

**[TAB 19]**

**Complaint 26-02-CD,  
Wendy Isbell v. Cody Anderson**

Presented By:

Kim Stone, Campaign Disclosure Coordinator



**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

Wendy Isbell,	)	
	)	
Complainant,	)	
	)	
vs.	)	Case No. <b>26-02-CD</b>
	)	
Cody Anderson,	)	
	)	
Respondent.	)	
<hr/>		

**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, June 3, 2026.

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

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

**PREHEARING AND HEARING PROCEDURES**

- 1) **Parties.** The parties in this case are Commission Staff and Respondent.
- 2) **Issues.** At the hearing, the Commission will consider whether Respondent violated campaign disclosure law by accepting corporate contributions.
- 3) **Procedural history.** Complainant Wendy Isbell filed a complaint against Respondent Cody Anderson on February 23, 2026. Respondent filed a Response to the Complaint on March 9, 2026. Staff’s investigation report recommending the complaint be upheld in part and dismissed in part was issued May 5, 2026.
- 4) **Hearing procedures.** The hearing will be conducted as provided in AS 15.13.380, 2 AAC 50.891, and the Alaska Administrative Procedure Act, AS 44.62.330 – 44.62.630. All

<sup>1</sup> Meeting ID: 226 535 332 612 23, Passcode: wZ9Uy9wz

testimony must be presented or submitted under oath. A party may call witnesses, cross-examine witnesses, present and rebut evidence. If the respondent does not testify, the respondent may be called and examined as if under cross-examination.

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

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

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

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

Dated: May 15, 2026



Heather Hebdon, Executive Director  
Alaska Public Offices Commission

<b>CERTIFICATE OF SERVICE:</b>	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Wendy Isbell 1319 H Street Anchorage, AK 99501 <a href="mailto:Wendy99501@gmail.com">Wendy99501@gmail.com</a>	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Cody Anderson PO Box 210183 Anchorage, AK 99504 <a href="mailto:info@andersonforanchorage.com">info@andersonforanchorage.com</a>	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

*Cari Rousselle*

05/15/2026

Signature

Date

**Rousselle, Cari J (DOA)**

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**From:** Microsoft Outlook  
**To:** info@andersonforanchorage.com  
**Sent:** Friday, May 15, 2026 1:25 PM  
**Subject:** Relayed: Notice of Hearing and Procedural Order

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

[info@andersonforanchorage.com](mailto:info@andersonforanchorage.com) ([info@andersonforanchorage.com](mailto:info@andersonforanchorage.com))

Subject: Notice of Hearing and Procedural Order



Notice of Hearing  
and Procedur...

**Rousselle, Cari J (DOA)**

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**From:** Microsoft Outlook  
**To:** wendy99501@gmail.com  
**Sent:** Friday, May 15, 2026 1:25 PM  
**Subject:** Relayed: Notice of Hearing and Procedural Order

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

[wendy99501@gmail.com](mailto:wendy99501@gmail.com) ([wendy99501@gmail.com](mailto:wendy99501@gmail.com))

Subject: Notice of Hearing and Procedural Order



Notice of Hearing  
and Procedur...

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

Wendy Isbell  
 1319 H Street  
 Anchorage AK 99501



9590 9402 9692 5199 6811 97

2. Article Number (Transfer from service label)

9589 0710 5270 1126 7215 00

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
*[Handwritten Signature]*

- Agent
- Addressee

B. Received by (Printed Name)

*John Fairleigh Stille*

C. Date of Delivery

- Yes
- No

D. Is delivery address different from item 1? If YES, enter delivery address below:

3. Service Type

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

Restricted Delivery





**TO:** APOC Commissioners  
**DATE:** May 5, 2026  
**FROM:** Kim Stone, Campaign Disclosure Coordinator  
**SUBJECT:** Staff Report 26-02-CD, *Isbell v. Anderson*

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## **SUMMARY OF COMPLAINT AND RESPONSE**

Complainant, Wendy Isbell, alleges Respondent, Cody Anderson, violated state campaign disclosure law by accepting non-monetary corporate contributions: (1) from an individual, Steven Nye, for video services; and (2) from Mountain City Church, Inc. for Respondent's campaign's free use of its facilities.<sup>1</sup> Respondent initially denied either was a corporate contribution but subsequently paid the church for his campaign's previous use of its facilities.<sup>2</sup>

## **SUMMARY OF STAFF RECOMMENDATIONS**

APOC staff finds Respondent's acceptance of a contribution from the individual Stephen Nye was not a corporate contribution and did not violate campaign disclosure law and recommends the Commission dismiss this allegation.

APOC staff finds Respondent accepted a corporate contribution from Mountain City Church, Inc. and failed to report it. Thus, APOC staff recommends the Commission uphold this allegation.

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<sup>1</sup> [Complaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27446), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27446>.

<sup>2</sup> [Complaint Response](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27476), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27476>.

## **BACKGROUND FACTS**

Respondent Cody Anderson was a candidate for Anchorage Assembly in the April 7, 2026 Anchorage Municipal Election.

On his year-start report, Respondent recorded a non-monetary contribution dated December 5, 2025, from Stephen Nye in the amount of \$2,000 for “video ad creation.”<sup>3</sup> The report describes Nye’s occupation as a self-employed videographer. State of Alaska online records reflect the existence of an Alaskan limited liability company owned 100% by Steven Nye with the legal name of Stephen Nye Media, LLC.<sup>4</sup>

On February 13, 2026, Respondent reported an expenditure to Stephen Nye, the individual, for video ad creation paid for with campaign funds.<sup>5</sup> In response to the Complainant’s allegation that Respondent accepted in-kind contributions from Stephen Nye, Respondent explained that Nye used his own personal equipment to produce the videos, which were filmed “in the common areas of the church.”<sup>6</sup>

Mountain City Church, Inc., an Alaskan nonprofit corporation, operates Mountain City Church at 6401 E. Northern Lights Boulevard in Anchorage, Alaska.<sup>7</sup> Respondent is an officer of the corporation<sup>8</sup> and a minister and full-time employee.<sup>9</sup> In his initial Response to the complaint, Respondent admitted Mountain City Church did not charge his campaign to use its facilities for campaign-related events and filming social media content but also emphasized that the church allowed him to use the facilities without charge because he is an employee.<sup>10</sup>

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<sup>3</sup> [Year-start report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49244&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49244&ViewType=CD>.

<sup>4</sup> Exhibit 1, Stephen Nye Media LLC Articles of Organization.

<sup>5</sup> [30-day report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49384&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49384&ViewType=CD>.

<sup>6</sup> Complaint Response, p. 1.

<sup>7</sup> Exhibit 2, Mountain City Church, Inc. Entity details.

<sup>8</sup> *Id.*

<sup>9</sup> Complaint Response, p. 1; [Cody Anderson for Anchorage](#), last accessed April 7, 2026.

<sup>10</sup> Complaint Response, p. 1.

