Both the statute and the instructions for Schedule B clearly indicate that both the income from a business interest and the business interest itself must be separately reported. Although Ms. Wilson disclosed income from DDI, that alone does not identify her ownership interest in DDI and because DDI was not separately disclosed as a business interest she violated AS 39.50.030(2).

FINANCIAL DISCLOSURE STATEMENT

State Candidate - 2026 - State Primary - State Senate District D - Report From: 1/1/2025 To: 12/31/2025

SCHEDULE B: BUSINESS INTERESTS Remove Export Import

BUSINESS INTERESTS NONE / Not Applicable ⇒ ☐

- Report business interests even if they were NOT a source of income, including businesses in which the filer or family member (spouse, domestic partner, dependent children and, for legislative branch filers ONLY, nondependent children living with the filer):
  1. Served as stockholder, owner, officer, director, partner, proprietor, employee or held an interest.
  2. Had ownership interests of more than $1,000 in a publicly traded corporation.
  3. Had any other ownership interest in a business, including shares in non-publicly traded corporations, sole proprietorships, limited liability companies. Include options to buy.
  4. Include non-profit organizations, corporations, businesses, associations, trade groups.
- If the business was a source of income over $1,000, it must also be reported in Schedule A.

No Interest Found.
Click here to add new source of Interest

Save & Resume Later Previous Next

10 / 19

CONCLUSION

APOC staff finds that Ms. Wilson is not, by definition, self-employed by DDI and was not required to identify DDI's clients or customers as sources of income and recommends those allegations be dismissed. However, because DDI was not identified as a business interest, Ms. Wilson violated AS 39.50.030(b)(2).

[20] AS 39.50.030(b)(2); 2 AAC 50.708.
[21] Complaint 26-13-POFD at Ex. B.

MAXIMUM POTENTIAL CIVIL PENALTIES

Ms. Wilson's POFD was filed on May 29, 2026.[22] Accordingly, the violation continued for 102 days until the Complaint was accepted on September 8, 2026. The civil penalty for such a violation is $10 per day.[23] The maximum civil penalty in this matter is $1,020.

PENALTY ASSESSMENT AND MITIGATION CRITERIA

When APOC staff assesses a penalty, the starting point for calculation is 2 AAC 50.855. Here, where the issue is not timeliness of the filing but rather missing information, staff looks to 2 AAC 50.855(b)(3) which enables staff to document the violation and not assess a penalty when the missing information is readily available to the public through another forum. Staff finds no evidence of an intent to deceive or hide her ownership of DDI, only that she failed to report it as a business interest in addition to identifying it as a source of income. And as evidenced by the complaint, her ownership of DDI was publicly available through the state's corporations database.

APOC staff may also recommend mitigation criteria to reduce or waive a penalty under 2 AAC 50.865. The criteria provides for reductions when the filer is inexperienced and also in instances where the penalty is significantly out of proportion to the degree of harm to the public for not having the information required to be reported.[24] Here, this was Ms. Wilson's first time filing a POFD statement and there is no evidence of an intent to deceive or mislead the public; her statement did not fail to disclose or misreport the income she received from DDI, rather it failed to disclose her ownership of DDI.

Based on these circumstances, APOC staff recommends that Ms. Wilson be directed to amend her statement to fully disclose her ownership interest in DDI and that penalties be waived.

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[22] 2026 Candidate POFD.
[23] AS 39.50.135.
[24] 2 AAC 50.865(a)(1)(B); 2 AAC 50.865(b)(4) [there is no significant harm to the public when the dollar amount missing is less than $100].

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Zachary Wallen Chalmers, Adams, Backer & Wallen, LLC 301 South Hills Village Dr., Ste. LL200-420 Pittsburgh, PA 15241 zwallen@chalmersadams.com Robert Stone rob@stonelawalaska.com	☒ Certified Mail ☒ Email ☒ Email Only
Joel Borgquist 18730 Mills Bay Road Eagle River, AK 99577 Joel.gjj@gmail.com	☒ First Class Mail ☒ Email

Cari Rousselle 09/21/2026

Signature Date

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

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9/21/2026
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Joel C. Borgquist,	:	
Complainant,	:	
v.	:	CASE NO. 26-13-POFD
Bernadette Wilson,	:	
Respondent.	:	

AFFIDAVIT OF BERNADETTE WILSON

Bernadette Wilson, being duly sworn, deposes and says:

1. I am over 18 years of age, of sound mind and otherwise competent to make this Affidavit, which may be offered into evidence in the above captioned matter.

2. The facts set forth in this Affidavit are based on facts known to me personally.

3. I am one of the owners of Denali Disposal, Inc., a refuse company located in Anchorage, Alaska.

4. The focus of Denali Disposal's business is providing refuse services to businesses in the Anchorage area.

5. Denali Disposal's business is commercial refuse. This means that nearly all of its customers are businesses rather than individuals. By contrast, Denali Disposal does not engage in "roll cart" trash collection from individual homes.

6. I serve as Denali Disposal's General Manager, which is how I typically identify myself in connection with my relationship with the business.

7. My role at Denali Disposal is a back office one; focusing on prep and administrative work that occurs behind the scenes. I am responsible for route management, scheduling

maintenance of equipment, maintaining the schedule for ordering parts, entity payroll, HR, data entry from routes, checking for accuracy and consistency between routes and driver paperwork, monitoring solid waste services activity, and assisting with invoice prep and check processing.

8. I do not engage in sales for Denali Disposal, and I do not solicit any new or potential customers, and I do not answer phone calls or emails from potential customers.

9. Moreover, I do not personally provide services to customers. I do not drive or otherwise work on the garbage trucks that service Denali Disposal's customers. I also am not responsible for providing customer support to those client accounts in-office. Instead, that work is done by other employees that drive the garbage trucks that are out on the routes, or by other employes that are in the office.

10. Prior to becoming a candidate for Governor of Alaska, I reviewed the relevant statutory and code sections with legal counsel and compared that language with my roles and responsibilities at Denali Disposal. Upon that review, and based on my particular job responsibilities, I concluded that I was not "self-employed" as that term is defined in 2 AAC 50.799(a).

11. All of my income from Denali Disposal is compensation for my role as General Manager. I reported all of my income from Denali Disposal in the "Income" section of my POFD.

12. While I do have an ownership interest in Denali Disposal, the business has not paid any shareholder distributions (K-1 income) in many years.

13. The statements made in this affidavit are true and correct to the best of my personal knowledge or information and belief.

Affiant states nothing further.

BERNADETTE WILSON

f Alaska
Y PUBLIC
Summers
xpires Dec 15, 2028

State of Alaska)

Third Judicial District)

SUBSCRIBED AND SWORN to before me this 21st day of September, 2026, at Anchorage, Alaska.

