

**[TAB 18]**

**Complaint (Remand) 23-07-CD,  
Alaskans for Better Elections v.  
Alaskans for Honest Elections**

Presented By:

John Whitlock, Paralegal





**TO:** APOC Commissioners  
**DATE:** April 27, 2026  
**FROM:** John Grover Whitlock, Paralegal III  
**SUBJECT:** Supplemental Staff Report on Remand, Complaint 23-07-CD,  
*Alaskans for Better Elections v. Alaskans for Honest Elections, et al.*

---

### Supplemental Staff Report on Remand

At its February 28, 2024 meeting, the Alaska Public Offices Commission (Commission) considered allegations filed against Alaskans for Honest Elections (AHE), Wellspring Ministries, Wellspring Fellowship of Alaska, Mikaela Emswiler, and Top Fundraising Solutions, LLC (TPF) in complaint 23-07-CD.<sup>1</sup> In its March 19, 2024 order, the Commission remanded for staff to investigate whether AHE improperly reported payments to TPF in its 2023 fourth quarterly report or other reports, and if so, to determine whether APOC should assess a penalty against AHE and in what amount.<sup>2</sup>

Specifically, the Commission noted that AHE failed to account for a \$3,196.17 expenditure for TPF in its fourth quarterly report and misreported the date of a \$15,000 expenditure to TPF, and encouraged AHE to amend the report if needed.<sup>3</sup> On April 30, 2024, AHE amended its 2023 fourth quarterly report, adding an October 17, 2023 expenditure to TPF paid by check #61 in the amount of \$3,196.17 and corrected the date of its \$15,000 expenditure to TPF to October 9, 2023.<sup>4</sup>

Because APOC staff already assessed a penalty for AHE's late filing of the quarterly report, the penalty for inaccurately reporting the expenditure would begin on the date the

---

<sup>1</sup> [Complaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=25521), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=25521>.

<sup>2</sup> [Order Dismissing Complaint in Part and Remanding Part to Staff](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=25727), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=25727>, pp. 10-11.

<sup>3</sup> *Id.*

<sup>4</sup> [Amended Fourth Quarterly Report Filed on 4/30/24](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=43391&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=43391&ViewType=CD>.

report was first filed, January 23, 2024 and ends on the date the report was corrected, April 30, 2024.<sup>5</sup> This represents 98 penalty days for a maximum penalty of \$4,900.

Because this was AHE’s first election cycle, the maximum penalty may be reduced by 50%.<sup>6</sup> Mitigation criteria allows for further reduction, because AHE was an inexperienced filer engaged in its first election cycle.<sup>7</sup> Accordingly, APOC staff recommends a penalty of **\$1,225**.

<b>Violation</b>	<b>Total Days</b>	<b>Max Penalty</b>	<b>2 AAC 50.855 Assessment</b>	<b>2 AAC 50.865 Mitigation</b>
Incomplete 4 <sup>th</sup> Quarterly Report (\$50/Day)	98	\$4,900	\$2,450	\$1,225
<b>Total Penalty \$1,225</b>				

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:	
Scott Kendall Samuel Gottstein 510 L. St., Ste 601 Anchorage, AK 99501 scott@cashiongilmore.com sam@cashiongilmore.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
Kevin Clarkson Law Offices of Kevin Clarkson 2223 Latona Dr. NE Keizer, OR 97303 kclarkson@gci.net	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

*Cari Rousselle*                      04/27/2026  
 Signature    Date

<sup>5</sup> [Order Dismissing Complaint in Part and Remanding Part to Staff, https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=25727](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=25727), pp. 10-11.

<sup>6</sup> 2 AAC 50.855(b)(2)(C)(i).

<sup>7</sup> 2AAC 50.865(a)(1)(B).