Respondent’s campaign Facebook page shows his campaign’s use of Mountain City Church facilities beginning with a November 23, 2025 “Campaign Kickoff Party”<sup>11</sup> at its 6401 E. Northern Lights Boulevard location.<sup>12</sup> For the remainder of November 2025, throughout December 2025, and in January and February, 2026, videos posted to Respondent’s Facebook page show campaign events taking place at the church and campaign videos filmed at the church.<sup>13</sup> Respondent reported a single \$50 non-monetary contribution for room rental for the campaign kickoff event but reported it as a contribution from himself and not the church.<sup>14</sup> Respondent reported no other contemporaneous debts or expenditures for any use of church facilities on his year-start or 30-day reports.

In his response to the complaint, Respondent included documentation of what Mountain City Church charges the public to rent its facilities, ranging from \$20 to \$200 per hour with required deposits and a 2-hour minimum rental.<sup>15</sup>

Subsequently, in response to APOC staff’s additional requests for information, Respondent indicated he would “identify a payment to Mountain City Church for the utilization of church facilities related to all my campaign activities performed at the church” when he filed his next disclosure report.<sup>16</sup> On his 7-day report, filed March 31, 2026, Respondent described a single expenditure for his campaign’s past use of church facilities but did not identify the date when the individual events occurred or when the corresponding debt for such use was incurred, as displayed in the table below:<sup>17</sup>

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<sup>11</sup> Exhibit 3, November 23, 2026 Cody Anderson Campaign Kickoff Party flyer.

<sup>12</sup> <https://www.facebook.com/CodyAndersonforAnc/>, last accessed April 10, 2026. As of April 13, 2026, the pages content was no longer available; however, see Exhibit 4 for screen shots of relevant content that formerly appeared on this page.

<sup>13</sup> Exhibit 4, Cody Anderson for Anchorage Facebook screenshots.

<sup>14</sup> [Year-start report](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49244&ViewType=CD>.

<sup>15</sup> Complaint Response, pp. 2-3.

<sup>16</sup> Exhibit 5, March 13, 2026 Anderson response to APOC’s request for information.

<sup>17</sup> [7-day report](#), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49408&ViewType=CD>.

03/20/2026	Check 787	<b>Mountain City Church</b> 6401 E Northern Lights Blvd Anchorage, Alaska 99504	Room Rental for Social Media Reel Filming, Phone Banking & Note Writing Events	<b>\$540.00</b>
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## LAW

Alaska campaign disclosure law requires candidates to disclose debts and expenditures incurred by their campaigns. For the 2026 Anchorage election, mandatory APOC reports included a year-start, 30-day, 7-day, and 105-day report.<sup>18</sup> An expenditure includes “a purchase or a transfer of money or anything of value, or promise or agreement to purchase or transfer money or anything of value, incurred or made for the purpose of . . . influencing the nomination or election of a candidate.”<sup>19</sup>

Alaska law prohibits a corporation from making a campaign contribution to a candidate for municipal office.<sup>20</sup> Likewise, Alaska law prohibits a candidate from soliciting or accepting a contribution “from a person not authorized by law to make a contribution.”<sup>21</sup> AS 15.13.400(4)(A)(i) defines contribution, in relevant part, to include

a purchase, payment, promise or obligation to pay, loan or loan guarantee, deposit or gift of money, goods, or services for which charge is ordinarily made, and includes the payment by a person other than a candidate or political party, or compensation for the personal services of another person, that is rendered to the candidate or political party, and that is made for the purpose of influencing the nomination or election of a candidate.

A contribution must be made in the name of the true source of the money or thing of value; a person may not make a contribution using the name of another; and a person may not use

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<sup>18</sup> AS 15.13.110(a).

<sup>19</sup> AS 15.13.400(7)(A)(i).

<sup>20</sup> AS 15.13.074(f); *see also* [Despain v. Eberhart, 13-12-CD](#), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=8032>

<sup>21</sup> AS 15.13.072(a).

a third-party conduit to obscure the true source of any money or thing of value contributed to a campaign.<sup>22</sup>

When APOC receives a properly filed complaint, APOC staff must undertake an investigation and present the investigation report.<sup>23</sup> Staff bears the burden of proving a violation by a preponderance of the evidence.<sup>24</sup>

## **ANALYSIS**

The complaint alleges Respondent violated Alaska’s campaign disclosure laws by accepting a corporate contribution from Stephen Nye for video services and by accepting and not reporting corporate contributions from Mountain City Church, Inc. for donated facility space.

a) Stephen Nye’s non-monetary contribution was not a prohibited corporate contribution

Stephen Nye appears to be a professional videographer<sup>25</sup> and 100% member owner of Stephen Nye Media LLC, an Alaska-registered corporation.<sup>26</sup> In his reporting, Respondent described Nye’s occupation as self-employed videographer and his initial services to the campaign as non-monetary contributions.<sup>27</sup> Nye later performed additional video ad creation services for which the campaign compensated him \$2,500.<sup>28</sup>

While a business or corporation cannot contribute to a candidate, including goods or “services for which charge is ordinarily made,”<sup>29</sup> the law does not preclude a personal contribution of services from an individual who also offers the services as part of a

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<sup>22</sup> AS 15.13.074(b); 2 AAC 50.258(a).

<sup>23</sup> 2 AAC 50.870; 2 AAC 50.891.

<sup>24</sup> 2 AAC 50.891(d).

<sup>25</sup> [StephenNyeMedia.com](https://www.stephennyemedia.com), last accessed April 7, 2026; Respondent’s year-start report describes Nye as a self-employed videographer.

<sup>26</sup> Exhibit 1.

<sup>27</sup> [Year-start report](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49244&ViewType=CD>.

<sup>28</sup> [30-day report](#), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49384&ViewType=CD>.

<sup>29</sup> AS 15.13.400(4)(A).

business; Nye’s status as a professional videographer and LLC owner does not necessarily mean his contribution originated from his business and violated the law. If the services were personal and not performed through the business, they do not constitute a prohibited contribution.<sup>30</sup> Here, in response to APOC staff requests for information, Respondent advised that Nye volunteered his time and used his own personal equipment in making the videos; the videos were filmed at the church and as such did not use any space provided by Nye’s business, Stephen Nye, LLC.<sup>31</sup> Under these circumstances, “this activity is more akin to the photographer taking pictures on his own free time, for which there is likely no charge ordinarily made.”<sup>32</sup> APOC staff finds Nye’s contribution of videography services did not violate AS 15.13.074(f) and recommends the Commission dismiss the allegation.

b) In using church facilities without paying for them, Respondent accepted a corporate contribution

Respondent is a full-time employee of Mountain City Church, Inc. and also serves as a corporate officer (secretary) for the corporation. The church campus at 6401 E. Northern Lights Boulevard in Anchorage, as described in its facility use fee schedule, includes an auditorium, a big gym, a CMC gym, a playroom, a cafeteria, a student union, a kitchen, a stage, and several additional individual rooms.<sup>33</sup> Mountain City Church rents its facilities to the public, and Respondent provided the church’s per-hour fee schedule with associated charges.<sup>34</sup> At the time the complaint was filed, Respondent had only once reported his campaign’s use of church facilities for campaign events and filming social media content<sup>35</sup> and had never reported the church’s contribution of free facility use.

