

[TAB 7]

Commission Reconsideration

Complaint 25-01-CD

Widney v. McCabe

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Mike Widney,)	
)	
Complainant,)	
)	
vs.)	Case No. 25-01-CD
)	
Kevin McCabe)	
)	
Respondent.)	
_____)	

NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing concerning the reconsideration of this case will take place before the Alaska Public Offices Commission at approximately 11:30 a.m. on Wednesday, September 10, 2025.

The Commissioners will be present in person, by telephone, or via Microsoft Teams and will receive evidence regarding this matter. You may be present at the hearing either by telephone (1-907-202-7104, Access Code: 218 853 540#), in-person (2221 E. Northern Lights Blvd, Ste 128, Anchorage, Alaska), or via [Microsoft Teams Meeting](#).¹ You may be, but are not required to be, represented by an attorney or agent.

If you wish to participate by telephone and are an individual who requires a special accommodation to participate, you must advise the Commission office on or before September 3, 2025 so that a special accommodation can be made.

PREHEARING AND HEARING PROCEDURES

- 1) Parties.** The parties in this case are Commission Staff and Respondent.
- 2) Issues.** At the hearing, the Commission will consider the merits and penalty assessment of the case but not evidence or argument about other candidates' alleged violations of the law, purportedly selective enforcement, or the complainant's motives.
- 3) Procedural history.** Complainant Mike Widney filed a complaint against Kevin McCabe on January 2, 2025. Respondent McCabe filed a response on January 21, 2025. Staff's investigation report recommending the complaint be upheld in part and dismissed in part was

¹ Meeting ID: 234 956 901 993 7, Passcode: Yb9UE6WW

issued June 11, 2025. The Commission issued a final order on July 7, 2025 and an order granting reconsideration, in part, on August 5, 2025

- 4) **Hearing procedures.** The hearing will be conducted as provided in AS 15.13.380, 2 AAC 50.891, and the Alaska Administrative Procedure Act, AS 44.62.330 – 44.62.630. All testimony must be presented or submitted under oath. A party may call witnesses, cross-examine witnesses, present and rebut evidence. If the respondent does not testify, the respondent may be called and examined as if under cross-examination.
- 5) **Evidence and exhibits.** All relevant evidence may be admissible at the hearing. In passing upon the admissibility of evidence, the Commission may consider, but is not bound to follow, the rules of evidence governing general civil proceedings in the courts of the State of Alaska. The Commission may exclude inadmissible evidence and order repetitive evidence discontinued.
- 6) **Prehearing filings.** No later than September 2, 2025, a party:
 - a) may file a list of witnesses expected to testify at the hearing;
 - b) may file copies of exhibits to be presented at the hearing that are marked and identified (for example, Resp.'s Ex. A);
 - c) may file a prehearing memorandum;
 - d) may file prehearing motions, including motions to dismiss, for summary judgment, or to exclude evidence, and
 - e) shall serve all parties and the Complainant with filings submitted.
- 7) **Response to motions and requests for subpoenas.** No later than September 9, 2025, a party
 - a) may respond to a motion; and
 - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing, and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) **Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) **Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

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

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

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

Dated: August 26, 2025



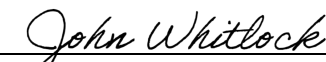
Heather Hebdon, Executive Director
Alaska Public Offices Commission

CERTIFICATE OF SERVICE:

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

Mike Widney PO Box 520857 Big Lake, AK 99652 MCWidney@protonmail.com MCWidney@outlook.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
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Kevin McCabe PO Box 520248 Big Lake, Alaska 99652 kevin@kevinjmccabe.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
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Signature

8/26/25

Date

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Mike Widney,

Complainant,

v.

Kevin McCabe,

Respondent.

Case No. 25-01-CD



ORDER GRANTING RECONSIDERATION IN PART

The respondent, Representative Kevin McCabe, asks the Alaska Public Offices Commission to reconsider the final order issued on July 7, 2025, finding violations on his 2020 and 2024 campaign disclosure reports and imposing a civil penalty of \$3,200. The Commission grants reconsideration, in part, to allow Rep. McCabe sufficient time to address the merits of the complaint and penalty assessment and invites him to address the Commission on those issues again at its September 10 meeting. The Commission denies reconsideration to address arguments relating to purportedly selective enforcement, alleged violations by other candidates, and the complainant's intentions. Rep. McCabe made those arguments at the June hearing and in his request for reconsideration, and the Commission is now rejecting them for a second time as a basis for dismissing the case. The scope of the second hearing is limited to the merits and penalty assessment.

In his reconsideration request, Rep. McCabe argues that he had insufficient time to respond to staff's investigation report before the hearing. By regulation, he was permitted to file an answer or amended answer to staff's report no later than 10 days after delivery

of the report.¹ But staff served the report on June 12 and gave Rep. McCabe until no later than June 18—six days—to file witness lists, exhibits, a prehearing memorandum, or prehearing motions. The hearing was scheduled and held at the Commission’s regular meeting on June 25. Rep. McCabe could have asked for an extension to file pleadings or a continuance at the hearing. Nevertheless, because the scheduling of his case for hearing shortened the usual 10-day timeframe for a written response to the investigation report and Rep. McCabe contends this harmed his ability to prepare, the Commission finds “a substantial procedural error” and grants reconsideration.²

As limited by this order, the Commission will rehear the merits of Rep. McCabe’s case on September 10, unless he and staff otherwise agree to a later date. Staff’s June 12 investigation report with attached exhibits, the testimony and arguments at the June 25 hearing, the July 7 order, Rep. McCabe’s reconsideration request, and this order are part of the record for this hearing. If providing this second opportunity does not resolve Rep. McCabe’s concerns about unfairness or prejudice with the timing of the process, he may raise those arguments at the new hearing, and the Commission will likely call on staff to testify about the reasons for the delay in issuing the investigation report.³

At the second hearing, the Commission will consider Rep. McCabe’s two principal arguments addressing the merits. First, he argues that he could not provide the

¹ 2 AAC 50.875(d); 2 AAC 50.880(a)(2).

² 2 AAC 50.891(g)(1).

³ 2 AAC 50.875(c) (requiring issuance of an investigation report no later than 30 days after staff accepts a complaint). The complaint was filed on January 2, 2025, and the investigation report was issued on June 12.

required details for the Republican Ads LLC expenditure because the ads went to mobile devices, rather than being placed on social media platforms or on a radio or TV station. The Commission observes that the regulation does not appear to require identification of who received every communication. Rep. McCabe’s explanation—that the ads were “geo-targeted . . . to District 30 mobile devices, using voter-file matching to reach conservatives”—seems to meet the regulatory requirement.⁴ The regulation thus appears neither out of date nor overly burdensome. The Commission invites Rep. McCabe and staff to respond to this and make any related arguments.

Second, Rep. McCabe contends that he did not violate the law because he disclosed the necessary details for the \$16,825 expenditure to Optima Public Relations on his year-end campaign disclosure report.⁵ Rep. McCabe states that he had the details on where Optima placed ads by mid-December and not when he reported the expenditure on 7-day general election report. Although Rep. McCabe did not amend his 7-day report when he had more details, he argues that he ultimately made the necessary disclosure. He also claims that he received “unclear, non-committal responses” from staff about how to disclose the ad placement details. Rep. McCabe and staff may present evidence and argument about this issue, including any relevant communications between them.

Lastly, Rep. McCabe may present any other arguments or evidence about why the

⁴ 2 AAC 50.321(d) (requiring for expenditures made to advertising, campaign consultation or management services firms “the name of each business from which . . . media advertising [was] placed”).

⁵ The complaint was filed on January 2—before the year-end report was due on February 18. The civil penalty accrual was tolled as of the complaint filing date.

identified Optima and Republican Ads disclosures on the 2020 30-day primary report, 2024 7-day primary report, and 2024 7-day general report did not violate AS 15.13.040 and 2 AAC 50.321(d), and/or why the currently imposed penalty of \$3,200 should be further reduced or waived entirely based on disproportionality or other reasons. Staff may respond to these arguments and evidence.

Rep. McCabe's other arguments do not constitute grounds for reconsideration,⁶ and the Commission consequently excludes them from the scope of the second hearing. Notwithstanding Rep. McCabe's claims that he had insufficient time to prepare, he has now had ample opportunity to make these arguments. And none of them are relevant to whether his reports violated the law and what penalty should be imposed if he did.

First, whether others have or are currently violating the law is irrelevant to whether Rep. McCabe did. Staff need not look at other candidates' reports to determine whether Rep. McCabe's reporting provided the details required by 2 AAC 50.321(d). If other candidates are violating the law, anyone—including staff—may file a complaint against those candidates within the five-year statute of limitations, and such complaints will proceed as separate cases.⁷ Moreover, the Commission complies with its statutory duty to “examine, investigate, and compare all reports, statements, and actions required

⁶ 2 AAC 50.891(g).

⁷ AS 15.13.380(b) (“A person who believes a violation of this chapter or a regulation adopted under this chapter has occurred or is occurring may file an administrative complaint with the commission within five years after the date of the alleged violation.”); 2 AAC 50.870(a) (clarifying that the person filing a complaint may be, but does not have to be, a member of the commission or staff).

by [AS 15.13]” through the complaint process and civil penalty assessment process for late reports laid out in statute and regulation.⁸ By following these processes for Rep. McCabe’s case (and for any other candidate against whom a complaint is filed), the Commission satisfies its duty under AS 15.13.030(7). The Commission rejects Rep. McCabe’s argument that he should be permitted to violate the law because everyone else is purportedly doing it, too.

Second, the fact that other candidates may be violating the law does not support Rep. McCabe’s claim that the Commission is unfairly and selectively enforcing the law against him. Rep. McCabe’s selective enforcement claim fails on its face—without even asking about the reasons for staff’s enforcement—because staff *did not* initiate this process by filing a complaint. Instead, staff investigated, as it must, a complaint filed by another person.⁹ Whether or when the law is enforced against other candidates who may have similar reporting violations remains to be determined and is outside the scope of Rep. McCabe’s case.

Third, the Commission has no authority in statute or regulation to reject or dismiss complaints based on the motives of the individual filing the complaint.¹⁰ And giving the Commission such authority would contravene the purposes of AS 15.13 because it would allow violations to go unchecked, harming the public’s informational interest. Instead of

⁸ AS 15.13.030(7); *see* AS 15.13.045; AS 15.13.380; AS 15.13.390; 2 AAC 50.831; 2 AAC 50.845–2 AAC 50.891. In effect, the Commission has clarified and made specific AS 15.13.030(7) in regulation. *See* 2 AAC 50.831; 2 AAC 50.845–2 AAC 50.891.

⁹ AS 15.13.380(e).

¹⁰ *See* 2 AAC 50.870(c) (providing grounds for rejecting a complaint).

evaluating the complainant's motives, procedural protections ensure that respondents are not punished for meritless complaints and help depoliticize the process. At the outset, staff rejects complaints that do not state grounds that, if true, would violate AS 15.13 or that are outside the statute of limitations.¹¹ If the complaint is accepted, staff independently investigates the allegations and issues a report with recommendations.¹² The respondent may respond to the complaint and staff's investigation report, including by presenting evidence and argument at a hearing before the Commission.¹³ The complainant's role at hearing is typically—and was here—limited to argument.¹⁴ And after a final order is issued, the respondent may seek reconsideration and/or appeal the order to superior court.¹⁵ The Commission therefore denies reconsideration based on the complainant's purported political motives.

Fourth, the Commission has already explained to Rep. McCabe that it did not consider—and will not consider—any of his legislative actions in determining whether violations occurred and penalties should be imposed. Rep. McCabe asks the Commission to strike the complainant's argument, yet he testified about his legislative actions. The Commission consequently does not strike any testimony or argument from the record but tells Rep. McCabe once again that it is not and will not take his legislative actions into

¹¹ 2 AAC 50.870(c).

¹² 2 AAC 50.875.

¹³ 2 AAC 50.875(d); 2 AAC 50.880; 2 AAC 50.891.

¹⁴ 2 AAC 50.891(d).

¹⁵ AS 15.13.380(g); AS 15.13.390(c); 2 AAC 50.891(g).

account in deciding this case.

Fifth and finally, the Commission has no authority to rewrite its statutes, which is a task for the legislature. Rep. McCabe's arguments in his reconsideration request about purportedly outdated aspects of the statutory scheme are largely beyond the scope of this case. As noted above, Rep. McCabe and staff may address what the regulation at issue here, 2 AAC 50.321(d), requires as applied to digital advertising and why Rep. McCabe's reporting of the Republican Ads and Optima expenditures did or did not violate it.

For the above reasons, the Commission will reconsider the merits and penalty assessment in Rep. McCabe's case on September 10 (or a later date agreed to by staff and Rep. McCabe). The Commission limits the scope of the hearing to evidence and argument about (1) the actions of Rep. McCabe's campaign, including information about when Rep. McCabe knew where ads would be placed or what work would be done by Optima and Republican Ads and any relevant communications with staff, and (2) the reasons the currently imposed penalty of \$3,200 is or is not too high. Rep. McCabe may argue that the imposed penalty is unlike the penalties imposed on other candidates in other cases with similar reporting violations, but the Commission will not hear further evidence and argument about other candidates' alleged violations of the law, purportedly selective enforcement, or the complainant's motives.

This is not a final Commission order for the purposes of an appeal as of right to superior court.¹⁶ The Commission retains jurisdiction to address the merits of the case in

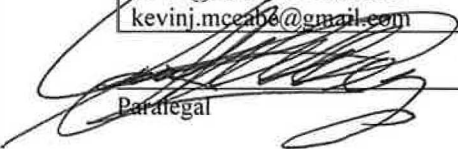
¹⁶ See AS 44.62.560 (providing for judicial review by the superior court of "a *final* administrative order" (emphasis added)); AS 15.13.390(b)-(c) (permitting an appeal of a *Widney v. McCabe* APOC Case No. 25-01-CD
Order Granting Reconsideration in Part Page 7 of 8

a final order that will be issued after the September 10 hearing.

Dated: August 5, 2025

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION¹⁷

Certificate of Service: I hereby certify that on this date, I served, by certified mail, US mail, and email a true and correct copy of the foregoing in this proceeding on the following:	
Mike Widney PO Box 520857 Big Lake, AK 99652 KCWidney@protonmail.com MCWidney@outlook.com	and by email to: Heather Hebdon Executive Director Alaska Public Offices Commission heather.hebdon@alaska.gov
Kevin McCabe PO Box 520248 Big Lake, AK 99652 kevin@kevinjmcabe.com kevinj.mccabe@gmail.com	


Paralegal

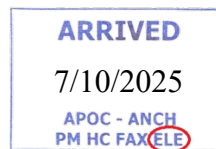
8.5.25
Date

Commission decision on an administrative complaint that determines that a violation occurred and assesses penalties).