State of Alaska
NOTARY PUBLIC
Mary M. Summers
My Commission Expires Dec 15, 2028

Notary Public, State of Alaska
My Commission Expires: 12/15/2028

State
NOTAR
Mary M
My Commission

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Counsel for Respondent

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9/25/2026
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BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

JOEL BORGQUIST, Complainant, v. BERNADETTE WILSON, Respondent.	Case No. 26-13-POFD

ANSWER TO COMPLAINT

INTRODUCTION AND STATUTORY BASIS

This Complaint, brought under AS. 39.50 and the Alaska Administrative Code provisions governing Public Official Financial Disclosure ("POFD") statements, is fundamentally flawed and misleading. Contrary to its allegations, the Complaint fails to identify any willful or material failure to disclose required financial information and instead tries to make a mountain out a molehill by relying on a selective and distorted reading of POFD requirements. The Complaint—one of multiple that Mr. Borgquist filed in eleventh hour attempts to find technical issues with long-filed POFDs of political opponents—ignores the substance of the disclosures that Ms. Wilson

made, misconstrues the scope of what Alaska law requires, and improperly attempts to place outsized emphasis on technical issues.

Indeed, the Staff Report readily identifies the disconnect between the Complaint and the relevant legal requirements and recommends that Ms. Wilson make a slight amendment to her POFD and "that penalties be waived." Staff Report at 5. Ms. Wilson respectfully requests that the Commission adopt the Staff Report in full and close this case.

CLEAR AND CONCISE STATEMENT OF FACTS

Bernadette Wilson is a candidate for Governor of Alaska in the upcoming November General Election. Ms. Wilson is a first-time candidate and has not previously submitted a POFD. In connection with that candidacy, Ms. Wilson filed her candidate POFD on May 29, 2026. No questions were raised about Ms. Wilson's POFD until Mr. Borgquist filed the instant complaint several months later on September 8, 2026.

"Ms. Wilson's POFD disclosed salaried income from DDI, Alaska Policy Forum, and Alaskans for Nick Begich, a real property interest, and a beneficial interest." Staff Report, Complaint 26-13-POFD, at 2.

The Complaint makes two separate allegations against Ms. Wilson: that the POFD "failed to list her ownership interest in Denali Disposal, Inc. ('DDI') and failed to identify, as sources of income, clients that paid DDI more than $1,000 during calendar year 2025." Staff Report at 1.

As to the ownership issue, Ms. Wilson admits that she is one of the owners of Denali Disposal, Inc. In her POFD, Wilson properly disclosed all income that she received from Denali Disposal, Inc. Nonetheless, she inadvertently failed to also list that she had an ownership interest in Denali Disposal in the "Interests" section. Ms. Wilson will promptly correct this issue by amending her POFD.

Ms. Wilson denies that she was required to identify in her POFD statement each client or customer that paid Denali Disposal more than $1,000 in 2025. Such a requirement only exists "if Ms. Wilson was 'self-employed' by DDI." Staff Report at 3. She was not.

Under 2 AAC 50.799, a "self-employed" person is required to disclose their clients who pay them over $1,000 if they satisfy a two-part test. First, a person, such as Ms. Wilson "must have an ownership interest in the business entity in which that person derives income. The second part states that the person must be directly and actively involved with clients or customers of the business by soliciting the business of the client or customer or; by personally providing services to the patient or customer." Staff Report at 3.

While Ms. Wilson does have an ownership interest in Denali Disposal and derives income from her role as General Manager, she does not satisfy the second part of the test.

As outlined in the affidavit that Ms. Wilson provided to the Commission (See Staff Report Exhibit 1), Ms. Wilson "does not engaged in sales for DDI or solicit new or potential clients or customers and that she does not personally provide any services to clients or customers." Staff Report at 3. Instead, Ms. Wilson's role as the company's general manager is administrative-focused work that occurs behind the scenes. She is responsible for route management, scheduling maintenance of equipment, maintaining the schedule for ordering parts, entity payroll, HR, data entry from routes, checking for accuracy and consistency between routes and driver paperwork. Affidavit at ¶ 7.

Ms. Wilson does not engage in sales for Denali Disposal. She does not solicit any new or potential customers, and she does not answer phone calls or emails from potential customers. Affidavit at ¶ 8. She also does not personally provide services to customers. She does not drive or

otherwise work on the garbage trucks that service Denali Disposal's customers. She is also not responsible for providing customer support to those client accounts in-office. Affidavit at ¶ 9.

Since Ms. Wilson does not engage in soliciting clients for Denali Disposal nor does she personally provide any services to any of Denali Disposal's clients, she was not required to identify each client that paid Denali Disposal more than $1,000. Instead, she correctly disclosed Denali Disposal as her source of income.

The remainder of Mr. Borgquist's allegations consist of conclusory assertions and conclusions of law and contain no additional factual allegations that require a response. To the extent that a response is deemed necessary, however, those assertions are expressly denied.

DEFENSES

At all times, Ms. Wilson substantially complied with all applicable disclosure obligations. Because she properly disclosed all income she received from Denali Disposal, there was no missing monetary disclosure, at issue. As such, incomplete disclosure "did not cause significant harm to the public." 2 AAC 50.865(b)(4)(1); *see also* Staff Report at 5. This was simply a technical mistake made by a first-time filer.

Furthermore, the missing information was already readily available to the public as shown in Exhibit B to the Expedited Complaint. Because the "incomplete information is readily available to the public through another forum" the "incomplete report did not cause significant harm to the public." 2 AAC 50.865(b)(4)(C). Moreover, Ms. Wilson will promptly amend her POFD to address this issue, with that amendment to be filed well in advance of the upcoming election.

"[F]inancial disclosure laws have the purpose of promoting efficient, ethical government and preserving the integrity and fairness of the political process both in fact and in appearance." *Falcon v. Alaska Pub. Offs. Comm'n*, 570 P.2d 469, 477 (Alaska 1977). The Alaska Supreme Court

has further explained that disclosure requirements "call for an accurate representation of [Ms. Wilson's] financial interests, but they do not require or imply absolute precision." *See Grimm v. Wagoner*, 77 P.3d 423, 432 (Alaska 2003). Accordingly, Ms. Wilson is required to substantially comply with A.S. 39.50.010 *et seq*.; strict or hypertechnical compliance is not required.

The Alaska Supreme Court adopted the doctrine of substantial compliance "in order to carry out legislative intent and give meaning to all parts of [a] statute without producing harsh and unrealistic results." *Adamson v. Municipality of Anchorage*, 333 P.3d 5, 13 (Alaska 2014). In applying this doctrine, the Commission must "consider the purpose served by the statutory requirements because substantial compliance involves conduct which falls short of strict compliance, but which affords the public the same protection that strict compliance would offer." *Id.* at 14.

Here, all reportable income from Denali Disposal was disclosed, and that income was, at all times, fully ascertainable through a public forum. Moreover, Ms. Wilson's ownership interest in Denali Disposal was a matter of public record, as demonstrated by the Complainant's ability to readily identify those interests through records maintained online by the state.

Ultimately, the touchstone of Alaska's financial disclosure regime is whether the public received an accurate and meaningful representation of a public official's financial affairs. They did here. Ms. Wilson's POFD filings disclosed all reportable income. There is no evidence that Wilson's not listing her ownership interest in the "Interests" section was anything other than inadvertent. *See* Staff Report at 5. Most importantly, the public was, at all times, able to readily ascertain her financial interests.

