

[TAB 3]

POFD Civil Penalty Appeals

Presented By:

Heather Hebdon, Executive Director

August 26, 2026 Commission Meeting

[illegible]



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

PREPARED BY: Heather Hebdon

DATE: August 7, 2026

RESPONDENT: Chase Berenson

VIOLATION

ASSESSED UNDER: ☒ **Legislative Financial Disclosure: AS 24.60.240, 2 AAC 50.855**

REASON FOR FILING: Alternate Public Member, Select Committee on Legislative Ethics

LATE REPORT(S): **Legislative Financial Disclosure**
☒ 2026 Initial LFD Statement¹

DUE DATE: February 9, 2026

FILED ON: February 10, 2026

DAYS LATE: 1 day late

DATE DELINQUENCY NOTICE(S) SENT: N/A

APPEAL RECEIVED: March 23, 2026²

MAXIMUM STATUTORY PENALTY: \$10

PENALTY ASSESSED³: \$0

RECOMMENDATION: **Uphold Violation**
(See "Staff's Analysis of Facts For Commission Review")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Filer states that he was a first-time filer and relied heavily on APOC staff and staff for the Select Committee on Legislative Ethics (SCLE).
2. Filer states that staff for the SCLE did not connect with APOC staff until the Friday (2/6/2026) before his statement was due (2/9/2026) and as a result, instructions to file were only received one business day prior to his due date.

¹ Exhibit 1, 2026 Initial LFD.

² Exhibit 2, Appeal.

³ Violation documented and penalty waived under 2 AAC 50.855(b)(A)(i).

3. Filer states that because of his fulltime work schedule, he was unable to communicate with staff at either agency during business hours.
4. Filer states that based on APOC staff's lack of sufficient detail regarding the process for seeking an exemption from identifying clients of his spouse's business, he misunderstood the timeline for filing his statement; filer understood his requirement was to either submit a request for an exemption or file his statement by the deadline. He did not understand that both the request and the statement needed to be filed by the deadline.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. APOC staff received notice of Mr. Berenson's January 9, 2026, appointment from the SCLE on February 6, 2026.⁴ Staff responded immediately and provided instructions to assist him with filing his initial LFD statement and noted the deadline to file was Monday, February 9, 2026.⁵
2. On February 8, 2026, Mr. Berenson emailed APOC staff for more information about seeking an exemption from disclosing his spouse's clients. Mr. Berenson noted that his statement was "completed and ready to file" and that he was "operating under the belief that my due date is tomorrow, February 9th."⁶
3. On February 9, 2026, APOC staff provided information regarding the process for seeking an exemption from disclosing his spouse's clients.⁷ Mr. Berenson responded later that evening and submitted his request for a waiver from disclosing his spouse's clients, but he did not submit his initial statement.
4. On February 10, 2026, APOC staff acknowledged receipt of his request for a waiver, clarified that the request did not extend his filing deadline, and asked him to login as soon as possible to file his statement. Mr. Berenson filed his initial statement that same day.
5. On February 20, 2026, staff issued a notice of violation and noted that regulations enabled staff to waive the penalty for his late-filed LFD statement.⁸
6. On March 23, 2026, Mr. Berenson appealed staff's finding of a violation based on APOC staff error.⁹ APOC staff error is a standard mitigating factor that can be relied on in recommending a reduction of an assessed civil penalty.¹⁰ APOC staff notes that in this matter the contemplated civil penalty has already been waived entirely because Mr. Berenson is a first-time filer and first-time committee member who received late notice of his filing requirement.¹¹ Although staff recognizes there may have been unique factors that contributed to Mr. Berenson's late-filed statement, such factors are already considered in our assessment procedures. Mr. Berenson now asks that his late-filing violation be set aside in order to maintain his good filing history.

⁴ Exhibit 3, January 9, 2026 Appointment Letter.

⁵ Exhibit 4, February 6, 2026 Email Exchange.

⁶ Exhibit 5, February 8, 2026 Email re Exemption from Disclosing Clients.

⁷ Exhibit 6, February 9, Email Response re Exemption Request.

⁸ Exhibit 7, NOV dated Feb. 20, 2026.

⁹ Ex. 2.

¹⁰ 2 AAC 50.865(b)(2).

¹¹ 2 AAC 50.855(b)(1)(A)(i).

However, assessing compliance with a filing deadline is straightforward – a statement is either timely filed or it is not.¹² In the matter herein, Mr. Berenson, as a public member of the SCLE was required to file an initial statement “within 30 days after the person’s appointment.”¹³ Based on his January 9th appointment date, the statutory deadline for his initial statement was on or before February 8th, but because that deadline fell on a weekend, regulations provide that it would have been timely, if filed the next business day – February 9th. It was not. Accordingly, staff recommends that the violation be upheld and documented in accordance with 2 AAC 50.855(b)(1)(A).

FILER’S REPORTING HISTORY:

2026 Initial POFD – 1 day late, subject of this appeal

¹² *Grimm v. Wagoner*, 77 P.3d 423, 430-431 (Alaska 2003).

¹³ AS 24.60.210(a).

POFD FORM

COMPLETED

Submission Date: **02/10/2026**

FILER INFORMATION

First Name: **Chase**
 Last Name: **Berenson**
 Partner Type: **Spouse**
 Spouse/Domestic Partner Name: **Charla Hughes**
 Dependent Children: **0**
 Non-Dependent Children: **0**
 Names of Non-Dependent Children living with filer:

PURPOSE OF FILING

Report Year: **2026**Report Dates: From **01/01/2025** Through **12/31/2025**Filing As: **State Office Holder**Branch: **Legislative**Position: **Member of Select Committee on Legislative Ethics**Report Type: **Initial**

INCOME

Owner	Type	Detail	Description	Amount
Filer	Salaried	Aleut Ventures Full-time From: 01/01/2025 Through 08/05/2025 Time Worked:	General Manager	\$200,000 - \$500,000
Spouse	Salaried	Prince William Sound Stewardship Foundation Full-time From: 01/01/2025 Through 12/31/2025 Time Worked:	Executive Director	\$50,000 - \$100,000
Spouse	Salaried	Alyeska Resort Operations Part-time From: 01/01/2025 Through 12/31/2025 Time Worked: 5 hours/week	Yoga Instructor	\$5,000 - \$10,000
Filer	Dividend or Interest	Alaska Permanent Fund Dividend (exactly \$1,000)		\$1,000 - \$2,000
Spouse	Dividend or Interest	Alaska Permanent Fund Dividend (exactly \$1,000)		\$1,000 - \$2,000
Spouse	Dividend or Interest	Calvert Roth IRA distribution		\$1,000 - \$2,000
Filer	Dividend or Interest	Ally Bank account interest		\$5,000 - \$10,000
Spouse	Self Employment	Charla Hughes Yoga Retreat Project From: 01/01/2025 Through 12/31/2025 Time Worked: 140 hours	Hosted a yoga retreat	\$1,000 - \$2,000
Client Names				Client Amount
No Clients Reported				

INTERESTS

Owner	Type	Detail	Description / Interest
Filer	Business	Business Name: Imagine Girdwood P.O. Box 514 Girdwood, Alaska 99587	Position / Type: Director
Filer	Business	Business Name: Powder Run Owners Association 601 West 41st Avenue, Suite 201 Anchorage, Alaska 99503	Position / Type: Director
Spouse	Business	Business Name: Girdwood Health Clinic, Inc P.O. Box 1130 Girdwood, Alaska 99587	Position / Type: Director
Spouse	Business	Business Name: Charla Hughes Yoga Retreat P.O. Box 1634 Girdwood, Alaska 99587	Position / Type: Owner
Filer, Spouse	Real Property	Not Reported Not Reported, Alaska 99587	Ownership Interest: Fee Simple
Filer	Beneficial	Managed By: Principal	401(k) account Ownership: 100%
Filer	Beneficial	Managed By: Fidelity	401(k) account Ownership: 100%
Filer	Beneficial	Managed By: Elevations Credit Union	HSA account Ownership: 100%
Spouse	Beneficial	Managed By: Calvert	Roth IRA account Ownership: 100%

LOANS AND DEBTS

Owner	Type	Name
Filer, Spouse Address: 4000 Credit Union Drive Anchorage, Alaska 99503	Creditor Original Loan Amount: \$639,000.00 Balance Amount: \$613,231.88 Interest Rate: 5.25%	Global Credit Union

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		

Chase Berenson
Post Office Box 1634
Girdwood Alaska 99587



Heather Hebdon
Alaska Public Offices Commission
2221 Northern Lights Boulevard
Room 128
Anchorage, Alaska 99508

Re: Notice of Appeal of Violation

Monday, March 23rd, 2026

Dear Ms. Hebdon,

Please accept this letter as my notice of appeal of the alleged violation of timely submission of my Legislative Financial Disclosure on February 9th, 2026. In this letter, I plan to explain why the late submission was caused by one of the mitigating factors described in 2 AAC 50.865(b)(2). I will also provide background factors for context, though those are separate from the mitigating factor from 2 AAC 50.865(b)(2) that my appeal is structured upon.