¹⁷ Commissioners Richard Stillie, Dan LaSota, Lanette Blodgett, Eric Feige, and Walt Monegan participated in this matter. The decision was made on a 5–0 vote.

McCabe response to #25-01-CD

Dear Commissioners,



I respectfully request reconsideration of the Alaska Public Offices Commission's (APOC) Final Order in Case No. 25-01-CD, dated July 7, 2025, imposing a \$3,200 fine for alleged violations of AS 15.13.040 and 2 AAC 50.321(d).

The Staff Report claims my 2020 30-day primary, 2024 7-day primary, and 2024 7-day general reports lacked sufficient detail for expenditures of \$16,825 to Optima Public Relations and \$2,061 to Republican Ads LLC, based on a complaint filed by Mike Widney on December 31, 2024.

I believe this decision overlooks key facts, applies inconsistent standards, and stems from Widney's retaliation for my legislative votes on the Permanent Fund Dividend (PFD) and budget which are protected under Article II, Section 6 of the Alaska Constitution. My concerns are:

1. APOC's untimely investigation and claim of not auditing reports contradict AS 15.13.030(7) and enable selective enforcement.
2. I'm unfairly targeted for standard reporting practices identical to other candidates.
3. My defense regarding Republican Ads LLC, independent of Optima, was ignored, and similar reporting by others was overlooked.
4. My February 2025 Optima disclosure was not acknowledged.
5. AS 15.13 is outdated for digital advertising.
6. The complaint's political context suggests targeting.

I request reconsideration and dismissal of this case based on the following:

1. APOC's Untimely Investigation and Claim of Not Auditing Reports Contradicts Its Statutory Duty

APOC's investigation failed to comply with 2 AAC 50.875's intent for a fair and timely process. The six-month delay in processing Widney's complaint (from December 31, 2024, to June 16, 2025) and notification on June 16, 2025, two days before the submission deadline for witnesses and written response, severely limited my ability to respond, undermining the fairness required by 2 AAC 50.875(b)(1) as well as due process principles under AS 44.62. Such delays create an undue burden that could chill competent candidates' desire to run for office, contrary to AS 39.50.010(a). The staff's failure to seek further information about my Republican Ads LLC and Optima disclosures, or compare my reports with similar ones by

Merrick, LaFrance, and others, suggests an incomplete investigation under 2 AAC 50.875(c), contributing to this selective enforcement.

The Staff Report (Page 3) claims APOC is not required to audit all reports. This contradicts AS 15.13.030(7), which mandates examining and comparing all reports under AS 15.13. This enables selective enforcement, potentially driven by political complaints. The following examples of staff-initiated complaints prove APOC does indeed audit reports independent of a complaint:

- APOC Staff v. Christopher Constant (April 17, 2020): Violation of AS 15.13.112(b)(7) for \$100 in Facebook ads.
- APOC Staff v. Recover Alaska (April 30, 2020): Failure to register (AS 15.13.050) or report expenditures (AS 15.13.040(d)).
- APOC Staff v. Alaska Yes, Inc. (September 23, 2019): Failure to register (AS 15.13.050).
- APOC Staff v. INSURPAC of Alaska (July 29, 2019): Failure to register (2 AAC 50.290(a)).
- APOC Staff letter (August 15, 2022) to Senator Shower. Late reporting of cash donation in the 24 hour reporting period. (AS 15.13.110(b)).
- Tilton Letter (January 14, 2025): APOC Staff flagged a \$6.00 anonymous cash contribution to Representative Tilton (2 AAC 50.266).

My campaign has sought APOC guidance a few times, but staff lately seemed unavailable or non-committal with their responses. I understand the staffing issues; in fact, I believe the staffer who investigated this complaint has only been at APOC two months. However, limited resources do not excuse the untimely processing, poor responses, or ignoring others' similar violations.

2. I'm Being Unfairly Targeted for Standard Reporting Practices

The \$3,200 fine feels unfair because my reporting matches other candidates', yet I'm the only one penalized. This complaint is purely Widney's retaliation for my PFD and budget votes. If actual APOC reporting were his concern, he would target other campaigns as well as mine.

The Staff Report (Page 2) cites insufficient details for my \$16,825 Optima and \$2,061 Republican Ads LLC payments. My hearing testimony, based on the APOC database, shows my reporting aligns with the following as yet un-investigated and unpenalized candidates:

- Kelley Merrick: July 19, 2024, 30-day report lists \$2,600 and \$3,600 to Lurtsema Communications for “Campaign Digital Services.”
- Suzanne LaFrance: March 8, 2024, 7-day report shows \$23,500 to Hamburger Group Creative for “Digital Ads.”
- Justin Ruffridge: August 10, 2024, reported \$7,500 to Martin Media for “Campaign Media.”
- Ashley Carrick: September 2024 reports list \$3,103.70 to Last Frontier Mediactive for “Radio Ads.”
- Cathy Giessel: October 2022 reported \$4,000 and \$5,000 to Winfluence Strategies for “Advertising campaign strategy” and “TV advertising.”
- Mia Costello: August 10, 2024, listed \$1,500 to Pragmatic Data Solutions for “Campaign Services, Graphics, Data Management, Consulting, Ads, etc.”
- Doyle Holmes: 2022 reported \$3,000 and \$5,000 to Leading Light Advisors for “Campaign Marketing” and “Advertising.”

My 2020 penalties were waived due to inexperience and good filing history (Staff Report, Page 2), but this \$3,200 fine for 2024 seems disproportionate. Christopher Constant faced minor fines, and Berkowitz and Alaskans for Honest Elections (2023) saw fines reduced by 99%. Many Democratic candidates report vaguely their contributions to the Alaska Democratic Party as “Campaign Coordination” without any APOC scrutiny. Widney’s focus on me, despite AS 15.13.030(7), suggests selective, politically charged enforcement.

3. The Order Overlooks My Republican Ads LLC Explanation

The Staff Report (Page 2) faults my \$2,061 payments to Republican Ads LLC but ignores my defense that this complaint is incorrect due to the nature of the vendor’s business model. I testified that Republican Ads LLC runs “Digital Door Knocking” or “Digital Yard Signs” which are geo-targeted ads to District 30 mobile devices, using voter-file matching to reach conservatives. These were independent and not managed by Optima, so grouping them in the Final Order disregards my explanation.

Senator Kelley Merrick’s 2024 year-end report lists three Ground Truth expenditures, a company which uses similar geo-targeted digital marketing. Both vendors deliver pre-roll video and banner ads within geographic boundaries via algorithms, not candidate control. Expecting sub-vendor disclosures or placement lists is like requiring addresses for every yard sign. Merrick’s reports face no scrutiny, but mine draw a \$3,200 fine, indicating arbitrary enforcement.

The Staff Report (Page 2) notes I said placement details weren’t initially available but dismisses this, citing my duty to amend under 2 AAC 50.321(g). Without

Optima's involvement, real-time tracking across apps and devices is nearly impossible. This burdensome requirement risks chilling candidates' desire to run for office, contrary to AS 39.50.010(a). Since the fine associated with Republican Ads LLC is almost half of the total fine, I ask that you reconsider my explanation and Merrick's unpenalized reporting, per AS 15.13.030(7) and remove this alleged violation from the complaint.

4. The Final Order Did Not Recognize My Optima Disclosure

The Staff Report (Page 2) claims I didn't disclose "all services rendered" for the \$16,825 Optima payment, per 2 AAC 50.321(d). I testified that Widney's complaint preceded my February 2025 year-end report, where I did disclose all of Optima details, consistent with prior campaigns. We sought APOC guidance on this but received unclear, non-committal responses. Widney questions my initial description of "account management, graphic design, digital ads, radio ads, text messaging, email, printing, and postage," but sub-vendor invoices often arrive post-election. In fact, due to negotiation over the bill, I did not receive an invoice from Optima, nor pay them the balance until mid-December. I followed the same timeline as Giessel, Carrick, and Costello, who use similar language yet without updating year-end reports.

The Staff Report (Page 2) states my reports weren't amended, overlooking my good-faith post-election disclosure, which makes my entire campaign fully transparent to the public. My approach mirrored other candidates' reports and should be acknowledged, as in APOC v. INSURPAC.

5. No Recognition from APOC That the 1974 Law Doesn't Fit Digital Advertising

AS 15.13, enacted in 1974, is not designed for modern digital advertising, as I emphasized at the hearing. Requiring reports for every ad placement on cell phones or tablets is egregious and nearly impossible, as vendors don't know final placements due to algorithmic delivery. The Staff Report (Page 2) cites AS 15.13.040 and 2 AAC 50.321(d), but the law has limitations:

- **No Minimum Threshold:** AS 15.13.040 requires reporting every dollar, unlike federal laws, overly scrutinizing small expenditures like my \$2,061 or Constant's \$100.
- **Unclear Rules:** "Independent expenditure" in AS 15.13.400 doesn't address the fluid, low-cost nature of digital ads.
- **Legal Protections:** Citizens United (2010) and Thompson v. Hebdon (2021) support broader campaign speech, suggesting outdated rules may infringe on my First Amendment rights.

This egregious requirement creates an undue burden that could chill competent candidates' desire to run for office, contrary to AS 39.50.010(a). LaFrance's report indicates "Digital Ads" for \$23,500 without penalty. The law needs updating, and I shouldn't be penalized for its limits. In addition, asking the legislature to update AS 15.13, (as briefly discussed in the hearing), while APOC already consistently fails to follow AS 15.13.030(7) seems nonsensical.

6. The Complaint's Political Context Raises Concerns

I believe Widney's complaint, confirmed by his hearing testimony, was filed in retaliation for my PFD and budget votes, not genuine reporting concerns. As lawfare increases it will be up to APOC to determine the veracity of a complaint by also considering the underlying complainant and their actions. In this vein, all of my votes would be protected under Article II, Section 6 of the Alaska Constitution, shielding legislative speech from external tribunal.

While Widney's testimony about my votes to defund APOC via amendment to HB53 are indicative of why he filed this complaint, those comments about HB53 amendment should be stricken, as they risk influencing this decision and prejudicing a superior court appeal. His ties to the "Save the PFD" activist group and alignment with FACL, (per Must Read Alaska, December 30, 2024), which advocates pressuring legislators through retaliatory complaints, suggest political motives based on my actions as a legislator, not a candidate. Complaints such as these create an undue burden on APOC and one that could chill competent candidates' desire to run for office, contrary to AS 39.50.010(a). The Staff Report (Page 4) claims impartiality but it utterly fails to address Widney's intent, warranting review given my selective enforcement claim under AS 15.13.030(7).

My Request for Reconsideration

I respectfully request dismissal of the \$3,200 fine and complete dismissal of this egregious and retaliatory complaint. I urge APOC to strike Widney's testimony about my legislative votes, which is irrelevant and prejudicial, and to review the investigation's procedural deficiencies, including untimely notification and incomplete analysis under 2 AAC 50.875. My concerns are:

1. **Contradictory Claim About Auditing:** APOC's claim it isn't required to audit reports (Staff Report, Page 3) contradicts AS 15.13.030(7), and its untimely investigation violated 2 AAC 50.875's fairness.
2. **Unfair Targeting:** I'm singled out for standard reporting, likely due to Widney's retaliation for my votes.

3. Overlooking My Republican Ads LLC Defense: My reports were proper, as Optima didn't manage these ads, and Merrick's Ground Truth reporting went unpenalized.
4. Ignoring My Optima Disclosure: My February 2025 report included detailed Optima disclosures.
5. Outdated Law: AS 15.13 doesn't suit digital advertising, burdening candidacy, contrary to AS 39.50.010(a).
6. Political Retaliation: Widney's complaint, tied to my PFD and budget votes, suggests targeting and may violate my constitutional protections.

My campaign diligently followed the law, sought guidance, reported in good faith, and aligned with APOC-accepted norms. I appreciate your consideration and urge reconsideration in the interest of fairness and integrity.

Sincerely, Representative Kevin McCabe

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Mike Widney,)	
)	
Complainant,)	
)	
v.)	Case No. 25-01-CD
)	
Kevin McCabe,)	
)	
Respondent.)	
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FINAL ORDER

On June 25, 2025, the Alaska Public Offices Commission considered Mike Widney's complaint against Representative Kevin McCabe.¹ Mr. Widney alleges that Rep. McCabe violated campaign laws during his 2020 and 2024 campaigns by not including all the necessary details for expenditures made to advertising and public relations firms.² Staff investigated and recommended that the Commission find violations on three reports, waive the civil penalties for two of the violations, and impose a civil penalty of \$3,200 for the third violation. The Commission agrees with staff's recommendations and orders Rep. McCabe to pay a civil penalty of \$3,200.

The Commission incorporates staff's findings and recommendations by reference in this order. As recommended by staff, the Commission finds that Rep. McCabe's 2020 30-day primary report, 2024 7-day primary report, and 2024 7-day general report violated

¹ The Commission heard testimony from staff, Rep. McCabe, and his campaign treasurer, and argument from Mr. Widney. *See* 2 AAC 50.891(d).

² AS 15.13.040(a); 2 AAC 50.321(d).

AS 15.13.040 and 2 AAC 50.321(d) by failing to disclose sufficient details on expenditures made to Optima Public Relations and Republican Ads LLC. At the hearing, Rep. McCabe testified that the campaign did not always have all details on where the ads would be placed until later. As staff pointed out, however, the campaign had an ongoing obligation to file complete reports and to amend them if details changed or information became available later.³ The three reports at issue did not originally disclose, nor have they been subsequently amended, to add “all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed.”⁴

For the violations on the first two reports, the Commission agrees with staff’s recommendation to waive the penalties because after reduction for Rep. McCabe’s inexperience in 2020 and his good filing history in 2024, they are “significantly out of proportion to the degree of harm to the public for not having the information.”⁵ For the

³ See AS 15.13.040(a) (requiring candidates to file a “full report, upon a form prescribed by the commission”; reports are only “full” to the extent that they are complete by including all the required details); 2 AAC 50.321(g) (requiring amendments within 10 days after a correct value is known when “the value of any transaction in [a] report is incorrect or subsequently becomes incorrect, even if the value was accurate at the time of initial filing” if the change in value is \$100 or more); *Republican Governors Ass’n v. APOC*, 485 P.3d 545, 551 (Alaska 2021) (noting that requiring prompt initial reporting, followed by prompt disclosure of any changes made later, helps ensures “precisely the sort of transparency the disclosure laws are intended to achieve”).

⁴ 2 AAC 50.321(d).