By contrast, the disclosure statutes were not enacted to punish inadvertent, non-material omissions where the same information was otherwise fully disclosed and readily ascertainable.

Those objectives were fully satisfied. Because the public had an accurate understanding of Ms. Wilson's finances at all relevant times, the purpose of the disclosure regime was met.

PROPOSED REMEDY

Ms. Wilson agrees with the proposed remedy in the Staff Report that "Ms. Wilson be directed to amend her statement to fully disclosure her ownership interest in DDI and that penalties be waived." Staff Report at 5.

Ms. Wilson will amend her POFD as soon as possible. Once that amendment has been made, Ms. Wilson respectfully requests that the Commission close this matter and take no further action in connection therewith.

CONCLUSION

Bernadette Wilson's POFD was substantially compliant with the rules governing financial disclosure. All reportable income from Denali Disposal, Inc. was fully disclosed, Likewise, Ms. Wilson's ownership interest in Denali Disposal, Inc. was a matter of public record and readily ascertainable.

While Ms. Wilson regrets that the "Interests" section was incomplete on the earlier POFD statement, she did not act willfully or with any improper intent, and that omissions did not prevent the public from having an accurate understanding of her financial affairs. Ms. Wilson will promptly amend her POFD to address the issue, demonstrating her willingness to promptly address the issue once notified.

In sum, the objectives of Alaska's disclosure regime have been satisfied. Ms. Wilson's substantial compliance meets the statutory standard, and no additional penalty is warranted.

DATED this 25th day of September, 2026.

Stone Law, LLC
Counsel for Respondent

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Certificate of Service

I certify that a true and correct copy of the foregoing was sent on September 25, 2026, to the following:

Via email and US Mail
Joel Borgquist
Joel.gjj@gmail.com

Via email only
Heather Hebdon
Heather.hebdon@alaska.gov

/s/ Robert D. Stone
Stone Law, LLC

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September 28, 2026

Via E-Mail

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Executive Director
Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508

Re: Response to Staff Report (26-13-POFD)

Dear Ms. Hebdon:

On behalf of Respondent, Bernadette Wilson, we wish to briefly respond to the Staff Report filed in Case No. 26-13-POFD.

First, we write to update you and the Commissioners that earlier today, Ms. Wilson amended her POFD to add her ownership interest in Denali Disposal Inc. in the "Interests" section. This amendment serves to address all issues noted in the Staff Report.

Beyond that update, and for the sake of brevity, Ms. Wilson fully incorporates her Answer to the Complaint, which she filed on September 25, 2026, in this Response.

Accordingly, Respondent respectfully requests that the Commission adopt the carefully considered Staff Report in its entirety.

Respectfully submitted,

Zachary M. Wallen

CC: Rob Stone (via e-mail)

Joel Borgquist (via e-mail)

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9/28/2026
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PM HC FAX ELE

RESPONSE TO STAFF REPORT

Complaint 26-13-POFD, Joel Borgquist v. Bernadette Wilson

Complainant's response to the Staff Report dated September 21, 2026

Summary of response

- **Staff did not investigate.** The Staff Report adopted the respondent's affidavit on the same day the affidavit arrived at APOC. Every fact supporting staff's self-employment conclusion is cited to that affidavit and nothing else.
- **The additional time was ordered for an investigation, and that did not happen.** The Commission denied expedited consideration but set an abbreviated timeline so the facts could be investigated. Staff used that time to wait for the respondent's sworn denial, then accepted it.
- **The facts show Wilson was directly involved in marketing and soliciting customers.** Denali Disposal's own 2025 website, Wilson's signed proposal to the Kodiak Island Borough, company records, customer letters, and Wilson's own public statements contradict her affidavit. Exhibits H through L.
- **Same law, opposite treatment: Tregarrick Taylor was investigated, Bernadette Wilson got a free pass until the complaint was filed.** Taylor had no more involvement with the tenants of his building than Wilson has with Denali Disposal's customers, as is clear in public record. APOC still demanded the full name of every tenant who paid him more than $1,000, pursued him for more than a year, and voted 4-1 to recommend he not be certified. Wilson signed an affidavit and staff stopped looking. Same statute, same deadline, same office, completely different results.
- **The Commission should follow the Open Meetings Act – and not use a limited exception as the rule.** The public deserves to hear the deliberations and to know what votes are taken and by whom. At a minimum, the spirit of the law is being violated when deliberations and votes are done in secret. That is exactly why the Open Meetings Act was passed into law. The exceptions to that law should only be used in limited and justifiable circumstances. However, the Commission has made the exception its standard practice, applying it to all deliberations and votes, without justification. This is an abuse of the limited exceptions provided by law.
- **The process has been inconsistent and unfair.** The hearings in this matter were not held under the same process the Commission used for the Taylor matter, even though both involve gubernatorial candidates, the same statute, and the same July 1, 2026 cure deadline. The process also differed between Wilson and Johnson, with different opportunities and requirements given to the respondents and complainant.
- **Commission Staff gave more weight to Wilson's testimony than to the significant evidence contradicting it.** All evidence should be treated equally, with the preponderance of evidence determining the outcome, not a weighted system that is imbalanced toward which side presents the evidence. Evidence should only ever be weighted by its veracity or significance, not its origin.

Laws and regulations at issue

AS 39.50.030(a), (b)(1), and (b)(2); AS 39.50.060(b); AS 39.50.200(a)(10); 2 AAC 50.700(b); 2 AAC 50.708; 2 AAC 50.799(a); 2 AAC 50.850(h); AS 44.62.310; and AS 44.62.312.

Staff accepted the affidavit without investigating

1. The Staff Report and the affidavit it relies on carry the same date. The Staff Report is dated September 21, 2026. Wilson's affidavit was sworn before a notary on the 21st day of September 2026 and is stamped "ARRIVED 9/21/2026 … PM" by APOC. The report adopting the affidavit was issued the same day the affidavit was received, leaving no time to test a single statement in it. Exhibit G.
2. Every factual citation supporting staff's conclusion that Wilson is not self-employed (Staff Report footnotes 15 through 19) cites only Exhibit 1, the Wilson affidavit. The report cites no interview, no document, no business record, no website, no customer, and no employee.
3. The report does not describe a single investigative step. Staff did not report interviewing Wilson under questioning, Denali Disposal employees, or any customer. Staff did not report requesting Denali's 2025 customer list, marketing materials, website history, job descriptions, or the email and phone records of the addresses Wilson used with customers. Staff did not address the complainant's Exhibit D, the written price quote from Denali's Front Office.
4. Staff wrote that it "found no evidence to the contrary of the facts provided through her affidavit." That statement reflects an absence of inquiry, not an absence of evidence. Contrary evidence was publicly available and was located by two news outlets within days. Exhibits H through L.
5. The affidavit speaks only in the present tense ("I do not engage in sales," "I do not solicit," "I do not personally provide services") and was sworn in September 2026. The POFD at issue covers calendar year 2025. The affidavit never states what Wilson did during 2025, and staff did not ask. The only 2025 evidence in the public record, Denali's April 2025 website, shows Wilson personally soliciting customers in her own name. Exhibit H.
6. The affidavit is a self-serving statement by the party with the most at stake, prepared for this proceeding after the complaint was filed. Paragraph 10 is a legal conclusion, not a fact: Wilson states that she and counsel concluded she was not "self-employed." Even the duties Wilson does admit in paragraph 7, including route management, monitoring solid waste services activity, and invoice preparation, are part of delivering and billing service to customers.
7. Staff did not reconcile the affidavit with the complainant's Exhibit D. That quote came from Denali's Front Office at (907) 522-2220. In Denali's 2019 proposal to the Kodiak Island Borough, Wilson directed prospective clients to contact her personally at that same number and at Bernadette@denalidisposal.com. Exhibit I.