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<sup>30</sup> [AO 10-11-CD, Alaska Democratic Party,](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4840)  
[https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4840.](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4840)

<sup>31</sup> Complaint Response, p. 1.

<sup>32</sup> [AO 10-11-CD, Alaska Democratic Party,](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4840t)  
<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4840t>, p. 6.

<sup>33</sup> Complaint Response, p. 4.

<sup>34</sup> Complaint Response, pp. 2-4.

<sup>35</sup> While Respondent reported a \$50 non-monetary contribution for room rental for his Campaign Kickoff Party at the church, he reported it as a personal non-monetary contribution from himself. The contribution valued at \$50 appears inaccurate or at a reduced rate, since the event was scheduled for two hours and would have required set-up time. The hourly rental for Room 111, according to church’s fee schedule, is \$40 per hour, in addition to associated fees. This would result at minimum in a \$120 charge for three

Without question, the use of church facilities is a good or service for which Mountain City Church, Inc. usually charges.<sup>36</sup> Respondent acknowledges Mountain City Church did not charge his campaign for its use of church facilities as it would any member of the public, making his campaign’s use of them a prohibited corporate contribution.<sup>37</sup>

Respondent argues that his campaign’s free use of the corporation’s facilities does not constitute acceptance of a corporate contribution because he is allowed such use as an employee. But the fact that the corporation allowed the use does not mean it was not a corporate contribution. As in *DeSpain v. Eberhart*, 13-12-CD, where a candidate similarly used his employer’s corporate facilities and resources for campaign purposes without paying for them, AS 15.13.074(f) prohibits Mountain City Church, Inc. from contributing use of its facilities without charge, and AS 15.13.072(a)(1) prohibits Respondent from accepting it.<sup>38</sup> Additionally, the value of the use was not incidental or *de minimis*. After the complaint was filed, Respondent provided a fee schedule showing the church’s room rental rates ranging from \$20 to \$200 per hour, with a 2-hour minimum.<sup>39</sup> Thereafter, on his 7-day report filed March 31, 2026, Respondent acknowledged using church facilities for “social media reel filming, phone banking, and note writing events” and reported a \$540 payment to the church for “room rental” for the events.<sup>40</sup> Respondent did not specify the dates incurred or amend past reports to reflect contemporaneous debts for the events. And while Respondent’s initial responses to APOC staff’s requests for information stated his campaign’s use of church facilities was limited only to the making of four videos, a review of Respondent’s “Cody Anderson for Anchorage” Facebook page shows events and videos that appear to have taken place within church facilities throughout the campaign. Several videos appear to have been filmed in the same locations as other videos and events that

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hours. See also, 2 AAC 50.250(b)(1)(B) [reduction of a business’s charges is a contribution]. [Year-start report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49244&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49244&ViewType=CD>.

<sup>35</sup> AS 15.13.400(4)(A).

<sup>36</sup> AS 15.13.400(4)(A).

<sup>37</sup> [Despain v. Eberhart, 13-12-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=8032), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=8032>.

<sup>38</sup> [Despain v. Eberhart, 13-12-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=8032), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=8032>.

<sup>39</sup> Complaint Response, p. 4.

<sup>40</sup> [7-day report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49408&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49408&ViewType=CD>.

Respondent acknowledges took occurred at the church.<sup>41</sup> For several other videos, the precise filming locations were ambiguous but suggest a larger space or commercial facility rather than a home or residence, and Respondent’s expenditures do not describe rentals for any facility outside of Mountain City Church.<sup>42</sup> Respondent subsequently provided an invoice from the church confirming his campaign’s use of church facilities for “social media reel filming” on nine separate occasions during December, January, and February, three additional videos filmed by Stephen Nye in the auditorium lobby on November 20, 2026, a phone banking event on January 1, 2026, and note writing events that occurred February 27 and February 28, 2026.<sup>43</sup>

Accordingly, APOC staff finds by a preponderance of the evidence Respondent violated AS 15.13.074(f) and 2 AAC 50.258 by accepting prohibited campaign contributions from Mountain City Church, Inc. The campaign’s unpaid or inaccurately reported use of church facilities began November 23, 2025 and ended with the campaign’s March 20, 2026 payment.<sup>44</sup> Respondent also violated AS 15.13.040 because he failed to report the non-monetary contributions from Mountain City Church in his year-start and 30-day campaign disclosure reports. APOC staff recommends the Commission find Respondent violated campaign law on these bases.

### **MAXIMUM POTENTIAL CIVIL PENALTIES**

The maximum civil penalty for failing to timely file complete and accurate year-start report is \$50 per day for each day the violation continues, beginning February 18, 2026 when the year-start report was due and ending February 23, 2026, the day the complaint was filed, amounting to a maximum possible penalty of **\$300** (6 days).<sup>45</sup> APOC does not assess a fine for failing to timely file a complete and accurate 30-day report as the complaint’s tolling of penalties February 23, 2026 occurred prior to the report’s due date,

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<sup>41</sup> Exhibit 4, Cody Anderson for Anchorage Facebook screenshots, pp. 1, 3, 10, 13-15.

<sup>42</sup> Exhibit 4, Cody Anderson for Anchorage Facebook screenshots, pp. 2-4, 6-9, 11-12.

<sup>43</sup> Exhibit 6, Mountain City Church Invoice, provided to APOC April 20, 2026.

<sup>44</sup> The March 20, 2026 rental payment came after the date the complaint was filed, which tolls the accrual of penalties.

<sup>45</sup> AS 15.13.390(a)(1).

but recommends the Commission order Respondent to amend his 30-day report within 30 days of any Commission decision in this matter.

The acceptance of prohibited campaign contributions carries a maximum civil penalty of \$50 per day, beginning on the day of the first violation November 23, 2025 and ending February 23, 2026, the day the complaint was filed, amounting to a maximum possible penalty of **\$4,600** (92 days).<sup>46</sup>

### **MITIGATION CRITERIA**

When APOC staff assesses a penalty, the starting point for calculating it is 2 AAC 50.855. Here, the regulation enables staff to reduce the maximum statutory assessment for Respondent’s incomplete year-start report (\$300) by 50% because it is Respondent’s first alleged violation,<sup>47</sup> resulting in an assessment for this violation of \$150. The violation for accepting prohibited corporate contributions is not reduced under this regulation.

Once the statutory assessment is calculated under 2 AAC 50.855, APOC staff may recommend mitigation criteria to the Commission to reduce or waive the penalty under 2 AAC 50.865. While many mitigating factors of the regulation refer to filings, violations resulting in penalty assessments nevertheless are subject to appeal, and mitigation under the regulation is appropriate. Here, Respondent has had no late filings in the preceding five years and therefore has a “good filing history” which warrants up to a 50% reduction pursuant to 2 AAC 50.865(a)(1)(A)(i) for the remaining \$4,750 fine (\$150 + \$4,600), resulting in a reduced penalty of \$2,375.