⁵ 2 AAC 50.865(b)(5). See 2 AAC 50.855(b)(3)(B) (applying 50 percent reduction when the report is the person’s first incomplete report and the information was not readily available in another forum); 2 AAC 50.865(a)(1) (allowing for a reduction of up to 50 percent for inexperienced filers and those with a good filing history). Staff applied the wrong criteria to initially reduce the penalty for the 2020 reporting violation; because the

third violation, the Commission agrees with staff's recommendation to impose a civil penalty of \$3,200, after applying a reduction to the maximum penalty for Rep. McCabe's good filing history.⁶ As staff explained, a penalty of \$3,200 is far less than the more than the \$18,000 in expenditures for which Rep. McCabe failed to provide adequate details on the report that was due days before the election, when the electorate's need for the information was high.

At the hearing, Rep. McCabe argued that the Commission was unfairly targeting him by (1) not imposing penalties against other candidates with similar reporting violations and (2) retaliating against him for his legislative actions concerning the agency. Neither is true. First, the Commission's staff did not single out Rep. McCabe for an enforcement action for any reason, much less retaliation. Staff's investigation arose due to a complaint filed by an independent person (apparently a political opponent), which is permitted by statute.⁷ The Commission must investigate all such complaints that satisfy the filing rules.⁸ Second, the Commission is not required to audit all reports for all potential violations, nor could it reasonably accomplish such a task with the staff,

report was incomplete, rather than late, a reduction of only 50 percent, not 75 percent, applies. *Compare* 2 AAC 50.855(b)(2)(B)(i) *with* 2 AAC 50.855(b)(3)(B). But this mistake is immaterial because staff's ultimate recommendation was waiver, and a penalty that is higher than staff's calculation still supports the disproportionality analysis.

⁶ 2 AAC 50.865(a)(1)(A).

⁷ AS 15.13.380(b) ("A person who believes a violation of this chapter or a regulation adopted under this chapter has occurred or is occurring may file an administrative complaint with the commission within five years after the date of the alleged violation."); 2 AAC 50.870(a)–(b) (providing rules for filing a complaint).

⁸ AS 15.13.380(e); 2 AAC 50.875(a); 2 AAC 50.870(c)–(d).

resources, and other responsibilities that it has.⁹ The Commission’s staff investigates violations of AS 15.13 when a complaint is filed and provides a report with recommendations to the commissioners for a decision.¹⁰

Moreover, to any extent that Rep. McCabe’s claim alleges bias by the commissioners, it is well established that adjudicators of administrative cases are “presumed to be honest and impartial.”¹¹ To show bias, a party must show that a decision-maker “had a predisposition to find against a party or . . . interfered with the orderly presentation of the evidence. This is a demanding standard.”¹² Here, accepting Rep. McCabe’s claim and recusing the commissioners would leave no one to hear this case—an absurd result when the Commission’s very duties are to enforce compliance with campaign finance and disclosure rules, and personal financial disclosure rules against sitting legislators.¹³ Instead of recusal, structural safeguards address concerns about institutional bias. So that decisions are not made based on an alleged violator’s political affiliation, the governor appoints two commissioners each from the two most successful political parties and the fifth commissioner is appointed after nomination by a

⁹ See AS 15.13.030 (listing the Commission’s duties); AS 24.60.220 (requiring the Commission to administer provisions on legislative financial disclosures); AS 15.13.374 (duties and procedure for addressing advisory opinion requests); AS 15.13.380 (duties and procedures for receiving and addressing complaints).

¹⁰ AS 15.13.380(e); 2 AAC 50.875; 2 AAC 50.891.

¹¹ E.g., *APOC v. Not Tammie*, 482 P.3d 386, 389 (Alaska 2021) (citations omitted).

¹² *Calvert v. State, Dep’t of Labor & Workforce Dev.*, 251 P.3d 990, 1006 (Alaska 2011) (citation omitted).

¹³ AS 15.13.030; AS 24.60.220.

majority of the others.¹⁴ To avoid even the appearance of bias, the commissioners may not engage in political activities or hold elective office while serving on the Commission.¹⁵ And impartiality is ensured in particular cases by requiring withdrawal or disqualification if a commissioner has a conflict of interest or cannot be fair.¹⁶ Here, Rep. McCabe did not indicate that he was seeking recusal nor did not provide “with particularity the grounds” for any alleged bias by a commissioner.¹⁷ And the Commission’s chair made clear at the hearing that Rep. McCabe’s official legislative actions would not be a consideration in reaching this decision.

For the above reasons, the Commission finds that Rep. McCabe’s 2020 30-day primary report, 2024 7-day primary report, and 2024 7-day general report violated AS 15.13.040 and 2 AAC 50.321(d). The Commission orders Rep. McCabe to pay a civil penalty of \$3,200 and to amend the reports within 30 days of this order to provide the details required by 2 AAC 50.321(d) on the expenditures specified in staff’s report.

This is a final Commission order. It may be appealed to the superior court within 30 days from the date of this order.¹⁸ A request for the Commission to reconsider this order must be filed within 15 days from the date this order is delivered or mailed.¹⁹

¹⁴ AS 15.13.020(b)–(c).

¹⁵ AS 15.13.020(e).

¹⁶ AS 44.62.450(c); 2 AAC 50.835.

¹⁷ AS 44.62.450(c).

¹⁸ AS 15.13.380(g); AS 44.62.560; Alaska R. App. P. 602.

¹⁹ 2 AAC 50.891(g); AS 44.62.540.

Dated: July 7, 2025

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION²⁰

Certificate of Service: I hereby certify that on this date, I served, by certified mail, US mail, and email a true and correct copy of the foregoing in this proceeding on the following:	
Mike Widney PO Box 520857 Big Lake, AK 99652 KCWidney@protonmail.com MCWidney@outlook.com	and by email to: Heather Hebdon Executive Director Alaska Public Offices Commission heather.hebdon@alaska.gov
Kevin McCabe PO Box 520248 Big Lake, AK 99652 kevin@kevinjmccabe.com	


Paralegal

7.7.25
Date

²⁰ Commissioners Richard Stillie, Dan LaSota, Lanette Blodgett, Eric Feige, and Walt Monegan participated in this matter. The decision was made on a 5–0 vote.



TO: APOC Commissioners
DATE: June 12, 2025
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report, 25-01-CD, *Widney v. McCabe*

SUMMARY OF COMPLAINT AND RESPONSE

Complainant Mike Widney alleges Respondent Kevin McCabe failed to properly document expenditures incurred by advertising and public relations firms in his 2020 and 2024 campaigns.¹ McCabe responds that he properly disclosed the expenses by timely reporting them and including detail consistent with widely accepted campaign reporting practices.²

FACTS

Respondent McCabe was a candidate for State House in the 2020, 2022, and 2024 state elections. The complaint's specific allegations relate only to expenditures disclosed in the 2020 and 2024 campaigns.

During his 2020 and 2024 campaigns, McCabe engaged Optima Public Relations at different points in his campaign, both as a "vendor" and for campaign management services.³ According to its website, Optima offers a variety of services including audio production, campaigns and elections, digital and social media, graphic design and branding, websites, and others.⁴

¹ Exhibit 1, Complaint

² Exhibit 2, Response to Complaint.

³ Ex. 2 at p.2-4.

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

McCabe's 2020 year-start report⁵ disclosed expenditures to Optima including:

11/19/2019	Non-Monetary Optima Public Relations: Fundraising/strategizing consultation	McCabe, Kevin P.O. Box 520248 Anchorage, Alaska 99517		\$1,000.00
12/31/2019	Debit Card	Optima Public relations 5751 E Mayflower Ct Wasilla, Alaska 99654	PR services and PIP yard signs, rack cards	\$1,607.29
01/31/2020	Debit Card	Optima Public relations 5751 E. Mayflower Ct Wasilla, Alaska 99654	People's Paper ad	\$266.20

McCabe's 2020 30-day primary report⁶ also disclosed several expenditures to Optima, including:

03/19/2020	Debit Card	Optima Public relations 5751 E. Mayflower Ct Wasilla, Alaska 99654	Graphics, digital advertising	\$2,000.00
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In his 2024 campaign McCabe again engaged Optima for campaign related services. McCabe's 7-day general report⁷ of disclosed:

10/15/2024	Check 111	OPTIMA PUBLIC RELATIONS 73622 W PARKS HWY #665 WASILLA, Alaska 99623	ACCOUNT MANAGEMENT, GRAPHIC DESIGN, DIGITAL ADS, RADIO ADS, TEXT MESSAGING AND EMAIL, PRINTING AND POSTAGE	\$16,825.00
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Also, during the 2024 campaign, McCabe's 7-day primary and 7-day general reports disclosed expenditures to Republican Ads LLC, which describes itself as a "voter targeted digital advertising platform."⁸ McCabe's expenditures to Republican Ads LLC included:

07/31/2024	Debit Card	REPUBLICAN ADS LLC 700 PENNSYLVANIA AVE SE 2ND FLOOR WASHINGTON, District of Columbia 20003	DIGITAL ADS	\$685.00
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and

⁵ 2020 Year Start Report, available at: <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=28975&ViewType=CD>.

⁶ 2020 30-Day Primary Report, available at:
<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=33200&ViewType=CD>.

⁷ 2024 7-Day General Report, available at:
<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=45214&ViewType=CD>.

⁸ See [About | RepublicanAds.com](https://www.republicanads.com), accessed May 12, 2025.

10/25/2024	Debit Card	REPUBLICAN ADS, LLC 700 PENNSYLVANIA AVE SE WASHINGTON, District of Columbia 2000.	DIGITAL AD	\$1,376.00
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LAW

Under Alaska campaign disclosure law, an “expenditure” includes a purchase or a transfer of money or anything of value, or a promise or agreement to purchase or transfer money or anything of value, incurred or made for the purpose of influencing the nomination or election of a candidate.⁹ Candidates are required to disclose financial activity, including expenditures and debts incurred by their campaigns. For each campaign, the standard reports include a year-start report, 30-day and 7-day reports for the primary and general elections, and a year-end report.¹⁰ For each paid expenditure, a candidate must report its date and amount as well as the check number or identifying transaction number, the name and address of the payee, and the purpose of the expenditure.¹¹ Where a candidate makes expenditures to an advertising agency or to a business that provides campaign consultation or management services, “the report must disclose in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed...”¹²

APOC’s 2024 Candidate Campaign training materials outline the details a candidate must provide when a campaign uses an advertising agency or campaign consultation or management services:

- **Expenditure Rules** [AS 15.13.082; AS 15.13.086; 2 AAC 50.321]
 - When reporting expenditures for campaign consulting or media buys, you must detail the services provided and subcontractors (includes identifying radio/tv stations where media was placed).¹³

⁹ AS 15.13.400(7)(A)(i).

¹⁰ AS 15.13.110.

¹¹ 15.30.040(a)(1)(A), 2 AAC 50.321(a)(5).

¹² 2 AAC 50.321(d).

¹³ Candidate Training Presentation at p. 13 available at: <https://apoc.doa.alaska.gov/media/edrdibcp/cdt-2024-candidate-training-manual.pdf> (*emphasis in original*).

APOC Staff has in the past offered guidance relating to candidates' reporting on use of advertising agencies, management consultants, and other campaign management services. In an email sent to all candidates and their treasurers, Staff outlined how candidates could meet 2 AAC 50.321(d)'s requirements:

Basically, what this means is that the services provided must be disclosed along with any subcontractors used by the consultant, agency or service. An example might be, "Tom's consulting service for creation and placing of social media on Facebook and Twitter" or "Tom's consulting service for production and placement of radio and tv advertising on stations x, y and z."¹⁴

ANALYSIS

The complaint alleges four specific instances in which McCabe failed to properly report his campaign expenditures.

1. "December 31, 2019: Hires Optima PR for various services but doesn't properly break down how the money was spent"

McCabe reported this Optima expenditure in his 2020 year-start report disclosing its purpose as "PR services and PIP yard signs, rack cards" in the amount of \$1,607.29. McCabe points out in his Complaint Response that Optima, at this point in his campaign, was acting as a "direct vendor." Here, McCabe provides the name of the business providing campaign consultation, the services provided, and the name of the subcontractor (PIP), meeting the requirements of 2 AAC 50.321(d) by disclosing "all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted."

Accordingly, APOC Staff finds McCabe's 2020 year-start report complied with AS 15.13.040 and 2 AAC 50.321(d) because it disclosed the services rendered and identified the subcontractor as PIP.

¹⁴ Ex. 1 at p. 9.

2. “March 19, 2020: \$2,000 to Optima PR for “graphics and digital advertising” – no proper breakdown”

McCabe reported this expenditure in his 30-day primary report, describing its purpose as “graphics and digital advertising.” In his Complaint Response, McCabe additionally provides that the payment was for “graphic design services” – to develop the McCabe logo and integrate it into digital advertisements – and for Optima to purchase “block digital advertising.” McCabe describes Optima as the “final payee” in this transaction and calls Optima a “vendor” and not a campaign manager.¹⁵ But this characterization does not remove Optima’s services from the realm of 2 AAC 50.321(d) or from the regulation’s requirement that an expenditure made to an advertising agency provide details of “all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed....” Per McCabe’s description, Optima purchased – *for the McCabe campaign* – block digital advertising, paying for “large quantities of ad impressions,”¹⁶ thereby bringing those goods and services under subsection .321(d). Regardless of whether McCabe knew or understood the precise details of the advertising transactions Optima was incurring on his behalf, Optima certainly possessed and could have provided them to the candidate for reporting purposes. Under .321(d), details would include the name of the business(es) from whom Optima purchased the ad space and/or where the ads were placed. While McCabe emphasizes that the ads’ exact placement details often aren’t known in advance, McCabe reported the March 19, 2020, expenditure on his 30-day primary report filed July 20, 2020, by which time all details would have been known. And a candidate in similar circumstances always has the option to amend a report with details not available at the time of filing.

APOC Staff recommends the Commission find McCabe’s 2020 30-day primary report violated AS 15.13.110(a)(1) and 2 AAC 50.321(d) because it failed to disclose in detail all services rendered by Optima Public Relations.

¹⁵ Ex. 2 at p.2.

¹⁶ *Id.*

3. “July/October 2024: \$2,061 to Republican Ads, LLC – again, no proper details”

The complaint’s allegations concerning McCabe’s expenditures to Republican Ads, LLC relate to (1) a July 31, 2024, expenditure with the described purpose of “digital ads” for \$685, timely reported on his 7-day primary report filed August 13, 2024, and (2) an October 25, 2024, expenditure with the described purpose of “digital ads” for \$1,376, timely reported on his 7-day general report filed October 29, 2024. The complaint alleges McCabe provided insufficient details for the purpose of these expenditures.