I appreciate that as a first-time filer, Ms. Cari Rousselle has used her discretion to waive the civil penalty for this violation. Despite there being no civil penalty aligned with this violation, I am appealing the violation in an effort to maintain my “good filing history” as defined in 2 AAC 50.865(a)(1)(A)(i).

Background factors

These factors are not recognized as a mitigating factor under 2 AAC 50.865(b)(2) but they will help illustrate the situation in which the alleged violation occurred:

- As noted above, this is the first time I have had to file, and thus my first time going through the financial disclosure process. Since this was my first time, I was heavily dependent on advice and instructions from the staff of the Select Committee on Legislative Ethics and the staff of the Alaska Public Offices Commission (APOC).
- Despite my earlier requests to Mr. Kevin Reeve, the Administrator of the Select Committee on Legislative Ethics, he did not successfully connect with anyone at the APOC about my financial disclosure until Friday, February 6th; my financial disclosure was due the next business day on Monday, February 9th. In her e-mail response, Ms. Hebdon noted, “...the 30-day deadline to file an initial statement is quickly approaching!” Because Mr. Reeve made the connection to APOC so late in the process, I only received the general instructions to submit the disclosure and an example form from Ms. Hebdon the business day before the due date.

- Had Mr. Reeve connected me to APOC with more time before the due date, this simple miscommunication would have been worked out easily with time to spare. The miscommunication in question is only relevant due to the short window we had to complete and submit the filing.
- On Friday, February 6th, and Monday, February 9th, I was working my full-time job from 8AM-5PM. This meant I wasn't free to communicate with Ms. Hebdon and Mr. Reeve during business hours (other than lunch), which further complicated the communications on this shortened timeframe.

Mitigating factor:

I greatly appreciate Ms. Hebdon's quick e-mail response times, especially that she found time to send two e-mails at short notice on Monday, February 9th. I do not think Ms. Hebdon's responses were purposefully misleading. However, I intend to show that the late submission could have been avoided had Ms. Hebdon communicated information differently; as such, I believe the mitigating factor is 2 AAC 50.865(b)(2)(B): "giving incorrect oral or written information to a person required to submit a statement or other filing." The reason for this is that Ms. Hebdon didn't provide instructions on how to submit a disclosure with a pending waiver request until after the due date.

Specifically:

- On Sunday, February 8th, I filled out my disclosure on APOC's website and discovered that we would have to disclose the names of my wife's clients from self-employment as a yoga instructor; my wife would prefer not to do that, so I had considered submitting a waiver for that information.
- On Sunday, February 8th, I e-mailed Ms. Hebdon to ask about a waiver. In my e-mail I stated, "I have the form completed and ready to file, however I am hoping that this situation can be resolved before filing."
 - My intention with this statement was to illustrate a choice: I has completed the disclosure online, but I hoped to submit a waiver for the information instead. In other words, I thought only one document would be submitted by the due date. My (incorrect) understanding was that if I submit my waiver request, that postpones the submission of the financial disclosure since the waiver request may impact the information provided in the financial disclosure.
- At 11:15AM on Monday, February 9th, Ms. Hebdon e-mailed back with information about submitting a waiver request.
 - Specifically she cited 2 AAC 50.775(f) and 2 AAC 50.82. Both of these Alaska Administrative Codes detail how to submit waivers, and neither of them contradicted my assumption that only the waiver needed to be filed by the due declaration's due date.
- At 12:57PM on Monday, February 9th, I replied to Ms. Hebdon and stated I would send her a waiver request that day (the due date).

- At 2:10PM on Monday, February 9th, Ms. Hebdon replied to my e-mail and confirmed that I should send the waiver request to her.
 - In my mind this settled the choice that had been conveyed in my e-mail on Sunday, February 8th: I thought my options were to submit the disclosure or to submit a waiver request, and Ms. Hebdon accepted my suggestion of submitting the waiver request.
- At 6:40PM on Monday, February 9th, I submitted my waiver request to Ms. Hebdon.
- At 8:20AM on Tuesday, February 10th, I received an e-mail from Ms. Hebdon claiming there was “a misunderstanding.” Her e-mail said I had still needed to submit my financial disclosure by the due date of February 9th, and since I hadn’t done so the disclosure was late. Her e-mail clearly states that, “While you do not have to disclose her clients until a decision is issued, you are still required to file a statement that discloses the information that is not subject to the exemption request.” The e-mail continued, “Your statement won’t need to disclose your wife’s clients until there has been a determination, but it should otherwise be an accurate representation of your business and financial interests for calendar year 2025.”
 - This e-mail came after the due date, and this was the first indication that the disclosure was still due despite the pending waiver request.
 - This e-mail was the first time I had received instructions on how to submit my disclosure with a pending waiver request, and it came after the due date.
- On Tuesday, February 10th, I submitted my financial disclosure, on the same day that Ms. Hebdon told me it was required. This was easy for me to do, since I had already pre-populated the entire form on the APOC website; I merely had to make small changes to account for the pending waiver request and then submit it.

Summary

To summarize:

- My financial disclosure was complete and ready to submit. However, when I provided a choice in my message to Ms. Hebdon (e.g., submit my declaration or submit my waiver request), she seemed to accept my waiver request.
 - I believe this counts as a mitigating factor as defined in 2 AAC 50.865(b)(2)(B).
- Furthermore, it wasn’t until after the due date that I received instructions for how to submit my disclosure with a pending waiver request.
 - I believe this also counts as a mitigating factor as defined in 2 AAC 50.865(b)(2)(B).
- These mitigating factors were compounded by two background factors: that this is my first time performing the process, and that Mr. Reeve did not get me connected to APOC for the financial disclosure process until the business day before the deadline.

I am honored to be serving Alaska as a member of the Select Committee on Legislative Ethics, and I have strived to perform the financial disclosure process to the best of my ability

filing history” as defined in 2 AAC 50.865(a)(1)(A)(i).

Thank you for your consideration of this request.

Sincerely,

Chase Berenson
Alternate Public Member
Alaska Select Committee on Legislative Ethics



Chambers of
Susan M. Carney
Chief Justice

Supreme Court State of Alaska

January 9, 2026

ARRIVED

2/6/2026

APOC - ANCH
PM HC FAX ELE

101 Lacey Street
Fairbanks, Alaska
99701-4761

(907) 455-9150

The Honorable Gary Stevens
Senate President
Alaska State Legislature
State Capitol, Room 111
Juneau, AK 99801-1182

The Honorable Bryce Edgmon
House Speaker
Alaska State Legislature
State Capitol, Room 208
Juneau, AK 99801-1182

Re: Alternate public member appointment to the Legislative Ethics Select Committee

Dear Senate President Stevens and House Speaker Edgmon:

Alaska Statute 24.60.130(b) designates the Chief Justice of the Alaska Supreme Court to nominate the five public members who sit on the Select Committee on Legislative Ethics. In my capacity as Chief Justice, and pursuant to AS 24.60.131(b)(3), I am nominating Mr. Chase Berenson to serve as an alternate.

Mr. Berenson is an experienced business leader and holds a Masters of Business Administration. His information is available upon request from the Select Committee on Legislative Ethics. For purposes of determining compliance with AS 24.60.130(c), I understand Mr. Berenson is registered with the Alaska Democratic Party.

Please let me know if I can provide you with any additional information.

Sincerely,

Susan M. Carney
Chief Justice

cc: Mr. Chase Berenson
Mr. Kevin Reeve, Administrator, Select Committee on Legislative Ethics

Hebdon, Heather R (DOA)

From: Hebdon, Heather R (DOA)
Sent: Friday, February 6, 2026 9:28 AM
To: Reeve, Charles K (LEG)
Cc:
Subject: RE: Appointment of an Alternate Public Member
Attachments: POFD Electronic Filing Instructions.pdf; POFD Form - Example.pdf; Undeliverable: Testing

Good morning, Mr. Reeves and Mr. Barenson,

Thank you for reaching out and for the notice of Mr. Berenson's appointment. You are correct that the 30-day deadline to file an initial statement is quickly approaching!

I have attached general instructions for how to electronically file the POFD statement through the [myAlaska](#) portal, as well as an example form that illustrates the information that is needed. The statement should disclose personal business and financial interests for the preceding calendar year (2025) and based on the January 9 appointment date, should be filed before midnight on Monday, February 9, 2026, to avoid any penalties. If there are specific questions that either of you have about this process or the form itself, please feel free to reach out.

As for Ben's email account, I do not know why you wouldn't have received notice that the account is no longer active as it was deactivated upon Ben's separation in August. A test message sent moments ago resulted in the attached "Undeliverable" notice that the email address is no longer valid.

Again, if you have any questions, please feel free to reach out.

Thank you,

Heather

From: Kevin Reeve <Kevin.Reeve@akleg.gov>
Sent: Friday, February 6, 2026 8:58 AM
To: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Cc:
Subject: FW: Appointment of an Alternate Public Member

You don't often get email from kevin.reeve@akleg.gov. [Learn why this is important](#)

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.

Ms. Hebdon,

I called Ben Wolfe this morning to discuss the request in the email below. I was informed that he does not work for APOC, and was given your name as the POC to assist with the request. (It is worth noting that I did not get an undeliverable notification in response to the email that I sent. Is Ben's email potentially still receiving emails?)