APOC staff finds no additional mitigating factors apply under the circumstances. Without question, the intangible benefits of being able to use a corporate employer’s resources for campaign purposes provides a great benefit to any candidate. The assessed penalty is not significantly out of proportion to the degree of harm to the public, particularly because the Respondent is being assessed a penalty for a single violation for acceptance of

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<sup>46</sup> AS 15.13.390(a)(4).

<sup>47</sup> 2 AAC 50.855(b)(3)(B).

a corporate contribution whereas the evidence indicates and Respondent does not dispute that he used church facilities throughout much of his campaign.

Given the above considerations, the total penalty of \$2,375 is appropriate.

<b>CERTIFICATE OF SERVICE:</b> I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Wendy Isbell 1319 H Street Anchorage, AK 99501 <a href="mailto:Wendy99501@gmail.com">Wendy99501@gmail.com</a>	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Cody Anderson PO Box 210183 Anchorage, AK 99504 <a href="mailto:info@andersonforanchorage.com">info@andersonforanchorage.com</a>	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

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Signature

Date



THE STATE of ALASKA

Department of Commerce, Community, and Economic Development
Division of Corporations, Business, and Professional Licensing
PO Box 110806, Juneau, AK 99811-0806
(907) 465-2550 • Email: corporations@alaska.gov
Website: corporations.alaska.gov

AK Entity #: 10244356
Date Filed: 08/31/2023
State of Alaska, DCCED

FOR DIVISION USE ONLY

Web-8/31/2023 7:41:09 AM

Articles of Organization
Domestic Limited Liability Company

1 - Entity Name

Legal Name: STEPHEN NYE MEDIA LLC

2 - Purpose

IMAGE AND VIDEO CONTENT CREATION AND DISTRIBUTION

3 - NAICS Code

812990 - ALL OTHER PERSONAL SERVICES

4 - Registered Agent

Name: REPUBLIC REGISTERED AGENT INC.

Mailing Address: 441 W 5TH AVE SUITE 405, ANCHORAGE, AK 99501

Physical Address: 441 W 5TH AVE SUITE 405, ANCHORAGE, AK 99501

5 - Entity Addresses

Mailing Address: 2611 BRITTANY DRIVE, ANCHORAGE, AK 99504

Physical Address: 2611 BRITTANY DRIVE, ANCHORAGE, AK 99504

6 - Management

The limited liability company is managed by its members.

7 - Officials

Table with 4 columns: Name, Address, % Owned, Titles. Row 1: STEPHEN NYE, Organizer

Name of person completing this online application

This form is for use by the named entity only. Only persons who are authorized by the above Official(s) of the named entity may make changes to it. If you proceed to make changes to this form or any information on it, you will be certifying under penalty of perjury that you are authorized to make those changes, and that everything on the form is true and correct. In addition, persons who file documents with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor. Continuation means you have read this and understand it.

Name: LOVETTE DOBSON

# ENTITY DETAILS

## Name(s)

Type	Name
Legal Name	MOUNTAIN CITY CHURCH, INC.
Previous Legal Name	ANCHORAGE BAPTIST TEMPLE, INC.

**Entity Type:** Nonprofit Corporation

**Entity #:** 38046D

**Status:** Good Standing

**AK Formed Date:** 5/1/1986

**Duration/Expiration:** Perpetual

**Home State:** ALASKA

**Next Biennial Report Due:** 7/2/2026 [File Biennial Report](#)

**Entity Mailing Address:** 6401 E NORTHERN LIGHTS BLVD, ANCHORAGE, AK 99504

**Entity Physical Address:** 6401 E NORTHERNLIGHTS BLVD., ANCHORAGE, AK 99504

## Registered Agent

**Agent Name:** Shaun Stubbs

**Registered Mailing Address:** 6401 E NORTHERN LIGHTS BLVD, ANCHORAGE, AK 99504

**Registered Physical Address:** 6401 E NORTHERN LIGHTS BLVD, ANCHORAGE, AK 99504

## Officials

Show Former

AK Entity #	Name	Titles	Owned
	Cody Anderson	Secretary	
	Floyd Damron	Vice President	
	Larry Lee	Director	
	Mike Paulsen	Director	
	Paul Brandon	Director	
	Ronald Hoffman	President	
	Shaun Stubbs	Treasurer	

## Filed Documents

Date Filed	Type	Filing	Certificate
5/01/1986	Creation Filing	<a href="#">Click to View</a>	
8/25/1988	Biennial Report		
5/24/1990	Biennial Report		

# CODY ANDERSON

EAST ANCHORAGE ASSEMBLY  
DISTRICT 5



## CAMPAIGN KICKOFF PARTY



**SUNDAY, NOVEMBER 23**  
**1:00 P.M. - 3:00 P.M.**

6401 E. Northern Lights Blvd.  
Room #111

Be part of the excitement as we launch Cody's campaign. Enjoy refreshments and light snacks while connecting with our community and learning more about the vision for the future.

[www.andersonforanchorage.com](http://www.andersonforanchorage.com)

Paid for by Anderson for Anchorage,  
P.O. Box 210183, Anchorage, AK 99521



**Cody Anderson For Anchorage**

**November 24, 2025** ·

Thank you to everyone who came out for our kickoff! I am excited to earn your support! Your generosity is humbling! [#AndersonForAnchorage!](#) [#ProtectWhatMatters](#)





Cody Anderson For Anchorage

December 3, 2025 · 🌐



Will the Anchorage Assembly LISTEN to their constituents?! [#AndersonForAnchorage](#)  
[#ProtectWhatMatters](#)



👍 73    💬 8    ➦ 15



[View more comments](#)

