

[TAB 9]

Complaint 25-17-CD

Mike Alexander v. Kevin McCabe

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing in these cases will take place before the Alaska Public Offices Commission at approximately 1:30 p.m. on Wednesday January 14, 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: 382 982 822#), 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 January 7, 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 did not properly report a campaign debt during his 2024 campaign.
- 3) **Procedural history.** Complainant Michael Alexander filed a complaint against respondent Kevin McCabe on September 10, 2025. Respondent McCabe did not file a substantive response but APOC received documentation from a third-party business concerning the transaction at issue on September 23, 2025. Staff's investigation report recommending the complaint be dismissed was issued October 16, 2025.

¹ Meeting ID: 237 734 363 936 42, Passcode: iz3Ps6vV

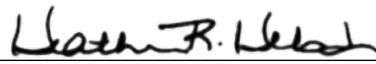
- 4) **Hearing procedures.** The hearing will be conducted as provided in AS 15.13.380, 2 AAC 50.891, and the Alaska Administrative Procedure Act, AS 44.62.330 – 44.62.630. All testimony must be presented or submitted under oath. A party may call witnesses, cross-examine witnesses, present and rebut 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 January 2, 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 January 9, 2026, a party
 - a) may respond to a motion; and
 - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing, and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) **Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) **Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

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

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

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

Dated: December 24, 2025



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:	
Michael Alexander PO Box 521171 Big Lake, AK 99652 BigLakeMike907@outlook.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Kevin McCabe PO Box 520248 Big Lake, AK 99652 Rep.Kevin.McCabe@akleg.gov	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email



12-24-25

Signature

Date



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: October 16, 2025
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report, 25-17-CD, *Alexander v. McCabe*

SUMMARY OF COMPLAINTS AND RESPONSES

In Complaint 25-17-CD, *Alexander v. McCabe*, complainant Michael Alexander alleges respondent Kevin McCabe did not report a campaign debt of \$1,000 to Optima Public Relations (Optima).¹ McCabe did not file an Answer to the complaint but provided a statement from Optima relating to the allegations.

SUMMARY OF STAFF RECOMMENDATIONS

A preponderance of the evidence does not support a finding of a violation. This matter is the fourth complaint filed against McCabe concerning expenditures to Optima during the 2024 election cycle and the third by Alexander.² Evidence and testimony given in the earlier matters as well as additional documentation provided herein reflect that McCabe's first expenditure to Optima occurred in mid-October, after which he timely reported it on a 7-day report on October 29, 2025. APOC staff recommends dismissal.

BACKGROUND FACTS

APOC staff incorporates by reference the documentary evidence and testimony given in prior matters and asks the Commission to take judicial notice of its findings in the related Orders.³

¹ Exhibit 1, Complaint 25-17-CD.

² *Alexander v. McCabe*, 24-12-CD, *Widney v. McCabe*, 25-01-CD, and *Alexander v. McCabe*, 25-07-CD. From notes left on the electronic version of the complaint, it appears that a third individual, Pat Martin, is assisting Alexander in his filing efforts. Exhibit 2.

³ [Alexander v. McCabe, 24-12-CD and 25-07 CD](#) (consolidated), September 22, 2025 and [Widney v. McCabe, 25-01-CD](#), September 22, 2025.

Respondent McCabe was a candidate for reelection to the State House of Representatives during the 2024 primary and general elections. McCabe engaged the services of Optima Public Relations,⁴ who took over campaign management in mid-October 2024.⁵ Optima's October 15, 2024 invoice for \$16,825 describes the services provided through the November 5th election.⁶ McCabe reported Optima's services as an expenditure on his 7-day general report on October 29, 2025,⁷ as follows:

10/15/2024	Check 111	OPTIMA PUBLIC RELATIONS 73622 W PARKS HWY #665 WASILLA, Alaska 99623	ACCOUNT MANAGEMENT, GRAPHIC DESIGN, DIGITAL ADS, RADIO ADS, TEXT MESSAGING AND EMAIL, PRINTING AND POSTAGE	\$16,825.00
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LAW

Candidates are required to disclose financial activity, including expenditures and debts incurred by their campaigns. For each campaign, the standard reports include a year-start report, 30-day and 7-day reports for the primary and general elections, and a year-end report.⁸ An expenditure includes not only a purchase but also “a promise or agreement to purchase or transfer money” for the purpose of influencing the election of a candidate.⁹ A candidate must list and report as a debt any expenditure incurred but not paid.¹⁰ As the Alaska Supreme Court has noted, “[t]he Commission’s regulations and manuals clarify that expenditures include both paid and incurred expenditures; they require expenditures to be reported when the deal in question is made, instead of when the expenditure is invoiced or paid.”¹¹

⁴ <https://optimapublicrelations.com/> last accessed May 7, 2025.

⁵ Exhibit 3, McCabe January 16, 2025 Response to Complaint 24-12-CD, p. 2.

⁶ Exhibit 4, Optima invoice to McCabe dated October 15, 2024. McCabe provided the Optima invoices in response to APOC’s request for information related to complaint 24-12-CD.

⁷ [7-day report](#) filed October 29, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570>.

⁸ AS 15.13.110.

⁹ AS 15.13.400(7)(A)(i).

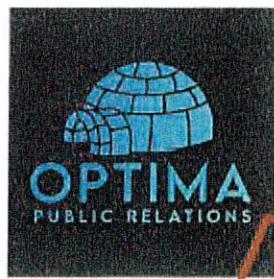
¹⁰ 2 AAC 50.321(a)(6).

¹¹ *Republican Governors Ass’n v. Alaska Pub. Offices Comm’n*, 485 P.3d 545, 551 (Alaska 2021).