Can you assist with the process to get Chase Berenson's (copied on this email) financial disclosure completed?

Please feel free to call if that would facilitate/expedite the process. We are rapidly approaching the 30 suspense date for Chase to complete his disclosure.

Regards,

Kevin Reeve

Administrator

Select Committee on Legislative Ethics

Phone: (907) 269-0150

Confidentiality: This email and any attachments are intended for the addressee and may contain confidential information protected by law from improper or unauthorized disclosure, copying or distribution.

From: Kevin Reeve

Sent: Friday, January 30, 2026 3:01 PM

To: Wolfe, Ben B (DOA) <ben.wolfe@alaska.gov>

Cc:

Subject: Appointment of an Alternate Public Member

Ben,

We worked together last year to get the financial disclosure completed for an Alternate Public Member that was appointed to the Ethics Committee.

We need to complete that process for Mr. Chase Berenson. His appointment letter is attached. I have ccd him on this email you that you have Mr. Berenson's email address.

Please let me know if you need anything else or if I can assist with the process.

Regards,

Kevin Reeve

Administrator

Select Committee on Legislative Ethics

Phone: (907) 269-0150

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Hebdon, Heather R (DOA)

From: Chase Berenson
Sent: Sunday, February 8, 2026 4:29 PM
To: Hebdon, Heather R (DOA)
Cc: Reeve, Charles K (LEG)
Subject: Re: Appointment of an Alternate Public Member

Follow Up Flag: Follow up
Flag Status: Completed

Hi Heather and Kevin -

Heather, thank you for getting this information to me. With the earlier lapse in communication from APOC about Ben's departure, it is unfortunate that it arrived so late in the 30-day window as I could not work on it until today and I do have questions.

The biggest question is that my wife is a yoga instructor, and she also is a sole proprietor who leads yoga retreats. In 2025, her income from yoga retreats was \$1,115.89, which is over the \$1,000 threshold. However, she does not want to list all her yoga retreat participants. For this year, the information arrived too late for her to contact all the participants to notify them and get approval that they would be listed in a public document; for future years, it could be a barrier to yoga retreat participants if they knew they would be listed in the public document. I would like more information for requesting an exemption under 2 AAC 50.775(f) that the right to privacy of the yoga retreat participants outweighs the compelling state interest in disclosing the information for such a small amount of income.

I have the form completed and ready to file, however I am hoping that this situation can be resolved before filing. As you mentioned in your e-mail on 2/6, I am operating under the belief that my due date is tomorrow, February 9th. Unfortunately tomorrow I will be at work from 8AM-5PM and will have limited opportunity to respond to calls/e-mails, though I plan on checking voicemail and e-mail during my lunch break from 12PM-1PM to try to catch your response.

Thank you for your help,
Chase Berenson

On Fri, Feb 6, 2026 at 9:28 AM Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov> wrote:

Good morning, Mr. Reeves and Mr. Barensen,

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Thank you,

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Ms. Hebdon,

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that I did not get an undeliverable notification in response to the email that I sent. Is Ben's email potentially still receiving emails?)

Can you assist with the process to get Chase Berenson's (copied on this email) financial disclosure completed?

Please feel free to call if that would facilitate/expedite the process. We are rapidly approaching the 30 suspense date for Chase to complete his disclosure.

Regards,

Kevin Reeve

Administrator

Select Committee on Legislative Ethics

Phone: (907) 269-0150

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From: Kevin Reeve
Sent: Friday, January 30, 2026 3:01 PM
To: Wolfe, Ben B (DOA) <ben.wolfe@alaska.gov>
Cc:
Subject: Appointment of an Alternate Public Member

Ben,

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We need to complete that process for Mr. Chase Berenson. His appointment letter is attached. I have ccd him on this email you that you have Mr. Berenson's email address.

Please let me know if you need anything else or if I can assist with the process.

Regards,

Kevin Reeve

Administrator

Select Committee on Legislative Ethics

Phone: (907) 269-0150

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Hebdon, Heather R (DOA)

From: Hebdon, Heather R (DOA)
Sent: Monday, February 9, 2026 11:16 AM
To: Chase Berenson
Cc: Reeve, Charles K (LEG)
Subject: RE: Appointment of an Alternate Public Member

Good morning, Mr. Berenson,

It is not clear what earlier lapse in communication from APOC you are referring to. Mr. Reeves's email from Friday, February 6 is the first notice our agency received about your January 9 appointment. Had we received earlier notice, we would have issued a courtesy notice of your initial reporting requirement, that provided a due date for filing an initial statement, along with instructions for filing.

In any event, I am happy to provide you the information that will be needed to submit a request for an exemption from disclosing your wife's clients. However, if I understand correctly, the total amount your wife received as income for the yoga retreat was \$1,115.89. While you are correct that it is above the reporting threshold and must therefore be disclosed as income, **an individual client would need to be disclosed as a source of income only if the individual paid more than \$1,000.** This seems unlikely given the \$1,115.89 figure, but if my understanding is not correct, please let me know.

There are also several standard exemptions under [2 AAC 50.775\(b\)-\(e\)](#) that enable a filer to seek an exemption from identifying individual clients as sources of income in certain situations where the information is generally legally protected (mental health services, medical services, certain legal services) constitutionally protected, or protected by a court order where disclosure may present a personal security threat. Absent any standard exemption noted in subsections (b)-(e), a filer may seek an exemption under subsection (f) (pasted below) when the filer can demonstrate that the right to privacy outweighs the compelling state interest in disclosing the information. Requests for exemption must comport with [2 AAC 50.821\(a\)](#) (also pasted below). The request does not need to be extensive, but it does need to satisfy each noted criteria. Once a request is submitted, staff would then have 30 days to either issue a decision granting or denying the request, or a recommendation for the Commission's consideration.

2 AAC 50.775. Exemption from reporting sources of income

(a) A legislative branch filer, public official, or candidate required under AS 24.50.200 or AS 39.50.020 to file a disclosure statement may, for any reason set out in this section, request an exemption from the requirement to report the name of an individual who was a source of income, the amount of income, or any other information required under AS 39.50.030 or 2 AAC 50.680 - 2 AAC 50.740. **An exemption request must comply with 2 AAC 50.821. The person requesting any exemption has the burden of proving each fact necessary to show that an exemption available under this section is applicable.**

(f) Notwithstanding any other provision of this section, a legislative branch filer, public official, or candidate may request an exemption from reporting the name of a source of income, the amount of income, or any other information required under AS 39.50.030 or 2 AAC 50.680 - 2 AAC 50.740, if the public official or candidate demonstrates that the right to privacy of the information outweighs the compelling state interest in disclosing the information.

2 AAC 50.821. Request for exemption or waiver

(a) To request an exemption allowed under AS 15.13, AS 24.45, AS 24.60.200 - 24.60.260, or AS 39.50, or a waiver of any requirement of this chapter, a person shall file a written request for exemption or waiver. A written request for exemption or waiver must be submitted on or before the due date of any report or filing to which it relates, and must provide the following information:

- (1) the name of the person requesting the exemption or waiver;
- (2) the person's mailing address;
- (3) the electronic mail address or telephone number at which the person may readily be contacted;
- (4) the matter for which the person seeks an exemption or waiver;
- (5) if the exemption or waiver request relates to information for which this chapter provides an exemption, the applicable provision of this chapter;
- (6) a statement whether the requested exemption or waiver is for a single report or filing, or for additional future reports requiring similar information;
- (7) the reasons for the exemption request;
- (8) any other information essential to the particular exemption or waiver request; and
- (9) a certification by the person requesting the exemption or waiver that all facts stated in the request are true.

I hope this is helpful. I will keep an eye out for any follow up you may have, and do my best to quickly respond.

Thank you,

Heather

From: Chase Berenson

Sent: Sunday, February 8, 2026 4:29 PM

To: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>

Cc: Reeve, Charles K (LEG) <Kevin.Reeve@akleg.gov>

Subject: Re: Appointment of an Alternate Public Member

Hi Heather and Kevin -

Heather, thank you for getting this information to me. With the earlier lapse in communication from APOC about Ben's departure, it is unfortunate that it arrived so late in the 30-day window as I could not work on it until today and I do have questions.

The biggest question is that my wife is a yoga instructor, and she also is a sole proprietor who leads yoga retreats. In 2025, her income from yoga retreats was \$1,115.89, which is over the \$1,000 threshold. However, she does not want to list all her yoga retreat participants. For this year, the information arrived too late for her to contact all the participants to notify them and get approval that they would be listed in a public document; for future years, it could be a barrier to yoga retreat participants if they knew they would be listed in the public document. I would like more information for requesting an exemption under 2 AAC 50.775(f) that the right to privacy of the yoga retreat participants outweighs the compelling state interest in disclosing the information for such a small amount of income.

I have the form completed and ready to file, however I am hoping that this situation can be resolved before filing. As you mentioned in your e-mail on 2/6, I am operating under the belief that my due date is tomorrow, February 9th. Unfortunately tomorrow I will be at work from 8AM-5PM and will have limited opportunity to respond to calls/e-mails, though I plan on checking voicemail and e-mail during my lunch break from 12PM-1PM to try to catch your response.

