

[TAB 13]

**Complaint 26-01-CD,
Joel Borgquist v. Kyle Walker**

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Joel Borgquist,)	
)	
Complainant,)	
)	
vs.)	Case No. 26-01-CD
)	
Kyle Walker,)	
)	
Respondent.)	
<hr/>		

NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing in these cases will take place before the Alaska Public Offices Commission at approximately 9:30 a.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](#).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 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 provided adequate paid-for-by disclaimers in his campaign messaging.
- 3) **Procedural history.** Complainant Joel Borgquist filed a complaint against Respondent Kyle Walker on January 30, 2026. Respondent Walker filed a Response on February 23, 2026. Staff’s investigation report recommending the complaint be dismissed was issued March 20, 2026.

¹ Meeting ID: 226 535 332 612 23, Passcode: wZ9Uy9wz

- 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 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

CERTIFICATE OF SERVICE:	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Kyle Walker 20633 Eagle River Road Eagle River, AK 99577 c.killgore@shipcreekgroup.com WalkerForAssembly@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Joel Borgquist 18730 Mills Bay Drive Eagle River, AK 99517 joel.gjj@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

Cari Rousselle

05/15/2026

Signature

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: c.killgore@shipcreekgroup.com
Sent: Friday, May 15, 2026 1:15 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:

c.killgore@shipcreekgroup.com (c.killgore@shipcreekgroup.com)

Subject: Notice of Hearing and Procedural Order



Notice of Hearing
and Procedur...

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: walkerforassembly@gmail.com; joel.gjj@gmail.com
Sent: Friday, May 15, 2026 1:15 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:

[walkerforassembly@gmail.com \(walkerforassembly@gmail.com\)](mailto:walkerforassembly@gmail.com)

[joel.gjj@gmail.com \(joel.gjj@gmail.com\)](mailto:joel.gjj@gmail.com)

Subject: Notice of Hearing and Procedural Order



Notice of Hearing
and Procedur...



TO: APOC Commissioners
DATE: March 20, 2026
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report 26-01-CD, *Joel Borgquist v. Kyle Walker*

SUMMARY OF COMPLAINT AND RESPONSE

Complainant Joel Borgquist alleges Respondent Kyle Walker violated campaign disclosure law, asserting (1) a webpage reading “Walker for Assembly” existed during 2025 that did not bear Respondent’s paid-for-by disclaimer,¹ and (2) the paid-for-by disclaimer Respondent uses on his campaign messaging lists an Eagle River post office box whereas his APOC registration lists an Eagle River street address. Respondent answers that (1) the webpage was an “automatically generated placeholder” that did require a disclaimer, and (2) both addresses are valid, and using two valid addresses does not violate campaign disclosure law.²

SUMMARY OF STAFF RECOMMENDATIONS

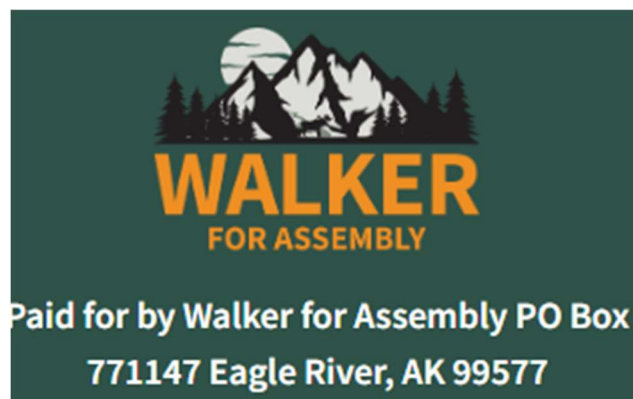
APOC staff finds Respondent did not violate campaign disclosure law as the webpage in question did not sufficiently identify Respondent as a candidate and thus did not require a paid-for-by disclaimer. APOC staff further finds Respondent’s use of different addresses on his registration and paid-for-by disclaimers did not violate campaign disclosure law. APOC staff recommends the Commission dismiss the complaint.

¹ [Coplaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27428), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27428>.

² [Complaint Answer](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27437), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27437>.

BACKGROUND FACTS

Respondent was a candidate in the April 1, 2025 Anchorage Municipal Election³ and currently is a candidate in the April 7, 2026 Anchorage Municipal Election. His campaign website features images and messaging typical of an Alaska candidate: photos of the candidate, his family, Alaska scenery, and extolling Respondent’s virtues and strengths as a candidate.⁴ The website’s paid-for-by messaging identifies Respondent’s campaign’s post office box in Eagle River:



In his initial 2026 registration, Respondent listed his residential Eagle River street address for a campaign mailing address⁵ but later changed the address to his campaign’s Eagle River post office box.⁶

At some point during 2025, according to documentation submitted with the complaint, a webpage appeared online bearing the words “Walker for Assembly.”⁷ The page is markedly different in appearance from Respondent’s 2026 campaign website; the webpage’s only image is what appears to be an AI-generated image of a city with skyscrapers and blurred headlights of a multi-lane freeway leading into it, with a caption

³ [2025 Registration](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7680&ViewType=CR), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7680&ViewType=CR>.