In his Complaint Response, McCabe provides additional details behind the two expenditures, noting that he disclosed “the development costs for these ads” as a \$480 debt to Hogosha (for “website maintenance and digital ad production”) and \$50 to Results Advertising Werks for “voice recording for ad”:

07/15/2024	RESULTS ADVERTISING WERKS PO BOX 877556 WASILLA, Alaska 99687	VOICE RECORDING FOR AD	\$50.00	\$50.00
07/16/2024	HOGOSHA 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, South Dakota 57702	WEBSITE MAINTENANCE AND DIGITAL AD PRODUCTION.	\$480.00	\$480.00

But the costs to develop the content of the digital ads is independent of McCabe’s expenditures to Republican Ads LLC, which describes itself as a “voter targeted digital advertising platform.”¹⁷ McCabe paid Republican Ads to distribute his campaign ads across multiple platforms. What platforms and how many ads are details subsection .321(d) requires; that the ads’ “specific placements cannot be determined in advance”¹⁸ does not vitiate the need to report these details at all. And it is unlikely that neither a candidate nor the entity paid to place digital advertisements for the candidate would have no expectation of where or when the ads are to be placed. Also, the time for a candidate to report expenditures under AS 15.13.110 will often fall well after the ads have run, by which time

¹⁷ See [About | RepublicanAds.com](#), accessed May 12, 2025.

¹⁸ Ex. 2 at p.2.

the information can be easily provided by the entity engaged to place the ads. A candidate can always amend a report with any details learned after the original filing.

APOC Staff recommends the Commission find McCabe violated AS 15.13.040 and 2 AAC 50.321(d) by failing to disclose in detail all services rendered by Republican Ads LLC on his 2024 7-day primary report submitted August 13, 2024, and his 2024 7-day general report submitted October 29, 2024.

4. “October 29, 2024: \$16,825 to Optima PR for ‘comprehensive campaign services’ – still no proper breakdown”

McCabe timely reported this October 15, 2024, expenditure, paid by check to Optima on his 7-day general report filed October 29, 2024. The complainant alleges the timing of the expenditure “doesn’t add up” and “is fishy” and “suspicious” but presents nothing to support his suspicion that the expenditure was reported late. As the complainant knows from writing his complaint, McCabe has worked with Optima dating back to 2019, which undoubtedly allowed for quick and dynamic action in terms of creating and booking advertising and managing a campaign. However, the complaint also alleges McCabe’s reporting of the \$16,825 expenditure to Optima, which McCabe described as “account management, graphic design, digital ads, radio ads, text messaging and email, printing and postage,” provided insufficient details of the purpose. 2 AAC 50.321(d)’s application to this allegation compares with the above analysis relating to digital advertising and reporting. Where a candidate makes expenditures to a business providing campaign services, the candidate must disclose, “in detail, all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed.”¹⁹ McCabe’s description of purpose, lacking detail of subcontracted services and where Optima placed the digital and radio ads on his behalf fails the standard of .321(d). The campaign undoubtedly had or could have acquired from Optima details of subcontractors used and where the media advertising was placed by the

¹⁹2 AAC 50.321(d).

time the campaign submitted its report of expenditures on October 29, 2024, and it could have amended the report with any remaining details learned after the fact.

APOC Staff recommends the Commission find McCabe’s 2024 7-day general report violated AS 15.13.040 and 2 AAC 50.321(d) because it failed to disclose in detail all services rendered by Optima Public Relations.

CONCLUSION

APOC Staff recommends the Commission find the following violations:

1. McCabe’s 2020 year start report filed February 14, 2020, did not violate AS 15.13.040 or 2 AAC 50.321(d) as it sufficiently detailed goods and services purchased through Optima Public Relations.
2. McCabe’s 2020 30-day primary report filed July 20, 2020, violated AS 15.13.040 and 2 AAC 50.321(d) because it failed to disclose in detail all services rendered by Optima Public Relations.
3. McCabe’s 2024 7-day primary report filed August 13, 2024, violated AS 15.13.040 and 2 AAC 50.321(d) because it failed to disclose in detail all services rendered by Republican Ads LLC.
4. McCabe’s 2024 7-day general report filed October 29, 2024, violated AS 15.13.040 and 2 AAC 50.321(d) because it failed to disclose in detail all services rendered by Republican Ads LLC and Optima Public Relations.

MAXIMUM CIVIL PENALTIES

The maximum civil penalty for reporting violations, other than a 7-day report, is \$50 per day for each day the violation continues.²⁰ For 7-day reports, the maximum civil penalty is \$500 per day through the date of the election and \$50 per day thereafter.²¹ For purposes of calculating the maximum civil penalties, the accrual of penalties was tolled on January 2, 2025, the day the complaint was filed.

²⁰ AS 15.13.390(a)(1).

²¹ AS 15.13.390(a)(1); 2 AAC 50.855(b)(5).

Report	Penalty Period	Days	Maximum
2020 30-Day Primary Report (\$50/day)	7/21/2020 – 1/2/2025	1,627	\$81,350
2024 7-Day Primary Report (pre-election - \$500/day)	8/14/2024 – 8/20/2024	7	\$3,500
2024 7-Day Primary Report (post-election - \$50/day)	8/21/2024 – 1/2/2025	135	\$6,750
2024 7-Day General Report (pre-election - \$500/day)	10/30/2024 – 11/5/2024	7	\$3,500
2024 7-Day General Report (post-election - \$50/day)	11/6/2024 – 1/2/2025	58	\$2,900
Total			\$98,000

PENALTIES, MITIGATION, AND RECOMMENDATION

When staff assesses a penalty, the starting point for calculating the penalty is 2 AAC 50.855. Regulation enables staff to assess a reduced at 25% of the maximum penalty because 2020 was McCabe’s first election cycle.²² Accordingly, the penalty for his 2020 30-day primary report can be assessed at \$20,337.50. From there, mitigation criteria may be considered for further reductions. A civil penalty may be reduced by up to 50% if the person is an inexperienced filer who has been subject to reporting for less than one year.²³ Again, 2020 was McCabe’s first election cycle and at that time he had been subject to reporting requirements for less than one year. Accordingly, the penalty for his 2020 30-day primary can be further reduced to \$10,167.75 based on his status as an inexperienced filer.

A civil penalty may also be reduced by 50% when there is a good filing history meaning they have no late filings in the immediately preceding five years.²⁴ Here, McCabe has timely filed his reports since the 2020 cycle which means he has a good filing history that qualifies the penalties for his 2024 reports for a 50% reduction.

²² 2 AAC 50.855(b)(2)(B)(i).

²³ 2 AAC 50.865(a)(1)(B).

²⁴ 2 AAC 50.865(a)(1)(A).

A civil penalty may also be reduced by a percentage greater than 50%, or waived entirely, if the penalty is significantly out of proportion to the degree of harm suffered by the public for not having the information. A civil penalty is considered to be significantly out of proportion if it exceeds the value of the transactions at issue.²⁵ Here, McCabe’s 2020 30-day primary report failed to disclose sufficient details for a \$2,000 expenditure and his 2024 7-day primary report failed to disclose sufficient details for a \$685 expenditure. The penalties for both reports (\$10,168.75 and \$5,125), even after prior reductions still exceed the value of those transactions and are therefore out of proportion to the degree of harm. However, the 2024 7-day general report failed to disclose sufficient detail for more than \$18,000 in expenditures and the total reduced penalty for the 7-day general report is \$3,200 which means it cannot be considered to be disproportionate to the degree of harm.

Based on the forgoing mitigation analysis, staff recommends the penalties for McCabe’s 2020 30-day primary report and 2024 7-day primary reports be waived based on his status as an inexperienced filer in 2020, his good filing history, and because the penalties are significantly out of proportion to the degree of harm. Staff finds no applicable mitigation for the 2024 7-day general report, however, and recommends a penalty of \$3,200.

Report	Days	Max Penalty	2 AAC 50.855 Assessment	2 AAC 50.865(a) Mitigation	2 AAC 50.865(b) Mitigation
2020 30-Day Primary (\$50/day)	1,627	\$81,350	\$20,337.50	10,168.75	\$0 ²⁶
2024 7-Day Primary (pre-election - \$500/day)	7	\$3,500	\$3,500	\$1,750	\$0 ²⁷
2024 7-Day Primary (post-election - \$50/day)	135	\$6,750	\$6,750	\$3,375	\$0 ²⁸
2024 7-Day General (pre-election - \$500/day)	7	\$3,500	\$3,500	\$1,750	\$1,750
2024 7-Day General (post-election - \$50/day)	58	\$2,900	\$2,900	\$1,450	\$1,450
Total		\$98,000	\$33,987.70	\$18,493.75	\$3,200

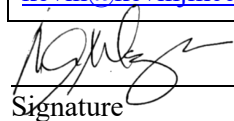
²⁵ 2 AAC 50.865(b)(5).

²⁶ 2 AAC 50.865(b)(5).

²⁷ 2 AAC 50.865(b)(5).

²⁸ 2 AAC 50.865(b)(5).

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered as indicated to the following:	
Mike Widney PO Box 520857 Big Lake, AK 99652 MCWidney@protonmail.com MCWidney@outlook.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail 9489 0090 0027 6610 9555 14
Kevin McCabe PO Box 520248 Big Lake, Alaska 99652 kevin@kevinjmccabe.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail 9489 0090 0027 6610 9555 21


Signature

06/12/2025

Date



Alaska Public Offices Commission

COMPLAINT



FILING A COMPLAINT <i>To be accepted, complaint must include</i>	APOC LAWS ALLEGEDLY VIOLATED <i>Specify section of law or regulation</i>		APOC case name/number/date
1. Complainant's name + contact info 2. Respondent's name + contact info 3. Laws, regulations allegedly violated 4. Description of allegations 5. Basis of knowledge of alleged facts 6. Documentation to support allegations 7. Notarized signature of the complainant 8. Proof that complaint and all supporting documents were served on respondent	Campaign Disclosure Law Public Official Financial Disclosure Legislative Financial Disclosure Lobbying Regulation	<input checked="" type="checkbox"/> AS 15.13 <input checked="" type="checkbox"/> 2 AAC 50.250-405 <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799 <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799 <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590	<div style="border: 1px solid blue; padding: 5px; text-align: center;"> ARRIVED 01/02/2025 APOC - ANCH PM HC FAX ELE MM </div> 25-01-CD

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

<input type="checkbox"/> APOC <input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group	COMPLAINANT Mike Widney Address PO Box 520857 Big Lake, AK 99652 Phone/Fax (907) 414-8989 E-mail MCWidney@ProtonMail.com; MCWidney@Outlook.com	RESPONDENT <i>Person or group allegedly violating law</i> <input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group Kevin McCabe 2193 W Linn Marie Circle Big Lake, AK 99652 PO Box 520248 (907) 229-3721 kevin@kevinjmccabe.com or rep.kevin.mccabe@akleg.gov
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COMPLAINANT'S REPRESENTATIVE	RESPONDENT'S REPRESENTATIVE
<i>If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info</i>	
Name/Title	
Address	
Phone/Fax	
E-mail	

DESCRIPTION or SUMMARY of ALLEGED VIOLATION Kevin McCabe refused or failed to disclose many campaign expenditures as required by AS 15.13.040 and 7/22/2020 APOC notification detailing 2 AAC 50.321(d) requirements.	Use extra pages if needed	<input checked="" type="checkbox"/> SUPPORTING DOCUMENTS – DESCRIBE: Summary of Alleged Violations/Statutes Campaign Disclosures Must Read Alaska 12/30/2024 APOC Notification Email 7/22/2020
PROOF of SERVICE ATTACHED: <input type="checkbox"/> Fax – receipt confirmation <input type="checkbox"/> Certified mail – signed receipt <input type="checkbox"/> Process server – return of service <input checked="" type="checkbox"/> E-mail – delivery/read receipt <input type="checkbox"/> Other:		

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

Signature Michael C. Widney Title _____ Date 12-31-24

Subscribed and sworn to or affirmed by me at Big Lake, Alaska on December 31, 2024

Signature P. Mazonna-Jones Title Member Experience Office Supervisor

APOC COMPLAINTS, RESPONSES, INVESTIGATIONS, AND APOC COMMISSION ACTIONS ARE PUBLIC DOCUMENTS



APOC ANCHORAGE	APOC JUNEAU	APOC COMPLAINT PROCESS: 2 AAC 50.450 - 476	
2221 E. NORTHERN LIGHTS #128	240 MAIN STREET #500	FILING COMPLAINTS: 2 AAC 50.870	ANSWERING COMPLAINTS: 2 AAC 50.880
ANCHORAGE, AK 99508	P.O. BOX 110222	APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870	
907-276-4176 / FAX 907-276-7018	JUNEAU, AK 99811	INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891	
TOLL-FREE 800-478-4176	465-4864 / FAX 465-4832	RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c)	
WEB: http://doa.alaska.gov/apoc	APOC FORMS: http://doa.alaska.gov/apoc/forms_all.html		APOC LAWS: http://doa.alaska.gov/apoc/apoclaws.html

Outlook

Search

Meet Now

MW

HomeViewHelp

New mailDeleteArchiveMove toReportReplyRead / UnreadFlag / UnflagDiscover groupsUndo

Folders

Inbox78091

Junk Email317

Drafts1

Sent Items

Deleted Items

Archive

Notes

Conversation Histo...

Groups

New group

Relayed: Continuing our conversation from yesterday

Continu...erday

postmaster@outlook.com

To: kevin@kevinjmccabe.com

Continuing our conversation ... Outlook Item

ReplyReply allForward

Wed 1/1/2025 9:04 PM

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

kevin@kevinjmccabe.com (kevin@kevinjmccabe.com)

Subject: Continuing our conversation from yesterday

ReplyForward

Ad

Outlook

Search

Meet Now

MW

HomeViewHelp

New mailDeleteArchiveMove toReportReplyRead / UnreadFlag / UnflagDiscover groupsUndo

Folders

Inbox78091

Junk Email317

Drafts1

Sent Items

Deleted Items

Archive

Notes

Conversation Histo...

Groups

New group

<>

Relayed: Continuing our conversation from yesterday

Continu...erday

postmaster@outlook.com

To: rep.kevin.mccabe@akleg.gov

Continuing our conversation ... Outlook Item

ReplyReply allForward

Wed 1/1/2025 9:03 PM

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

rep.kevin.mccabe@akleg.gov (rep.kevin.mccabe@akleg.gov)

Subject: Continuing our conversation from yesterday

ReplyForward

Ad

Representative Kevin McCabe's Optima Slush Fund

A Calculated Evasion of AS 15.13.040 and 2 AAC 50.321(d)

December 31, 2024

I'm writing because yesterday's Must Read Alaska article about Rep. McCabe's campaign finance practices really got under my skin. What started as a simple question about some unreported Facebook ads has turned into something a lot bigger - and Must Read Alaska's attempt to brush it all under the rug just made it worse.