Thank you for your help,
Chase Berenson

On Fri, Feb 6, 2026 at 9:28 AM Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov> wrote:

Good morning, Mr. Reeves and Mr. Barensen,

Thank you for reaching out and for the notice of Mr. Berenson's appointment. You are correct that the 30-day deadline to file an initial statement is quickly approaching!

I have attached general instructions for how to electronically file the POFD statement through the [myAlaska](#) portal, as well as an example form that illustrates the information that is needed. The statement should disclose personal business and financial interests for the preceding calendar year (2025) and based on the January 9 appointment date, should be filed before midnight on Monday, February 9, 2026, to avoid any penalties. If there are specific questions that either of you have about this process or the form itself, please feel free to reach out.

As for Ben's email account, I do not know why you wouldn't have received notice that the account is no longer active as it was deactivated upon Ben's separation in August. A test message sent moments ago resulted in the attached "Undeliverable" notice that the email address is no longer valid.

Again, if you have any questions, please feel free to reach out.

Thank you,

Heather

From: Kevin Reeve <Kevin.Reeve@akleg.gov>
Sent: Friday, February 6, 2026 8:58 AM
To: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Cc:
Subject: FW: Appointment of an Alternate Public Member

You don't often get email from kevin.reeve@akleg.gov. [Learn why this is important](#)

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.

Ms. Hebdon,

I called Ben Wolfe this morning to discuss the request in the email below. I was informed that he does not work for APOC, and was given your name as the POC to assist with the request. (It is worth noting that I did not get an undeliverable notification in response to the email that I sent. Is Ben's email potentially still receiving emails?)

Can you assist with the process to get Chase Berenson's (copied on this email) financial disclosure completed?

Please feel free to call if that would facilitate/expedite the process. We are rapidly approaching the 30 suspense date for Chase to complete his disclosure.

Regards,

Kevin Reeve

Administrator

Select Committee on Legislative Ethics

Phone: (907) 269-0150

Confidentiality: This email and any attachments are intended for the addressee and may contain confidential information protected by law from improper or unauthorized disclosure, copying or distribution.

From: Kevin Reeve
Sent: Friday, January 30, 2026 3:01 PM
To: Wolfe, Ben B (DOA) <ben.wolfe@alaska.gov>
Cc:
Subject: Appointment of an Alternate Public Member

Ben,

We worked together last year to get the financial disclosure completed for an Alternate Public Member that was appointed to the Ethics Committee.

We need to complete that process for Mr. Chase Berenson. His appointment letter is attached. I have ccd him on this email you that you have Mr. Berenson's email address.

Please let me know if you need anything else or if I can assist with the process.

Regards,

Kevin Reeve

Administrator

Select Committee on Legislative Ethics

Phone: (907) 269-0150

Confidentiality: This email and any attachments are intended for the addressee and may contain confidential information protected by law from improper or unauthorized disclosure, copying or distribution.



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

February 20, 2026

Via U.S. Mail and Email

Chase Berenson
PO Box 1634
Girdwood, AK 99587

Re: Notice of Violation

Mr. Berenson:

According to our records you did not timely file your Initial Legislative Financial Disclosure (LFD) Statement that was due on February 9, 2026. Instead, your report was filed on February 10, 2026 (1 day 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 \$10.²

However, because you are a first-time filer, regulation allows APOC staff to document the violation and waive the associated penalty.³ **Accordingly, there is no penalty owed at this time.** A copy of this letter will be placed in your APOC file and is considered a public document.

Alternatively, you have the right to appeal staff's conclusion that a violation has occurred.⁴ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**⁵ 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.

¹ AS 24.60.240.
² 2 AAC 50.855(a).
³ 2 AAC 50.855(b)(1)(A).
⁴ 2 AAC 50.831(a).
⁵ 2 AAC 50.831(a).

Notice of Violation
Page 2

Chase Berenson
February 20, 2026

If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION



Heather R. Hebdon
Executive Director

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: LFD 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:	
Chase Berenson PO Box 1634 Girdwood, AK 99587	☒ First Class Mail ☒ Email

Cari Rousselle
Signature

02/20/2026
Date



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
apoc@alaska.gov
doa.alaska.gov/apoc

August 10, 2026

Via Certified Mail, US Mail, and Email

Chase Berenson
PO Box 1634
Girdwood, AK 99587
chaseberenson@gmail.com

Re: Commission Meeting Notice
Civil Penalty Appeal and Exemption Request

Dear Mr. Berenson:

The Commission will review the matter of your violation appeal for your late-filed 2026 Initial LFD Statement at its upcoming August 26, 2026, Commission Meeting in Anchorage. A copy of the Staff Recommendation that will be presented to the Commission at the meeting is enclosed. The Commission will also consider your exemption request related to disclosure of your spouse's clients. A copy of the exemption recommendation has previously been provided to you.

You have a right to participate at the meeting, either in-person, by telephone (1-907-202-7104, Conference ID: 845 091 354#), or online via [Microsoft Teams](#) (Meeting ID: 250 016 996 214 088, Passcode: ss9Fo9K9). POFD Civil Penalty Appeals are expected to begin at **9:30 am on Wednesday, August 26, 2026. Your exemption request will immediately follow and is expected to begin at 9:45 am.**

Your appeal will initially be presented to the Commission on a Consent Agenda. If you do not wish to 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 the Commission, on record, prior to the approval of the consent agenda. Regardless of your participation, you will be issued a copy of the Commission's final decisions in both matters.

If you have any questions, please contact our office.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

Heather R. Hebdon
Executive Director

Encl.: Appeal 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:

Chase Berenson
PO Box 1634
Girdwood, AK 99587
chaseberenson@gmail.com

☒ Certified Mail
☒ Email

Cari Rousselle 08/10/2026

Signature

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: chaseberenson@gmail.com
Sent: Monday, August 10, 2026 2:34 PM
Subject: Relayed: Commission Meeting Notice

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

chaseberenson@gmail.com (chaseberenson@gmail.com)

Subject: Commission Meeting Notice



Commission
Meeting Notice



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

PREPARED BY: Heather Hebdon

DATE: August 7, 2026

RESPONDENT: Jake Garner

CIVIL PENALTY

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

REASON FOR FILING: Board of Game Member

LATE REPORT(S): **Public Official Financial Disclosure**
☒ 2026 Annual POFD Statement¹

DUE DATE: March 16, 2026

FILED ON: March 19, 2026

DAYS LATE: 3 days late

DATE PENALTY ASSESSED: April 2, 2026

APPEAL RECEIVED: April 7, 2026²

MAXIMUM STATUTORY PENALTY: \$30

PENALTY ASSESSED³: \$15

RECOMMENDATION: **Reduced by 50% to \$7.50**
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Filer states that he experienced technical difficulties in accessing his myAlaska account and ultimately required IT assistance to file his statement.
2. Filer states that there were staffing transitions that led to inconsistent communications.
3. Filer states that there was no change in his financial interests during the reporting period.

¹ Exhibit 1, 2026 Annual POFD.

² Exhibit 2, Penalty Appeal

³ Reduced to 50% of maximum under 2 AAC 50.855(b)(1)(C).

4. Filer states that his time and effort, as well as APOC staff's, far exceeds the penalty and requests a full waiver.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. Mitigation criteria allows for up to a 50% reduction in the event a filer experiences a technical error in filing. When staff sought further details regarding specific technical issues he experienced, Mr. Garner stated that the time and public resources spent to pursue his penalty were excessive and reiterated the most reasonable course of action was to waive his penalty.⁴ APOC staff had no communication with Mr. Garner regarding difficulty filing on or around the due date and the filing system's internal logs do not indicate any technical errors associated with his filing. Accordingly, staff recommends no reduction based on a technical issue.
2. Neither changes in departmental staff nor having no change in reportable information from a previously filed statement are criteria that APOC staff can consider in recommending a reduction.⁵
3. While APOC staff concedes that a \$15 penalty is small, it should be noted that staff's initial assessment reduced the penalty by 50%. Further, because Mr. Garner serves on a state board, he is subject to reporting requirements. Similarly, APOC staff's duty is to enforce timely filing. Therefore, consideration of the time involved to file or enforce are, again, not something that staff can consider for further reduction of the penalty.
4. While not cited in his appeal, staff notes that Mr. Garner has a good filing history in that he has timely filed his two prior statements. This qualifies for up to a 50% reduction. Accordingly, staff recommends the penalty be further reduced by 50% to \$7.50.

FILER'S REPORTING HISTORY:

2024 Initial POFD – Timely
2025 Annual POFD – Timely
2026 Annual POFD – 3 days late, subject of 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.⁶ **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)**

⁴ Ex. 2 at p. 2.

⁵ 2 AAC 50.865(c)(1)(5).

⁶ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

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.⁷ 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.⁸ 2 AAC 50.865(b)(5)
- ☐ A unique circumstance. 2 AAC 50.865(b)(6)

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.⁹ 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 \$7.50**
- ☐ **Upheld at the assessed amount of _____**

⁷ 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.

⁸ 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.

⁹ Value greater than \$1000.