The additional time was for investigating the facts

8. On September 10, 2026, the Commission declined expedited consideration but ordered "an abbreviated timeline for investigation and a hearing on the merits to occur on or before October 8, 2026." (Staff Report at 1–2.) Under that schedule, staff's report was due September 21, the respondent's response was due September 25, and both parties' responses to the staff report are due September 28.
9. The purpose of that time was fact-finding. Instead of investigating, staff waited for the respondent's sworn denial and adopted it the day it arrived, four days before the respondent's own response deadline. Staff reached its findings before the record was complete.
10. The complaint expressly stated that the complainant does not have access to Denali Disposal's private customer records. Only APOC can obtain them. The Commission's investigative authority exists for exactly this situation. Declining to use it shifts the burden back to the complainant and lets the respondent decide the outcome by affidavit.
11. If a sworn denial is enough to end the inquiry, any business owner who files a POFD can avoid disclosing clients by signing a statement. As the Anchorage Daily News noted, the recommendation "could have implications for dozens of public officials who file financial disclosures every year covering businesses they own." Exhibit L.

The facts show Wilson marketed and solicited for Denali Disposal

12. Under 2 AAC 50.799(a), a person is self-employed if (1) the person has an ownership interest in the business from which the person derives income, and (2) the person is directly and actively involved with the business's clients or customers, either by soliciting their business or by personally providing services to them. Staff concedes the first part. Either method satisfies the second part.
13. **Soliciting customers in 2025.** Denali's homepage, as archived in April 2025, within the reporting period, carried a first-person message signed "– Bernadette Wilson," including: *"I believe that customer service should never be compromised, that every customer's needs are unique…"*; *"I know how hard Alaskans work and believe pricing should be competitive…"*; and ***"With this in mind, I invite you to give us a call, save money, and do business with an Alaskan-owned company. We can't wait to serve you!"*** The owner's personal invitation to prospective customers to call and do business is solicitation. The same page stated that "Clients have come to know Penelope," Wilson's daughter, as the company's "littlest assistant business manager." Exhibit H.
14. The Anchorage Daily News reports that later that year the website "was altered to remove Wilson's personal message and her photos," and the site is now offline. Exhibits H and L.
15. **Soliciting a government client.** Wilson authored and signed Denali's February 22, 2019 proposal to the Kodiak Island Borough as "President, General Manager." The letter solicits the Borough's business, names Denali customers (Lynden Transport, American Landscaping, Anchorage Sand & Gravel, WillowRidge Construction, Crestone General, and The Odom Corporation), describes her own customer-service standards, and states: ***"Please contact Bernadette Wilson at 907-522-2220 or by email at Bernadette@denalidisposal.com."*** This directly contradicts paragraph 8 of the affidavit, which states she does not solicit new customers or answer calls or emails from potential customers. Exhibit I.
16. **Primary contact and head of Customer Care.** The proposal's company profile lists "Bernadette Wilson, President / General Manager" as the primary contact. Denali's organizational chart places Wilson at the top with Customer Care reporting directly to her. Exhibit J.
17. **Customers know her by name.** Lynden Transport's reference letter states: *"Bernadette and Dan have proven to be very professional during our long standing relationship and provide excellent service."* Customers do not describe a back-office employee they have never dealt with as part of a long-standing relationship. Exhibit K.
18. **Personally providing services.** At a September 2026 candidate forum hosted by Chugach Electric, Wilson described climbing into an 8-yard dumpster that "had come from a restaurant" and shoveling it out herself, "high heels and all." This contradicts paragraph 9 of the affidavit, which states she does not personally provide services to customers. Exhibit L.
19. The 2019 proposal predates the reporting period, but it shows the role Wilson has held with Denali's customers and contradicts the affidavit's categorical denials. Together with the April 2025 website and her own public statements, the record shows Wilson both solicits customers and personally provides services. She is self-employed under 2 AAC 50.799(a), and Denali customers who paid more than $1,000 in 2025 are sources of income that AS 39.50.030(b)(1) and 2 AAC 50.700(b) required her to disclose. At a minimum, these contradictions require a real investigation before the Commission relies on the affidavit.

Same law, opposite treatment: Taylor and Wilson

20. **The Commission cannot hold one candidate for Governor to the letter of the disclosure law and excuse another on her word alone. That is exactly what the Staff Report asks it to do.**
21. **Tregarrick Taylor.** Taylor and his wife own Anchorage's Inlet View Tower, which has about 234 tenants. APOC required him to disclose "each tenant who paid more than $1,000 in rent during a calendar year" (*Alaska Current, Sept. 23, 2025*). Nothing in the public record shows APOC ever asked whether Taylor personally signed a lease, showed a unit, or took a tenant's call. The Taylors themselves pointed to the building's "property managers" (*Alaska Story, Aug. 28, 2026*). His distance from his tenants was irrelevant. As the Executive Director told the Taylors: ***"This is what the statute tells you that needs to be disclosed. It's not for APOC's information; it's for the public information."*** (*Alaska Current*).
22. **Bernadette Wilson.** Wilson owns 75 percent of Denali Disposal, and Denali's customers pay the business she owns, just as Taylor's tenants pay the building he owns. The record shows Wilson is far more involved with her customers than Taylor was with his tenants: she signed a personal invitation to customers on the company's 2025 website, named herself as primary contact in a government bid, has Customer Care reporting directly to her, and publicly describes cleaning out a customer's dumpster herself (Exhibits H through L). Staff excused disclosure of every one of those customers based only on her affidavit.