COMPLAINT ANALYSIS

Complainant Alexander alleges McCabe “failed to disclose 2 x \$500 campaign debts to Optima PR on 7/15/2024.”¹² For supporting evidence, Alexander provides Optima’s October 15, 2024 invoice and argues that Optima’s date notation of “July 15 – Nov 5, 2024 | Fixed Fee” reflects a “Debt Incurred 7/15/24 Not Reported”:

As alleged by Alexander at p. 2 of Complaint:

 Optima Public Relations 907-202-5516 7362 W. Parks Hwy, #605 Wasilla, AK 99623			
Debt Incurred 7/15/2024 Not Reported.			
Billed To Kevin McCabe McCabe for State House	Date of Issue 10/15/2024	Invoice Number 24-158-VKM	Amount Due (USD) \$0.00
Due Date 10/29/2024			
<hr/>			
Description	Rate	Qty	Line Total
Account Management & Campaign Strategy <i>July 15 - Nov 5, 2024 Fixed Fee</i> Staff Becca Client Coordination (Misc phone calls, weekly meetings and emails re campaign, project assistance)	\$500.00	2	\$1,000.00

Standing alone, the identification of a “July 15 - Nov 5, 2024” date range for “Account Management & Campaign Strategy” allows an inference that McCabe incurred a debt on July 15, 2024 that required reporting earlier than his 7-day report of October 2024.¹³ However, evidence and testimony taken in previous complaints concerning McCabe’s Optima expenditures demonstrate that interactions between the contracting parties did not give rise to “a promise or agreement to purchase or transfer money” until October 15, 2024. Prior to that date, the interactions can be described as discussions of possibilities.

¹² Exhibit 1, Complaint at p. 2.

¹³ [7-day report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570) filed October 29, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570>.

An August 16, 2024 email from “becca@optimapublicrelations.com” discusses in conditional terms a “plan for the general campaign and how we can help.”¹⁴ The email describes possibilities and estimated budgets, noting “[t]his is all just a ballpark on options and can be customized/scaled/adjusted depending on how you see the best fit to move forward.” Optima asked McCabe to review the plan and make any adjustments or additions, after which Optima would “begin execution.” These statements show Optima presenting various proposals to McCabe in August, and refute Alexander’s allegation that McCabe had purchased or promised or agreed to purchase Optima’s services in July.

McCabe’s statements similarly attest to a process of negotiation for services that did not actualize into an agreement to purchase Optima’s services until October 15, 2024. McCabe characterizes Optima’s efforts as a “campaign proposal” that his campaign, due to limited funds, did not execute “until October 17th, 2024, when I verbally told Optima to go ahead with the entire plan.”¹⁵

Finally, in response to this most recent complaint (25-17-CD) Alexander has filed against him, McCabe submits additional documentation from Rebecca Koonce at Optima, who attests:

- the July 15, [2024]¹⁶ meeting between Optima and McCabe was for an introductory, exploratory discussion regarding potential campaign services during which McCabe made no financial commitment, and
- “[a]t no point did Representative McCabe incur financial obligations with Optima prior to October [2024]”¹⁷

Based upon the above, and with Alexander having provided no supporting evidence or documentation beyond the date range in the Optima invoice to substantiate his

¹⁴ Exhibit 3, pp. 4-6.

¹⁵ Exhibit 3, p. 2. APOC staff notes that whether the agreement between Optima and McCabe occurred October 15 or October 17 is not significant to this complaint.

¹⁶ The September 23, 2025 letter from Optima references services occurring in 2023. APOC staff assumes McCabe cited this year in error and intended the actual date to reflect the year 2024, corresponding with the 2024 election and other dates referenced in the complaint.

¹⁷ Exhibit 5, September 23, 2025 letter from Optima. APOC staff also assumes this actual date was 2024.

allegation, Alexander fails to overcome contrary evidence indicating McCabe did not incur a debt or expenditure until October 15, 2024.

CONCLUSION

APOC staff finds no violation of campaign disclosure law and recommends dismissal of the complaint.

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Kevin McCabe PO Box 520248 Big Lake, Alaska 99652 kevin@kevinj.mccabe.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Mike Alexander PO Box 521171 Big Lake, AK 99652 BigLakeMike907@outlook.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

John Whitlock

Signature

10/16/25

Date



Alaska Public Offices Commission

COMPLAINT



FILING A COMPLAINT

To be accepted, complaint must include

1. Complainant's name + contact info
2. Respondent's name + contact info
3. Laws, regulations allegedly violated
4. Description of allegations
5. Basis of knowledge of alleged facts
6. Documentation to support allegations
7. Notarized signature of the complainant
8. Proof that complaint and all supporting documents were served on respondent

APOC LAWS ALLEGEDLY VIOLATED

Specify section of law or regulation

Campaign Disclosure Law	<input checked="" type="checkbox"/> AS 15.13 <input checked="" type="checkbox"/> 2 AAC 50.250-405
Public Official Financial Disclosure	<input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799
Legislative Financial Disclosure	<input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799
Lobbying Regulation	<input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590

APOC case name/number/date

ARRIVED

9/10/2025

APOC - ANCH
PM HC FAX/E

25-17-CD

If complaint meets requirements for acceptance, APOC will investigate the allegations and notify the respondent of the right to respond. APOC will notify Complainant and Respondent when APOC accepts or rejects a complaint.

COMPLAINANT		RESPONDENT Person or group allegedly violating law	
<input type="checkbox"/> APOC <input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group	Mike Alexander	<input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group	Kevin McCabe
Address City / Zip	PO Box 521171 Big Lake, AK 99652	2193 W Linn Marie Cir PO Box 520248 Big Lake, AK 99652	
Phone/Fax	(907) 892-4878	(907) 229-3721	
E-mail	BigLakeMike907@Outlook.com	Representative.Kevin.McCabe@akleg.gov, Kevin@KevinJMcCabe.com	

COMPLAINANT'S REPRESENTATIVE

RESPONDENT'S REPRESENTATIVE

If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info

Name/Title	
Address	
Phone/Fax	
E-mail	

DESCRIPTION or SUMMARY of ALLEGED VIOLATION
Kevin McCabe failed to disclose 2 x \$500 campaign debts to Optima PR on 7/15/2024 as required by AS 15.13.040, AS 15.13.110, and 2 AAC 50.321.