Here's what's got me worked up: Must Read Alaska actually tried to defend McCabe by writing that he "turned over all his digital advertising to Optima Public Relations and paid the company \$16,825, all of which is declared on his APOC filings." Then they had the nerve to claim "This is a normal process for many campaigns." Well, it's not normal, and it's not legal either.

This morning (12/31/2024), during the APOC hearing, McCabe himself admitted that he was planning to hold off reporting these expenses until February 2025. He tried to claim this was both legal and common practice. It's neither, and he should know better - he's been through three campaigns now.

Let me be clear about the law here. Alaska Statutes 15.13.040, 15.13.110, and Alaska Administrative Code 2 AAC 50.321(d) spell it out plain as day: candidates have to report ALL expenditures, including everything that goes through PR firms or consultants. They can't just dump money into Optima PR and call it good.

Tom Lucas, your Campaign Disclosure Coordinator, sent out crystal clear instructions about this back on July 22, 2020. Every candidate got that email explaining exactly how to report these kinds of expenses. McCabe got it too, but he's been ignoring those rules since day one.

Let's look at McCabe's pattern here:

- December 31, 2019: Hires Optima PR for various services but doesn't properly break down how the money was spent
- March 19, 2020: \$2,000 to Optima PR for "graphics and digital advertising" - no proper breakdown
- July/October 2024: \$2,061 to Republican Ads, LLC - again, no proper details

- October 29, 2024: \$16,825 to Optima PR for "comprehensive campaign services" - still no proper breakdown

All told, that's about \$34,061.55 in campaign money that's disappeared into what I'm calling the Optima PR slush fund. And now Must Read Alaska is trying to tell us this is just business as usual? That's not right.

What's really got me steamed is that McCabe's using the "everybody does it" excuse. We teach our kids that's not a valid excuse, and it sure shouldn't fly for an elected official. Plus, I've looked at his February campaign closure reports from 2021 and 2023 - they don't back up his claim that this is his normal practice at all.

What's even worse is how Must Read Alaska's article, by trying to normalize this kind of lawlessness, is setting up other politicians to fall into the same trap. By claiming 'This is a normal process for many campaigns,' they're encouraging more campaign finance violations and inviting the APOC complaints that will inevitably follow. Every politician who reads their article and follows McCabe's example of using Optima PR or similar firms as a convenient cash stash is walking right into trouble. Kevin McCabe isn't just breaking the law – with Must Read Alaska's help, he's making it harder to recruit and keep good candidates who want to serve Alaska the right way.

And who's going to want to run for office when they see how messy this gets? The irony here is outrageous. Kevin McCabe has spent five years developing a pattern of breaking campaign finance laws and gaining unfair advantages over his opponents. Instead of playing by the rules and disclosing his expenditures in a lawful and timely manner, he's perfected his shell game with Optima PR. Now Must Read Alaska, in their calculated attempt to protect him, is actually drawing more attention to these violations and forcing an investigation. By trying to normalize and legitimize McCabe's unlawful manipulation of campaign finance laws, they're setting conservatives and republicans up for a fall and making it even harder to find good people willing to serve in the Legislature.

Let's talk about timing here, because something doesn't add up. McCabe dumps \$16,825 into Optima PR on October 29, 2024, just seven days before the November 5 election. Anyone who's worked campaigns knows this timing is fishy. Facebook had already locked down new political ads that very day. Print media deadlines for election ads would have long passed. Even if Optima PR has some kind of miracle workers on staff, securing radio, TV, and streaming ad slots that late in the game - during the most competitive ad-buying period in four years - would be nearly impossible. And direct mail? To hit mailboxes before Election Day, those letters would have needed to be designed, printed, and in the mail system almost immediately. So we've got to ask

ourselves: How could Optima possibly spend nearly \$17,000 effectively in those final days?

These questions wouldn't need to be asked if McCabe had just followed the law and reported his expenditures properly and on time. But his deliberate lack of transparency forced me to dig deeper. If Must Read Alaska hadn't tried to normalize his behavior in their December 30 article, and if McCabe hadn't tried to defend his actions in his December 31 APOC testimony by claiming 'everybody does it,' this pattern might have stayed hidden. Instead, McCabe's arrogance has drawn attention to what could be years of similar violations by other politicians following his example.

The real damage here goes beyond just one campaign or one election. Every time McCabe got away with hiding his spending through Optima PR, his law-abiding opponents were forced to campaign with one hand tied behind their backs. And now, by dragging his scheme into the spotlight and trying to defend it, he's put every other politician who's been following his playbook at risk of similar scrutiny. If APOC doesn't investigate this thoroughly and penalize these violations to the full extent of the law, what message does that send? It tells every candidate in Alaska that our campaign finance laws are optional, that transparency is negotiable, and that playing by the rules is for suckers.

APOC Commissioners, I encourage you to thoroughly investigate Kevin McCabe's campaign finance practices. His pattern of violations includes:

- Deliberately hiding campaign expenditures through Optima PR and similar firms
- Intentionally delaying expense reporting until after elections
- Refusing to provide legally required breakdowns of how money is spent
- Using vague descriptions to mask the true nature of campaign spending
- Making suspiciously timed large payments that defy practical campaign execution
- Repeatedly ignoring APOC's clear guidance on reporting requirements

These violations have directly harmed Alaskans by:

- Denying voters accurate information about campaign spending during elections
- Robbing opposing candidates and voters of fair elections
- Making a mockery of Alaska's campaign finance transparency laws
- Preserving the uneven playing field that Kevin McCabe has established in House District 30

- Undermining public trust in our electoral process
- Setting a dangerous example for other candidates to follow

If APOC fails to fully investigate and hold Kevin McCabe accountable:

- Other politicians will continue hiding campaign spending in similar schemes
- Voters will become disenfranchised and disengage from an electoral process that no longer guarantees fair elections
- Future candidates will be emboldened to run corrupt campaigns
- House District 30 voters will continue to be denied fair elections
- Campaign finance transparency will become irrelevant as more candidates follow McCabe's example
- The public's right to know how campaign money is spent will be permanently damaged

I urge you to conduct a complete investigation into every aspect of McCabe's campaign financing over the past five years. Examine every payment to Optima PR and similar firms. Demand detailed breakdowns of how money was spent. Investigate the timing of expenditures versus services rendered. Most importantly, enforce our campaign finance laws to their fullest extent to protect the integrity of Alaska's elections.

Mike Widney
MCWidney@ProtonMail.com
(907) 414-8989
PO Box 520857
Big Lake, AK 99652

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

From: **Lucas, Tom R (DOA)** <tom.lucas@alaska.gov>

Date: Wed, Jul 22, 2020 at 4:55 PM

Subject: Reporting services from advertising agencies, campaign management consultants and campaign management services

To: Lucas, Tom R (DOA) <tom.lucas@alaska.gov>

Cc: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>, Odena, Jacqueline S (DOA) <jacqueline.odena@alaska.gov>, Collins, Dacia C (DOA) <dacia.collins@alaska.gov>, Stormont, Charles R (DOA) <charles.stormont@alaska.gov>

Dear Candidates and their Treasurers,

We are receiving many inquiries concerning insufficient detail in campaign disclosure reports when reporting expenditures for advertising agencies, management consultants and other campaign management services. Simply stating “campaign advertising” or “management consultant”, for example is not consistent with the following regulation found at [2 AAC 50.321\(d\)](#):

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

Basically, what this means is that the services provided must be disclosed along with any subcontractors used by the consultant, agency or service. An example might be, “Tom’s consulting service for creation and placing of social media on Facebook and Twitter” or Tom’s consulting service for production and placement of radio and tv advertising on stations x, y and z”.

If your campaign has not been doing this, your 30 day report should be amended to come into compliance. If you have any questions or desire any help in doing so, please do not hesitate to contact our office.

Thomas R. Lucas
Campaign Disclosure Coordinator

Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, Alaska 99508
Phone: (907) 276-4176

Fax: (907) 276-7018

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Sec. 15.13.040. Contributions, expenditures, and supplying of services to be reported.

(a) Except as provided in (g) and (l) of this section, each candidate shall make a **full report**, upon a form prescribed by the commission,

(1) listing

(A) **the date and amount of all expenditures** made by the candidate;

(B) **the total amount of all contributions**, including all funds contributed by the candidate;

(C) **the name, address, date, and amount contributed by each contributor**; and

(D) **for contributions in excess of \$50 in the aggregate during a calendar year, the principal occupation and employer** of the contributor; and

(2) filed in accordance with [AS 15.13.110](#) and certified correct by the candidate or campaign treasurer.

(b) Each group shall make a full report upon a form prescribed by the commission, listing

(1) the name and address of each officer and director;

(2) the aggregate amount of all contributions made to it; and, for all contributions in excess of \$100 in the aggregate a year, the name, address, principal occupation, and employer of the contributor, and the date and amount contributed by each contributor; *for purposes of this paragraph, "contributor" means the true source of the funds, property, or services being contributed*; and

(3) **the date and amount of all contributions made** by it and **all expenditures made**, incurred, or authorized by it.

(c) The report required under (b) of this section shall be filed in accordance with [AS 15.13.110](#) and shall be certified as correct by the group's treasurer.

(d) Every person making an independent expenditure shall make a full report of expenditures made and contributions received, upon a form prescribed by the commission, unless exempt from reporting.

(e) Each person required to report under (d) of this section shall file a full report in accordance with [AS 15.13.110](#)(h) on a form prescribed by the commission. The report must contain

(1) the name, address, principal occupation, and employer of the individual filing the report;

(2) *an itemized list of all expenditures made, incurred, or authorized* by the

person;

(3) the name of the candidate or the ***title of the ballot proposition*** or question ***supported or opposed by each expenditure*** and whether the expenditure is made to support or oppose the candidate or ballot proposition or question;

(4) the name and address of each officer and director, when applicable;

(5) the aggregate amount of all contributions made to the person, if any, for the purpose of influencing the outcome of an election; for all contributions, the date of the contribution and amount contributed by each contributor; and, for a contributor

(A) who is an individual, the name and address of the contributor and, for contributions in excess of \$50 in the aggregate during a calendar year, the name, address, principal occupation, and employer of the contributor; or

(B) that is not an individual, the name and address of the contributor and the name and address of each officer and director of the contributor.

2 AAC 50.321. Reporting by a candidate, group, or nongroup entity.

(a) ***A candidate shall file each report*** required under [AS 15.13.110](#) containing the information required under [AS 15.13.040](#)(a) and the following information:

(5) **for each paid expenditure,**

(A) the date of payment;

(B) the check number or the identifying transaction number if paid by other means;

(C) the **name and address of the payee;**

(D) the **purpose** of the expenditure; and (E) the **amount** of the expenditure;

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

In other words:

If an expenditure required to be reported under (a) or (b) or this section

- Is made to an **advertising agency**
- To an individual or business
- that provides **campaign consultation** or **management** services
- the report **must** disclose **in detail**
 - o **all services** rendered, including the
 - § **name of each business** from which campaign goods or services were
 - purchased or
 - **subcontracted or**
 - **media advertising placed**, and the
 - o **amount of the expenditure.**

Filer Type	Name	Submitted	Payment Detail	Date	Amount	Last/Business Name	Purpose of Expenditure	Report Type	Election Name
Candidate	Kevin McCabe	2/14/2020		12/31/2019	\$1,607.29	Optima Public relations	PR services and PIP yard signs, rack cards	Year Start Report	2020 - State Primary Election
Candidate	Kevin McCabe	2/14/2020		1/31/2020	\$266.20	Optima Public relations	People's Paper ad	Year Start Report	2020 - State Primary Election
Candidate	Kevin McCabe	7/20/2020		2/22/2020	\$486.42	Optima Public relations	Postcard and Postage	Thirty Day Report	2020 - State Primary Election
Candidate	Kevin McCabe	7/20/2020		3/19/2020	\$2,000.00	Optima Public relations	Graphics, digital advertising	Thirty Day Report	2020 - State Primary Election
Candidate	Kevin McCabe	7/20/2020		5/11/2020	\$1,500.00	Optima Public relations	30 second spot, digital placement	Thirty Day Report	2020 - State Primary Election
Candidate	Kevin McCabe	7/20/2020		7/2/2020	\$1,358.55	Optima Public relations	Ads in People's Paper and Frontiersman, and banner from PIP printing	Thirty Day Report	2020 - State Primary Election
Candidate	Kevin McCabe	7/20/2020	#1106	7/13/2020	\$3,550.00	Optima Public relations	Radio production and ads: KAYO; KMBQ; KVNT; KENI	Thirty Day Report	2020 - State Primary Election
Candidate	Kevin McCabe	8/11/2020		7/30/2020	\$2,500.00	Optima Public relations	Digital Marketing--Google display ads and YouTube video ad August 1-18/20	Seven Day Report	2020 - State Primary Election
Candidate	Kevin McCabe	8/11/2020		8/5/2020	\$1,022.00	Optima Public relations	Radio production and ads on KAYO, KMBQ, KNLT	Seven Day Report	2020 - State Primary Election
Candidate	Kevin McCabe	10/5/2020		8/11/2020	\$420.00	Optima Public relations	Print Ad People's Paper	Thirty Day Report	2020 - State General Election
Candidate	Vote Kevin McCabe	7/17/2022	1119	7/13/2022	\$600.00	Optima	Advertising print ad for People's Paper, July edition.	Thirty Day Report	2022 - State Primary
Candidate	Vote Kevin McCabe	11/1/2022	1128	10/24/2022	\$4,286.00	Optima Public Relations	Voice, Production, and radio ad placement from 10/26/22 through 11/8/22	Seven Day Report	2022 - State General
Candidate	Kevin J. McCabe	10/29/2024	111	10/15/2024	\$16,825.00	OPTIMA PUBLIC RELATIONS	ACCOUNT MANAGEMENT, GRAPHIC DESIGN, DIGITAL ADS, RADIO ADS, TEXT MESSAGING AND EMAIL, PRINTING AND POSTAGE	Seven Day Report	2024 - State General
					\$36,421.46				

