

[TAB 12]

POFD

Civil Penalty Appeals and Referrals

Presented By:

Heather Hebdon, Executive Director

**CONSENT AGENDA CIVIL PENALTY APPEALS AND REFERRALS
UNDER AS 39.50.135, 2 AAC 50.855-860
Public Official Financial Disclosure
January 14, 205 Commission Meeting**



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
apoc@alaska.gov
doa.alaska.gov/apoc

ALASKA PUBLIC OFFICES COMMISSION STAFF RECOMMENDATION FOR COMMISSION ACTION

PREPARED BY: Heather Hebdon

DATE: December 29, 2025

RESPONDENT: Wilfred Fernandez III

CIVIL PENALTY

ASSESSED UNDER: **Public Official Financial Disclosure: AS 39.50.135, 2 AAC 50.855**

REASON FOR FILING: Municipal Office Holder

LATE REPORT(S): Public Official Financial Disclosure
 2025 Final POFD Statement¹

DUE DATE: November 3, 2025

FILED ON: December 2, 2025

DAYS LATE: 29 days late

DATE DELINQUENCY NOTICE(S) SENT: November 14, 2025; November 26, 2025

APPEAL RECEIVED: December 2, 2025

MAXIMUM STATUTORY PENALTY: \$290

PENALTY ASSESSED²: \$145

RECOMMENDATION: **Reduce by 50%**

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

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Filer states that he moved out of state in July and had some mix-ups with his mail and email during the transition.

¹ Exhibit 1, 2025 Final POFD.

² Reduced to 50% of maximum under 2 AAC 50.855(b)(1)(C).

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. A civil penalty may be reduced when the filer has had no late filings within the past five years.³ Here, Mr. Fernandez has submitted timely statements since he took office in 2023 and therefore qualifies for a 50% reduction.

Staff finds no other applicable mitigation criteria that would further reduce the penalty. Based on his good filing history staff recommends a 50% reduction of the assessed penalty.

FILER'S REPORTING HISTORY:

2023 Initial POFD – timely
2024 Annual POFD – timely
2025 Annual POFD – timely
2025 Final POFD – 29 days late, subject of this appeal

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

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

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

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

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

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

³ 2 AAC 50.865(a)(1)(A)

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

⁶ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions.

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

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

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

Aggravating Factors [2 AAC 50.865(d)]:

- Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁷ **2 AAC 50.865(d)(1)**
- More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

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

- Waived**
- Reduced by 50% to \$72.50**
- Upheld at the assessed amount of _____**

⁷ Value greater than \$1000.

POFD FORM

COMPLETED

Submission Date: **12/02/2025**

FILER INFORMATION

First Name: **Wilfred**
 Last Name: **Fernandez**
 Address: **480 w Ivory Dr**
 City, State Zip: **Wasilla, Alaska 99654**
 Contact Phone: **9072321205**
 Alternate Phone: **Nothing to Report**
 Fax (Optional): **Nothing to Report**
 Email: **wilfred@fregalaska.com**
 Partner Type: **None / Not Applicable**
 Spouse/Domestic Partner Name: **Nothing to Report**
 Dependent Children: **0**
 Non-Dependent Children: **0**

PURPOSE OF FILING

Report Year: **2025**

Report Dates: From **01/01/2025** Through **12/02/2025**
 Filing As: **Municipal Office Holder**
 Municipality: **Matanuska-Susitna Borough**
 Office: **Planning or Zoning Commission**
 Report Type: **Final**

INCOME

Owner	Type	Detail	Description	Amount
Filer	Other	Source: Sold my residence in palmer.		\$100,000 - \$200,000
Filer	Self Employment	Keller Williams Realty Alaska Group Commission From: 01/01/2025 Through 12/02/2025 Time Worked: 12/2/8	I was a commissioned sales agent at Keller Williams Realty Alaska Group and operated my business under the LLC Fernandez Real Estate Group.	\$20,000 - \$50,000
Client Names			Client Amount	
No Clients Reported				

INTERESTS

Owner	Type	Detail	Description / Interest
No Interests / Nothing to Report			

LOANS AND DEBTS

Owner	Type	Name
No Debt / Nothing to Report		

LEASES

Owner	Type of Lease	Lease/Contract ID	Interest	Status	Description
No Leases / Nothing to Report					

CLOSE ECONOMIC ASSOCIATIONS

Associated Person	Description
No Associations / Nothing to Report	

LOBBYIST PARTNER EMPLOYERS

Name	Address	Compensation
No Lobbyist Partner Employers / Nothing to Report		

Civil Penalty Appeal Affidavit

AS 39.50 Public Official Financial Disclosure Law

ARRIVED
12/2/2025
APOC - ANCH
PM HC FAX ELE

Name of Appellant: Wilfred Fernandez III

Position and City/Borough: Planning Commissioner - Mat-Su Borough

Penalty Issued For (check box): State Filer Late POFD
 Municipal Filer Late POFD

Instructions: If you send payment, you need not file this. An affidavit is required only if you are appealing the CPA.