23. The difference in treatment is stark:

	Taylor	Wilson
Business owned	Inlet View Tower, co-owned with his wife	75% of Denali Disposal (Staff Report)
Who pays the business	About 234 tenants	Denali's commercial and residential customers
Evidence of personal contact with those who pay	None in the public record; the Taylors refer to property managers	Signed 2025 website invitation, primary contact in bid, Customer Care reports to her, cleaned a customer's dumpster
What APOC required	Full name of every tenant paying more than $1,000	Nothing; customer disclosure excused
APOC scrutiny	Sept. 10, 2025 hearing; June 17, 2026 follow-up; July 21 deficiency notice; Aug. 12 memo to Commission	Affidavit adopted the day it arrived
Partial compliance	First name and last initial rejected as insufficient	Omitted 75% ownership treated as a paperwork error
Certification analysis	Substantial compliance under AS 39.50.060(b)	None
Result	4-1 vote recommending he not be certified	Amend the form; all penalties waived

24. The Executive Director defended strict disclosure against Taylor by explaining that the law exists "to assure that public officials and their official acts are free from the influence of undisclosed business interests and to allow the public to have access to the information necessary to judge the public officials' credentials or performance in office" (*Alaska Current*). That purpose applies with equal force to the businesses that pay Denali, and to the local governments Denali has pursued as clients (Exhibit I). It did not disappear because Wilson signed an affidavit.

25. Wilson may argue that rental income is treated differently because tenants must be listed no matter how involved the owner is. That only proves the point. The public's interest in who pays a candidate's business does not turn on whether the payment is a rent check or a garbage bill. And even under the self-employment test, Taylor was held to documents, deadlines, and a formal deficiency process, while Wilson was held to her own say-so. The Commission should not accept a lower standard of proof for one candidate than it demanded of another.

26. **Taylor's filing triggered a year of scrutiny, a formal deficiency notice, and a recommendation that he not be certified. Wilson's filing triggered a same-day acceptance of her sworn denial and a full penalty waiver. That is a free pass. If the Commission adopts the Staff Report, it will be telling voters that Alaska's disclosure law depends on which candidate is filing.**

    Sources: https://thealaskacurrent.com/2025/09/23/treg-taylor-still-has-to-disclose-his-business-connections-campaign-regulators-find/ ; https://thealaskastory.com/breaking-apoc-staff-recommends-treg-taylor-be-denied-certification-over-incomplete-financial-disclosure/

The Commission should deliberate and vote in public

27. AS 44.62.310(a) requires that meetings of state commissions be open to the public and that, except when voice votes are authorized, "the vote shall be conducted in such a manner that the public may know the vote of each person entitled to vote." AS 44.62.312(a)(2) declares that "it is the intent of the law that actions of those units be taken openly and that their deliberations be conducted openly." AS 44.62.312(b) requires that exceptions be construed narrowly to avoid exemptions from open meeting requirements and unnecessary executive sessions.
28. The quasi-judicial exclusion in AS 44.62.310(d)(1) is an exception. It should not become the Commission's default practice, especially when deciding whether a candidate for Governor complied with Alaska's disclosure law weeks before the general election. That an exception is available does not mean it should be used.
29. The public deserves to hear the deliberations, understand what votes are taken, and know who cast them. When the reasoning happens privately and only a result is announced, at a minimum the spirit of the law is being violated and decisions are being made behind a curtain. That undermines public confidence in the Commission's decisions, regardless of the outcome.
30. The complainant respectfully requests that the Commission hold its deliberations on this complaint in open session, take a roll-call vote with each commissioner's vote on the record, and issue a written decision explaining its reasoning.

The process has been inconsistent and unfair

31. In the Taylor matter, the Commission treated an incomplete POFD as a substantial-compliance and certification question under AS 39.50.060(b) and 2 AAC 50.850(h). It found, by a 4-1 vote, that Taylor's statement did not substantially comply within 30 days after the due date and recommended that his nomination not be certified. Exhibit E (complaint).
32. Here, staff found that Wilson violated AS 39.50.030(b)(2) by omitting her 75 percent ownership of Denali Disposal, an omission that was not cured by July 1, 2026. Yet the Staff Report never analyzes substantial compliance or certification. It treats the omission as a paperwork error, recommends an amendment, and waives every penalty. Two gubernatorial candidates, the same statute, and the same cure deadline received two different processes.
33. The hearings were not held under the same process, which has created an inconsistent and unfair process for the parties and the public. Similar matters should be heard in the same way, under the same standards, and on the same kind of record.
34. The penalty rationale is also inconsistent. Staff waives penalties because this was Wilson's first POFD, but her own affidavit states that she reviewed the statutes with legal counsel before filing (¶ 10). Staff also reasons that her ownership was available in the state corporations database. That rationale would excuse nearly every omitted business interest, because corporate ownership is almost always on public record. The POFD exists so voters do not have to search other databases to find it.

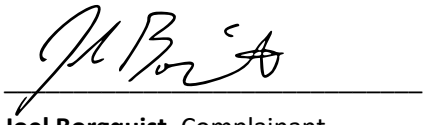
Requested action

- Reject staff's recommendation to dismiss the client-disclosure allegation.
- Find on this record that Wilson is self-employed under 2 AAC 50.799(a), or direct staff to complete a real investigation before the merits hearing, including obtaining Denali Disposal's 2025 customer list and amounts, marketing materials, website history, and customer-contact records, and interviewing employees and customers.
- Give no weight to the affidavit where it is contradicted by the record, or require Wilson to testify under oath at the hearing and answer questions.
- Hold Wilson to the same standard applied to Taylor: require documented disclosure of every 2025 customer that paid Denali Disposal more than $1,000, and apply the same substantial-compliance and certification analysis.
- Reject the recommended penalty waiver.
- Deliberate and vote in open session, with a roll-call vote on the record.

Basis of knowledge

This response is based on the Staff Report and its Exhibit 1, the complaint and its exhibits, and the public records and reporting attached as Exhibits G through L. Exhibits H through K were published by The Alaska Landmine, which obtained the 2019 Kodiak Island Borough proposal through a public records request and the 2025 website through the Internet Archive. Exhibit L is from the Anchorage Daily News. Facts about the Taylor matter come from APOC's recommendation (complaint Exhibit E) and reporting by the Alaska Current and the Alaska Story. The complainant is not a lawyer and cannot give legal advice, but a plain reading of the statutes and regulations appears to support the conclusions stated above.

Respectfully submitted,



Joel Borgquist, Complainant

September 28th, 2026

EXHIBIT G

Same-Day Staff Report and Affidavit

Staff Report and Wilson affidavit, both dated September 21, 2026

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

TO: APOC Commissioners
DATE: September 21, 2026
FROM: Heather Hebdon, Executive Director
SUBJECT: Staff Report, Complaint 26-13-POFD, *Joel Borgquist v. Bernadette Wilson*

The Staff Report is dated September 21, 2026.

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

ARRIVED
9/21/2026
APOC - ANCH
PM HC FAX ELE

Joel C. Borgquist,	:	
Complainant,	:	
v.	:	CASE NO. 26-13-POFD
Bernadette Wilson,	:	
Respondent.	:	

AFFIDAVIT OF BERNADETTE WILSON

Bernadette Wilson, being duly sworn, deposes and says:

1. I am over 18 years of age, of sound mind and otherwise competent to make this

Wilson's affidavit (Staff Report Exhibit 1) is stamped "ARRIVED 9/21/2026" by APOC.

SUBSCRIBED AND SWORN to before me this 21st day of September, 2026, at Anchorage, Alaska.