POFD FORM

COMPLETED

Submission Date: 03/19/2026

FILER INFORMATION

First Name: **Jake**Last Name: **Garner**Partner Type: **None / Not Applicable**Spouse/Domestic Partner Name: **Nothing to Report**Dependent Children: **0**Non-Dependent Children: **0**

PURPOSE OF FILING

Report Year: **2026**Report Dates: From **01/01/2025** Through **12/31/2025**Filing As: **State Office Holder**Branch: **Board/Commission Member**Board/Commission: **Board of Game**Report Type: **Annual**

INCOME

Owner	Type	Detail	Description	Amount
Filer	Salaried	Ouzinkie Native Corporation Full-time From: 01/01/2024 Through 12/31/2024 Time Worked:	As the Vice President of Operations for Ouzinkie Native Corporation I was responsible for the oversight and management of the Corporation's day to day commercial operations and managed the subsidiaries and staff.	\$200,000 - \$500,000
Filer	Salaried	Self Full-time From: 01/01/2024 Through 12/31/2024 Time Worked:	Rental Property	\$20,000 - \$50,000
Filer	Salaried	Self Full-time From: 01/01/2024 Through 12/31/2024 Time Worked:	AK Dividend	\$1,000 - \$2,000
Filer	Salaried	self Full-time From: 01/01/2024 Through 12/31/2024 Time Worked:	Owner of a small hotel on the Kenai Peninsula	\$50,000 - \$100,000

INTERESTS

Owner	Type	Detail	Description / Interest
Filer	Real Property	230 N. Willow Street Kenai, Alaska 99611	Ownership Interest: Fee Simple
Filer	Real Property	9108 JEWEL TERRACE ST ANCHORAGE, Alaska 99502	Ownership Interest: Fee Simple
Filer	Real Property	7154 Bearfoot ANCHORAGE, Alaska 99502	Ownership Interest: Fee Simple
Filer	Beneficial	Managed By: Merrill Lynch	IRA Ownership: 100%

Owner	Type	Detail	Description / Interest
Filer	Beneficial	Managed By: Empower	401k Ownership: 100%

LOANS AND DEBTS

Owner	Type	Name
Filer	Lender	Mr. Cooper
Filer	Lender	Global CU
Filer	Lender	Northrim 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



Name of Appellant: Jake Garner

Position and City/Borough: Director for Board of Game

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:

Dear APOC Representative,

I am writing to request a full waiver of the \$15.00 penalty associated with the late filing of my financial disclosure.

I experienced repeated technical difficulties accessing the myAlaska account, which prevented me from retrieving communications and completing the required filing. Despite multiple attempts, I was unable to successfully submit my disclosure without seeking IT assistance.

Additionally, there were several other contributing factors. During the relevant period, there were multiple staffing transitions within the department, including the retirement of Kristy Tibbles, interim support from Art Nelson, and the subsequent transition to Kari Winkel. These changes led to inconsistent communication across voice, text, and email.

It is also worth noting that there were no changes to my financial information during the reporting period.

Finally, I would respectfully point out that the time and effort expended by both your office and myself in addressing this matter has far exceeded the value of the penalty itself. I believe it is in everyone's best interest to resolve this efficiently through a simple waiver of an insufficient sum.

Thank you for your consideration of this request.

Sincerely,
Jake Garner

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: 

Hebdon, Heather R (DOA)

From: Jake Garner <jgarner@ouzinkie.com>
Sent: Thursday, April 30, 2026 5:37 PM
To: Hebdon, Heather R (DOA)
Subject: RE: Civil Penalty Appeal Affidavit Submission _ Jake Garner _ State Board of Game

Good evening Ms. Hebdon,

The amount of time and public resources being spent to pursue a \$15 penalty is excessive and unjustified. A simple waiver of the fee, before even sending out the certified mail notification would have been the most efficient and economical solution.

The administrative effort involved for you, me, and the State of Alaska has clearly exceeded the value of the penalty itself.

At this point, the most reasonable course of action is waive the fee, or just deduct the amount directly from my pay and close this matter.

I also want to reiterate that I have experienced ongoing issues accessing the State's platform. Even basic access to my state email through the portal has been unreliable, which directly contributed to this situation and is the reason you are communicating with me via my personal email address rather than my State of Alaska email address.

Thank you,

Jake

From: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Sent: Thursday, April 30, 2026 4:06 PM
To: Jake Garner <jgarner@ouzinkie.com>
Subject: RE: Civil Penalty Appeal Affidavit Submission _ Jake Garner _ State Board of Game

Good afternoon, Mr. Garner,

Thank you for timely submitting your appeal. In it you state that you experienced technical difficulties and ultimately had to seek IT assistance in order to file your statement. I have done a brief search of my correspondence but only find the multiple reminder notices that were sent to you, but nothing from you indicating you were having trouble accessing the system.

Because staff is limited to standard mitigation criteria when recommending reductions or waivers, it would be helpful if you could provide more details about the issues you experienced, what time frame you experienced the issues, and ultimately who you contacted for assistance. If you have correspondence documenting your trouble, that would be helpful too.

Thank you so much!

Heather

From: Jake Garner <jgarner@ouzinkie.com>
Sent: Tuesday, April 7, 2026 2:02 PM
To: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Cc: Public Offices Commission, Alaska (DOA sponsored) <doa.apoc@alaska.gov>
Subject: Civil Penalty Appeal Affidavit Submission _ Jake Garner _ State Board of Game

Some people who received this message don't often get email from jgarner@ouzinkie.com. [Learn why this is important](#)

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.

Dear Ms. Hebdon,

Please find attached my Civil Penalty Appeal Affidavit for your review and consideration.

This affidavit outlines the circumstances surrounding the late filing and my request for a waiver of the associated civil penalty.

Thank you for your time and consideration.

Sincerely,

Jake Garner



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

April 2, 2026

Via Certified Mail and Email

Jake Garner
9022 Jewel Lake Terrace Street
Anchorage, AK 99502
jgarner@ouzinki.com

Re: Notice of Penalty

Dear Mr. Garner:

According to our records you did not timely file your 2026 Annual Public Official Financial Disclosure (POFD) Statement that was due on March 16, 2026. Instead, your statement was filed on March 19, 2026 – 3 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 \$30.²

However, because you are an annual filer regulation allows APOC staff to document the violation and reduce the assessed penalty to 50% of the maximum.³ **Accordingly, the assessed penalty owed is \$15.**

Additionally, please be advised:

- 1) 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](https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx)⁴ 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.

¹ AS 39.50.135.

² 2 AAC 50.855(a).

³ 2 AAC 50.855(b)(1)(C).

⁴ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

- 2) Alternatively, you have the right to appeal staff's conclusion that a violation has occurred, or the reduced penalty amount assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

If you appeal, 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 either making arrangement for payment or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for entry of a final order in the amount of the assessed penalty and referral to the Attorney General's Office.⁶

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:

Jake Garner
9022 Jewel Lake Terrace St.
Anchorage, AK 99502
jgarner@ouzinki.com

☒ Certified Mail
☒ Email


Law Office Assistant

04/02/2026
Date

⁵ 2 AAC 50.831(a).

⁶ 2 AAC 50.895.



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

August 10, 2026

Via Certified Mail, US Mail, and Email

Jake Garner
9022 Jewel Terrace Street
Anchorage, AK 99502
jgarner@ouzinkie.com

Re: Commission Meeting Notice
Civil Penalty Appeal

Dear Mr. Garner:

The Commission will review the matter of your civil penalty appeal for your late-filed 2026 Annual POFD Statement at its upcoming August 26, 2026, Commission Meeting in Anchorage. A copy of the Staff Recommendation that will be presented to the Commission at the meeting is enclosed.

You have a right to participate at the meeting, either in-person, by telephone (1-907-202-7104, Conference ID: 845 091 354#), or online via [Microsoft Teams](#) (Meeting ID: 250 016 996 214 088, Passcode: ss9Fo9K9). POFD Civil Penalty Appeals are expected to begin at **9:30 am on Wednesday, August 26, 2026.**

Your appeal will initially be presented to the Commission on a Consent Agenda. If you do not wish to 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 the Commission, on record, prior to the approval of the consent agenda. Regardless of your participation, you will be issued a copy of the Commission's final decision.

If you have any questions, please contact our office.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

Heather R. Hebdon
Executive Director

Encl.: Appeal 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:

Jake Garner
9022 Jewel Terrace Street
Anchorage, AK 99502
jgarner@ouzinkie.com

☒ Certified Mail
☒ Email

Cari Rousselle 08/10/2026
Signature Date

Rousselle, Cari J (DOA)

From: Rousselle, Cari J (DOA)
Sent: Monday, August 10, 2026 2:46 PM
To: jgarner@ouzinki.com
Cc: Hebdon, Heather R (DOA)
Subject: Commission Meeting Notice - Resending
Attachments: 260810 Garner, Jake Meeting Notice.pdf

Importance: High

Tracking:	Recipient	Delivery
	jgarner@ouzinki.com	
	Hebdon, Heather R (DOA)	Delivered: 8/10/2026 2:47 PM

Good Afternoon,

Please find the attached document(s) being issued to you from the Alaska Public Offices Commission. You will receive physical copies as indicated within the attachment.

Please note if there are any timeframes established to take action within these documents.