Statement: State why the reporting violation occurred and reasons the CPA should not be assessed (use additional pages if needed). I do hereby swear and affirm that:

I Moved out of the State of Alaska in July of 2025 and some mail and emails have gotten mixed up in the move. I apologize for my lateness and ask that the penalty fees assessed be omitted.

Thank you!

Wil

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

Sign/Date: Wilfred Fernandez 11/1



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

December 19, 2025

Via Email Only

Wilfred Fernandez
480W. Ivory Drive
Wasilla, AK 99654
wilfred@fregalaska.com

Re: Notice of Penalty

Dear Mr. Fernandez:

According to our records you did not timely file your 2025 Final Public Official Financial Disclosure (POFD) Statement that was due on November 3, 2025. Instead, your statement was filed on December 2 (29 days late). By law a maximum penalty of \$10 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is 290.²

However, because it was your final statement, regulation allows APOC staff to document the violation and reduce the assessed penalty to 50% of the maximum. **Accordingly, the assessed penalty owed is \$145.**³

Additionally, please be advised:

- 1) You have the right to appeal staff's conclusion that a violation has occurred, or the penalty amount assessed.⁴ **You have already submitted an appeal for this matter, in response to staff's notice of deficiency. You may, but are not required to, submit additional documentation for your appeal.** If we do not receive payment or additional appeal documentation within thirty days, we will use your previously submitted appeal to prepare a recommendation for the Commission. You will receive a copy of staff's recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in-person or telephonically.

¹ AS 39.50.135.

² 2 AAC 50.855(a).

³ 2 AAC 50.855(b)(1)(C).

⁴ 2 AAC 50.831(a).

2) Alternatively, you may pay the reduced penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; visiting our [website](#)⁵ to make a payment by credit card; or you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other questions concerning this matter, please contact the APOC staff.

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

Thank you,

ALASKA PUBLIC OFFICES COMMISSION



Heather R. Hebdon
Executive Director

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Wilfred Fernandez 480W. Ivory Drive Wasilla, AK 99654 wilfred@fregalaska.com	<input checked="" type="checkbox"/> Email

 12/19/2025
Signature Date

⁵

<https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

PLEASE NOTE: credit card payment cannot be made by phone; they must be made online.



Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
apoc@alaska.gov
doa.alaska.gov/apoc

December 29, 2025

Via Certified Mail, US Mail, and Email

Wilfred Fernandez
1502 Fawcett Avenue, Unit 1208
Tacoma, WA 98402
wilfred@fregalaska.com

Re: Commission Meeting Notice
Civil Penalty Appeal – 2025 Final POFD Statement

Dear Mr. Fernandez:

The Commission will review the matter of the civil penalty assessed for your late-filed 2025 Final POFD Statement at its January 14, 2026, Commission Meeting in Anchorage. Enclosed, is the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting, either in-person, by telephone (1-907-202-7104, Conference ID: 382 982 822#), or online via [Microsoft Teams](#) (Meeting ID: 237 734 363 936 42, Passcode: iz3Ps6vV). Please notify our office if you intend to participate. POFD Civil Penalty Appeals and Referrals are expected to begin at **3:00 pm on Wednesday, January 14, 2026**.

This matter will initially be presented to the Commission on a Consent Agenda. If you do not wish to present your appeal or make a statement to the Commission, and your appeal is not removed from the agenda by a Commissioner, the staff recommendation will be approved without discussion or deliberation. If you wish to present or make a statement to the Commission, please notify staff or the Commission prior to the approval of the consent agenda. Staff will send you a copy of the Commission's final decision regarding your appeal.