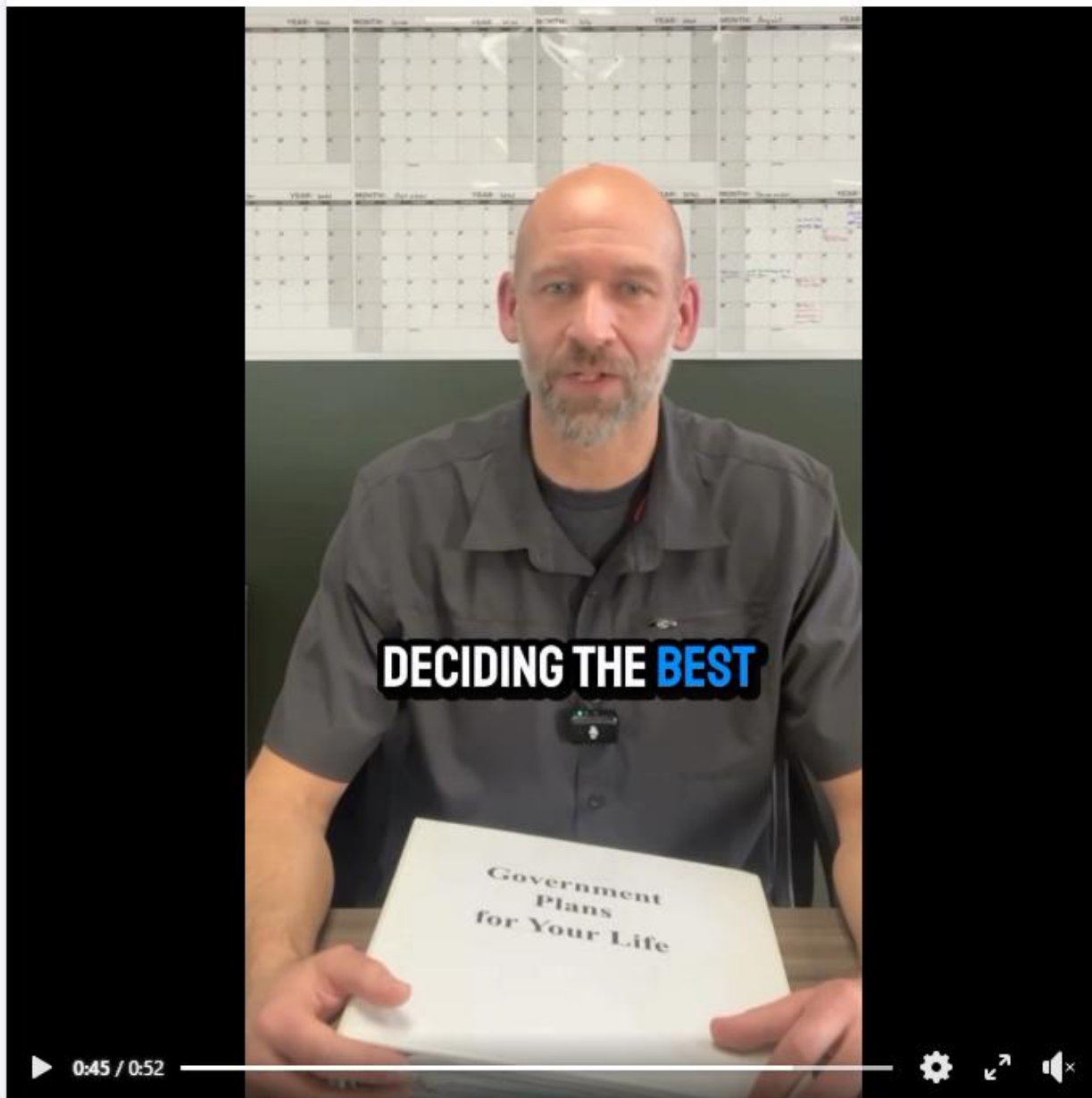


Cody Anderson For Anchorage

December 8, 2025 · 🌐



Who wants a SMALLER government?! #AndersonForAnchorage #ProtectWhatMatters



👍 31    💬 5    ➦ 3





Cody Anderson For Anchorage

December 9, 2025 · 🌐



At the end of this month I will proudly retire as a Chief Master Sergeant in the United States Air Force. 🇺🇸 Our nation is great because of the Veterans who fought and ... See more



2.3K



251



431



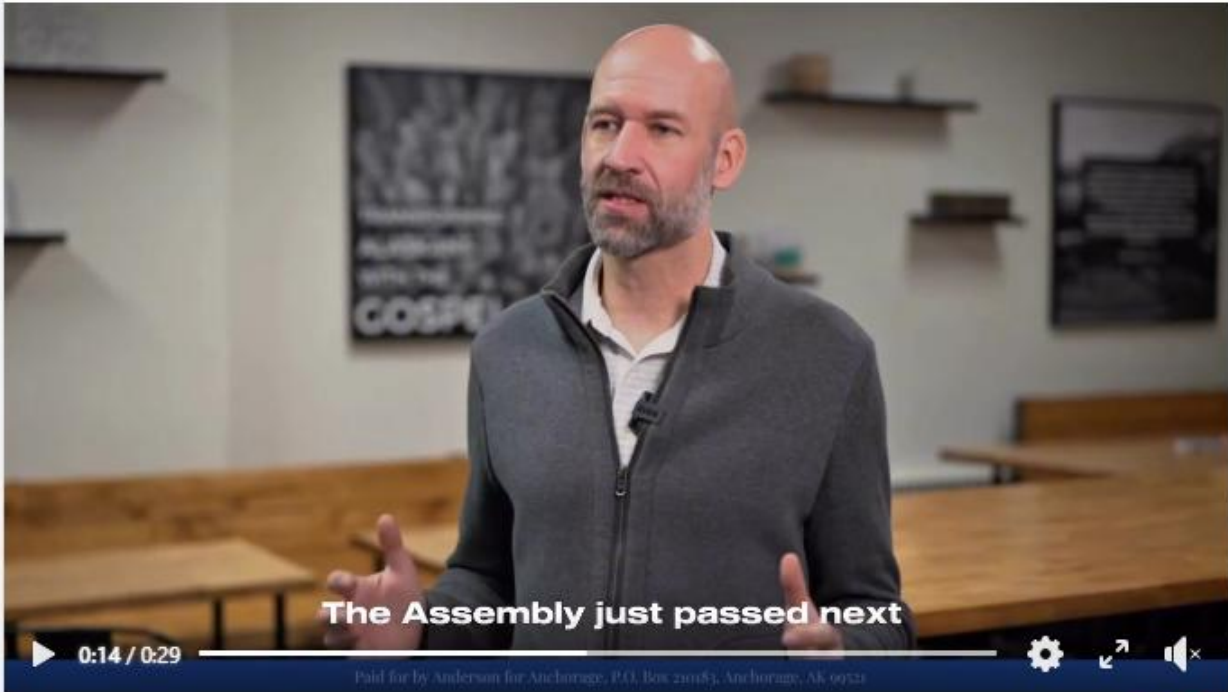


Cody Anderson For Anchorage

December 12, 2025 · 🌐



Let's SUPPORT our essential services! Every tax dollar matters. [#AndersonForAnchorage](#)  
[#ProtectWhatMatters](#)



👍 31    💬 2    ➦ 5



[View more comments](#)



Cody Anderson For Anchorage is with Seth Gruber and Turning Point USA.

December 14, 2025 · 🌐



Honored to help host [Turning Point USA](#) speaker [Seth Gruber](#)! Seth is the CEO and Founder of The White Rose Resistance, host of The Seth Gruber Show, and a nationally renowned human rights activist. Powerful message, meaningful discussion, and an incredible experience all around.