Should you have any questions, please contact our office.

Thank you,

Cari Rousselle
Law Office Assistant 3
2221 E. Northern Lights Blvd, Rm #128
Anchorage, AK 99508
(907) 276-4176



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

PREPARED BY: Heather Hebdon

DATE: August 7, 2026

RESPONDENT: Paula Harrison

CIVIL PENALTY

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

REASON FOR FILING: University of Alaska Board of Regents Member

LATE REPORT(S): **Public Official Financial Disclosure**
☒ 2026 Annual POFD Statement¹

DUE DATE: March 16, 2026

FILED ON: May 5, 2026

DAYS LATE: 51 days late

DATE PENALTY ASSESSED:² May 15, 2026

APPEAL RECEIVED: June 16, 2026³

MAXIMUM STATUTORY PENALTY: \$510

PENALTY ASSESSED:⁴ \$255

RECOMMENDATION: **Waive**
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Filer states that she had been in and out of the hospital in Seattle since mid-February 2026. Once she returned home and was able to access her computer, she logged in and filed.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. APOC staff began sending reminder emails for the 2026 Annual POFD reporting deadline in January 2026. In response to one of the reminders, Ms. Harrison contacted staff and advised

¹ Exhibit 1, 2026 Annual POFD.

² NODs issued March 26, 2026 and April 7, 2026.

³ Exhibit 2, Penalty Appeal

⁴ Reduced to 50% of maximum under 2 AAC 50.855(b)(1)(C).

that she had been admitted and was currently in the hospital undergoing treatment. She was uncertain when she would be able to return home or when she would be able to access her computer in order to file. She checked in with staff periodically to advise of her status. Once she returned home and was able to access her computer, she filed her statement.

2. Mitigation criteria allows for a waiver of a penalty in the event of a personal emergency including an incapacitating illness. In light of Ms. Harrison's hospitalization and ongoing treatment during the months leading up to the deadline, staff recommends the penalty be waived.

FILER'S REPORTING HISTORY:

2019 Initial POFD – Timely

2020 – 2025 Annual POFDs – Timely

2026 Annual POFD – 51 days late, subject of 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.⁵ **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.⁶ **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.⁷ **2 AAC 50.865(b)(5)**
- ☐ A unique circumstance. **2 AAC 50.865(b)(6)**

⁵ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁶ 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.

⁷ 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.⁸ **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 _____**

⁸ Value greater than \$1000.

POFD FORM

COMPLETED

Submission Date: 05/05/2026

FILER INFORMATION

First Name: **Paula**
Last Name: **Harrison**
Partner Type: **None / Not Applicable**
Spouse/Domestic Partner Name: **Nothing to Report**
Dependent Children: **0**
Non-Dependent Children: **0**

PURPOSE OF FILING

Report Year: **2026**
Report Dates: From **01/01/2025** Through **12/31/2025**
Filing As: **State Office Holder**
Branch: **Board/Commission Member**
Board/Commission: **University of Alaska Board of Regents**
Report Type: **Annual**

INCOME

Owner	Type	Detail	Description	Amount
Filer	Salaried	Enstar Natural Gas Company, LLC Full-time From: 01/01/2025 Through 12/31/2025 Time Worked:	Director Human Resources and Labor Relations	\$200,000 - \$500,000
Filer	Dividend or Interest	PFD		\$1,000 - \$2,000
Filer	Other	Source: Social Security		\$20,000 - \$50,000
Filer	Other	Source: SOA Pension		\$20,000 - \$50,000
Filer	Other	Source: VA		\$20,000 - \$50,000

INTERESTS

Owner	Type	Detail	Description / Interest
Filer, Child	Real Property	1956 Sonoma Crest Circle Anchorage (ANC), Alaska 99516	Ownership Interest: Tenant in Common
Filer	Real Property	1970 Brandilyn St Anchorage (ANC), Alaska 99516	Ownership Interest: Other::Sole Owner
Filer	Beneficial	Managed By: TROWEPRICE	401 (k) Ownership: 100%

LOANS AND DEBTS

Owner	Type	Name
Filer	Guarantor	Paula Marie Harrison
Filer, Child	Guarantor	Paula Marie Harrison and Dirk Craft II

LEASES

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

page 1 of 2

Exhibit 1
Page 1 of 2

CLOSE ECONOMIC ASSOCIATIONS

Associated Person	Description
No Associations / Nothing to Report	

LOBBYIST PARTNER EMPLOYERS

Name	Address	Compensation
No Lobbyist Partner Employers / Nothing to Report		

Hebdon, Heather R (DOA)

From: Paula Harrison <Paula.Harrison@enstarnaturalgas.com>
Sent: Tuesday, June 16, 2026 1:37 PM
To: Hebdon, Heather R (DOA)
Subject: Re: Notice of Penalty

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.

This message was sent securely using Zix®

Hi Heather
Re: waiving of penalty

I just got back from Seattle again. So I would like to appeal the penalty on my filing. I have been in and out of the hospital and seeing doctors in Seattle since Feb 14 which is why my filing was late. I will be having surgery in Seattle soon. I would appreciate consideration for waiving. I have not been late in the past.

Thank you

Paula Harrison

Get [Outlook for iOS](#)

From: Paula Harrison <Paula.Harrison@enstarnaturalgas.com>
Sent: Friday, 15 May 2026 16:24:57
To: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Subject: Fw: Notice of Penalty

Were you going to waive the penalty? I am still not back to work and headed back to Seattle

Paula Harrison

Get [Outlook for iOS](#)

From: Rousselle, Cari J (DOA) <cari.rousselle@alaska.gov>
Sent: Friday, May 15, 2026 4:23 PM
To: Paula Harrison <paula.harrison@enstarnaturalgas.com>
Cc: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Subject: Notice of Penalty

CAUTION: This email originated outside of ENSTAR/TSU. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you are not sure, use the "Report Phish" button or contact enstar.helpdesk@enstarnaturalgas.com



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

May 15, 2026

Via Certified Mail, US Mail, and Email

Paula Harrison
1970 Brandilyn Street
Anchorage, AK 99516
paula.harrison@enstarnaturalgas.com

Re: Notice of Penalty

Dear Ms. Harrison:

According to our records you did not timely file your 2026 Annual Public Official Financial Disclosure (POFD) Statement that was due on March 16, 2026. Instead, your statement was filed on May 5, 2026 (51 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 510.²

However, because you are an annual filer, regulation allows APOC staff to document the violation and reduce the assessed penalty to 50% of the maximum. **Accordingly, the assessed penalty owed is \$255.**³

Additionally, please be advised:

- 1) 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](https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx)⁴ 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.

¹ AS 39.50.135.

² 2 AAC 50.855(a).

³ 2 AAC 50.855(b)(1)(C).

⁴ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

- 2) Alternatively, you have the right to appeal staff's conclusion that a violation has occurred, or the reduced penalty amount assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

If you appeal, 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 either making arrangement for payment or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for entry of a final order in the amount of the assessed penalty and referral to the Attorney General's Office.⁶

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:	
Paula Harrison 1970 Brandilyn Street Anchorage, AK 99516 paula.harrison@enstarnaturalgas.com	☒ Certified Mail ☒ US Mail ☒ Email


Signature

05/15/2026

Date

⁵ 2 AAC 50.831(a).

⁶ 2 AAC 50.895.



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

August 10, 2026

Via Certified Mail, US Mail, and Email

Paula Harrison
1970 Brandilyn Street
Anchorage, AK 99516
paula.harrison@enstarnaturalgas.com

Re: Commission Meeting Notice
Civil Penalty Appeal

Dear Ms. Harrison:

The Commission will review the matter of your civil penalty appeal for your late-filed 2026 Annual POFD Statement at its upcoming August 26, 2026, Commission Meeting in Anchorage. A copy of the Staff Recommendation that will be presented to the Commission at the meeting is enclosed.

You have a right to participate at the meeting, either in-person, by telephone (1-907-202-7104, Conference ID: 845 091 354#), or online via [Microsoft Teams](#) (Meeting ID: 250 016 996 214 088, Passcode: ss9Fo9K9). POFD Civil Penalty Appeals are expected to begin at **9:30 am on Wednesday, August 26, 2026.**

Your appeal will initially be presented to the Commission on a Consent Agenda. If you do not wish to 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 the Commission, on record, prior to the approval of the consent agenda. Regardless of your participation, you will be issued a copy of the Commission's final decision.