Use extra pages if needed

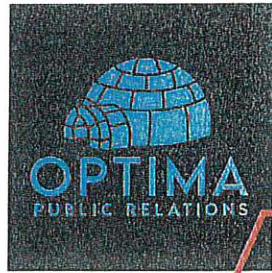
SUPPORTING DOCUMENTS - DESCRIBE:
Optima Public Relations Invoice 24-158-VKM
McCabe Campaign Disclosure Report(s)

PROOF of SERVICE ATTACHED: Fax - receipt confirmation Certified mail - signed receipt
 Process server - return of service E-mail - delivery/read receipt Other:

COMPLAINANT'S SWORN STATEMENT: To the best of my knowledge and belief, these statements are true

Signature *Michael R Alexander* Title _____ Date 9/10/2025
Subscribed and sworn to or affirmed by me at Eagle River, AK on 09/10/2025
Signature *Kaylin Harrel* Title Notary Commission # 220520002 Exp: 06/26/2026

APOC COMPLAINTS, RESPONSES, INVESTIGATION REPORTS & COMMISSION ACTIONS ARE PUBLIC DOCUMENTS		
APOC ANCHORAGE	APOC JUNEAU	APOC COMPLAINT PROCESS: 2 AAC 50.460 - 476
2221 E. NORTHERN LIGHTS #128 ANCHORAGE, AK 99508 907-276-4176 / FAX 907-276-7018 TOLL-FREE 800-478-4176 WEB: http://www.alaska.gov/apoc	240 MAIN STREET #500 P.O. BOX 110222 JUNEAU, AK 99811 465-4864 / FAX 465-4832 APOC FORMS: http://www.alaska.gov/apocforms	FILING COMPLAINTS: 2 AAC 50.870 ANSWERING COMPLAINTS: 2 AAC 50.880 APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870 INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891 RULES for REQUESTING EXPEDITED CONSIDERATION: AS 15.13.380(c) APOC LAWS: http://www.alaska.gov/apoclaw.htm



Optima Public Relations
907-202-5516
7362 W. Parks Hwy, #665
Wasilla, AK 99623

**Debt Incurred 7/15/2024
Not Reported.**

Billed To
Kevin McCabe
McCabe for State House

Date of Issue
10/15/2024
Due Date
10/29/2024

Invoice Number
24-158-VKM

Amount Due (USD)
\$0.00

Description	Rate	Qty	Line Total
Account Management & Campaign Strategy July 15 - Nov 5, 2024 Fixed Fee Staff: Becca Client Coordination (Misc phone calls, weekly meetings and emails re: campaign, project assistance)	\$500.00	2	\$1,000.00
Graphic Design 6 Digital Ad Sizes x 2 Sets Absentee Mailer Early Voting Mailer Additional Mailer Signage FB Graphics Web Digital Graphics for Streaming/Google Absentee Voting Mailer Absentee Voting Digital Ad Set Proven Leadership. Real Purpose. Social Media Endorsements McCabe Mailer Edits Postcard Early Voting Signage Video Assets Animated Ads	\$150.00	6.5	\$975.00
Digital Advertising Launch Sept - Nov 5 (Partial Pre-Bill) Google Digital Search Facebook Youtube iHeart Video Integration	\$3,500.00	1	\$3,500.00

Exhibit 8
Page 1 of 4

Exhibit 1
Page 2 of 12

Radio Placement Oct 18 - Nov 6 30-second ad voiced KM & 60, Sec YT Voice Traditional Radio Stations iHeart Morning Shows w/ 3rd Party Platform Integration Dan F (KVNT) Pandora Streaming (Spotify/Pandora/iHeart) - geotargeted Video & Podcast Micro Targeting	\$3,000.00	1	\$3,000.00
Radio Ad Production Voice over edits w/ KM & Previous YT Voice 4 Final Version w/ sound rights (30 sec/60 sec) + 15 sec (for YT bumper edits)	\$350.00	1	\$350.00
Text Messaging & Email Targeting 6 Text Messages (Image & written content with link) 6 Rappsonolve Email Marketing Ads (Includes design and content/copy) @ appx 4000-5550 recipients + \$250 Per Text + \$150 Per Email	\$2,000.00	1	\$2,000.00
ONE TIME FEE(s): Graphic Design & Reports (\$120) Set-Up Fee (\$100) Data Entry/Upload "opt-in" verification for each List (\$125)			
Printing / Postage for Mailers PIP Printing + Mailer 1- Early Voting + Mailer 2 ? + 4x8 Signage x 6 + Sticker/Badge for Signage (prepayment - will adjust with final bill or credit)	\$6,000.00	1	\$6,000.00

Subtotal	16,825.00
Tax	0.00
Total	16,825.00
Amount Paid	16,825.00
Amount Due (USD)	\$0.00

Terms

PAYMENT INFO:

For the bank transfer, Optima Public Relations's Business Account Info:

[REDACTED]

Exhibit 8
Page 2 of 4

Exhibit 1
Page 3 of 12

CAMPAIGN DISCLOSURE FORM

AMENDMENT

Amendment Description: DEBT TO META LISTED AS \$20.50 IS ACTUALLY \$20.00. 50 CENT CORRECTION.

COMPLETED

Submission Date: **08/13/2024**

Filer First Name: **KEVIN**

Filer Middle Name: **J**

Filer Last Name: **MCCABE**

Filer's Title: **Treasurer**

Report Type: **Thirty Day Report**

CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**

Candidate Address: **PO Box 520248**

City, State Zip: **Big Lake, Alaska 99652**

REPORT INFORMATION

Election Year: **2024**

Election: **State Primary**

Report Type: **Thirty Day Report**

Reporting Period: From **02/02/2024** Through **07/19/2024**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:		\$4,901.52			
[+] ↓		Previous Campaign Income: (From Box A of previous report)		Campaign Income Total: (Box A)	
Total Income Reported:	\$5,918.83	[+] ⇒	\$702.16	[=] ⇒	\$6,620.99
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)		Campaign Expense Total: (Box B)	
Total Expenditures Reported:	\$4,665.67	[+] ⇒	\$0.00	[=] ⇒	\$4,665.67
[=] ↓					
Closing Cash On Hand:	\$6,154.68				
[-] ↓					
Total Debts:	\$550.00				
[=] ↓					
Surplus/Deficit:	\$5,604.68				