If you have any questions, please contact our office.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

Heather R. Hebdon
Executive Director

Encl.: Staff Recommendation

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

Wilfred Fernandez
1502 Fawcett Ave, Unit 1208
Tacoma, WA 98402
wilfred@fregalaska.com

Certified Mail
 US Mail
 Email

Cari Rousselle 12/29/25

Signature

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: wilfred@fregalaska.com
Sent: Monday, December 29, 2025 1:33 PM
Subject: Relayed: Re-Sending Commission Meeting Notice

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

wilfred@fregalaska.com (wilfred@fregalaska.com)

Subject: Re-Sending Commission Meeting Notice



Re-Sending
Commission Me...



THE STATE
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GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

PREPARED BY: Heather Hebdon

DATE: December 29, 2025

RESPONDENT: David Langford

CIVIL PENALTY

ASSESSED UNDER: **Public Official Financial Disclosure: AS 39.50.135, 2 AAC 50.855**

REASON FOR FILING: State Office Holder

LATE REPORT(S): Public Official Financial Disclosure
 2025 Initial POFD Statement¹

DUE DATE: July 31, 2025

FILED ON: September 8, 2025

DAYS LATE: 39 days late

DATE DELINQUENCY NOTICE(S) SENT: August 8, 2025; September 5, 2025

APPEAL RECEIVED: September 11, 2025

MAXIMUM STATUTORY PENALTY: \$390

PENALTY ASSESSED²: \$292.50

RECOMMENDATION: **Waiver**

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

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Filer states that he was only notified of his filing requirement 2 days prior to the due date.
2. Filer states that he obtained an extension for filing his income tax return and filed his statement as soon as his return had been completed.

¹ Exhibit 1, 2025 Initial POFD.

² Reduced to 75% of maximum under 2 AAC 50.855(b)(1)(D).

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. APOC staff received notice from the Division of Personnel of Mr. Langford's July 1 appointment on August 1, 2025 – 1 day after the due date for his initial statement. Because of this technical oversight, staff was unable to issue a courtesy notice of his filing requirement prior to the due date.
2. Because he needed financial information from his tax return, Mr. Langford submitted his initial statement shortly after his tax return was filed with the IRS.
3. A civil penalty may be reduced by up to 50% for an inexperienced filer. An inexperienced filer is someone who has been subject to a reporting requirement for less than 365 days. In this instance, Mr. Langford was a first-time filer and meets the definition of an inexperienced filer.³
4. Based on the delayed notification from the Division of Personnel, staff's delay in notifying him of his initial requirement, and his status as an inexperienced filer, staff recommends the penalty be waived.

FILER'S REPORTING HISTORY:

2025 Initial POFD – 39 days late, subject of this appeal

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

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

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

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

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

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

³ 2 AAC 50.865(a)(1)(A)

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

⁶ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions.

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

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

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

Aggravating Factors [2 AAC 50.865(d)]:

- Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁷ **2 AAC 50.865(d)(1)**
- More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

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

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

⁷ Value greater than \$1000.

POFD FORM

COMPLETED

Submission Date: **09/08/2025**

FILER INFORMATION

First Name: **David**
 Last Name: **Langford**
 Address: **1202 Seward Avenue**
 City, State Zip: **Sitka, Alaska 99835**
 Contact Phone: **406 672 2269**
 Alternate Phone: **406 628 7341**
 Fax (Optional): **n/a**
 Email: **davidl@mehs.us**
 Partner Type: **Spouse**
 Spouse/Domestic Partner Name: **Keri L. Spahr-Langford**
 Dependent Children: **0**
 Non-Dependent Children: **0**

PURPOSE OF FILING

Report Year: **2025**

Report Dates: From **01/01/2024** Through **12/31/2024**
 Filing As: **State Office Holder**
 Branch: **Executive**
 Position: **Executive Director**
 Department: **Department of Education and Early Development**
 Report Type: **Initial**

INCOME

Owner	Type	Detail	Description	Amount
Filer, Spouse	Rental	Tenant: TMC		\$100,000 - \$200,000
Filer, Spouse	Rental	Tenant: Langford International, Inc.		\$20,000 - \$50,000
Filer	Dividend or Interest	Banks		\$5,000 - \$10,000
Filer	Other	Source: State of Alaska		\$10,000 - \$20,000
Filer	Other	Source: Social Security		\$20,000 - \$50,000
Spouse	Other	Source: Social Security		\$20,000 - \$50,000