[#AndersonForAnchorage](#) [#ProtectWhatMatters](#) [#Anchorage](#) 🗣️



🔄 0:09 / 0:09



👍 79    💬 5    ➦ 8



[View more comments](#)



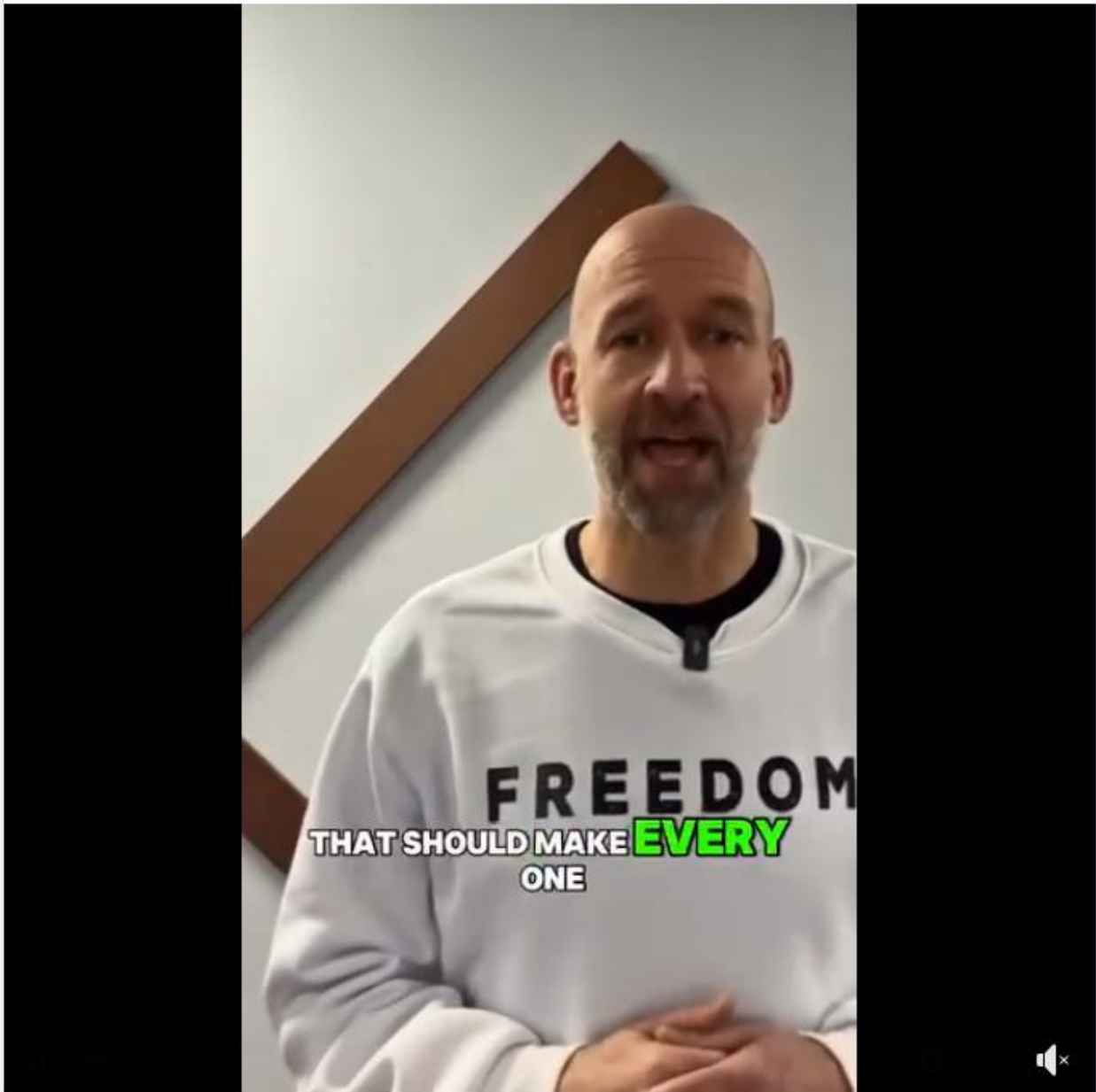
Cody Anderson For Anchorage

January 3 · 🌐



Public safety isn't political... it's PERSONAL!

[#AndersonForAnchorage](#) [#ProtectWhatMatters](#)



97



11



13



View more comments



Cody Anderson For Anchorage

January 13 · 🌐



You aren't DUMB! A LEVY is a TAX!

📺 TONIGHT 📺 Tuesday 1.13.26

🕒 ... See more



184



28



43



[View more comments](#)



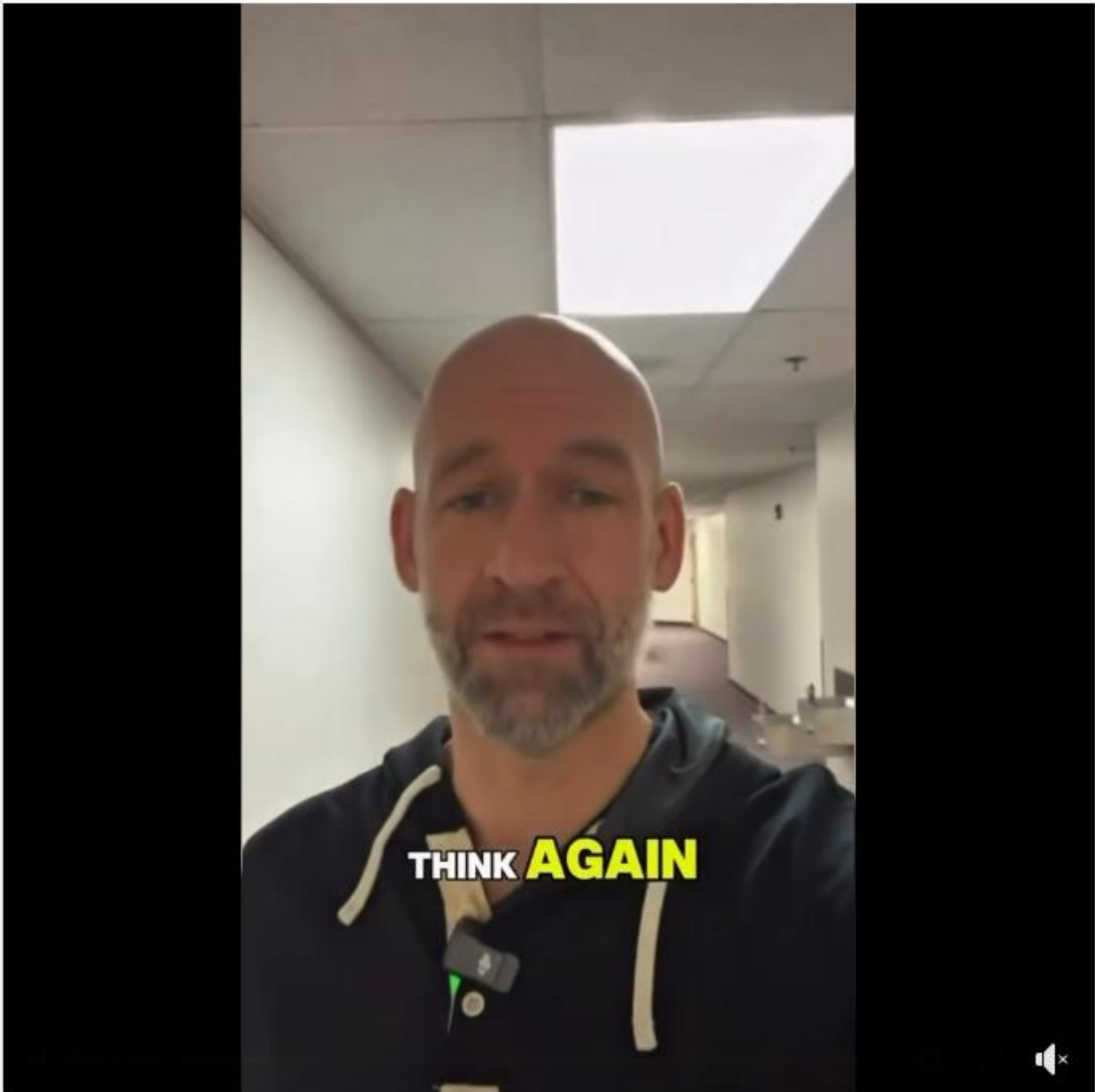
Cody Anderson For Anchorage

January 19 · 🌐



Do we want a "LEARING" center? Do you like handing over your MONEY with NO accountability?  
Time for change!