	REPUBLICAN ADS LLC 1	REPUBLICAN ADS LLC 2
NAME	Kevin J. McCabe	Kevin J. McCabe
FILER	Candidate	Candidate
ELECTION TYPE	2024 - State Primary	2024 - State General
REPORT	Seven Day Report	Seven Day Report
YEAR	2024	2024
EXPENDITURE DATE	10/25/2024	7/31/2024
APOC SUBMISSION	8/13/2024	10/29/2024
EXPENDITURE	REPUBLICAN ADS LLC	REPUBLICAN ADS LLC
AMOUNT	\$685.00	\$1,376.00
AD / CONTRACTOR INFO	Not in compliance with AS 15.13.040 and 2 AAC 50.321(d)	Not in compliance with AS 15.13.040 and 2 AAC 50.321(d)

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **02/15/2024**
 Filer First Name: **Linn**
 Filer Middle Name: **M**
 Filer Last Name: **MCCABE**
 Filer's Title: **Treasurer**
 Report Type: **Year Start Report**

CANDIDATE INFORMATION

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

REPORT INFORMATION

Election Year: **2024**
 Election: **State Primary**
 Report Type: **Year Start Report**
 Reporting Period: From **07/29/2023** Through **02/01/2024**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$4,199.36				
[+] ↓		Previous Campaign Income: (From Box A of previous report)		Campaign Income Total: (Box A)	
Total Income Reported:	\$702.16	[+] ⇒	\$0.00	[=] ⇒	\$702.16
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)		Campaign Expense Total: (Box B)	
Total Expenditures Reported:	\$0.00	[+] ⇒	\$0.00	[=] ⇒	\$0.00
[=] ↓					

Closing Cash On Hand:	\$4,901.52
[-] ↓	
Total Debts:	\$0.00
[=] ↓	
Surplus/Deficit:	\$4,901.52

INCOME

Date Received	Payment Method	Contributor	Details	Amount
11/27/2023	Check 2692	Alaska's Doctors of Optometry PAC 3706 Arctic Blvd #575 Anchorage, Alaska 99503	Occupation: PAC Employer: PAC	\$200.00
12/13/2023	Check 2812	Alaska Miners Association PAC 121 W Fireweed Lane, Suite 120 Anchorage, Alaska 99503	Occupation: PAC Employer: PAC	\$500.00
12/31/2023	Bank Interest	Global Credit Union PO Box 3200 Spokane, Washington 99220-3200	Occupation: Bank Employer: Bank	\$2.16
			Income Total:	\$702.16

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
No Expenditures / Nothing to Report				
Expenditure Total:				\$0.00

DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
No Debts / Nothing to Report				
			Remaining Debt Total:	\$0.00

CAMPAIGN DISCLOSURE FORM

TWENTY-FOUR HOUR REPORT

COMPLETED

Submission Date: **11/04/2024**Filer First Name: **LINN**Filer Middle Name: **M**Filer Last Name: **MCCABE**Filer's Title: **Treasurer**Report Type: **24 Hour Report**

CANDIDATE INFORMATION

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

REPORT INFORMATION

Election Year: **2024**Election: **State General**Report Type: **24 Hour Report**Reporting Period: From **10/27/2024** Through **11/04/2024**

INCOME

Date Received	Payment Method	Contributor	Details	Amount
11/04/2024	Check 3416	EWING, SHELL		\$500.00
11/04/2024	Check 8200	USIBELLI, JOSEPH		\$1,000.00
			Income Total:	\$1,500.00

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **10/29/2024**
 Filer First Name: **Linn**
 Filer Middle Name: **M**
 Filer Last Name: **MCCABE**
 Filer's Title: **Treasurer**
 Report Type: **Seven Day Report**

CANDIDATE INFORMATION

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

REPORT INFORMATION

Election Year: **2024**
 Election: **State General**
 Report Type: **Seven Day Report**
 Reporting Period: From **10/05/2024** Through **10/26/2024**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$12,448.77				
[+] ↓		Previous Campaign Income: (From Box A of previous report)		Campaign Income Total: (Box A)	
Total Income Reported:	\$10,742.65	[+] ⇒	\$21,090.80	[=] ⇒	\$31,833.45
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)		Campaign Expense Total: (Box B)	
Total Expenditures Reported:	\$19,919.10	[+] ⇒	\$12,841.39	[=] ⇒	\$32,760.49
[=] ↓					
Closing Cash On Hand:	\$3,272.32				
[-] ↓					
Total Debts:	\$100.00				
[=] ↓					
Surplus/Deficit:	\$3,172.32				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
10/05/2024	Check 2092	ALASKA SEA PILOT 1621 TONGASS AVE KETCHIKAN, Alaska 99901	Occupation: PAC Employer: PAC	\$300.00

Date Received	Payment Method	Contributor	Details	Amount
10/07/2024	Check 15064	ALASKA REPUBLICANS INC PO BX 110707 ANCHORAGE, Alaska 99511	Occupation: PAC Employer: PAC	\$3,000.00
10/07/2024	Check 1529	BRANDENBURG, BRYAN 1630 N RIVER ROCK CIRCLE PALMER, Alaska 99645	Occupation: EXECUTIVE DIRECTOR Employer: ALASKA ADDICTION REHABILITATION SERVICES	\$100.00
10/07/2024	Cash	LYONS, TERRI 3001 E BEECH WAY WASILLA, Alaska 99654	Occupation: RETIRED Employer: RETIRED	\$100.00
10/07/2024	Check 1343	SHOWER, MICHELLE 3500 N TRAVELAIR DR WASILLA, Alaska 99654	Occupation: RETIRED Employer: RETIRED	\$250.00
10/07/2024	Check 6930	SMOLDON, CARRIE PO BOX 410 WILLOW, Alaska 99688	Occupation: TEACHER Employer: MSBSD	\$100.00
10/07/2024	Check 1504	TRAXLER, MICHELLE PO BOX 520907 BIG LAKE, Alaska 99652	Occupation: BOOKKEEPER Employer: PAPOOSE MILLING	\$200.00
10/07/2024	Credit Card	WILLIAMS, CASEY BOX 870275 WASILLA, Alaska 99687	Occupation: RETIRED Employer: RETIRED	\$200.00
10/08/2024	Credit Card	HUGHES, SHELLEY PO BOX 1496 PALMER, Alaska 99645	Occupation: SENATOR/PROJECT CONSULTANT Employer: STATE OF AK/SELF	\$208.65
10/08/2024	Credit Card	MCCOLLUM, PAT 5780 WEST BIRCH HARBOR DR WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$150.00
10/09/2024	Credit Card	BARIOS, TRAVIS 3032 GLACIER ST ANCHORAGE, Alaska 99508	Occupation: PARTS MANAGER Employer: ANCHORAGE CHRYSLER CENTER	\$100.00
10/09/2024	Check 9113	CLIFFORD, BRITT 12255 BROOKWOOD CIR ANCHORAGE, Alaska 99516	Occupation: SALES Employer: AFFORDABLE USED CARS	\$500.00
10/09/2024	Check 9515	MARTENSEN, KARIN 12520 GINAMI ST ANCHORAGE, Alaska 99516	Occupation: RETIRED Employer: RETIRED	\$500.00

Date Received	Payment Method	Contributor	Details	Amount
10/09/2024	Check 179	MARTENSEN ROSS, KERSTEN 12520 GINAMI ST ANCHORAGW, Alaska 99516	Occupation: BOOKKEEPER Employer: CONTINENTAL AUTO GROUP	\$500.00
10/09/2024	Check 4156	NICHOLS, JULIE 2052 VAN HORN CT FAIRBANKS, Alaska 99701	Occupation: PROPERTY MANAGER Employer: SELF EMPLOYED	\$250.00
10/09/2024	Check 917	ROSS, MIKE 12520 GINAMI ST ANCHORAGE, Alaska 99516	Occupation: RETIRED Employer: RETIRED	\$500.00
10/09/2024	Credit Card	SWENSON, RICHARD 13300 WINDRUSH CIRCLE ANCHORAGE, Alaska 99516	Occupation: FIXED OPERATIONS DIRECTOR Employer: CONTINENTAL AUTO GROUP	\$100.00
10/10/2024	Credit Card	BEN, RUSTY 11740 SUNCREST CIRCLE ANCHORAGE , Alaska 99515	Occupation: SHOP FOREMAN Employer: ANCHORAGE CHRYSLER	\$50.00
10/10/2024	Credit Card	BITNEY, JOHN PO BOX 521072 BIG LAKE, Alaska 99652	Occupation: LEGISLATIVE STAFF Employer: STATE OF ALASKA	\$200.00
10/10/2024	Credit Card	GARRETT, MARTI 9606 RELIANCE DR ANCHORAGE, Alaska 99507	Occupation: ACCOUNTING DIRECTOR Employer: LITHIA MOTORS	\$25.00
10/10/2024	Credit Card	GARZA, KEVIN 5301 E 98TH AVE ANCHORAGE, Alaska 99507	Occupation: SERVICE ADVISOR Employer: ANCHORAGE CHRYSLER DODGE	\$50.00
10/10/2024	Credit Card	GREEN, JUSTIN 2223 SORBUS WAY ANCHORAGE, Alaska 99508	Occupation: SALES Employer: ANCHORAGE CHRYSLER	\$50.00
10/10/2024	Credit Card	HOLEMAN, CURTIS PO BOX 521118 BIG LAKE, Alaska 99652	Occupation: SENIOR SALES ENGINEER Employer: LONG BUILDING TECH	\$104.48
10/10/2024	Credit Card	NOVAK, TODD 711 N STREET ANCHORAGE, Alaska 99501	Occupation: FIXED OPERATIONS DIRECTOR Employer: ANCHORAGE CHRYSLER	\$50.00

Date Received	Payment Method	Contributor	Details	Amount
10/10/2024	Credit Card	TRAUGHBER, CHARLES 7074 NORTH 5TH EAST IDAHO FALLS, Idaho 83401	Occupation: CERTIFIED AUTOMOTIVE TECHNICIAN Employer: ANCHORAGE CHRYSLER	\$50.04
10/10/2024	Credit Card	WALTON, KENNETH 14820 SIERRA WAY ANCHORAGE, Alaska 99516	Occupation: FIXED OPS MANAGER Employer: LITHIA MOTORS INC	\$100.00
10/13/2024	Credit Card	HILLMAN, HARRY 3060 NORTH LAZY EIGHT COURT STE 3; PMB-497 WASILLA, Alaska 99654	Occupation: RETIRED Employer: RETIRED	\$104.48
10/13/2024	Credit Card	WEBER, JOAN BOX 208756 WASILLA, Alaska 99629	Occupation: RETIRED Employer: RETIRED	\$50.00
10/15/2024	Check 1978	ALASKA REALTORS PAC PO BOX 2658 SOLDOTNA, Alaska 99669	Occupation: PAC Employer: PAC	\$1,000.00
10/15/2024	Check 2726	ALASKA'S DOCTORS OF OPTOMETRY 3705 ARCTIC BLVD #675 ANCHORAGE, Alaska 99503	Occupation: PAC Employer: PAC	\$500.00
10/15/2024	Credit Card	MEYERS, COREY 7111 E CHESTER HEIGHTS CIR ANCHORAGE, Alaska 99504	Occupation: GENERAL MANAGER Employer: ANCHORAGE CHRYSLER	\$1,000.00
10/25/2024	Non-Monetary DIGITAL AD	MCCABE, KYLE 6701 W SCATTERS WAY WASILLA, Alaska 99623	Occupation: WEB DEVELOPER Employer: SELF	\$250.00
10/26/2024	Check 1219	MILLS, BRYAN PO BOX 356 WILLOW, Alaska 99688	Occupation: WOODWORKER Employer: SELF	\$100.00
			Income Total:	\$10,742.65

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
10/06/2024	Debit Card	A T & T 208 S AKARD ST DALLAS, Texas 75202	DATA FOR CELL PHONE	\$80.13
10/11/2024	Debit Card	FRED MEYER 1501 E PARKS HWY WASILLA, Alaska 99654	THANK YOU CARDS	\$15.38
10/11/2024	Check 109	USPS 401 N MAIN ST WASILLA, Alaska 99654	POSTAGE	\$73.00
10/15/2024	Check 111	OPTIMA PUBLIC RELATIONS 73622 W PARKS HWY #665 WASILLA, Alaska 99623	ACCOUNT MANAGEMENT, GRAPHIC DESIGN, DIGITAL ADS, RADIO ADS, TEXT MESSAGING AND EMAIL, PRINTING AND POSTAGE	\$16,825.00
10/16/2024	Credit Card	AK DIVISION OF ELECTION 240 MAIN ST STE 300 JUNEAU, Alaska 99801	VOTER LIST	\$20.00
10/16/2024	Debit Card	AURORA DENALI LODGE PO BOX 458 HEALY, Alaska 99743	EVENT VENUE AND APPETIZERS	\$535.00
10/16/2024	Debit Card	AURORA DENALI LODGE PO BOX 458 HEALY, Alaska 99743	LODGING	\$230.26
10/18/2024	Check 110	USPS 2809 BIG LAKE RD BIG LAKE AK , Alaska 99652	POSTAGE	\$219.00
10/24/2024	Debit Card	THREE BEARS M 248.5 S GEORGE PARKS HWY HEALY, Alaska 99743	POMV GAS FOR TRIP TO HEALY	\$27.69
10/25/2024	Non-Monetary DIGITAL AD	MCCABE, KYLE 6701 W SCATTERS WAY WASILLA, Alaska 99623		\$250.00

Date	Payment Method	Vendor	Purpose	Amount
10/25/2024	Debit Card	REPUBLICAN ADS, LLC 700 PENNSYLVANIA AVE SE WASHINGTON, District of Columbia 2000.	DIGITAL AD	\$1,376.00
10/25/2024	Debit Card	THREE BEARS 14468 W HOLLYWOOD RD BIG LAKE, Alaska 99652	POMV GAS FOR TRIP HOME FROM HEALY	\$27.47
10/25/2024	Debit Card	WALMART 1350 S SEWARD MERIDIAN WASILLA, Alaska 99654	PRINTER INK	\$79.95
10/26/2024	Bank Fee	ANEDOT INC 1340 POYDRAS STREET STE 1770 NEW ORLEANS, Louisiana 70112	CREDIT CARD TRANSACTION FEES FOR DONATIONS MADE BETWEEN 10/05/24 AND 10/26/24	\$108.81
10/26/2024	Debit Card	HOME DEPOT 1255 E PALMER WASILLA HWY WASILLA, Alaska 99654	SAND BAGS FOR SIGNS	\$51.41
			Expenditure Total:	\$19,919.10

DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
07/15/2024	RESULTS ADVERTISING WERKS PO BOX 877556 WASILLA, Alaska 99687	PAID 10/7/24	\$50.00	\$0.00
09/16/2024	META 1 HACKER WAY MENLO PARK, California 94025	PAID 10/5/24	\$83.79	\$0.00
10/21/2024	META 1 HACKER WAY MENLO PARK, California 94025	BOOSTED POSTS	\$100.00	\$100.00
			Remaining Debt Total:	\$100.00

CAMPAIGN DISCLOSURE FORM

TWENTY-FOUR HOUR REPORT

COMPLETEDSubmission Date: **10/29/2024**Filer First Name: **LINN**Filer Middle Name: **M**Filer Last Name: **MCCABE**Filer's Title: **Treasurer**Report Type: **24 Hour Report**

CANDIDATE INFORMATION

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

REPORT INFORMATION

Election Year: **2024**Election: **State General**Report Type: **24 Hour Report**Reporting Period: From **10/27/2024** Through **11/04/2024**

INCOME

Date Received	Payment Method	Contributor	Details	Amount
10/28/2024	Check 0111	CONSERVATIVE LEADERSHIP TEAM PAC		\$1,000.00
			Income Total:	\$1,000.00

CAMPAIGN DISCLOSURE FORM

AMENDMENT

Amendment Description: TO ADD DONATION WHICH WAS MADE ON 10/4/24 AND ADD ANEDOT TRANSACTION FEES FROM THAT DONATION.