INTERESTS

Owner	Type	Detail	Description / Interest
Filer, Spouse	Business	Business Name: Langford International, Inc. 12742 Canyon Creek Road Molt, Montana 59057	Position / Type: Stockholder
Filer, Spouse	Real Property	12742 Canyon Creek Road Molt, Montana 59057	Ownership Interest: Other::Ag land
Filer, Spouse	Real Property	1044 Buffalo Trail Laurel, Montana 59057	Ownership Interest: Other::AirBnB
Filer, Spouse	Beneficial	Managed By: Oakmark	Oakmark Ownership: 100%

Owner	Type	Detail	Description / Interest
Filer, Spouse	Beneficial	Managed By: Fidelity	Fidelity Ownership: 100%

LOANS AND DEBTS

Owner	Type	Name
Filer, Spouse	Lender	Glacier Bank

LEASES

Owner	Type of Lease	Lease/Contract ID	Interest	Status	Description
No Leases / Nothing to Report					

CLOSE ECONOMIC ASSOCIATIONS

Associated Person	Description
No Associations / Nothing to Report	

LOBBYIST PARTNER EMPLOYERS

Name	Address	Compensation
No Lobbyist Partner Employers / Nothing to Report		

Civil Penalty Appeal Affidavit

AS 39.50 Public Official Financial Disclosure Law

ARRIVED

SEP 11 2025

**APOC - ANCH
PM HC FAX ELE**

Name of Appellant: David P. Langford

Position and City/Borough: _____

Penalty Issued For (check box): State Filer Late POFD
 Municipal Filer Late POFD

Instructions: If you send payment, you need not file this. An affidavit is required only if you are appealing the CPA.

Statement: State why the reporting violation occurred and reasons the penalty should not be assessed (use additional pages if needed). I do hereby swear and affirm that:

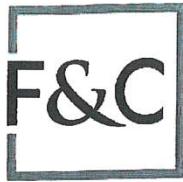
I was only notified this form was due two days before the due date. I have included a letter from my accountant documenting the extension we had for filing income taxes. We filed the report as soon as taxes were finished.

POFD has been filed and signed on line.

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

Sign/Date:

9/8/2025



FAGAN & COOK
PC
CERTIFIED PUBLIC ACCOUNTANTS

GRANT M. FAGAN, CPA BRIAN T. COOK, CPA

1555 Campus Way, Suite F
Billings, Montana 59102
Phone: (406) 652-2822
Fax: (406) 652-0999
www.FaganCook.com

September 8, 2025

Re: David Langford
State of Alaska APOC Form

To Whom It May Concern,

David Langford asked me to write a letter explaining the late filing of his State of Alaska APOC form. The Langford's filed for an extension of time to file their 2024 Income Tax Returns. The tax returns were completed and filed on September 5, 2025.

They then worked directly with me to complete the income portion of the APOC form from their income tax return on September 8, 2025.

If I can be of any further assistance let me know.

Sincerely,

Brian T. Cook, CPA

ARRIVED

SEP 11 2025

APOC - ANCH
PM HC FAX ELE



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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Anchorage, AK 99508-4149
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www.doa.alaska.gov/apoc

September 19, 2025

Via Email Only

David Langford
1202 Seward Avenue
Sitka, Alaska 99835
davidl@mehs.us

Re: Notice of Penalty

Dear Mr. Langford:

According to our records you did not timely file your 2025 Initial Public Official Financial Disclosure (POFD) Statement that was due on July 31, 2025. Instead, your statement was filed on September 8, 2025 (39 days late). By law a maximum penalty of \$10 accrues each day the report is late.¹ Accordingly, the maximum penalty the Alaska Public Offices Commission could assess you is \$390.²

However, regulation allows APOC staff to document the violation and reduce the assessed penalty to 75% of the maximum. **Accordingly, the assessed penalty owed is \$292.50.**³

Additionally, please be advised:

- 1) You have the right to appeal staff's conclusion that a violation has occurred, or the assessed penalty.⁴ **You have already submitted an appeal for this matter, in response to staff's notice of deficiency. You may, but are not required to, submit additional documentation for your appeal.** If we do not receive payment or additional appeal documentation within thirty days, we will use your previously submitted appeal to prepare a recommendation for the Commission. You will receive a copy of staff's recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in-person or telephonically.

¹ AS 39.50.135.

² 2 AAC 50.855(a).

³ 2 AAC 50.855(b)(1)(D).

⁴ 2 AAC 50.831(a).