State of Alaska
NOTARY PUBLIC
Mary M. Summers
My Commission Expires Dec 15, 2028

Notary Public, State of Alaska
My Commission Expires: 12/15/2028

The affidavit was sworn on the 21st day of September 2026, the same day the Staff Report issued.

Source: Staff Report, Complaint 26-13-POFD, and its Exhibit 1 (Affidavit of Bernadette Wilson), pages 1, 7, and 9

EXHIBIT H

Denali Disposal Homepage, April 2025

Internet Archive capture of denalidisposal.com, within the 2025 reporting period

https://denalidisposal.com/ Go

85 captur 23 Apr 2018 DEC 2024 APR 08 2025 MAY 2026 About this capture

- Home
- About Denali Disposal

We are a locally owned refuse company. We believe that homegrown is best, and that it's Alaskans helping Alaskans that makes our state such a great place to live

I was born and raised here. And with my deep roots and Alaska Native heritage, Denali is much more to me than just part of our name. I grew up in this business.

It was my mom and dad who sat at our kitchen table many years ago and started what is still Alaska's largest waste company.

Now, as the next generation, Denali Disposal is a family company that takes trash seriously. We're not the biggest, but we do it better.

I believe that customer service should never be compromised, that every customer's needs are unique, and that superior quality should be the rule, not the exception.

I know how hard Alaskans work and believe pricing should be competitive. I also believe your time is just as valuable as our own and that you shouldn't have to s on hold just to talk to someone.

With this in mind, I invite you to give us a call, save money, and do business with an Alaskan-owned company. We can't wait to serve you!

To my fellow Alaskans — new friends and old:

'Welcome to Denali Disposal Inc.'

– Bernadette Wilson

Bernadette Wilson

"Having opened our nursery in 1972, we know what a difference Alaska grown can make. Superior quality becomes the standard and customer service becomes exceptional. Working with Denali Disposal, they have exemplified these shared values, making them an outstanding company to work with."

– Mike Mosesian
Owner, Bells Nursery & Gifts

Click here to learn more about Denali Disposal

Bernadette and her daughter Penelope, sitting up high in front load truck 'Frenchie'. Clients have come to know Penelope as Denali Disposals littlest assistant business manager.

Bernadette with rolloff truck Miles in Florida where he was purchased.

Driver John out on the route.

Denali Disposal provides exceptional service wherever you're located.

Wilson's signed message invites customers to "give us a call, save money, and do business" with Denali and states "We can't wait to serve you!"

Not secure https://denalidisposal.com

Website not found...

The Denali Disposal website is now offline.

Source: https://alaskalandmine.com/landmines/records-reveal-denali-disposal-customers-and-role-bernadette-wilson-plays-in-business/

EXHIBIT I

Wilson's Proposal to the Kodiak Island Borough

Signed by Bernadette Wilson, President, General Manager, February 22, 2019

Denali DISPOSAL INC.
P.O. Box 112150
Anchorage, Alaska 99511
(907) 522-2220

February 22, 2019

Kodiak Island Borough
Office of the Borough Manager
Room 125
710 Mill Bay Road
Kodiak, Alaska 99615

RE: Kodiak Solid Waste Collection and Recycling Proposal

Dear Mr. Kovacs,

Denali Disposal Inc. is pleased to submit our proposal to the Kodiak Island Borough in the response to the Request for Proposal for Residential and Commercial Solid Waste Collection and Recycling Services.

We are an Alaskan owned refuse and recycling company. We believe that homegrown is best and that it's Alaskans helping Alaskans that makes our state such a great place to live.

My dad grew up in Alaska. My grandparents moved here when he was just 10 months old. He has run several successful businesses and is an avid, well-decorated snowmachine racer. I was born and raised here. My great-uncle served twice as Alaska's governor. My grandmother was born and raised in Naknek, Alaska. She instilled in me a deep appreciation for my Aleut heritage.

I first started working for the refuse and recycling industry in 1999. Two years prior, in 1997, my mom and dad started a local refuse company. By the time I collected my first paycheck, their company was servicing some of the largest companies in Alaska, including the Anchorage School District. I quickly learned the inner workings of billing, dispatch, route scheduling and recycling. We were on the cutting edge of recycling and were known for our superior customer service, our detail to safety and our dedication to the environment. For more than a decade my mom and dad's refuse company set the standard for waste removal and recycling in Alaska.

Eventually, my parents sold their company and refocused their efforts on Alaska Professional Truckers. It is a gravel hauling business they have had for more than 40 years and boasts

Page 1: Wilson solicits the Borough's residential and commercial solid waste business.

Source: https://alaskalandmine.com/landmines/records-reveal-denali-disposal-customers-and-role-bernadette-wilson-plays-in-business/

millions of dollars in private, municipal, state and federal contracts. Since its inception 40 years ago, Alaska Professional Truckers has been exemplary in their attention to the environment safety, and their ability to work collaboratively with large and small, public and private entities. This is evidenced in a 40 plus year contract with Anchorage Sand & Gravel as well as current contracts with the Municipality of Anchorage and the State of Alaska.

Three years ago, my dad and I decided it was time to take all those years of refuse and recycling experience and innovation and put them back to work for Alaskans. With our reputation proceeding us, we formed Denali Disposal Inc. a waste and recycling company. Many of our clients who had service with us in 1997 have since come back 'home' along with many new companies. Those include Lynden Transport and their family of companies, American Landscaping, Anchorage Sand & Gravel, WillowRidge Construction, Crestone General, The Odom Corporation and many more. We currently service a variety of sizes and types of refuse and recycling containers including cardboard and mixed paper, metal, and office recycling programs. We are also proud to say, that in conjunction with American Landscaping, we are entering our third summer of hauling the Municipality of Anchorage's green waste materials.

With Denali Disposal, we are once again providing a level of service that is unsurpassed with the goal of working towards zero waste. We are thrilled that the Kodiak Island Borough's Residential and Commercial Solid Waste Collection and Recycling Services Request for Proposal expresses such great interest in the expansion of recycling. With that commonly shared innovative drive and pioneering spirit, we look forward to sharing with the Kodiak Island Borough our ideas to expand and increase recycling. Together, let's repurpose used cooking oil; together let's bale more fiber; together let's reduce our plastics and get creative in recycling. Together; let's work towards zero waste.

I think back to 1997 and all our years of experience in this industry and I am incredibly proud. When my mom and dad sold their refuse and recycling company, they sold to other local Alaskans. They never imagined the company they started would be taken over by outside corporate interests. Yet, I still smile when I see that orange colored sunset with the prominent green in front of it. It takes me back to our kitchen table all those years ago where my mom designed that logo and where she and my dad ultimately decided on the name for their company – Alaska Waste.

It is bittersweet. No corporate employee will ever be as proud as I am of Alaska Waste's accomplishments. Yet once again, we recognized things could be done better. Alaskan's deserve an Alaskan option. We believe customer service should never be compromised. Every customer's needs are unique and superior quality should be the rule, not the exception. These are the driving principles behind why we do things, such as; wash and paint customers containers every year at no additional cost. These are the reasons we are excited that the Kodiak Island Borough Residential and Commercial Solid Waste Collection and Recycling Services Request puts an emphasis on community events and school engagements. We recycle, not because of a corporate mandate, but because we feel a responsibility to our native lands, and for me, a way of carrying on my native heritage.