Date Received	Payment Method	Contributor	Details	Amount
07/14/2024	Cash	MOBLEY, DORTE 575 JEROME DR WASILLA, Alaska 99654	Occupation: FIREFIGHTER Employer: MATSU BOROUGH	\$100.00
07/14/2024	Check 2819	SOLMONSON, JOELLEN PO BOX 521797 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$100.00
07/14/2024	Check 1927	STALLONE, JOHN 7362 W PARKS HWY PMB 860 WASILLA, Alaska 99623	Occupation: CORPORATE SAFETY OFFICER Employer: NEESER CONSTRUCTION INC	\$200.00
07/14/2024	Credit Card	STEPHL, DAN PO BOX 873671 WASILLA, Alaska 99697	Occupation: MILLWORK Employer: ROBINSON MILWORK	\$104.48
07/15/2024	Check 4222	KOAN, CJ 3420 SECLUDED MEADOWS LP WASILLA, Alaska 99623	Occupation: CONSULTANT Employer: SELF	\$50.00
07/17/2024	Credit Card	YUNDT, TRENITIE 1165 E WESPOINT DR WASILLA, Alaska 99654	Occupation: RESIDENTIAL HOME BUILDER Employer: ROBERT YUNDT HOMES, LLC	\$500.00
07/19/2024	Check 10	HALLER, BILL PO BOX 521801 BIG LAKE, Alaska 99652	Occupation: REAL ESTATE Employer: SELF-EMPLOYED	\$250.00
				Income Total: \$5,918.83

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
05/25/2024	Debit Card	HOGOSHA LLC 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, North Dakota 57702	WEBSITE DEVELOPMENT, RACK CARD EDITS, CAMPAIGN KICKOFF FLYER	\$955.80
05/28/2024	Non-Monetary DEPOSIT FOR HOTEL ROOM IN HEALY FOR EVENT	MCCABE, LINN PO BOX 520248 BIG LAKE, Alaska 99652		\$35.00

Date	Payment Method	Vendor	Purpose	Amount
05/31/2024	Electronic Funds Transfer	MATANUSKA VALLEY FCU 1020 S BAILEY ST PALMER, Alaska 99645	CHECKS	\$20.46
06/04/2024	Debit Card	AURORA DENALI LODGE PO BOX 458 HEALY, Alaska 99743	HOTEL FOR OVERNIGHT STAY BEFORE MORNING EVENT ON 7/05/24	\$176.88
06/05/2024	Debit Card	ROSE'S CAFE MILE 249.5 PARKS HWY HEALY, Alaska 99743	SNACKS AND TIP FOR MEET AND GREET	\$172.50
06/10/2024	Debit Card	DIVISION OF ELECTIONS PO BOX 110017 JUNEAU, Alaska 99811	VOTER LIST	\$20.00
06/12/2024	Debit Card	HOME DEPOT 1255 E PALMER WASILLA HWY WASILLA, Alaska 99654	STAKES FOR SIGNS	\$35.88
06/13/2024	Non-Monetary SCREWS FOR SIGNS	MCCABE, KEVIN PO BOX 520248 BIG LAKE, Alaska 99652		\$18.00
06/17/2024	Non-Monetary INK CARTRIDGES FOR PRINTER	MCCABE, KEVIN PO BOX 520248 BIG LAKE, Alaska 99652		\$187.98
06/17/2024	Debit Card	PIP PRINTING AND MARKETING SERVICES 833 E 4TH AVE ANCHORAGE, Alaska 99501	YARD SIGNS	\$721.73
06/19/2024	Non-Monetary STAMPS	MCCABE, LINN PO BOX 520248 BIG LAKE, Alaska 99652		\$13.00
06/26/2024	Debit Card	DIVISION OF ELECTIONS PO BOX 110017 JUNEAU, Alaska 99811	OFFICIAL ELECTION PAMPHLET	\$100.00

Date	Payment Method	Vendor	Purpose	Amount
07/02/2024	Debit Card	COSTCO 4125 DEBARR RD ANCHORAGE, Alaska 99508	CANDY FOR 4TH OF JULY PARADE IN WILLOW	\$359.42
07/03/2024	Debit Card	PIP PINTING AND MARKETING SERVICES 833 E 4TH AVE ANCHORAGE, Alaska 99501	RACK CARDS	\$440.54
07/08/2024	Check 102	CITY OF HOUSTON PO BOX 940027 HOUSTON, Alaska 99694	FOUNDER'S DAY SPECIAL EVENT VENTDOR PERMIT APPLICATION	\$10.00
07/08/2024	Debit Card	PIP PRINTING AND MARKETING SERVICES 833 E 4TH AVE ANCHORAGE, Alaska 99501	LETTERHEAD AND ENVELOPES	\$595.58
07/08/2024	Debit Card	UPS STORE #4347 7362 W PARKS HWY WASILLA, Alaska 99623	COPIES OF FLYER FOR EVENT	\$16.25
07/08/2024	Check 101	USPS 2809 BIG LAKE RD BIG LAKE, Alaska 99652	POSTAGE	\$136.00
07/14/2024	Debit Card	FLOATER'S 2990 S BIG LAKE RD BIG LAKE, Alaska 99652	FOOD AND TIP FOR EVENT	\$232.61
07/17/2024	Debit Card	PIP PRINTING AND MARKETING SERVICES 833 E 4TH AVE. ANCHORAGE, Alaska 99501	PRINTED ENVELOPES	\$126.51
07/18/2024	Debit Card	SHELL 14468 W HOLLYWOOD RD BIG LAKE, Alaska 99652	GAS FOR POV FOR DELIVERY OF SIGNS	\$102.12

Date	Payment Method	Vendor	Purpose	Amount
07/18/2024	Debit Card	SHELL 14469 W HOLLYWOOD RD BIG LAKE, Alaska 99652	GAS FOR POV FOR DELIVERY OF SIGNS	\$62.78
07/19/2024	Bank Fee	ANEDOT INC 1340 Poydras Street Suite 1770 NEW ORLEANS, Louisiana 70112	CREDIT CARD FEES FOR CURRENT REPORTING PERIOD.	\$126.63
				Expenditure Total: \$4,665.67

DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
07/05/2024	META 1 HACKER WAY MENLO PARK, California 94025	BOOST OF BIG LAKE EVENT FLYER POST. AMENDED TO CORRECT: ORIGINALLY LISTED AT \$20.50; ACTUAL IS \$20.00.	\$20.00	\$20.00
07/15/2024	RESULTS ADVERTISING WERKS PO BOX 877556 WASILLA, Alaska 99687	VOICE RECORDING FOR AD	\$50.00	\$50.00
07/16/2024	HOGOSHA 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, South Dakota 57702	WEBSITE MAINTENANCE AND DIGITAL AD PRODUCTION.	\$480.00	\$480.00
			Remaining Debt Total:	\$550.00

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **08/13/2024**Filer First Name: **Linn**Filer Middle Name: **M**Filer Last Name: **MCCABE**Filer's Title: **Treasurer**Report Type: **Seven Day Report**

CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**Candidate Address: **PO Box 520248**City, State Zip: **Big Lake, Alaska 99652**

REPORT INFORMATION

Election Year: **2024**Election: **State Primary**Report Type: **Seven Day Report**Reporting Period: From **07/20/2024** Through **08/10/2024**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN		
Beginning Cash On Hand:	\$6,154.68			
[+] ↓		Previous Campaign Income: (From Box A of previous report)	Campaign Income Total: (Box A)	
Total Income Reported:	\$5,770.31	[+] ⇒	\$6,620.99	[=] ⇒ \$12,391.30
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)	Campaign Expense Total: (Box B)	
Total Expenditures Reported:	\$2,988.24	[+] ⇒	\$4,665.67	[=] ⇒ \$7,653.91
[=] ↓				
Closing Cash On Hand:	\$8,936.75			
[-] ↓				
Total Debts:	\$50.00			
[=] ↓				
Surplus/Deficit:	\$8,886.75			

INCOME

Date Received	Payment Method	Contributor	Details	Amount
08/05/2024	Credit Card	ROTH, DOUG 10360 PRINCE WILLIAM CIRCLE ANCHORAGE, Alaska 99515	Occupation: PILOT Employer: ATLAS AIR	\$208.65
08/06/2024	Check 2840	AMAPAC 121 W FIREWEED LN STE 120 ANCHORAGE, Alaska 99503	Occupation: PAC Employer: PAC	\$250.00
08/06/2024	Credit Card	HALL, ROBERT PO BOX 871906 WASILLA, Alaska 99687	Occupation: SALES Employer: SELF	\$1,041.98
08/08/2024	Check 2327	SMITH, LILA 2436 LEE ST ANCHORAGE, Alaska 99504-3120	Occupation: RETIRED Employer: RETIRED	\$1,000.00
08/08/2024	Credit Card	TALERICO, DAVID 341 BRIARBROOK LN HAINES CITY, Florida 33844	Occupation: RETIRED Employer: RETIRED	\$52.40
08/10/2024	Credit Card	CARHART, STEVEN PO BOX 520902 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$104.48
08/10/2024	Cash	CONN, YVONNE 429 N BEAVER LAKE RD WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$100.00
08/10/2024	Credit Card	TORRISON, CLARA PO BOX 671656 CHUGIAK, Alaska 99567	Occupation: COMMERCIAL FISHER Employer: SELF	\$52.40
				Income Total: \$5,770.31

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
07/21/2024	Non-Monetary HOODIES AND TSHIRTS	MCCABE, KEVIN PO BOX 520248 BIG LAKE, Alaska 99652		\$163.94
07/22/2024	Check 103	CITY OF HOUSTON PO BOX 940027 HOUSTON, Alaska 99694	PERMIT FOR CAMPAIGN SIGN	\$25.00
07/29/2024	Debit Card	CARIBOU VIXENS VINYL 3120 S BIG LAKE RD BIG LAKE , Alaska 99623	IMPRINT LOGO ON HOODIES AND TSHIRTS	\$330.05
07/30/2024	Check 104	USPS 2809 BIG LAKE RD BIG LAKE , Alaska 99652	POSTAGE	\$219.00
07/31/2024	Debit Card	CAMPAIGN VERIFY 1215 31ST STREET NW WASHINGTON, District of Columbia 20007-9998	VERIFY IDENTITY FOR WIRELESS CARRIERS	\$95.00
07/31/2024	Debit Card	PIP PRINTING AND MARKETING SERVICES 833 E 4TH AVE ANCHORAGE, Alaska 99501	4X8 SIGNS	\$776.49
07/31/2024	Debit Card	REPUBLICAN ADS LLC 700 PENNSYLVANIA AVE SE 2ND FLOOR WASHINGTON, District of Columbia 20003	DIGITAL ADS	\$685.00
08/05/2024	Debit Card	META 1 HACKER WAY MENLO PARK, California 94025	BOOST OF BIG LAKE EVENT, ENTERED AS A DEBT FOR JULY 5, 2024 OF \$20.50 IN 30 DAY REPORT. ACTUAL AMOUNT 20.00, PAID 8/5/24	\$20.00

Date	Payment Method	Vendor	Purpose	Amount
08/07/2024	Debit Card	HOGOSHA LLC 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, South Dakota 57702	DIGITAL VIDEO AD (ENTERED AS DEBT FOR 7/16/24 IN 30 DAY REPORT) PD 8/7/24	\$480.00
08/08/2024	Debit Card	PIP PRINTING AND MARKETING SERVICES 833 E 4TH AVE ANCHORAGE, Alaska 99501	REMITTANCE ENVELOPES	\$72.79
08/10/2024	Bank Fee	ANEDOT INC 1340 POYDRAS ST STE 1770 NEW ORLEANS, Louisiana 70112	BANK FEES ON CREDIT CARD DONATIONS FROM JULY 20 THRU AUGUST 10, 2024	\$120.97
				Expenditure Total: \$2,988.24

DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
07/05/2024	META 1 HACKER WAY MENLO PARK, California 94025	BOOST OF POST. LISTED AS DEBT ON 30-DAY REPORT. LISTED AS \$20.50; ACTUAL CHARGE \$20.00. PAID AUGUST 6, 2024.	\$20.00	\$0.00
07/15/2024	RESULTS ADVERTISING WERKS PO BOX 877556 WASILLA, Alaska 99687	VOICE RECORDING FOR AD. BILL NOT YET RECEIVED.	\$50.00	\$50.00
07/16/2024	HOGOSHA 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, South Dakota 57702	WEBITE MAINTENANCE AND DIGITAL AD PRODUCTION. LISTED AS DEBT ON 30-DAY REPORT. PAID IN FULL 8/7/24.	\$480.00	\$0.00
			Remaining Debt Total:	\$50.00

Complaint, pp. 2-3, as received by APOC

OPTIMA
PUBLIC RELATIONS

**Debt Incurred 7/15/2024
Not Reported.**

Billed To	Date of issue	Invoice Number	Amount Due (USD)
Kevin McCabe McCabe for State House	10/15/2024	24-158-VKM	\$0.00
	Due Date		
	10/29/2024		
Description	Rate	Qty	Line Total
Account Management & Campaign Strategy <i>July 15 & Nov 5, 2024 Hour Fee</i> Staff: Becca Client Coordination (Misc phone calls, weekly meetings and emails re: campaign, project assistance)	\$150.00	2	\$1,000.00
Graphic Design 6 Digital Ad Sets x 2 Sets Absentee Voter Early Voting Voter Additional Voter Signage FB Graphics Digital Ads (Applies for Streaming Google Absentee Voter Mobile Absentee Voting Digital Ad Set Proven Leadership: Real Purpose Social Media Enhancements Mobile Voter Lists Postcard Early Voting Signage Video Assets Animated Ads	\$150.00	6.5	\$975.00
Digital Advertising Launch Sept 1 Nov 5 (Partial Pre-0.6) Google Digital Search Facebook YouTube Heart Video Integration	\$3,500.00	1	\$3,500.00

Optima Public Relations
907-202-5516
7362 W Parks Hwy. #665
Wasilla, AK 99623

Comments 10

Add a comment

Page 2

Pat Martin Sep 9
Debt Incurred 7/15/2024
Not Reported.

Reply

Pat Martin Sep 9
Highlighted Text

Reply

Page 1 of 4

Radio Placement	\$3,000.00	1	\$3,000.00
Orbit - Nov 5			
10-second ad (voiced KRM 3.60, 6sec VT Voice)			
Traditional Radio Stations			
Local Marketing Stations w/ 3rd Party Networks Integration			
Bar1 (KWHF)			
Postcard			
Streaming (Spotify/Pandora/YouTube) - geo-targeted			
Video & Podcast Micro Targeting			
 Radio Ad Production	 \$360.00	 1	 \$360.00
Orbit voice over reads w/ KRM & Previous VT Voice			
4 Final Version w/ sound nymph (30 sec/10 sec) + 15 sec (for VT targeting 20sec)			
 Text Messaging & Email Targeting	 \$2,000.00	 1	 \$2,000.00
6 Text Messages (Image & various content with link)			
6 Responsive Email Marketing Ads (includes design and content copy)			
12,000x400x650 recipients/s			
 • \$125 Per Text			
• \$150 Per Email			
 ONE TIME FEES			
Graphic Design & Requests (\$120)			
Set-Up Fee (\$120)			
Data Entry/Upload (*option verification for each list) (\$125)			
 Printing / Postage for Mailers	 \$6,000.00	 1	 \$6,000.00
PPG Printing			
• Master 1: Early Voting			
• Master 2: ?			
• Mail Signature w/			
• Streamer/ledge for Sprague			
(postage paid - web receipt with final bill or credit)			

TERMS
PAYMENT INFO:
For the bank transfer: Optina Public Relations's Business Account Info

x Comments 10   

 **Add a comment**   

 **Sep 9**   

Highlighted Text

Reply

 **Pat Martin**   

Sep 9   

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Reply

**Kevin McCabe
PO Box 520248
Big Lake, AK 99652**

01/16/2025

Response to Complaint by Alexander. 24-12-CD

To Whom it may concern:

This complaint appears premature, as the final report is not due until February 18, 2025. I am responding to his complaint in the time required by APOC rules, however there will be a campaign reconciliation done for the final APOC report to be filed on February 18, 2025 which may address some of his concerns.

Nonetheless, Mr. Alexander has raised allegations regarding my campaign's APOC reporting and he deserves a response. While I acknowledge the challenges he and others face navigating these reports, the complexity of APOC requirements—particularly for those unfamiliar with Meta's business platform and reporting structures—does create confusion, especially when attempting to audit accounts without complete information.

I want to emphasize that we strive for the utmost accuracy in our APOC reporting, even as we contend with the inherent difficulties of reconciling APOC reporting periods with the timing of payments from digital platforms such as Meta as well as other vendors.

Mr. Alexander identifies a few instances of alleged undisclosed ads, citing some by ad number and some by description.

For instance, regarding the claim labeled "Unexplained High-Spending Ad," which corresponds to item #5 on his list: this ad was part of a campaign managed, and paid for, by Optima over several weeks; which concluded after the "seven-day" APOC reporting period prior to the November 5th general election. The final invoice for this expenditure was received from Optima nearly a month after that reporting period closed and will be included in our next APOC filing, due February 18, 2025. Supporting documentation, including a letter from Optima, should already be in the complaint file for review; and further details will appear in the February 18 report.

Similarly, Mr. Alexander's reference to the October 21, 2024, "Delayed Reporting" ad stems from a payment made for an invoice after the APOC filing deadline for the seven-day report. This payment will also be reconciled and identified in our next report, as required.

We recognize the difficulties in interpreting campaign reports from the outside, especially when they involve contracts with advertising firms. These firms often provide proposals with estimated costs for services such as digital media, radio, and other ads in advance, but the actual costs and timing of placements are subject to change based on campaign dynamics. Because of limited funds, our campaign operated on a retainer basis with Optima, which handled the production and placement of ads across multiple platforms, including Meta, Google, and various radio stations. The Campaign proposal, found in an email from Optima dated August 16th is appended to the bottom of this letter. Again, it is important to note that, due to limited funds, to my knowledge, none of this proposal, requiring an expenditure, was executed until October 17th, 2024, when I verbally told Optima to go ahead with the entire plan.