2) Alternatively, you may pay the reduced penalty and avoid formal Commission action by remitting payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; visiting our [website](#)⁵ to make a payment by credit card; or you may pay in cash at our offices within 30 days.

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

Thank you,

ALASKA PUBLIC OFFICES COMMISSION



Heather R. Hebdon
Executive Director

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

David Langford 1202 Seward Avenue Sitka, Alaska 99835 davidl@mehs.us	<input checked="" type="checkbox"/> Email
---	---



Signature

9/19/2025

Date

⁵

<https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

PLEASE NOTE: credit card payment cannot be made by phone; they must be made online.

Hebdon, Heather R (DOA)

From: Microsoft Outlook
To: Langford, David P (MEHS)
Sent: Friday, September 19, 2025 12:26 PM
Subject: Relayed: 250919 Langford, David NOP.pdf

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

[Langford, David P \(MEHS\) \(davidl@mehs.us\)](mailto:Langford, David P (MEHS) (davidl@mehs.us))

Subject: 250919 Langford, David NOP.pdf



250919 Langford,
David NOP.pdf...



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
apoc@alaska.gov
doa.alaska.gov/apoc

December 29, 2025

Via Certified Mail, US Mail, and Email

David Langford
1202 Seward Avenue
Sitka, AK 99835
davidl@mehs.us

Re: Commission Meeting Notice
Civil Penalty Appeal – 2025 Initial POFD Statement

Dear Mr. Langford:

The Commission will review the matter of the civil penalty assessed for your late-filed 2025 Initial POFD Statement at its January 14, 2026, Commission Meeting in Anchorage. Enclosed, is the Staff Recommendation that will be presented to the Commission at the meeting.

You have a right to participate at the meeting, either in-person, by telephone (1-907-202-7104, Conference ID: 382 982 822#), or online via [Microsoft Teams](#) (Meeting ID: 237 734 363 936 42, Passcode: iz3Ps6vV). Please notify our office if you intend to participate. POFD Civil Penalty Appeals and Referrals are expected to begin at **3:00 pm on Wednesday, January 14, 2026**.

This matter will initially be presented to the Commission on a Consent Agenda. If you do not wish to present your appeal or make a statement to the Commission, and your appeal is not removed from the agenda by a Commissioner, the staff recommendation will be approved without discussion or deliberation. If you wish to present or make a statement to the Commission, please notify staff or the Commission prior to the approval of the consent agenda. Staff will send you a copy of the Commission's final decision regarding your appeal.

If you have any questions, please contact our office.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

Heather R. Hebdon
Executive Director

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

David Langford
1202 Seward Avenue
Sitka, AK 99835
davidl@mehs.us

Certified Mail
 US Mail
 Email

Cari Rousselle 12/29/25

Signature

Date

Encl.: Staff Recommendation

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: Langford, David P (MEHS)
Sent: Monday, December 29, 2025 1:49 PM
Subject: Relayed: Commission Meeting Notice

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

[Langford, David P \(MEHS\) \(davidl@mehs.us\)](mailto:Langford, David P (MEHS) (davidl@mehs.us))

Subject: Commission Meeting Notice



Commission
Meeting Notice



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
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doa.alaska.gov/apoc

**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION
[PROPOSED] FINDINGS AND ORDER**

In the matter of the civil penalty assessment against Elizabeth Jerue

On January 14, 2026, the Alaska Public Offices Commission (Commission) reviewed the assessed civil penalty of **\$560** for Elizabeth Jerue's delinquent 2025 Final Public Official Financial Disclosure (POFD) Statement. To date, Ms. Jerue has not filed a 2025 Final POFD Statement. To facilitate collection proceedings by the Department of Law, the Commission issues the following Findings and Order.

Findings of Fact

1. Ms. Jerue served on the Council on Domestic Violence and Sexual Assault until August 21, 2025, and as a public official, was subject to AS 39.50 Public Official Financial Disclosure Law.
2. Ms. Jerue's 2025 Final POFD Statement was due within 90 days of her separation from the Council (November 19, 2025) and has not yet been filed.
3. On September 19, 2025, staff issued a courtesy notice informing Ms. Jerue of her final filing requirement and the due date of her statement.
4. On November 26, 2025, staff issued a Notice of Delinquency to Ms. Jerue informing her that, as of the date of the notice, her report was 4 days late. The notice also informed Ms. Jerue that a daily civil penalty would continue to accrue until the report was filed and that she had the right to appeal the assessment of the penalty. The notice was sent via email and Certified Mail. Email delivery was successful. Certified Mail was returned unclaimed.¹
5. On December 19, 2025, Staff sent a Second Notice of Delinquency to Ms. Jerue for her missing 2025 Final Statement. The notice provided the amount of the penalty to-date, and again informed Ms. Jerue of her right to appeal the assessment of the penalty. The notice was sent via email and Certified Mail. Email delivery was successful. Certified Mail has not yet been claimed.