Page 2: Wilson names Denali customers and describes her customer-service standards.

Finally, on behalf of this father/daughter partnership, we would like to thank you for giving us the most valuable commodity, your time, in reading and reviewing our proposal. We look forward to working with the Borough on innovative ideas for refuse collection and recycling.

We acknowledge receipt of the RFP, its' enclosures and all addenda;

Revised SW Collection Recycling Services RFP
Revised Appendix C. Cost Eval Form
Revised Appendix C. Commercial Customers
PreBid Questions.Clarification.11.2018
11/28/18 - ADDENDUM No.1
1/18/19 - ADDENDUM No.2 Dumpster.
Appendix C - Rate Proposal
Appendix C - Commercial Customer
SW Collection Recycling Services Appendix D
1/22/19 - ADDENDUM 3. SW Collection. Recycling Services RFP 012219
AMENDED APPENDIX C
1/30/19 - ADDENDUM 4.Respondent Proposal Evaluation Form
Rev Plan Holder 1.30.2019
2/12/19 - ADDENDUM No. 5 Additional Quest 57-59.
Plan Holder List.2.12.2019
Plan Holder List.2.19.2019
2/19/19 - ADDENDUM No. 6

All RFP documents and addenda through today's date have been reviewed and we have completed the necessary due diligence to confirm material facts upon which the proposal is based. The terms of our proposal and the rates included in our proposal are firm throughout the RFP evaluation and selection process.

We would be pleased to answer any questions you may have regarding this proposal. Please contact Bernadette Wilson at 907-522-2220 or by email at Bernadette@denalidisposal.com with any questions or comments.

Welcome to an experienced, truly Alaskan company. Welcome to Denali Disposal Inc.

Respectfully Submitted,

Bernadette Wilson
Bernadette@denalidisposal.com
President, General Manager
Denali Disposal Inc.

Page 3: "Please contact Bernadette Wilson at 907-522-2220 or by email at Bernadette@denalidisposal.com."

Source: https://alaskalandmine.com/landmines/records-reveal-denali-disposal-customers-and-role-bernadette-wilson-plays-in-business/

EXHIBIT J

Company Profile and Organizational Chart

From Denali Disposal's 2019 Kodiak Island Borough proposal

4.2 Company Profile

Respondents shall provide the following information about their firm:

- ❑ Name of the entity that would sign the agreement if the Respondent is selected

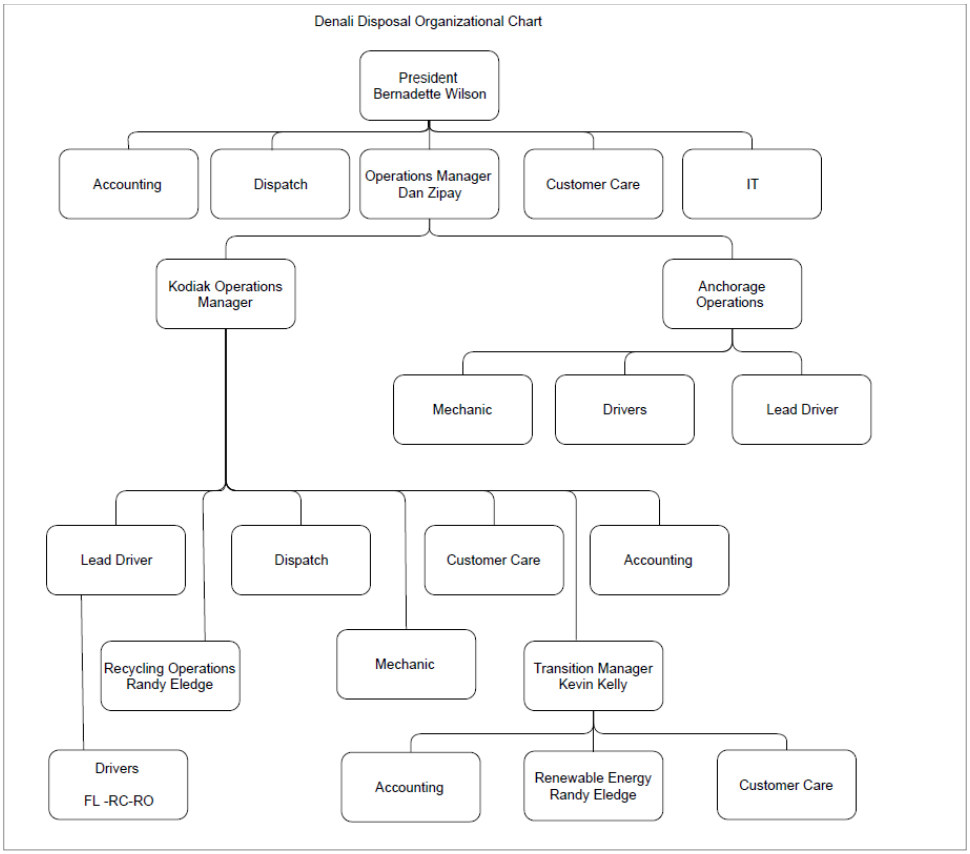
  Denali Disposal Inc.
- ❑ Any other names under which the Respondent does business

  NONE
- ❑ Primary contact name and title

  Bernadette Wilson, President / General Manager
- ❑ Secondary contact name and title

  Dan Zipay, Secretary/ Treasurer / Chief Operations Manager

Wilson is listed as the primary contact, President / General Manager.



Customer Care reports directly to President Bernadette Wilson.

Source: https://alaskalandmine.com/landmines/records-reveal-denali-disposal-customers-and-role-bernadette-wilson-plays-in-business/

EXHIBIT K

Customer Reference Letters

Included in Denali Disposal's 2019 Kodiak Island Borough proposal

Alaska LYNDEN TRANSPORT

February 12, 2019

To Whom It May Concern,

This letter represents a vote of confidence in Denali Disposal, a key recycling and refuse partner for Lynden. Bernadette and Dan have proven to be very professional during our long standing relationship and provide excellent service to many of our port facilities and service centers in Alaska.

Denali Disposal always has a quick response time. They are a safe, efficient, and clean operation and I personally enjoy working with the entire team. They assist in our day to day operations as well special projects, including a recent partnership on JBER.

Denali Disposal is a trusted partner that Lynden relies on for metal and cardboard recycling as well as refuse service. They know their business and provide outstanding service that allows my team to focus on our customer commitments. I can confidently recommend Denali Disposal as a reliable partner with expertise in the Alaska market.

Sincerely,

Justus Uphus
Service Center Manager
Lynden Transport

Lynden Transport: "Bernadette and Dan have proven to be very professional during our long standing relationship."

Crestone GENERAL

February 9, 2019

200 West 34th Ave. #1011 Anchorage, Alaska 99503
Office:(907) 274-1222 • Fax: (907) 274-1227

Letter of Recommendation
Denali Disposal Inc.