APOC rules under **AS 15.13.040(a)(1)(A)** require campaigns to disclose the date and amount of all expenditures. We have complied with this requirement by reporting known payments and agreements to pay. For instance, we reported Optima as the recipient rather than providing more granular details, such as Optima's payments to Meta or other platforms. This is because we simply do not have access to Optima's expenses, which were unknown at the time of the report, because Optima managed those sub-accounts. In addition, specific details about ad timing or placements are not required by APOC and are deliberately excluded from public disclosures to maintain the competitive nature of campaigns.

In our October 29, 2024, APOC filing (page 6 of 7), we disclosed our contract with Optima, specifying:

Purpose: ACCOUNT MANAGEMENT, GRAPHIC DESIGN, DIGITAL ADS, RADIO ADS, TEXT MESSAGING AND EMAIL, PRINTING AND POSTAGE

This arrangement allowed Optima to allocate resources strategically across various mediums in response to the campaign's evolving needs and funding. It also allowed the campaign to adjust the level of services provided by Optima based on donations received to the campaign and responses required to address opposing candidates, activists, or independent expenditure (IE) ads.

While the campaign reported these expenditures as a retainer, the final costs for specific services were unknown until those services were executed, sub-vendor invoices were finalized, and the final billing statement was sent from Optima to the campaign. These expenditures, as well as any corrections or amendments, will all be reported by the candidate, as required by **2 AAC 50.321**, which states:

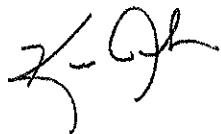
(d) If an expenditure required to be reported under (a) or (b) of this section is made to an advertising agency or to an individual or business that provides campaign consultation or management services, the report must disclose in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed, and the amount of the expenditure.

It is important to note that the language in **2 AAC 50.321** is in past tense, requiring the full reporting of expenditures finally known *after* they have been made.

Accordingly, we will report all details provided by the vendor, based on the final bill, in the next reporting period, as defined by APOC rules.

Our commitment to transparency remains unwavering. We meticulously reconcile all financial records, including expenditures with entities such as Anedot, Meta, PIP, and Optima. Any discrepancies, usually stemming from timing differences between vendor invoices and APOC reporting periods, are promptly addressed in subsequent filings or the final report.

Although Mr. Alexander's complaint appears retaliatory, we are fully committed to adhering to APOC communication standards and fulfilling all statutory reporting obligations, regulations, and requirements. We appreciate your guidance as we work to ensure complete transparency, maintain full compliance, and ensure that Mr. Alexander's complaint is thoroughly reviewed and adjudicated.



Sincerely,
Kevin McCabe

----- Forwarded message -----

From: Becca Koonce <becca@optimapublicrelations.com>

Date: Fri, Aug 16, 2024 at 4:21 PM

Subject: General Election Campaign Plan Re: PSA Radio Opportunity - Kevin McCabe

To: Kevin McCabe <kevinj.mccabe@gmail.com>

Cc: Danika Baldwin <danika@optimapublicrelations.com>, Linn McCabe <linn.mccabe@gmail.com>,

Angela Stephl <astephl907@gmail.com>, Sarah Paulus <sarah@optimapublicrelations.com>

Hi Kevin,

Hope all is well. I wanted to circle back with you on the plan for the general campaign and how we can help. Based on our previous discussions, I've put together a comprehensive plan for the general election. This plan includes digital advertising, social media, radio, mailers, text/call outreach, and e-blasts, similar to what we did last time, with adjustments to improve effectiveness. This is all just a ballpark on options and can be customized/scaled/adjusted depending on how you see the best fit to move forward. In the breakdown below we've outlined each portion with an estimated budget and timeframe:

1. Digital Advertising

Platform: Google Ads, Facebook/Instagram, YouTube, Search

Focus: PFD theme, Second Amendment, Education, and Resource Development

Strategy:

- Geo-targeting specific areas in District 30
- Video ads with voiceovers emphasizing key policy points
- Retargeting ads for website visitors and social media engagers

Estimated Budget: \$3,500

Timeframe: October 1 - November 7

2. Social Media

Platform: Facebook, Instagram, Twitter

Focus: Daily updates, voter engagement, policy posts, and key messaging content

Strategy:

- Frequent posting with a mix of video, graphics, and text
- Boosting posts around key issues and events
- Leveraging local endorsements and community groups

Estimated Budget: \$1,200

Timeframe: Ongoing, with a push in the last two weeks

3. Radio Advertising

Stations: KAGV 1110 AM (Big Lake), KAYO 100.9 FM (Wasilla), KVNT 1020 AM (Eagle River), KMBQ-

FM 99.7 FM (Wasilla), KBBO-FM 92.1 FM (Houston), KXLW 96.3 FM (Houston)

Contd: Spotify/ iHeart Streaming (geotargeted)

Focus: Promoting key issues like the PFD, Second Amendment, and Limited Government
Strategy:

- 60-second spots during peak listening times (6 AM - 10 AM, 3 PM - 7 PM)
- Rotate spots highlighting different issues

Estimated Budget: \$5,500 (including updated spot production)
Timeframe: October 26 - November 7

4. Mailers

Focus: Highlighting positions on key issues, including Equality, Education, and Resource Development
Strategy:

- Two rounds of mailers: one in early October, one in late October
- Targeted to likely voters in District 30

Budget: \$3,000
Timeframe: October 5 and October 25

5. Text/Call Outreach

Focus: Voter turnout, reminders about early voting, and key dates
Strategy:

- Use voter data to send personalized texts
- Call campaign focusing on undecided voters and previous supporters

Budget: \$1,000
Timeframe: October 15 - November 7

6. E-Blasts

Focus: Updates on the campaign, key issues, and reminders for voting
Strategy:

- Weekly e-blasts to the campaign's email list
- Special updates as necessary (e.g., new endorsements, key events)

Budget: \$500
Timeframe: Weekly, with additional blasts as needed

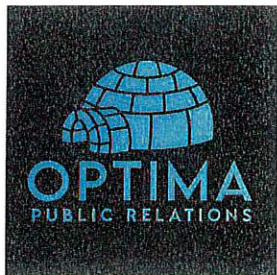
Action Items:

- Finalize radio station agreements and spot placements
- Review and approve digital ad creatives and mailer designs
- Confirm dates for text/call outreach and e-blasts
- Schedule and promote campaign events/fundraisers
- EIN Verification for Digital Ads
- Social Media Access for Content & Ad Placement
- Updated Agency Agreement (required for radio placements)

Please review the plan and let me know if there are any adjustments or additions you'd like to make. Once approved, we can begin execution right away. I have included in the attachments your PSA from iHeart, some previous radio spots, digital ads, and updated creative options for your review.