COMPLETED

Submission Date: **10/28/2024**

Filer First Name: **LINN**

Filer Middle Name: **M**

Filer Last Name: **MCCABE**

Filer's Title: **Treasurer**

Report Type: **Thirty Day Report**

CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**

Candidate Address: **PO Box 520248**

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

REPORT INFORMATION

Election Year: **2024**

Election: **State General**

Report Type: **Thirty Day Report**

Reporting Period: From **08/11/2024** Through **10/04/2024**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$8,936.75				
[+] ↓		Previous Campaign Income: (From Box A of previous report)		Campaign Income Total: (Box A)	
Total Income Reported:	\$8,699.50	[+] ⇒	\$12,391.30	[=] ⇒	\$21,090.80
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)		Campaign Expense Total: (Box B)	
Total Expenditures Reported:	\$5,187.48	[+] ⇒	\$7,653.91	[=] ⇒	\$12,841.39
[=] ↓					
Closing Cash On Hand:	\$12,448.77				
[-] ↓					
Total Debts:	\$133.79				
[=] ↓					
Surplus/Deficit:	\$12,314.98				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
08/12/2024	Check 11514	HUTTON, JIM PO BOX 520022 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$200.00
08/13/2024	Check 907	STALLONE, BARBARA 7362 W PARKS HWY #860 WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$250.00
08/15/2024	Credit Card	MORRIS, JULIE PO BOX 3035 ANDERSON, Alaska 99744	Occupation: LEGISLATIVE STAFF Employer: STATE OF ALASKA	\$521.15
08/16/2024	Cash	HANIFIN, STEVE AND DEBI 266 CLUB HOUSE WAY TRACY, California 95376	Occupation: RETIRED Employer: RETIRED	\$50.00
08/16/2024	Cash	KOAN, CJ AND ERIC 6420 W SECLUDED MEADOWS LP WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$20.00
08/16/2024	Check 2114	KOAN, CJ AND ERIC 3420 SECLUDED MEADOWS LP WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$50.00
08/17/2024	Cash	WOOD, JOHN PO BOX 743 WILLOW, Alaska 99688	Occupation: RETIRED Employer: RETIRED	\$100.00
09/13/2024	Credit Card	CRUM, ADAM 146 E BIRCHTREE DR WASILLA, Alaska 99654	Occupation: COMMISSIONER Employer: STATE OF ALASKA	\$104.48
09/14/2024	Check 2370	MATSU REPUBLICAN WOMENS CLUB EST 1947 PO BOX 875662 WASILLA, Alaska 99687	Occupation: PAC Employer: PAC	\$2,000.00

Date Received	Payment Method	Contributor	Details	Amount
09/14/2024	Credit Card	MORRIS, WILLIAM PO BOX 3035 ANDERSON, Alaska 99744	Occupation: PLUMBER Employer: SELF	\$521.15
09/16/2024	Check 7835/3110	BACKFORD, LOUANN 925 W 7TH APT 106 ANCHORAGE, Alaska 99501	Occupation: RETIRED Employer: RETIRED	\$25.00
09/18/2024	Cash	CRANDALL, KAREN 14041 W BIG LAKE RD WASILLA, Alaska 99623	Occupation: ARTIST Employer: SELF	\$60.00
09/18/2024	Credit Card	CRUM, JOEY 4543 W TWIN PEAKS DR WASILLA, Alaska 99654	Occupation: CEO Employer: NIT	\$100.00
09/20/2024	Check 737	GOARD, KEVIN 16609 W TAMARACK COVE DR WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$200.00
09/20/2024	Credit Card	TROMBLEY, ADAM 5803 GRAND TETON LP ANCHORAGE, Alaska 99502	Occupation: STATE DIRECTOR Employer: UNITED STATES SENATOR	\$100.00
09/21/2024	Credit Card	BOYLE, DAVID 5341 S OUTRIGGER DR WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$150.00
09/25/2024	Credit Card	KAJDAN, CHERYL PO BOX 500 PALMER, Alaska 99645	Occupation: Employer:	\$36.77
09/25/2024	Credit Card	MARTENSEN, MARTEN 5115 OLD SEWARD HWY ANCHORAGE, Alaska 99503	Occupation: CAR DEALER Employer: CONTINENTAL AUTO GROUP	\$521.15

Date Received	Payment Method	Contributor	Details	Amount
09/27/2024	Check 1509	BERGEY, TOM 17777 E SULLIVAN AVE PALMER, Alaska 99645	Occupation: FARMER Employer: SELF	\$100.00
09/28/2024	Check 503	ALDERMAN, MARK 1265 E LOLLY DR WASILLA, Alaska 99654	Occupation: PRESIDENT Employer: MAT-SU MECHANICAL, INC	\$400.00
09/29/2024	Credit Card	ALEXANDER, TAMMI PO BOX 520643 BIG LAKE, Alaska 99652	Occupation: EXECUTIVE ADMINISTRATOR Employer: AK PREMIER TRANSPORTATION LLC	\$521.15
09/29/2024	Cash	BREWER, WILLIAM PO BOX 506 WILLOW, Alaska 99688	Occupation: Employer:	\$10.00
09/29/2024	Cash	CARHART, STEVE 4094 S OLD YACHT CLUB BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$100.00
09/29/2024	Check 7208	HALL, AMY PO BOX 871906 WASILLA, Alaska 99687	Occupation: SALES Employer: SELF	\$1,000.00
09/29/2024	Check 142	JOHNSON, JANET 3350 S MARTH RD PALMER, Alaska 99645	Occupation: RETIRED Employer: RETIRED	\$100.00
09/29/2024	Cash	JOY, REGGIE PO BOX 521055 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$100.00
09/29/2024	Check 1288	MCCOLLUM, PAT 5780 W BIRCH HARBOR DR WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$100.00
09/29/2024	Check 121	STEPHL, ANGELA PO BOX 873671 WASILLA, Alaska 99687	Occupation: STATE OF ALASKA Employer: LEGISLATIVE STAFF	\$100.00

Date Received	Payment Method	Contributor	Details	Amount
09/30/2024	Check 5212	ALASKA TRUCKING ASSOC INC 3443 MINNESOTA DR ANCHORAGE, Alaska 99503	Occupation: PAC Employer: PAC	\$250.00
09/30/2024	Check 1113	VRWAK PO BOX 876739 WASILLA, Alaska 99687	Occupation: PAC Employer: PAC	\$700.00
10/04/2024	Credit Card	SULLIVAN LEONARD, COLLEEN BOX 874380 WASILLA, Alaska 99654	Occupation: RETIRED Employer: RETIRED	\$208.65
			Income Total:	\$8,699.50

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
08/12/2024	Debit Card	HOME DEPOT 1255 E PALMER WASILLA HWY WASILLA, Alaska 99654	SIGN FRAME MATERIALS	\$108.58
08/16/2024	Debit Card	PIP PRINTING AND MARKETING SERVICE 833 E 4TH AVE ANCHORAGE, Alaska 99501	SIGNS	\$721.73
08/17/2024	Debit Card	META 1 HACKER WAY MENLO PARK, California 94025	AD BOOST	\$17.00
08/19/2024	Debit Card	ACE HARDWARE 14468 W HOLLYWOOD RD BIG LAKE, Alaska 99623	SIGN FRAME MATERIALS	\$35.95

Date	Payment Method	Vendor	Purpose	Amount
08/21/2024	Debit Card	CARIBOU VIXENS 3120 S BIG LAKE RD SUITE G BIG LAKE, Alaska 99623	HATS AND PROMOTIONAL ITEMS WITH LOGO	\$341.46
08/24/2024	Debit Card	LOWES 2561 EAST SUN MOUNTAIN AVE WASILLA, Alaska 99654	SIGN FRAME MATERIALS	\$40.66
08/31/2024	Debit Card	LOWES HOME CENTERS LLC 2561 EAST SUN MOUNTAIN AVE WASILLA, Alaska 99654	SIGN FRAME MATERIALS	\$311.31
09/06/2024	Debit Card	AT&T 208 S AKARD ST DALLAS, Texas 75202	DATA FOR CELL PHONE	\$75.13
09/12/2024	Debit Card	SUSITNA BREWING COMPANY 5120 S BIG LAKE RD WASILLA, Alaska 99623	FOOD AND TIP FOR "PIZZA AND POLITICS" EVENT	\$405.00
09/17/2024	Debit Card	ALASKA WATCHMAN LLC 1625 W EDLUND RD WASILLA, Alaska 99654	DIGITAL ADVERTISING	\$875.00
09/23/2024	Debit Card	HOGOSHA LLC 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, South Dakota 57702	GRAPHIC DESIGN FOR "PIZZA AND POLITICS" AND GRAPHICS AND PRINTING FOR TSHIRTS	\$516.00
09/24/2024	Check 106	BIG LAKE POST OFFICE 2809 S BIG LAKE RD BIG LAKE, Alaska 99652	POSTAGE	\$365.00

Date	Payment Method	Vendor	Purpose	Amount
09/25/2024	Check 107	BIG LAKE POST OFFICE 2809 S BIG LAKE RD BIG LAKE , Alaska 99652	POSTAGE	\$18.15
09/27/2024	Debit Card	PIP PRINTING AND MARKETING SERVICES 833 E 4TH AVE ANCHORAGE, Alaska 99501	LETTERHEAD AND RACK CARDS	\$797.16
09/30/2024	Debit Card	WALMART 1350 S SEWARD MERIDIAN PKWY WASILLA, Alaska 99654	PRINTER CARTRIDGES	\$79.95
10/02/2024	Check 108	BIG LAKE POST OFFICE 2809 S BIG LAKE RD BIG LAKE, Alaska 99652	POSTAGE	\$365.00
10/04/2024	Bank Fee	ANEDOT INC 1340 POYDRAS STREET STE 1770 NEW ORLEANS, Louisiana 70112	CREDIT CARD FEES DEDUCTED FROM DONATIONS FROM 8/12/24 THROUGH 10/4/24. Modified 10/28/24 to reflect additional 8.65 deducted from \$208.65 donation received from Colleen Sullivan Leonard on Oct 4 2024.	\$114.40
Expenditure Total:				\$5,187.48

DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
07/15/2024	RESULTS ADVERTISINGN WERKS PO BOX 877556 WASILLA, Alaska 99687	RECORDED AS DEBT IN PRIMARY 7-DAY REPORT. BILL NOT YET RECEIVED.	\$50.00	\$50.00
09/16/2024	META 1 HACKER WY MENLO PARK, California 94025	BOOSTED POSTS.	\$83.79	\$83.79

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
			Remaining Debt Total:	\$133.79

CAMPAIGN DISCLOSURE FORM

AMENDMENT

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

COMPLETED

Submission Date: **08/13/2024**
 Filer First Name: **KEVIN**
 Filer Middle Name: **J**
 Filer Last Name: **MCCABE**
 Filer's Title: **Treasurer**
 Report Type: **Thirty Day Report**

CANDIDATE INFORMATION

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

REPORT INFORMATION

Election Year: **2024**
 Election: **State Primary**
 Report Type: **Thirty Day Report**
 Reporting Period: From **02/02/2024** Through **07/19/2024**

FINANCIAL SUMMARY

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

INCOME

Date Received	Payment Method	Contributor	Details	Amount
03/31/2024	Bank Interest	GLOBAL CREDIT UNION PO BOX 196613 ANCHORAGE, Alaska 99519	Occupation: BANK Employer:	\$1.22
05/21/2024	Credit Card	MCCABE, KEVIN PO BOX 520258 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	\$25.00
05/28/2024	Non-Monetary DEPOSIT FOR HOTEL ROOM IN HEALY FOR EVENT	MCCABE, LINN PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$35.00
06/07/2024	Credit Card	MCCABE, LINN PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$208.52
06/08/2024	Credit Card	BOYLE, DAVID 2001 BARROW ST #1 ANCHORAGE, Alaska 99501	Occupation: RETIRED Employer: RETIRED	\$200.00
06/08/2024	Credit Card	WILLIAMS, BEBE PO BOX 870275 WASILLA, Alaska 99645	Occupation: RETIRED Employer: RETIRED	\$50.00
06/09/2024	Credit Card	MCCABE, KEVIN PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	\$25.00
06/09/2024	Credit Card	MOORE, GAIL 5200 N DOROTHY DR PALMER, Alaska 99645	Occupation: RETIRED Employer: RETIRED	\$25.00
06/10/2024	Credit Card	Stephl, Angela PO BOX 873671 WASILLA, Alaska 99687	Occupation: LEGISLATIVE AIDE Employer: STATE OF ALASKA	\$100.00
06/10/2024	Credit Card	TILTON, CATHY PO BOX 871753 WASILLA, Alaska 99687	Occupation: LEGISLATOR Employer: STATE OF ALASKA	\$208.65