To whom it may concern:

My name is James Adair Burke. I am the owner of Crestone General LLC, a General Contracting firm here in Anchorage. During the many years I have been in the construction industry here in Alaska, we have at one time or another used the services provided by many of the refuse disposal companies here.

I am very pleased to recommend Denali Disposal for all of the services they provide. It is my opinion that they are the best game in town and further their service is far and above the other companies that provide the same type of services. Our experience with this company has evolved into one of trust and reliability. We trust them because they have always performed. They have proven repeatedly to be dependable, timely, and cost-effective. Other qualities that make this company stand out are, they consistently provide excellent turnaround time for delivery and pick up service requests which many times is a key factor in running a tightly scheduled project. As a company Denali Disposal's coordination and communication skills are excellent. They are easy to reach whether early or late and have always returned calls promptly when messages are left including outside of normal business hours. We have used their services many times now for disposing of a multitude of various materials such as asbestos, hazmat, construction and demolition materials and even recycling materials.

Also, I would like to add that the crew of Denali Disposal maintains are professional, well experienced, timely, pay attention to detail, have excellent safety habits, and have always been easy to communicate with. For us, Denali Disposal has performed every time when called upon. Being in the refuse business is not new to Denali Disposal as they were the original owners of Alaska Waste. Those numerous years of past experience are evident in every interaction.

Respectfully,

James Adair Burke
Crestone General, LLC

Crestone General letter of recommendation.

Source: https://alaskalandmine.com/landmines/records-reveal-denali-disposal-customers-and-role-bernadette-wilson-plays-in-business/

AMERICAN LANDSCAPING
CREATIVE DESIGNING
1313 LAONA CIRCLE
ANCHORAGE, AK 99518
[redacted]
Phone: 907-563-3804
Fax: 907-562-0922

Letter of recommendation

To whom it may concern

Denali Disposal has been working with us at American Landscaping for a number of years. They have been instrumental in aiding us in our green waste recycling effort with the Municipality of Anchorage. Denali Disposal has provided us with timely, professional transportation of green waste materials from various sites in Anchorage and surrounding communities to our transfer site.

The personnel employed by Denali Disposal have all proven themselves to perform well above expectation. Everyone at Denali Disposal has continuously been professional, courteous, timely and have communicated with us above expectation. I would expect Denali Disposal would do a great job providing refuse, waste and recycling services for other communities and organizations as well.

I would without hesitation, personally and professionally recommend Denali Disposal for all of your refuse, waste and recycling needs.

Please feel free to contact me if you need further information regarding the quality services they have provided us here at American Landscaping over the years.

Respectfully,

Glenn Ball
Vice President
American Landscaping

American Landscaping letter of recommendation.

AS&G A subsidiary of Alaska Basic Industries
ANCHORAGE SAND and GRAVEL CO., INC.
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February 21, 2019

Kodiak Island Borough
Re: RFP For Refuse and Recycling Services

To whom it may concern:

On behalf of Anchorage Sand & Gravel, I would highly recommend Denali Disposal for all recycling and refuse needs.

We had refuse and recycling service for nearly 10 years with this same family when they established Alaska Waste. We have worked with them on our gravel hauling needs since 1979. In our 40+ years of working with their multiple companies, they have continually provided excellent service in every facet.

As one of Alaska's largest gravel suppliers, our partnership with Denali Disposal has been beneficial in helping us remain committed to our core values: Safety, Honesty, Quality, and Respect. Currently Denali Disposal provides a variety of sizes and types of refuse and recycling for us at more than 12 locations. They have been incredibly responsive and great to work with especially in coordinating extensive metal recycling, as recent as this past fall.

I would give my utmost recommendation to Denali Disposal for all refuse and recycling needs for the Kodiak Island Borough. Please feel free to contact me if I can answer any questions.

Regards,

Ryan Zins
Vice President/General Manager
Anchorage Sand and Gravel Co., Inc.

Anchorage Sand and Gravel letter of recommendation.

WILLOWRIDGE
CONSTRUCTION COMPANY

4101 Arctic Blvd. Suite 101
Anchorage, Ak 99502

To Whom It May Concern:

I am writing to express my positive experience with Denali Disposal. My company builds high-end custom homes in Anchorage, Alaska. The demanding nature of our work requires that we deliver a unique product and experience to our clients. A crucial component of that experience is our team of subcontractors. We have worked with several waste removal companies over the last 13 years and are grateful to have Denali Disposal on our team. Denali Disposal is raising the bar for waste removal in Anchorage with their high level of professionalism, drive to price competitively, and dedication to hiring quality people. Denali consistently delivers a great experience to our clients and us.

Thank you,

Josh Sundstrom

WillowRidge Construction letter of recommendation.

Source: https://alaskalandmine.com/landmines/records-reveal-denali-disposal-customers-and-role-bernadette-wilson-plays-in-business/

EXHIBIT L

Anchorage Daily News, September 22, 2026

Reporting on the Staff Report, the altered website, and Wilson's own account of her work

Politics

Bernadette Wilson tells Alaska campaign regulators she has no contact with clients of her garbage disposal company

By Iris Samuels
Published: 1 day ago

"Staff found no evidence to the contrary of the facts provided through her affidavit," Commission Director Heather Hebdon wrote in a report. "Accordingly, she was not required to disclose (Denali Disposal's) clients and customers as sources of self-employment income."

In a financial disclosure form filed earlier this year, Wilson reported that she is Denali Disposal's general manager, a position that pays her between $100,000 and $200,000 annually. But she did not disclose that she owns a 75% stake in the business, nor that the other 25% is owned by her mother, Roberta Zipay.

Staff relied on the affidavit: "Staff found no evidence to the contrary."

The website for Denali Disposal has been taken offline, but in a version archived in April 2025, the landing page for the site featured pictures of Wilson and her infant daughter, along with a personal message from Wilson describing the company and her role leading it. Later that year, the website was altered to remove Wilson's personal message and her photos.

The 2025 homepage featured Wilson's personal message; it was later removed.

During a candidate forum held Thursday, Wilson described in detail her close involvement in services provided by her company.

"I pulled up to our shop one day, and the dumpster was just gross. It had come from a restaurant. I will spare you details because you're having lunch," she told employees of Chugach Electric during a forum hosted by the Anchorage utility. "I pulled up and I had on my jeans and my high heels. I remember telling an employee, 'Hey, we got to get in there and clean that thing out.' He said, 'I'm not climbing in the back of that thing.' I said, 'Well, go get me the ladder.' It's this big 8-yard dumpster, and here's me, right, 4-foot-nothing. And he pulls this ladder over, and I climb and jump into the back of this dumpster, high heels and all, shoveled that thing out."

Wilson describes personally cleaning out a restaurant customer's 8-yard dumpster.

Source: https://www.adn.com/politics/2026/09/22/bernadette-wilson-tells-alaska-campaign-regulators-she-has-no-contact-with-her-garbage-disposal-company-clients/