If you have any questions, please contact our office.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

Heather R. Hebdon
Executive Director

Encl.: Appeal 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:

Paula Harrison
1970 Brandilyn Street
Anchorage, AK 99516
paula.harrison@enstarnaturalgas.com

☒ Certified Mail
☒ Email

Cari Rousselle 08/10/2026

Signature

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: paulah@ak.net
Sent: Tuesday, August 11, 2026 9:37 AM
Subject: Relayed: Commission Meeting Notice

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

paulah@ak.net (paulah@ak.net)

Subject: Commission Meeting Notice



Commission
Meeting Notice

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: pmharrison@alaska.edu
Sent: Tuesday, August 11, 2026 9:37 AM
Subject: Relayed: Commission Meeting Notice

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

pmharrison@alaska.edu (pmharrison@alaska.edu)

Subject: Commission Meeting Notice



Commission
Meeting Notice



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

PREPARED BY: Heather Hebdon

DATE: August 7, 2026

RESPONDENT: Thomas Kirk

CIVIL PENALTY

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

REASON FOR FILING: Stebbins City Councilmember

LATE REPORT(S): **Public Official Financial Disclosure**
☒ 2026 Annual POFD Statement¹

DUE DATE: March 16, 2026

FILED ON: May 8, 2026

DAYS LATE: 54 days late

DATE PENALTY ASSESSED:² May 15, 2026

APPEAL RECEIVED: May 8, 2026³

MAXIMUM STATUTORY PENALTY: \$540

PENALTY ASSESSED:⁴ \$270

RECOMMENDATION: **Reduce by 50% to \$135**
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Filer submitted a signed appeal affidavit with no statement.

¹ Exhibit 1, 2026 Annual POFD.

² NODs issued March 27, 2026 and April 7, 2026; and NOR issued April 30, 2026.

³ Exhibit 2, Penalty Appeal

⁴ Reduced to 50% of maximum under 2 AAC 50.855(b)(1)(C).

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. Mitigation criteria allows for up to a 50% reduction of a penalty when the filer has a good filing history as defined as no late filings in the preceding five years. Here, Mr. Kirk has timely filed his POFD since taking office in 2023. Accordingly, staff recommends the assessed penalty be reduced by 50% to \$135

FILER'S REPORTING HISTORY:

2023 Candidate POFD – Timely
2024 – 2025 Annual POFDs – Timely
2026 Annual POFD – 54 days late, subject of 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.⁵ **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.⁶ **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.⁷ **2 AAC 50.865(b)(5)**
- ☐ A unique circumstance. **2 AAC 50.865(b)(6)**

⁵ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁶ 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.

⁷ 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)**

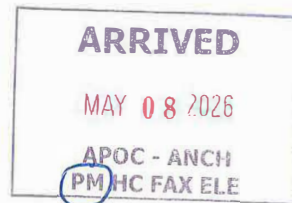
Aggravating Factors [2 AAC 50.865(d)]:

- ☐ Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁸ **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 \$135**
- ☐ **Upheld at the assessed amount of _____**

⁸ Value greater than \$1000.



ALASKA PUBLIC OFFICES COMMISSION
2026 Public Official Financial Disclosure
Covering Jan. 1– Dec. 31, 2025

Clerk Received Date

APOC Received Date

POFD for Municipal Officers and Candidates

You may only file this paper POFD if you are a municipal officer or municipal candidate and are serving or seeking office in a municipality with a population of less than 15,000
All other filers must file electronically via myAlaska: <https://my.alaska.gov/>

If you are a municipal candidate and already have a current POFD on file you do not need to file a candidate POFD (AS 15.13.030)

Contact APOC

Anchorage: 2221 E. Northern Lights Blvd., Rm. 128, Anchorage, AK 99508 / 907-276-4176 / Fax 907-276-7018
Juneau: 240 Main St., Rm. 201 / P.O. Box 110222, Juneau, AK 99811 / 907-465-4864 / Fax 907-465-4832
Toll-free in-state: 800-478-4176 / Online: <http://doa.alaska.gov/apoc/> E-mail: apoc@alaska.gov

This is a public record – Do not include information such as social security or account numbers

If you have nothing to report in a section, check NONE. Attach additional pages where needed

Filing as a Municipal: ☒ Office Holder ☐ Candidate

Statement Type:

☒ **Candidate POFD:** Due when filing declaration of candidacy or nominating petition.

☐ **Initial POFD:** Due 30 days from appointment.

☐ **Annual POFD:** Due by March 15 each year after appointment.

Municipality or Borough: Stebbins, Alaska 99671

Position: ☐ Borough/City Mayor ☐ Assembly member ☒ Councilmember ☐ School Board Member

☐ Elected Utility Board Member ☐ Borough/City Manager ☐ Planning or Zoning Commission

NAME: Thomas Francis Kink

E-MAIL: kink.tommy.64@gmail.com

PHONE: 1-907-944-1849 FAX: 1-907-934-2391

Exhibit 1
Page 1 of 7

ALASKA PUBLIC OFFICES COMMISSION
2026 Public Official Financial Disclosure
Covering Jan. 1– Dec. 31, 2025

SALARIED EMPLOYMENT INCOME

NONE: ☐

Income is anything of value and covers all forms of compensation or benefits from an employer including wages, salary, commissions, tips, bonuses, housing, use of an automobile and deferred compensation. Report each employer who paid you, your spouse, or children more than \$1,000. Include amount, dates and terms of employment, and time worked.
Amounts of income may be stated in these ranges: (1) \$250-\$1,000 gifts only; (2) \$1,000-\$2,000; (3) \$2,000-\$5,000; (4) \$5,000-\$10,000; (5) \$10,000-\$20,000; (6) \$20,000-\$50,000; (7) \$50,000-\$100,000; (8) \$100,000-\$200,000; (9) \$200,000-\$500,000; (10) \$500,000-\$1,000,000; (11) \$1,000,000 or more

Earned By: ☒ Filer ☐ Spouse ☐ Child

☒ Full-time ☐ Part-time ☐ Seasonal ☐ Commission ☐ Project ☐ Hourly

Income Amount: \$ 33,000.00

Dates and amount of time worked: January 01, 2025 - December 31, 2025

Employer: Stebbins Native Corporation

Address: P.O. Box 71110, Stebbins, AK 99621

Description: Chief Operating Officer

Earned By: ☐ Filer ☐ Spouse ☒ Child

☐ Full-time ☐ Part-time ☐ Seasonal ☐ Commission ☐ Project ☐ Hourly

Income Amount: \$ 35,000.00

Dates and amount of time worked: January 01, 2025 - December 31, 2025

Employer: Bering Straits School District Stebbins School

Address: P.O. Box Stebbins, AK 99621

Description: Teacher Aide

Earned By: ☐ Filer ☐ Spouse ☐ Child

☐ Full-time ☐ Part-time ☐ Seasonal ☐ Commission ☐ Project ☐ Hourly

Income Amount: \$ _____

Dates and amount of time worked: _____

Employer: _____

Address: _____

ALASKA PUBLIC OFFICES COMMISSION
2026 Public Official Financial Disclosure
Covering Jan. 1 - Dec. 31, 2025

SELF-EMPLOYMENT INCOME

NONE: ☒

List each source of self-employment income over \$1,000. See AS 39.50.200(10), source of income, 2 AAC 50.799(a), definition of self-employment, 2 AAC 50.695, reporting deferred income, and 2 AAC 50.700 for details. Disclose each client, customer or business that paid you and/or your family members more than \$1,000. Self-employment includes sole proprietors, partnerships, limited liability companies and professional corporations. Disclose income from corporations in which the filer and/or family members hold a controlling interest (2 AAC 50.700(b)). Exemptions: To obtain an exemption You must file a written request and receive an exemption from the commission (2 AAC 50.775, 2 AAC 50.821).

Earned By: ☐ Filer ☐ Spouse ☐ Child

☐ Full-time ☐ Part-time ☐ Seasonal ☐ Commission ☐ Project ☐ Hourly

Income Amount: \$ _____

Dates worked: _____ Amount of time worked: _____

Business name: _____

Client name and address: _____

Client name and address: _____

Description of services: _____

Earned By: ☐ Filer ☐ Spouse ☐ Child

☐ Full-time ☐ Part-time ☐ Seasonal ☐ Commission ☐ Project ☐ Hourly

Income Amount: \$ _____

Dates worked: _____ Amount of time worked: _____

Business name: _____

Client name and address: _____

Client name and address: _____

Description of services: _____

RENTAL INCOME

NONE: ☒

If any person paid you and/or your family members more than \$1,000 in rent during the preceding calendar year, report the name of the person and amount paid. If the property is managed by a person other than the filer or a family member, list the manager's name. Disclose the location of the property under Real Property Interests.

OWNER:	TENANT NAMES	AMOUNT
☐ Filer		
☐ Spouse		
☐ Child		

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 Covering Jan. 1– Dec. 31, 2025

DIVIDEND AND INTEREST INCOME

NONE: ☐

If more than \$1,000, disclose dividends, interest and other distributions of earnings from a business or investment. Include dividends or interest from bank accounts, capital gains, money market accounts, certificates of deposit, and Native corporation dividends. PFDs are only applicable if more than \$1,000.

RECIPIENT	SOURCE	AMOUNT
☒ Filer ☐ Child ☐ Spouse	AK PFD, BSNC Dividend	11762.25 - Dividend
☐ Filer ☐ Child ☒ Spouse	AK PFD, Calista Corporation	1,000.00 - PFD
☐ Filer ☒ Child ☐ Spouse	AK PFD	1,000.00
☐ Filer ☒ Child ☐ Spouse	AK PFD	1,000.00
☐ Filer ☒ Child ☐ Spouse	AK PFD	1,000.00
☐ Filer ☒ Child ☐ Spouse	AK PFD	1,000.00
☐ Filer ☒ Child ☐ Spouse	AK PFD	1,000.00

OTHER INCOME

NONE: ☒

List source and amount of income over \$1,000 not listed elsewhere on this form, including sale of goods or property, taxable capital gains, pensions, retirement cash-outs, government entitlements, alimony or child support payments, honoraria and any other payments not otherwise accounted for.