Date Received	Payment Method	Contributor	Details	Amount
06/12/2024	Check 1605	ANDERSON, THOMAS 7362 W PARKS HWY #665 WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$50.00
06/13/2024	Non-Monetary SCREWS FOR SIGNS	MCCABE, KEVIN PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	\$18.00
06/16/2024	Credit Card	MCCABE, BRIAN 12904 NORTH BAY TRAIL SIDE LAKE, Minnesota 55781	Occupation: RETIRED Employer: RETIRED	\$1,041.98
06/17/2024	Non-Monetary INK CARTRIDGES FOR PRINTER	MCCABE, KEVIN PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	\$187.98
06/19/2024	Non-Monetary STAMPS	MCCABE, LINN PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$13.00
06/24/2024	Check 7984	QUARLES, JAMES 96117 OYSTER BAY DR AMELIA ISLAND, Florida 32034	Occupation: RETIRED Employer: RETIRED	\$100.00
06/28/2024	Check 4713	MCKAY, THOMAS 11136 BAYSHORE DR ANCHORAGE, Alaska 99515	Occupation: LEGISLATOR Employer: STATE OF ALASKA	\$100.00
07/02/2024	Check 5392	WILSON, LANCE PO BOX 940065 HOUSTON, Alaska 99694-0064	Occupation: RETIRED Employer: RETIRED	\$200.00
07/09/2024	Credit Card	MCCOLLUM, KATHY 5780 W BIRCH HARBOR DR WASILLA, Alaska 99623	Occupation: SCHOOL BOARD MEMBER Employer: MSBSD	\$100.00
07/13/2024	Check 1049	BREINER, LINDA HC 89 BOX 8182 TALKEETNA, Alaska 99676-9701	Occupation: IOLA ENTERPRISES INC Employer: OFFICE MANAGER	\$500.00

Date Received	Payment Method	Contributor	Details	Amount
07/13/2024	Check 2359	MATSU REPUBLICAN WOMENS CLUB EST 1947 PO BOX 875662 WASILLA, Alaska 99687	Occupation: PAC Employer: PAC	\$500.00
07/14/2024	Credit Card	CARHART, STEVEN PO BOX 520902 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$100.00
07/14/2024	Cash	CHANDLER, C.H. BOX 520312 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$100.00
07/14/2024	Check 8574	CONN, YVONNE 429 N BEAVER LAKE RD WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$100.00
07/14/2024	Credit Card	GRAHAM, JENNIFER 3705 ARCTIC BLVD 933 ANCHORAGE, Alaska 99503	Occupation: FINANCE Employer: SELF	\$150.00
07/14/2024	Check 5106	HALLFORD, LYNN 1201 N OLD TOWNE DR PALMER, Alaska 99645	Occupation: RETIRED Employer: RETIRED	\$100.00
07/14/2024	Credit Card	JOHNSON, STEVEN PO BOX 944 PALMER, Alaska 99645	Occupation: RETIRED Employer: RETIRED	\$250.00
07/14/2024	Cash	MALO, DAVE PO BOX 521457 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$100.00
07/14/2024	Check 1684	MARTIN, NATALIE 3901 E PALMDALE DR WASILLA, Alaska 996654	Occupation: HOME SCHOOL MOM Employer: SELF	\$25.00

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

EXPENDITURES

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

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

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

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

DEBTS

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

CAMPAIGN DISCLOSURE FORM

AMENDMENT

Amendment Description: TO ADD 21.15 CREDIT CARD FEES PAID BY DONOR, AND CORRECT TOTAL TO \$521.15

TWENTY-FOUR HOUR REPORT

COMPLETED

Submission Date: **10/06/2024**

Filer First Name: **LINN**

Filer Middle Name: **M**

Filer Last Name: **MCCABE**

Filer's Title: **Treasurer**

Report Type: **24 Hour Report**

CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**

Candidate Address: **PO Box 520248**

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

REPORT INFORMATION

Election Year: **2024**

Election: **State Primary**

Report Type: **24 Hour Report**

Reporting Period: From **08/11/2024** Through **08/19/2024**

INCOME

Date Received	Payment Method	Contributor	Details	Amount
08/15/2024	Credit Card	Morris , Julie		\$521.15
			Income Total:	\$521.15

CAMPAIGN DISCLOSURE FORM

COMPLETED

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

CANDIDATE INFORMATION

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

REPORT INFORMATION

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

FINANCIAL SUMMARY

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

INCOME

Date Received	Payment Method	Contributor	Details	Amount
07/21/2024	Non-Monetary HOODIES AND TSHIRTS	MCCABE, KEVIN PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	\$163.94
07/23/2024	Credit Card	SHOWER, MICHAEL 3500 NORTH TRAVELAIR DR WASILLA, Alaska 99654	Occupation: PILOT Employer: FEDEX	\$250.00
07/23/2024	Check 1277	WORLAND, PEGGY 552 N BEAVER LODGE RD WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	\$200.00
07/29/2024	Credit Card	HALL, JESS PO BOX 1987 PALMER, Alaska 99645	Occupation: BUILDER Employer: HALL QUALITY HOMES	\$1,041.98
07/29/2024	Credit Card	SIMON, LORALI 1940 DRIFTWOOD CI PALMER, Alaska 99645	Occupation: VP EXTERNAL AFFAIRS Employer: USIBELLI COAL MINE	\$104.48
07/29/2024	Check 535	SMITH, MELODY LYNN PO BOX 521565 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$100.00
07/30/2024	Credit Card	SUMNER, JESSE PO BOX 872992 WASILLA, Alaska 99687	Occupation: LEGISLATOR Employer: STATE OF ALASKA	\$100.00
08/01/2024	Check 10970	GORLICK, TERRANCE PO BOX 524818 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	\$500.00
08/01/2024	Check 10969	GORLICK , JACQUELINE 222 E 7TH AVE APT 401 ANCHORAGE, Alaska 99501-3655	Occupation: RETIRED Employer: RETIRED	\$500.00

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

EXPENDITURES

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

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

DEBTS

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

AK Public Offices Commission has New Year's Eve meeting on complaint against Big Lake lawmaker

By **Suzanne Downing** - December 30, 2024

3

A special meeting of the Alaska Public Offices Commission is scheduled for New Year's Eve to take up the complaint of a political critic of Republican Rep. Kevin McCabe of Big Lake.

APOC is the agency tasked with ensuring that campaign finance laws and regulations are adhered to by candidates.

The complaint by Republican Michael Alexander says that McCabe has unresolved campaign finance violations relating to digital advertising. The complaint is lengthy and has numerous items that Alexander says are proof that not all of McCabe's digital advertising during his campaign for reelection were disclosed to APOC.

But McCabe has a defense: He turned over all his digital advertising to Optima Public Relations and paid the company \$16,825, all of which is declared on his APOC filings. This is a normal process for many campaigns.

McCabe and Alexander have some history. McCabe had his own APOC complaint already filed against Alexander for putting small signs pointing at McCabe's campaign signs. Those small signs said "PFD Thief" on them, and were allegedly placed there by Alexander, who did not form up a legal independent expenditure group before having them printed and installed alongside McCabe's signs.

McCabe also supported Rep.-elect Jubilee Underwood in her successful challenge to Rep. David Eastman in 2024; Alexander is a supporter of Eastman.

Why APOC is scheduling an expedited hearing on New Year's Eve, with only 24 hours notice, is one of the mysteries of the agency, which has a history of fining Republicans, while allowing

Democrats to skate.

The meeting will be held Dec. 31, at 10:00 a.m. APOC describes it as a meeting to "consider a request for expedited consideration of Complaint 24-12-CD, *Michael Alexander v. Kevin McCabe*. Under 2 AAC 50.888, if the Commission grants expedited consideration, a hearing on the merits of the complaint may immediately follow."

Microsoft Teams instructions:

The meeting will be held remotely via Microsoft Teams. [Click here to join the meeting](#).

Meeting ID: 287 379 483 743

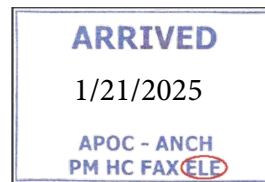
Passcode: AV75MR93

Call-in for audio only:

1 907-202-7104. Phone Conference ID: 402042679#

You may also email apoc@alaska.gov to request a Teams meeting invitation and questions regarding the meeting may be directed to the Commission's staff at (907) 276-4176.

Kevin McCabe
PO Box 520248
Big Lake, AK 99652



01/19/2025

Response to APOC Complaint 25-01-CD

To Whom It May Concern,

This complaint, filed by Mr. Mike Widney, appears politically retaliatory and reinforces my concerns that he and Mr. Alexander (24-11-CD) are collaborating as a radical Independent Expenditure Group with the long-term goal of influencing both the 2024 and 2026 elections. While I acknowledge the combined effort they put into crafting their claims, their failure to contact me—or APOC—for clarification before filing reflects a well-known tactic of political activism: “Pick the target, freeze it, personalize it, and polarize it.” Weaponizing the APOC process, with no real research or understanding, is simply the latest strategy in their ongoing campaign of bullying and harassment. Transparency and compliance with complex APOC rules are essential to the integrity of our election process but so is understanding those rules and open and honest communication.

Mr. Widney is not inexperienced with APOC, making his mischaracterizations and omissions of key dates appear an intentional attempt to politically weaponize APOC for future campaigns against me. Once again, the pattern of “Pick the target, freeze it, personalize it, and polarize it” is evident as a continued deliberate strategy of political-terrorism and attacks against me. This follows their guiding principles of being politically effective by being politically feared. I urge APOC not to be a part of this agenda.

I would like to address the points raised in his complaint and clarify his errors as well as highlight the actions and reporting practices of the Vote Kevin McCabe campaign.

1. December 31, 2019: Expenditure to Optima PR

Mr. Widney wrongly claims this expenditure was improperly documented. However, the APOC report dated February 14, 2020, clearly states the expenditure was for “PR services and PIP yard signs, rack cards.”

2. March 19, 2020: \$2,000 to Optima PR for “graphics and digital advertising”

This payment was for graphic design services, including developing the McCabe campaign logo and integrating it into digital advertisements. Optima purchases block digital advertising, which involves buying large quantities of ad impressions. This method often provides discounts and broad placements, but neither Optima nor the advertiser knows the exact placement details in advance. At the time of this filing, I was running my own campaign and Optima was just a vendor (not manager) to my campaign, thus they were the final payee.

3. July/October 2024: \$2,061 to Republican Ads, LLC

This expenditure covered block purchase “pre-roll” digital ads. Pre-roll ads are distributed across multiple platforms, and their specific placements cannot be determined in advance. Republican Ads operates similarly to Optima in this regard with block space and ad consolidation. The development costs for these ads were, in fact, transparently reported in APOC filings, including:

- July 22, 2024/Hogosha: “Website Maintenance and Digital Ad Production”
- July 15, 2024/Results Ad Werks: “Voice Recording for Ad” (debt)
- August 7, 2024/Hogosha: Payment for “Website Maintenance and Digital Ad Production” (reconciled in the August 13, 2024 report).

4. October 29, 2024: \$16,825 to Optima PR

Mr. Widney claims this payment was made just seven days before the election, but the report clearly states the payment date was October 15, nearly three weeks before Election Day. His attempt to mischaracterize this expense, and frame it as suspicious timing, is unfounded.

There is no “scheme” to take advantage of my opponent(s). My opponent, during the 2024 campaign (and in 2022), had the same ability and opportunity to utilize campaign management firms using digital platforms and ad agencies, and he did so. For instance, on my opponent’s 7/17/22 APOC report, on the line dated 06/08/22, he lists an expense for Leading Light Advisors with the description of services as merely “Campaign Marketing” – no real breakdown there! Surprisingly, this is the candidate Mr. Widney vetted and supported, yet there is no record of him filing a complaint about his candidate’s reporting.

Further, during the 2024 campaign, my opponent’s 08/13/24 report lists an expenditure to Make A Scene Media on 08/09/24, described simply as “Advertising,” containing no details where or how the funds were used. Similarly, on 08/29/24, my opponent reported a \$1,000 expense to

AdXcelerant as “Advertising,” again without specifying the type or placement of the ads or breaking down how, exactly, the funds were used by that agency.

Mr. Widney also seems extremely concerned about the timing of expenditures in my 2024 campaign (item #4 above), speculating that the timing of the APOC report date (not the expenditure) indicated nefarious behavior. My opponent in the 2024 race, during his 2018 campaign, had expenditures on two consecutive days within 10 days of the election date, and both simply listed “Radio and Mailers.” This is virtually the same timing issue with radio and mailers the concerns Widney. It seems like Mr Widney is holding me to a different standard than the candidate he supported the last election cycle.

I bring up the above examples not to criticize my opponent, or complain about his APOC filings, but to highlight the political nature of this specific APOC complaint and rebut Widney’s claim that our APOC reporting somehow disadvantaged my opponent. The Vote Kevin McCabe campaign reporting on our APOC forms is much more detailed than that of my opponent and most other campaigns in Alaska. I take APOC reporting obligations seriously and remain committed to full compliance. My campaign has maintained detailed records, ensured timely disclosures, and promptly addressed any necessary corrections or amendments.

It is important to note that the final campaign transaction report for the 2024 cycle is not due until February 18, 2025. Any claims of incomplete reporting are therefore premature. My campaign has meticulously reconciled expenditures with vendor invoices and reporting periods, adhering to APOC rules throughout the process. If we (or others) find we made a mistake, we will correct it.

Our engagement with Optima PR followed standard practices. Optima managed multiple services, including digital and radio ads, under a retainer agreement. Payments were reported as required, and, even though no other candidate or campaign does so, the allocation of funds for specific services will be reported, in as much detail as we have, in the final campaign finance report.

Alaska Statutes (AS 15.13.040(a)(1)(A)) and APOC regulations (2 AAC 50.321(d)) permit campaigns to report payments to consulting firms, which are responsible for managing and allocating resources. The past tense language in 2AAC 50.321(d) indicates the requirement to disclose sub-vendor details applies after final invoices are received, not before. In the digital advertising world of 2024, however, it is almost impossible to ascertain which ad was placed where - or with who - after the fact, let alone prior to placement.

Campaign finance dynamics often result in timing discrepancies between estimates, service agreements, delivery, and invoicing. This is especially true for digital advertising, where charges from platforms like Meta or Google may be delayed, or even paid for monthly, which is how Optima does it. These are not irregularities; they are common practice in most Alaska campaigns.

Contrary to Mr. Widney's claims, these practices are not a "slush fund" but an approved and widely accepted approach to reporting campaign management – even my opponent used the same exact reporting procedures. Professional firms like Optima and Leading Light Advisors, manage complex advertising strategies, Block Space buys, and consolidation, that cannot be broken down to the granular level as Widney suggests.

The public deserves transparency and accountability in campaign finance, and I am confident that the final APOC report and any investigation into this claim will affirm our compliance with all applicable regulations. I am fully prepared to cooperate with any investigation APOC deems necessary.

However, I also firmly believe that politicians, as citizens, have the right to be free from bullying and harassment by radical activists misusing government accountability agencies for political attacks, such as this case and the case of Mike Alexander (24-12-CD). I believe there should be consequences for knowingly filing a false complaint as radical activists often do not care if the complaint is valid. It is only the complaint, itself, posted and reshared all over social media, that politically harms a politician.

Sincerely,

A handwritten signature in dark ink, appearing to read "K. McCabe", with a stylized, cursive script.

Kevin McCabe