⁴ [Kyle Walker for Assembly](https://www.walkerforassembly.com/), <https://www.walkerforassembly.com/>, accessed March 3, 2026.

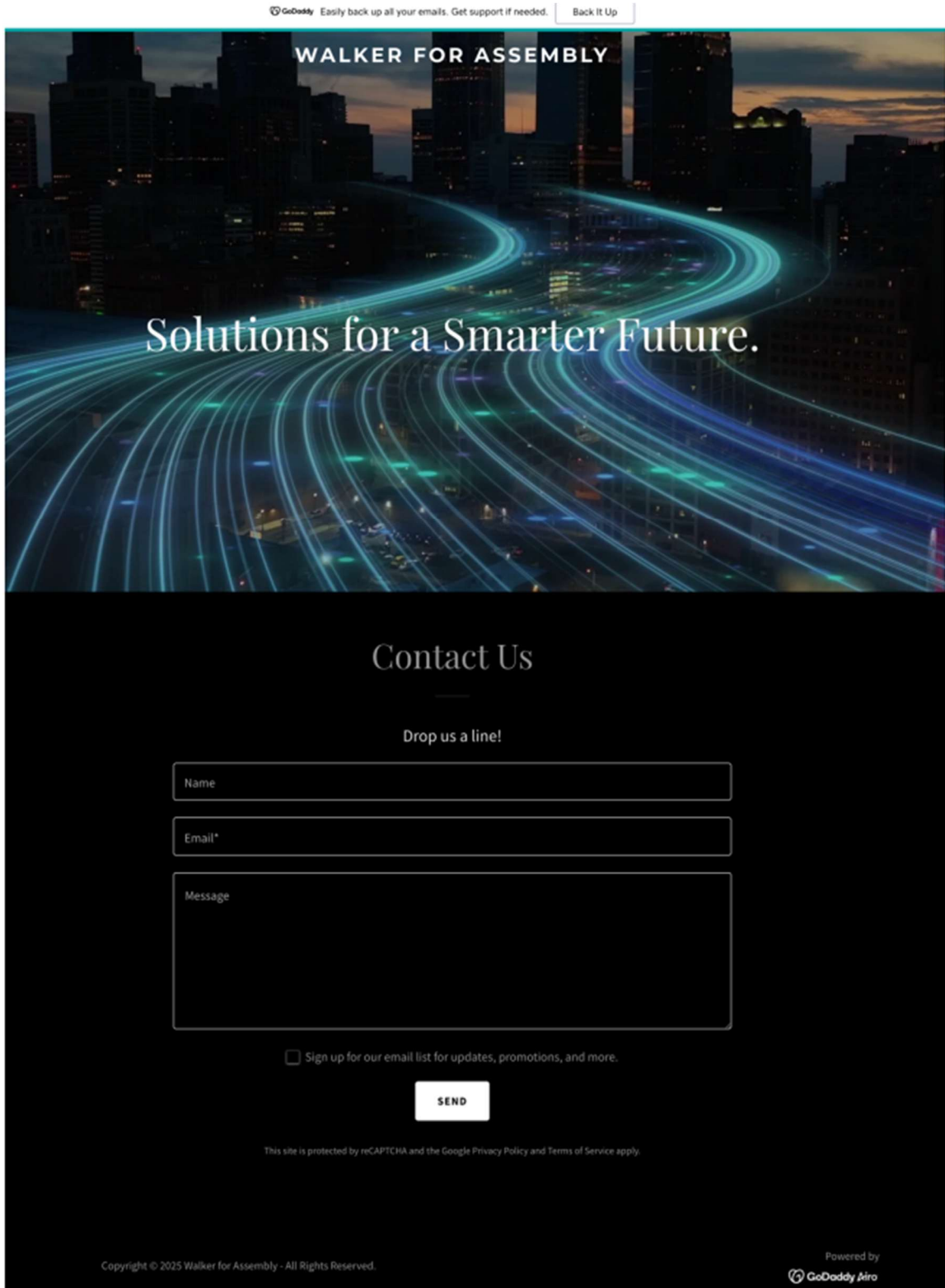
⁵ [2026 Registration](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7924&ViewType=CR), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7924&ViewType=CR>.

⁶ [2026 Registration, Amended \(second\)](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7993&ViewType=CR),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7993&ViewType=CR>.