¹ See, AS 44.62.380(c) [service effective by certified mail when mailed to address of record if filer is required to file address with agency and to notify any change in address]. See also, 2 AAC 50.811(b) [requiring filer to keep accurate address on file and to promptly notify any change in address].

6. On December 29, 2025, staff issued a Notice of Referral to Commission to Ms. Jerue for her missing 2025 Final Statement. The notice provided the amount of the assessed civil penalty, to-date, and informed Ms. Jerue that the matter would be considered by the Commission at its January 14, 2025 meeting. The notice was sent by email and by Certified Mail. Email delivery was successful. Tracking for Certified Mail is not yet available.
7. To date, Mr. Jerue has not filed a 2025 Final POFD Statement.

Conclusions of Law

Due to Mr. Jerue's failure to file a 2025 Final Statement, the Commission upholds the penalty assessment under the provisions of AS 39.50.135 and 2 AAC 50.855.

Commission staff has exhausted efforts to collect the delinquent statement and the penalty due and owing to the State of Alaska under 2 AAC 50.895 and approves referral of this case to the Office of the Attorney General to begin the formal collection process.

Decision and Order of the Commission

In accordance with the above findings of fact and conclusions of law, the Commission orders Elizabeth Jerue to pay a civil penalty of **\$560** for failing to timely file a 2025 Final Public Official Financial Disclosure Statement and refers this matter for collection to the Office of the Attorney General.

BY ORDER OF THE COMMISSION ON JANUARY 14, 2025

NOTICE TO RESPONDENT

You must pay the penalty of \$560 to the State of Alaska within thirty days from the date this order is distributed to you. To obtain judicial review of this order consistent with AS 44.62.560-570, you must file an appeal with the Superior Court within thirty days from the date this order is distributed to you.

Payment by check or money order payable to the State of Alaska to the Alaska Public Offices Commission at the address above; visiting our [website](#)² to make a payment by credit card; or you may pay in cash at our offices.

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

Elizabeth Jerue
735 Knightsbridge Rd.
Fairbanks, AK 99709
elrjerue@gmail.com

Certified Mail
 US Mail
 Email

Signature

Date

²

<https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

PLEASE NOTE: credit card payment cannot be made by phone; they must be made online.

Jerue – Findings and Order

Page 2



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

apoc@alaska.gov

doa.alaska.gov/apoc

November 26, 2025

Via Certified Mail, US Mail and Email

Elizabeth Jerue
735 Knightsbridge Road
Fairbanks, AK 99709
elrjerue@gmail.com

Re: Notice of Delinquency¹
Final Public Official Financial Disclosure— Due November 19, 2025

Ms. Jerue:

According to our records, you have not filed your Final Public Official Financial Disclosure (POFD) statement, due on November 19, 2025. Failure to timely file a statement results in the assessment of civil penalties for failure to comply with the provisions of the Public Official Financial Disclosure Law under Alaska Statute 39.50.

As of the date of this letter, your Final POFD Statement is **7 days** late and the accrued maximum penalty that may be assessed is **\$70**. This penalty continues to accrue by law at a rate of \$10 per day until your Final Public Official Financial Disclosure Statement is filed.

To stop the accrual of penalties, you must file your Final Public Official Financial Disclosure Statement. You have a right to appeal the assessment of a penalty. To do so, you must submit your delinquent report and the enclosed appeal affidavit to the Commission within 30 days. Alaska Public Offices Commission (APOC) staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in-person or telephonically.

Failure to respond to this notice by filing your report and either making payment arrangements or by appealing the assessment will result in APOC staff presenting this matter to the Commission for entry of a final order assessing the maximum penalty due.