Looking forward to your feedback!

Becca



Optima Public Relations
907-202-5516
7362 W. Parks Hwy, #665
Wasilla, AK 99623

Billed To Kevin McCabe McCabe for State House	Date of Issue 10/15/2024	Invoice Number 24-158-VKM	Amount Due (USD) \$0.00
	Due Date 10/29/2024		

Description	Rate	Qty	Line Total
Account Management & Campaign Strategy July 15 - Nov 5, 2024 Fixed Fee Staff: Becca Client Coordination (Misc phone calls, weekly meetings and emails re: campaign, project assistance)	\$500.00	2	\$1,000.00
Graphic Design 6 Digital Ad Sizes x 2 Sets Absentee Mailer Early Voting Mailer Additional Mailer Signage FB Graphics Web Digital Graphics for Streaming/Google Absentee Voting Mailer Absentee Voting Digital Ad Set Proven Leadership. Real Purpose. Social Media Endorsements McCabe Mailer Edits Postcard Early Voting Signage Video Assets Animated Ads	\$150.00	6.5	\$975.00
Digital Advertising Launch Sept - Nov 5 (Partial Pre-Bill) Google Digital Search Facebook Youtube iHeart Video Integration	\$3,500.00	1	\$3,500.00

Radio Placement Oct16 - Nov 5 30-second ad voiced KM & 60, Sec YT Voice Traditional Radio Stations iHeart Morning Shows w/ 3rd Party Platform Integration Dan F (KVNT) Porcaro Streaming (Spotify/Pandora/iHeart) - geotargeted Video & Podcast Micro Targeting	\$3,000.00	1	\$3,000.00
Radio Ad Production Voice over edits w/ KM & Previous YT Voice 4 Final Version w/ sound rights (30 sec/60 sec) + 15 sec (for YT bumper ads)	\$350.00	1	\$350.00
Text Messaging & Email Targeting 6 Text Messages (Image & written content with link) 6 Reppsnolve Email Marketing Ads (includes design and content/copy) @ appx 4000-5550 recipients	\$2,000.00	1	\$2,000.00
+ \$250 Per Text + \$150 Per Email			
ONE TIME FEE(s): Graphic Design & Reports (\$120) Set-Up Fee (\$100) Data Entry/Upload "opt-in" verification for each List (\$125)			
Printing / Postage for Mailers PIP Printing + Mailer 1- Early Voting + Mailer 2 ? + 4x8 Signage x 6 + Sticker/Badge for Signage (prepayment - will adjust with final bill or credit)	\$6,000.00	1	\$6,000.00

Subtotal	16,825.00
Tax	0.00
Total	16,825.00
Amount Paid	16,825.00
Amount Due (USD)	\$0.00

Terms

PAYMENT INFO:

For the bank transfer, Optima Public Relations's Business Account Info:
Wells Fargo 1012497606
Routing 125200057



OPTIMA PUBLIC RELATIONS
7362 W. Parks Hwy #665
Wasilla, Alaska 99623
www.optimapublicrelations.com
info@optimapublicrelations.com

Re: Clarification of Invoice and Services Rendered – McCabe Campaign

To Whom It May Concern,

I am writing on behalf of Optima Public Relations regarding recent complaints filed concerning Representative Kevin McCabe's APOC disclosures and our invoicing. I want to clarify the nature and timeline of Optima's professional services for Representative McCabe's campaign.

On **July 15, 2023**, Optima representatives met with Representative McCabe for an **introductory discussion** regarding potential campaign services. At that time, no agreement, contract, or financial commitment was made. This meeting was strictly exploratory, and no debts were incurred.

Following this initial discussion, Optima prepared a proposal outlining potential services. After further communication, and Optima's submission of a final formal proposal, Representative McCabe formally engaged Optima's services in **October 2023**, at which point a binding commitment was made and an invoice was issued. The official invoice was dated **October 15, 2023**. Had Mr. McCabe not accepted our proposal, the amount dated July 15 would have been absorbed by Optima as, once again, Mr. McCabe made no fiduciary commitment.

While it shows the initial discussions, Optima's invoicing procedure reflects the date of formal engagement and service commitment—not preliminary or exploratory conversations. Representative McCabe's APOC filings align with this practice and accurately reflect when actual commitments for payment were made.

Additionally, Optima itemizes campaign services in detail during the final Invoicing, including advertising types and platforms, to ensure clarity and compliance. Many of the radio blocks and ad space are purchased in advance directly by Optima and we often don't



know the amounts or have the final details until some time after the elections. Any suggestion that invoices were vague or improperly dated is incorrect. At no point did Representative McCabe incur financial obligations with Optima prior to October 2023.

We respectfully submit this clarification to ensure APOC's records accurately reflect the facts. If you require supporting documentation—including invoices, proposals, or related communications—we are happy to provide them.

Sincerely,

A handwritten signature in black ink that reads "Rebecca R. Koonce".

Rebecca Koonce

Owner, Optima Public Relations

Prepared by Optima Public Relations

A full-service public relations, advertising, and branding agency.

Info@OptimaPublicRelations.com

Optima Public Relations, LLC
7362 W. Park Hwy, # 665
Wasilla, Alaska 99623

EIN: 45-2229260 / S-Corp | Alaska Business License No: 1088688
General Liability Insurance / Worker's Comp / Tech and E & O: Liberty Mutual