[#AndersonForAnchorage...](#) See more



👍 228    💬 35    ➦ 41



[View more comments](#)

**Cody Anderson For Anchorage**

**February 2**

THANK YOU to everyone! We made 700 calls to East Anchorage, wrote 1,800 handwritten notes, and knocked on 2,500 doors! INCREDIBLE!





Cody Anderson For Anchorage

February 4 · 🌐



I attended the Assembly meeting last night...here's my biggest takeaway. [#ProtectWhatMatters](#)  
[#AndersonForAnchorage](#)



332



54



70





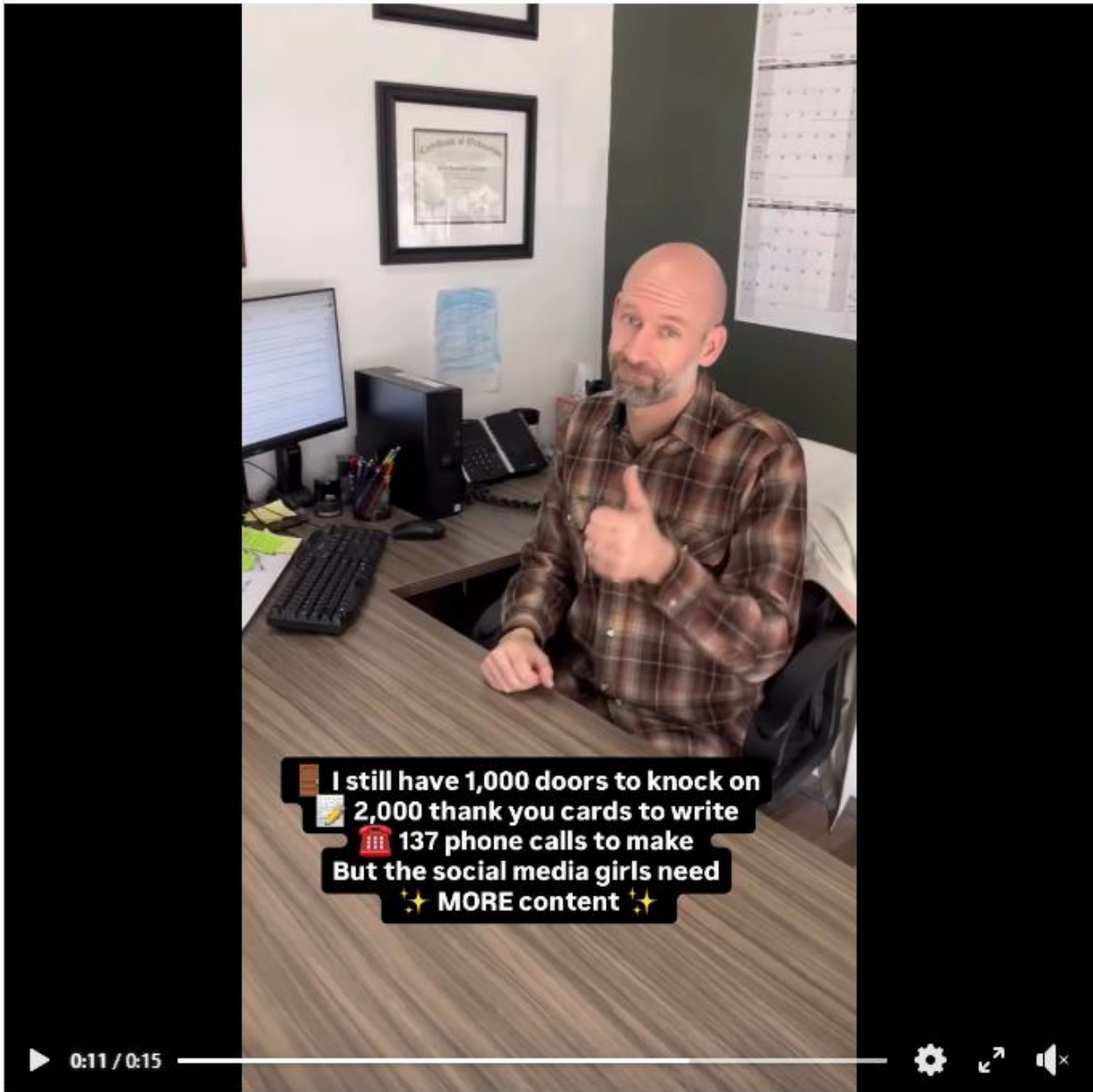
Cody Anderson For Anchorage

February 28 · 🎵 The Fate of Ophelia · Taylor Swift · 🌐



Saturday VIBES before door knocking!

You gotta have a little fun! #AndersonForAnchorage



I still have 1,000 doors to knock on  
2,000 thank you cards to write  
137 phone calls to make  
But the social media girls need  
🌟 MORE content 🌟