RECIPIENT	SOURCE	AMOUNT
☐ Filer ☐ Child ☐ Spouse		
☐ Filer ☐ Child ☐ Spouse		
☐ Filer ☐ Child ☐ Spouse		
☐ Filer ☐ Child ☐ Spouse		

GIFTS WORTH MORE THAN \$250

NONE: ☒

Include travel expenses, discounts not available to the public, loans forgiven or paid by a third party. Do not report gifts from spouse, domestic partner, parent, dependent child, sibling, grandparent, aunt, uncle, niece or nephew.

RECIPIENT	DESCRIPTION	SOURCE	VALUE
☐ Filer ☐ Child ☐ Spouse			
☐ Filer ☐ Child ☐ Spouse			
☐ Filer ☐ Child ☐ Spouse			

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BUSINESS INTERESTS

NONE: ☒

Report businesses in which the filer or family member: 1) Served as stockholder, owner, officer, director, partner, proprietor, employee, or held an interest. 2) Had ownership interests of more than \$1,000 in a publicly traded corporation, a business, shares in non-publicly traded corporations, sole proprietorships, or limited liability companies. Include options to buy, non-profit organizations, corporations, businesses, associations, and trade groups.

☐ Filer ☐ Spouse ☐ Child Position/Type of interest: _____

Business name: _____

Address: _____

Description: _____

☐ Filer ☐ Spouse ☐ Child Position/Type of interest: _____

Business name: _____

Address: _____

Description: _____

☐ Filer ☐ Spouse ☐ Child Position/Type of interest: _____

Business name: _____

Address: _____

Description: _____

REAL PROPERTY INTERESTS

NONE: ☒

A primary residence or recreational property held for personal use may be described only by zip code (2 AAC 50.720). (Enter 'Not Reported' for address if this applies to you.) Report the nature of the interest held in the property; including fee simple ownership, tenancy in common, general or limited partnership, and holder of an option to purchase. If property is jointly owned, check applicable boxes.

Owner(s): ☐ Filer ☐ Spouse ☐ Child ☐ Co-owner: _____

Address or description and zip-code: _____

Ownership interest: _____

Owner(s): ☐ Filer ☐ Spouse ☐ Child ☐ Co-owner: _____

Address or description and zip-code: _____

Ownership interest: _____

ALASKA PUBLIC OFFICES COMMISSION
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TRUSTS, RETIREMENT ACCOUNTS, OR OTHER BENEFICIAL INTERESTS **NONE:** ☒

Report each trust, retirement account or beneficial interest that exceeded \$1,000 during the reporting period, including a retirement plan, employee pension plans, profit-sharing, family, or education trusts, deferred compensation plans, annuity plans or any other similar arrangements intended to provide future income for the filer and/or family member. Identify individual investments accounts if you and/or family members manage or personally control the investments.

Owned By: ☐ Filer ☐ Spouse ☐ Child Percent Owned: _____

Managed By: _____

Fund or Companies: _____

Owned By: ☐ Filer ☐ Spouse ☐ Child Percent Owned: _____

Managed By: _____

Fund or Companies: _____

Owned By: ☐ Filer ☐ Spouse ☐ Child Percent Owned: _____

Managed By: _____

Fund or Companies: _____

LOANS, LOAN GUARANTEES, AND DEBTS OVER \$1,000 **NONE:** ☒

Report each creditor, lender or guarantor to whom more than \$1,000 was owed during the reporting period. List financial obligations, including property owned or sold during the reporting period; loans that have been guaranteed; delinquent taxes; alimony; child support payments; medical bills; boat and vehicle loans; business and personal loans; escrows; student loans; signature loans and promissory notes. Loans include secured, unsecured and contingent loans. Do not list credit card obligations or revolving charge accounts.

Debtor: ☐ Filer ☐ Spouse ☐ Child

Type: ☐ Lender ☐ Creditor ☐ Guarantor Name: _____

Debtor: ☐ Filer ☐ Spouse ☐ Child

Type: ☐ Lender ☐ Creditor ☐ Guarantor Name: _____

ALASKA PUBLIC OFFICES COMMISSION

2026 Public Official Financial Disclosure

Covering Jan. 1– Dec. 31, 2025

GOVERNMENT CONTRACTS AND OFFERS TO CONTRACT

NONE: ☒

List contracts, bids and offers to contract with the state or any state or municipal agency or entity. Report contract interests as individual, sole proprietor, family member, partnership, professional corporation, limited liability company, or through a corporation in which filer or family member/s held a controlling interest.

Contractor: ☐ Filer ☐ Spouse ☐ Child Type of Interest: _____

☐ Bid ☐ Offer ☐ Held Contract ID: _____

Contracting Agency: _____

Description: _____

NATURAL RESOURCE LEASES

NONE: ☒

List mineral, timber, oil and gas leases – held, bid or offered. Report lease interests as individual, sole proprietor, family member, partnership, professional corporation, limited liability company, or corporation in which you and/or a family member held a controlling interest.

Leaseholder: ☐ Filer ☐ Spouse ☐ Child Type of Interest: _____

☐ Bid ☐ Offer ☐ Held Lease ID: _____

Description: _____

CERTIFICATION

I certify under penalty of perjury that the foregoing is true and the information in this disclosure statement is, to the best of my knowledge, true, correct and complete. A person who knowingly makes a false sworn certification is guilty of perjury.

SIGNATURE: _____

Thomas Francis Kirk

Thomas Francis Kirk

PRINTED NAME

04/21/2026

DATE SIGNED

Filers are solely responsible for timely filing complete and accurate forms

File this POFD with the municipal clerk where you hold or seek office.



Civil Penalty Appeal Affidavit

AS 39.50 Public Official Financial Disclosure Law

Name of Appellant: Thomas Francis Kirk

Position and City/Borough: Stebbins City Council Member

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 civil penalty or violation.

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

Thomas Francis Kirk, 04/21/2020

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.

**Exhibit 2
Page 1 of 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

May 15, 2026

Via Certified Mail, US Mail, and Email

Thomas Kirk
PO Box 71007
Stebbins, AK 99761
kirktommy64@gmail.com

Re: Notice of Penalty

Dear Mr. Kirk:

According to our records you did not timely file your 2026 Annual Public Official Financial Disclosure (POFD) Statement that was due on March 16, 2026. Instead, your statement was filed on May 8, 2026 (54 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 540.²

However, because you are an annual filer, regulation allows APOC staff to document the violation and reduce the assessed penalty to 50% of the maximum. **Accordingly, the assessed penalty owed is \$270.**³

Additionally, please be advised:

- 1) 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](https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx)⁴ 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.

¹ AS 39.50.135.

² 2 AAC 50.855(a).

³ 2 AAC 50.855(b)(1)(C).

⁴ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

- 2) Alternatively, you have the right to appeal staff's conclusion that a violation has occurred, or the reduced penalty amount assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

If you appeal, 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 either making arrangement for payment or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for entry of a final order in the amount of the assessed penalty and referral to the Attorney General's Office.⁶

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:	
Thomas Kirk PO Box 71007 Stebbins, AK 99761 kirktommy64@gmail.com	☒ Certified Mail ☒ US Mail ☒ Email

Cari Rousselle 05/15/2026
Signature Date

⁵ 2 AAC 50.831(a).

⁶ 2 AAC 50.895.



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

August 10, 2026

Via Certified Mail, US Mail, and Email

Thomas Kirk
PO Box 71007
Stebbins, AK 99761
kirktommy64@gmail.com

Re: Commission Meeting Notice
Civil Penalty Appeal

Dear Mr. Kirk:

The Commission will review the matter of your civil penalty appeal for your late-filed 2026 Annual POFD Statement at its upcoming August 26, 2026, Commission Meeting in Anchorage. A copy of the Staff Recommendation that will be presented to the Commission at the meeting is enclosed.

You have a right to participate at the meeting, either in-person, by telephone (1-907-202-7104, Conference ID: 845 091 354#), or online via [Microsoft Teams](#) (Meeting ID: 250 016 996 214 088, Passcode: ss9Fo9K9). POFD Civil Penalty Appeals are expected to begin at **9:30 am on Wednesday, August 26, 2026.**

Your appeal will initially be presented to the Commission on a Consent Agenda. If you do not wish to 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 the Commission, on record, prior to the approval of the consent agenda. Regardless of your participation, you will be issued a copy of the Commission's final decision.

If you have any questions, please contact our office.

Sincerely,

ALASKA PUBLIC OFFICES COMMISSION

Heather R. Hebdon
Executive Director

Encl.: Appeal 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:

Thomas Kirk
PO Box 71007
Stebbins, AK 99761
kirktommy64@gmail.com

☒ Certified Mail
☒ Email

Signature

08/10/2026

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: kirktommy64@gmail.com
Sent: Monday, August 10, 2026 3:14 PM
Subject: Relayed: Commission Meeting Notice

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

kirktommy64@gmail.com (kirktommy64@gmail.com)

Subject: Commission Meeting Notice



Commission
Meeting Notice