¹

2 AAC 50.850(b).

Notice of Delinquency
Page 2

Elizabeth Jerue
November 26, 2025

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

Thank you,

ALASKA PUBLIC OFFICES COMMISSION



Heather R. Hebdon
Executive Director

Encl: CPA Appeal Affidavit
2 AAC 50.865

cc: POFD File

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

Elizabeth Jerue
735 Knightsbridge Road
Fairbanks, AK 99709
elrjerue@gmail.com

Email
 US Mail
 Certified Mail


Signature

11/26/2025
Date

From: Microsoft Outlook
To: elrjerue@gmail.com
Subject: Relayed: Notice of Delinquency
Date: Wednesday, November 26, 2025 3:45:53 PM
Attachments: [Notice of Delinquency.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
elrjerue@gmail.com (elrjerue@gmail.com) <mailto:elrjerue@gmail.com>
Subject: Notice of Delinquency



CERTIFIED MAIL®

PUBLIC OFFICES COMMISSION

Northern Lights, Room 128
Anchorage, Alaska 99508-4149

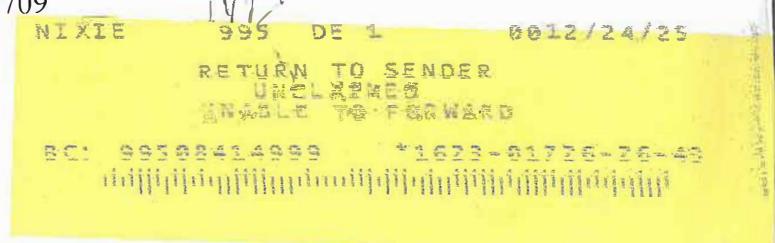


US POSTAGE™ PITNEY BOWES

ZIP 99508 \$ 006.04⁰
02 7H 0006225273 NOV 26 2025

Elizabeth Jerue
735 Knightsbridge Road
Fairbanks, AK 99709

UNC
99508-4149
99709-247735





THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

December 19, 2025

Elizabeth Jerue
735 Knightsbridge Road
Fairbanks, AK 99709
elrjerue@gmail.com

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

Via Certified Mail, U.S. Mail, and Email

Re: Second Notice of Delinquency¹ [2 AAC 50.850(c)]
Final Public Official Financial Disclosure – Due November 19, 2025

Dear Ms. Jerue:

On November 26, staff sent you a notice of delinquency notifying you that the Alaska Public Offices Commission (APOC) had not received your 2025 Final Public Official Financial Disclosure (POFD) Statement, due on November 19, 2025. To date, your statement has not been filed.

Failure to timely file a statement results in the assessment of civil penalties. As of the date of this letter, your POFD statement is **30 days** late and the accrued maximum penalty that could be assessed is **\$300**. This penalty continues to accrue at a rate of \$10/day until your POFD statement is filed.

Further, failure or refusal to file a POFD statement is punishable as a misdemeanor under AS 39.50.060. Failure to file your statement within 30 days after the due date may result in further formal action including requesting the attorney general to initiate misdemeanor proceedings and taking other action as appropriate.²

To stop the accrual of penalties and to avoid further formal action, you must file your POFD statement. After your statement is filed, you will be notified of the assessed penalty amount. **You have a right to appeal the assessment of this penalty. If you wish to contest the assessment of this penalty, you must submit your delinquent report and the enclosed appeal affidavit to the Commission within 30 days of the date of this letter.** APOC staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to

¹ 2 AAC 50.850(c).

² AS 39.50.060 - .080.

consider the matter. You will have the opportunity to participate in the meeting either in-person or telephonically.

Failure to respond to this notice by filing your report and either making payment arrangements or by appealing the assessment will result in APOC staff presenting this matter to the Commission for entry of a final order assessing the maximum penalty due.

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

Thank you,

ALASKA PUBLIC OFFICES COMMISSION



Heather R. Hebdon
Executive Director

Encl: CPA Appeal Affidavit
2 AAC 50.865

CERTIFICATE OF SERVICE:

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

Elizabeth Jerue
735 Knightsbridge Road
Fairbanks, AK 99709
eljerue@gmail.com

<input checked="" type="checkbox"/>	Certified Mail
<input checked="" type="checkbox"/>	US Mail
<input checked="" type="checkbox"/>	Email

Cari Rousselle

12/19/2025

Signature

Date

From: Microsoft Outlook
To: elrjerue@gmail.com
Subject: Relayed: Second Notice of Delinquency
Date: Friday, December 19, 2025 2:15:53 PM
Attachments: [Second Notice of Delinquency.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
elrjerue@gmail.com (elrjerue@gmail.com) <mailto:elrjerue@gmail.com>
Subject: Second Notice of Delinquency

ALERT: WINTER WEATHER IN THE GREAT LAKES AND NORTHEASTERN US MAY DELAY FINA...