👍 98    💬 24    ➦ 7

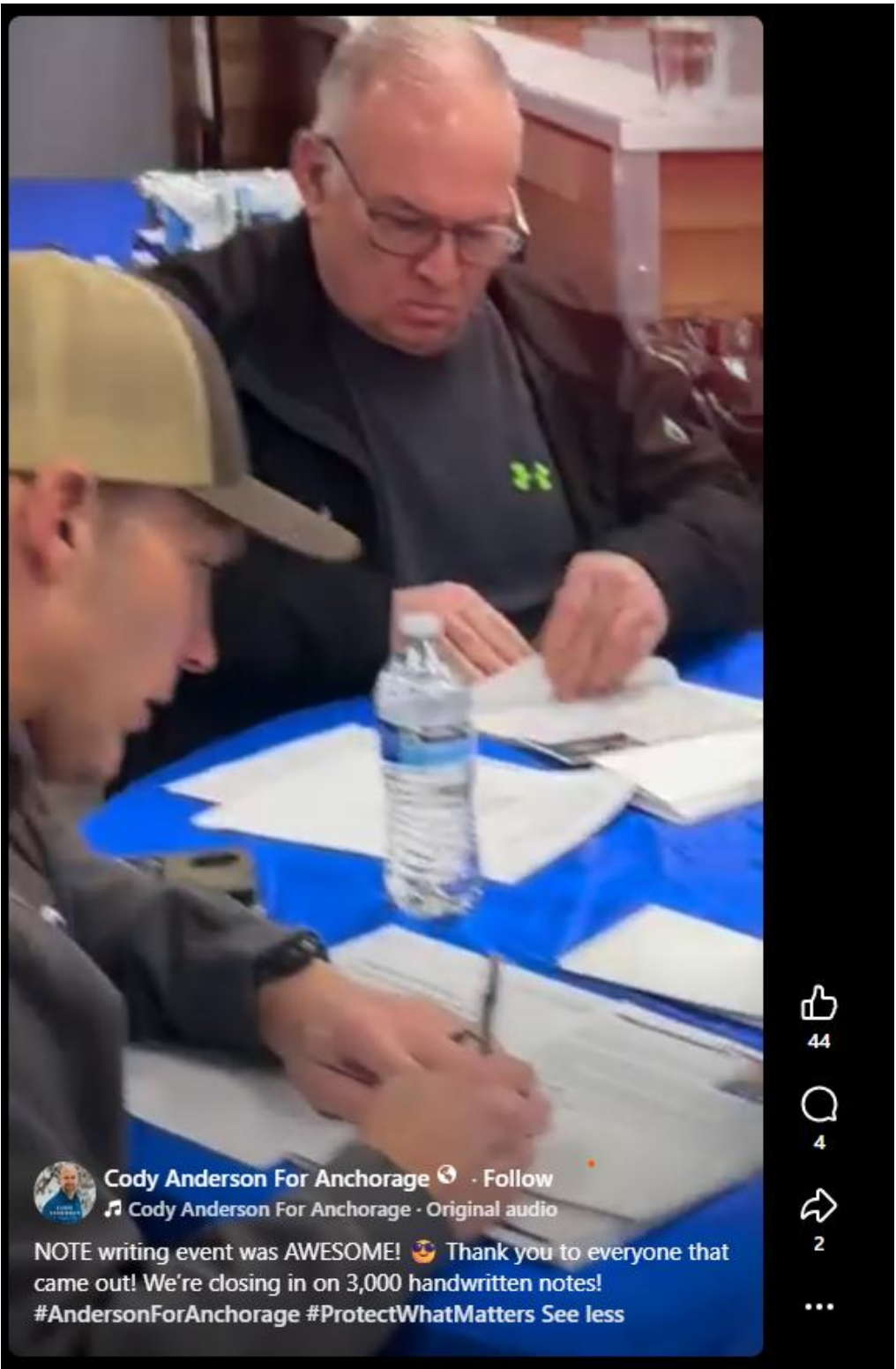


**Cody Anderson For Anchorage**

**March 2 ·**

NOTE writing event was AWESOME! 🥳 Thank you to everyone that came out! We're closing in on 3,000 handwritten notes!





Cody Anderson For Anchorage · Follow

Cody Anderson For Anchorage · Original audio

NOTE writing event was AWESOME! 🥳 Thank you to everyone that came out! We're closing in on 3,000 handwritten notes! #AndersonForAnchorage #ProtectWhatMatters See less

44

4

2

...



Cody Anderson For Anchorage · Follow

🔊 Cody Anderson For Anchorage · Original audio

NOTE writing event was AWESOME! 🥳 Thank you to everyone that came out! We're closing in on 3,000 handwritten notes!

#AndersonForAnchorage #ProtectWhatMatters See less



44



4



2





Cody Anderson For Anchorage · Follow

🎵 Cody Anderson For Anchorage · Original audio

NOTE writing event was AWESOME! 🥳 Thank you to everyone that came out!  
We're closing in on 3,000 handwritten notes!  
... See more



49



6



3



**From:** [Cody Anderson](#)  
**To:** [Stone, Kim S \(DOA\)](#)  
**Cc:** [Hebdon, Heather R \(DOA\)](#)  
**Subject:** Re: follow up questions concerning Isbell v. Anderson  
**Date:** Friday, March 13, 2026 1:25:58 PM

---

**CAUTION:** This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Kim,

Thank you for your continued communication regarding this matter. After speaking with my team, my next disclosure to APOC (7-day report) will identify a payment to Mountain City Church for the utilization of church facilities related to all my campaign activities performed at the church. Mountain City Church will provide me with an itemized invoice, and I'll report the payment in that disclosure. Thank you for your time and assistance.

Cody

On Wed, Mar 11, 2026 at 9:27 AM Stone, Kim S (DOA) <[kim.stone@alaska.gov](mailto:kim.stone@alaska.gov)> wrote:

Hello Mr. Anderson –

Thank you for bringing in materials Monday relating to complaint 26-02-CD and for providing them so quickly. In response to your earlier inquiry, you are always welcome to send documents electronically.

As a follow up to your Response: The complaint alleges that you have used Mountain City Church facilities for campaign purposes. The public Cody Anderson for Anchorage Facebook page at <https://www.facebook.com/CodyAndersonforAnc/> shows several videos.

Please describe any time you have used Mountain City Church facilities for any campaign events, general use, or videos since the beginning of your campaign. Please describe specifically and in detail whether church facilities were used for the events shown on the Facebook video reels described as “NOTE writing event was awesome!” and “Saturday VIBES before door knocking!”.

Your help is appreciated. Thank you in advance –

Kim Stone

Campaign Disclosure Coordinator

Alaska Public Offices Commission

2221 E. Northern Lights Blvd., Rm. 128

Anchorage, Alaska 99508

Phone: (907) 276-4176

Fax: (907) 276-7018

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--

**Cody Anderson**

*Candidate for East Anchorage Assembly | District 5*

907-406-6401

[www.andersonforanchorage.com](http://www.andersonforanchorage.com)



**Mountain City Church**  
*Christ Centered World Changers*

6401 E Northern Lights BLVD  
 Anchorage AK 99504  
 (907) 333-6535  
[accounting@mountaincity.church](mailto:accounting@mountaincity.church)

# INVOICE

ARRIVED  
 4.20.26  
 APOC - ANCH  
 PM HC FAX ELE

INVOICE NO. 36  
 DATE March 16, 2026  
 CUSTOMER ID

TO  
 Cody Anderson  
 P.O. Box 210183  
 Anchorage, Ak 99521

POC	ORGANIZATION/EVENT	PAYMENT TERMS	DUE DATE
	Cody Anderson East Anchorage Assembly District 5	Due upon receipt	

QUANTITY	DESCRIPTION	UNIT PRICE	LINE TOTAL
.45 Minutes	Social Media Reel Filming Each Reel filmed for approximately five minutes. (12/2) (12/3) (12/8) (12/9) (1/3) (1/13) (1/16) (1/19) (2/28) - Office - Room 210 - Hallway		\$ 30.00
.45 Minutes	Videos Filmed by Stephen Nye Three videos Filmed, November 20 Auditorium Lobby		30.00
8 Hours	Phone Banking Event Saturday, January 31st, 9am to 5pm Room 111	\$	320.00
2 Hours	Note-Writing Event February 27th and February 28th, 5:30pm to 7:30pm Room 111	\$	160.00

SUBTOTAL \$ 540.00  
 SALES TAX  
 TOTAL \$ 540.00

*Paid  
 5/5  
 3-20-26*

Make all checks payable to Mountain City Church

**THANK YOU FOR YOUR BUSINESS!**