⁷ A screenshot submitted with the complaint shows a date of November 27, 2025.

reading “Solutions for a Smarter Future.” The webpage contains no photos of Walker and does not identify an election or geographic region or identify a candidate by full name:



In his Answer to the Complaint, Respondent explained the screenshot was “clearly from an automatically generated placeholder website.”⁸

LAW AND ANALYSIS

a) The webpage does not constitute a communication identifying a candidate

Alaska campaign finance law requires a candidate to clearly identify all communications by the words “paid for by” followed by the name and address of the person paying for the communication.⁹ A communication includes an announcement or advertisement disseminated through the Internet but excludes those that do not directly or indirectly identify a candidate.¹⁰

While the webpage submitted by the complainant does bear the words “Walker for Assembly,” nothing else about the webpage ties it to a candidate, a political district, or even a geographic region. Nothing within the webpage indicates it is a communication for Kyle Walker, Eagle River candidate for Anchorage Municipal Assembly. The webpage’s only image – a metropolitan city skyline – evokes a location that does not exist in Alaska. Its messaging – “Solutions for a Smarter Future” – suggests marketing for a product and, like the webpage’s imagery, provides no details that would connect it to a political race in Eagle River, Alaska. A member of the public using the webpage’s limited text to search the internet might find information related not only to Kyle Walker but also to Latrice Walker, assembly member for New York State,¹¹ Jerry Walker, assembly member in New Jersey,¹² and instructional and sales materials on foldable walkers.¹³ A member of the

⁸ Complaint Answer.

⁹ AS 15.13.090(a).

¹⁰ AS 400(3).

¹¹ [Latrice M. Walker - Assembly District 55 | Assembly Member Directory | New York State Assembly](#), accessed March 3, 2026.

¹² [Jerry Walker - District 31 | New Jersey Legislative Assembly Democrats, NJ](#), accessed March 3, 2026.

¹³ [Learn how to Assemble a Walker | SeniorsMobility](#), accessed March 3, 2026.

public searching for “Solutions for a Smarter Future” would find nothing related to Anchorage Municipal Candidate Kyle Walker.

Under the circumstances presented, the webpage does not meet the general definition of communication as it does not sufficiently identify Kyle Walker, Eagle River candidate for Anchorage Municipal Assembly, to constitute an election communication. APOC staff recommends the Commission dismiss this aspect of the complaint.

b) Disclosure law does not require candidates to list a singular address for purposes of APOC registration and paid-for-by disclaimers

A candidate’s APOC registration must include the name of the candidate and the candidate’s campaign committee; (2) the address, telephone number, facsimile number, and electronic mail address of the candidate’s campaign committee; (3) the name, address, and contact information for the campaign officers.¹⁴ A candidate’s “paid for by” disclaimers, as discussed above, must identify the candidate’s communications by the words “paid for by” and “followed by the name and address of the person paying for the communication.”¹⁵

The complaint asserts Respondent violated campaign disclosure law by listing his physical residence address on his initial APOC registration while listing his campaign post office box on his paid-for-by disclaimers. (Respondent subsequently amended his registration and the two address listings are now the same.)

Complainant asserts the address is “inaccurate” and therefore “appears to violate AS 15.13.090 and applicable regulations under 2 AAC 50.”¹⁶

¹⁴ 2 AAC 50.282. The regulation reads, in its entirety, Candidate registration. A candidate shall register in the format prescribed by the commission no later than 15 days after filing a declaration of candidacy for a state office or no later than seven days after filing a declaration of candidacy for a municipal office. A separate registration is required for each elective state or municipal office for which an individual files a declaration of candidacy. A candidate's registration must list (1) the name of the candidate and the candidate's campaign committee; (2) the address, telephone number, facsimile number, and electronic mail address of the candidate's campaign committee; (3) the name, address, and contact information for the campaign officers, including a chairperson and a treasurer; (4) the name and address of each deputy treasurer; (5) the name and address of the regulated banking institution that will serve as the campaign account depository; and (6) the candidate's certification that the information contained in the registration statement is true, complete, and correct.

¹⁵ AS 15.13.090(a).

¹⁶ Complaint, p. 2.

The term “address” is not defined in campaign disclosure law.¹⁷ Neither the statute nor the regulations distinguish between a physical or mailing address; paid-for-by identifiers commonly list the name of the person paying for the communication along with a P.O. Box address containing the city, state and zip code. Nothing indicates that both addresses – where a candidate physically resides and where the candidate’s campaign receives mail – cannot both be correct under campaign disclosure law.

Complainant offers no explanation of why Respondent’s listed addresses were “inaccurate” and no legal argument to support his allegation that Respondent’s listing of two addresses violated AS 15.13.090 or related regulations. APOC staff finds no violation and recommends dismissal of the complaint relating to this issue.

CONCLUSION

For the above reasons, APOC staff finds Respondent did not violate campaign disclosure law and recommends the Commission dismiss the complaint.

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Kyle Walker 20633 Eagle River Road Eagle River, AK 99577 c.killgore@shipcreekgroup.com WalkerForAssembly@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Joel Borgquist 18730 Mills Bay Drive Eagle River, AK 99517 joel.gjj@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

Cari Rousselle

03/20/2026

Signature

Date

¹⁷[AO 13-05-CD French](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=8472), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=8472>. In the French AO, APOC staff noted it “was unable, even after enlisting the aid of the Alaska State Library, to locate any legislative history regarding the purpose the legislature intended to serve by requiring an address in a ‘paid for by’ identifier.”