USPS Tracking®

[FAQs >](#)**Tracking Number:**[Remove X](#)**9489009000276610962239**[Copy](#)[Schedule a Redelivery \(<https://tools.usps.com/redelivery.htm>\)](#)

Latest Update

This is a reminder to arrange for redelivery of your item before January 5, 2026 or your item will be returned on January 6, 2026. You may arrange redelivery by using the Schedule a Redelivery feature on this page or may pick up the item at the Post Office indicated on the notice.

Get More Out of USPS Tracking:

[USPS Tracking Plus®](#)[Feedback](#)**Delivery Attempt: Action Needed****Reminder to Schedule Redelivery of your item before January 5, 2026**

December 27, 2025

Notice Left (No Secure Location Available)

FAIRBANKS, AK 99709

December 22, 2025, 3:09 pm

In Transit to Next Facility

December 20, 2025

Arrived at USPS Regional Facility

ANCHORAGE AK DISTRIBUTION CENTER

December 19, 2025, 10:08 pm

[Hide Tracking History](#)[What Do USPS Tracking Statuses Mean? \(<https://faq.usps.com/s/article/Where-is-my-package>\)](#)



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

December 29, 2025

Via Certified Mail, US Mail, and Email

Elizabeth Jerue
735 Knightsbridge Road
Fairbanks, AK 99709
elrjerue@gmail.com

Re: NOTICE OF REFERRAL TO COMMISSION/MEETING NOTICE
Failure to file Final Public Official Financial Disclosure (POFD)

Ms. Jerue

On November 26, 2025, the Alaska Public Offices Commission Staff notified you that your Final POFD Statement, due November 19, 2025, was delinquent. This notice informed you of the accruing penalty and asked you to submit your POFD statement.¹ On December 19, 2025, APOC Staff again notified you of your delinquent statement, the accruing penalty, and other potential consequences that could result if you fail to file.² **As of the date of this letter, you have not filed your Final POFD Statement, and your accrued penalty is \$400. This penalty continues to accrue until your Final POFD Statement is filed or the matter is referred to the Attorney General's Office for further action.** To avoid formal Commission action regarding referral for failure to file, you must file your Final POFD.

APOC Staff will now refer this matter to the Commission for a final order of referral to the Attorney General's Office regarding your failure to file. This matter will be considered at the Commission's January 14, 2026 meeting.

You have a right to participate at the meeting, either in-person, by telephone (1-907-202-7104, Conference ID: 382 982 822#), or online via [Microsoft Teams](#) (Meeting ID: 237 734 363 936 42, Passcode: iz3Ps6vV). POFD Civil Penalty Appeals and Referrals are expected to begin at **3:00 pm on Wednesday, January 14, 2026**.

¹ 2 AAC 50.850(b).

² 2 AAC 50. 850(c).

This matter will initially be presented to the Commission on a Consent Agenda. If you do not wish to present an appeal or make a statement to the Commission, and your referral is not removed from the agenda by a Commissioner, the enclosed proposed findings and order will be approved without discussion or deliberation. If you wish to present or make a statement to the Commission, please notify staff or the Commission prior to the approval of the consent agenda. Staff will send you a copy of the Commission's final decision regarding your referral.

This letter will be placed in your public and permanent APOC file. If you have questions, please contact APOC.

Thank you,

ALASKA PUBLIC OFFICES COMMISSION



Heather R. Hebdon
Executive Director

Encl: Proposed Findings and Order

CERTIFICATE OF SERVICE:

I certify that on this date, I caused a true copy of the foregoing to be delivered as indicated to:

Elizabeth Jerue
735 Knightsbridge Road
Fairbanks, AK 99709
elrjerue@gmail.com

<input checked="" type="checkbox"/>	Certified Mail
<input checked="" type="checkbox"/>	US Mail
<input checked="" type="checkbox"/>	Email

Cari Rouselle

12/29/25

Signature

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: eljerue@gmail.com
Sent: Monday, December 29, 2025 1:44 PM
Subject: Relayed: Commission Notice of Meeting

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

eljerue@gmail.com (eljerue@gmail.com)

Subject: Commission Notice of Meeting



Commission
Notice of Meeting