## **Rousselle, Cari J (DOA)**

---

**From:** Rousselle, Cari J (DOA)  
**Sent:** Monday, April 27, 2026 3:26 PM  
**To:** 'scott@cashiongilmore.com'; 'sam@cashiongilmore.com'  
**Cc:** 'kclarkson@gci.net'; Whitlock, John G (DOA); Stone, Kim S (DOA); Hebdon, Heather R (DOA)  
**Subject:** Supplemental Staff Report on Remand  
**Attachments:** 23-07-CD Staff Supplemental Report on Remand FINAL.pdf

Good Afternoon,

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

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

Should you have any questions, please contact our office.

Thank you,

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

## **Rousselle, Cari J (DOA)**

---

**From:** Rousselle, Cari J (DOA)  
**Sent:** Monday, April 27, 2026 3:26 PM  
**To:** 'scott@cashiongilmore.com'; 'sam@cashiongilmore.com'  
**Cc:** 'kclarkson@gci.net'; Whitlock, John G (DOA); Stone, Kim S (DOA); Hebdon, Heather R (DOA)  
**Subject:** Supplemental Staff Report on Remand  
**Attachments:** 23-07-CD Staff Supplemental Report on Remand FINAL.pdf

Good Afternoon,

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

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

Should you have any questions, please contact our office.

Thank you,

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

## **Rousselle, Cari J (DOA)**

---

**From:** Rousselle, Cari J (DOA)  
**Sent:** Monday, April 27, 2026 3:26 PM  
**To:** 'scott@cashiongilmore.com'; 'sam@cashiongilmore.com'  
**Cc:** 'kclarkson@gci.net'; Whitlock, John G (DOA); Stone, Kim S (DOA); Hebdon, Heather R (DOA)  
**Subject:** Supplemental Staff Report on Remand  
**Attachments:** 23-07-CD Staff Supplemental Report on Remand FINAL.pdf

Good Afternoon,

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

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

Should you have any questions, please contact our office.

Thank you,

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





THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128  
Anchorage, AK 99508-4149  
Main: 907.276.4176  
Fax: 907.276.7018  
[www.doa.alaska.gov/apoc](http://www.doa.alaska.gov/apoc)

May 15, 2026

Via Certified Mail and Email

Scott Kendall  
Samuel Gottstein  
510 L. St., Ste 601  
Anchorage, AK 99501  
[scott@cashiongilmore.com](mailto:scott@cashiongilmore.com)  
[sam@cashiongilmore.com](mailto:sam@cashiongilmore.com)

Kevin Clarkson  
Law Offices of Kevin Clarkson  
2223 Latona Dr. NE  
Keizer, OR 97303  
[kclarkson@gci.net](mailto:kclarkson@gci.net)

RE: Commission Meeting Notice

To Whom it May Concern:

The Commission will review the Staff Report in the matter *Alaskans for Better Elections v. Alaskans for Honest Elections*, 23-07-CD at its June 2-3, 2026 Commission Meeting in Anchorage, Alaska.

Currently, the matter is scheduled to be considered at **1:00 p.m. on Wednesday, June 3, 2026**. The meeting will take place at the offices of the Alaska Public Offices Commission located at 2221 E. Northern Lights Boulevard, Room 128, in Anchorage, Alaska, by telephone (1-907-202-7104, Conference ID: 269 275 710#), or remotely via [Microsoft Teams](#) (Meeting ID: 226 535 332 612 23, Passcode: wZ9Uy9wz).

If you do not attend the meeting, staff will send you a final order notifying you of the Commission's decision.

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

*John Whitlock*  
John Grover Whitlock  
Paralegal III

Encl: Supplemental Staff Report

<b>CERTIFICATE OF SERVICE:</b> I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Scott Kendall Samuel Gottstein 510 L. St., Ste 601 Anchorage, AK 99501 scott@cashiongilmore.com sam@cashiongilmore.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
Kevin Clarkson Law Offices of Kevin Clarkson 2223 Latona Dr. NE Keizer, OR 97303 kclarkson@gci.net	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

*Cari Rousselle*

05/15/2026

Signature

Date

**Rousselle, Cari J (DOA)**

---

**From:** Microsoft Outlook  
**To:** scott@cashiongilmore.com; sam@cashiongilmore.com  
**Sent:** Friday, May 15, 2026 3:04 PM  
**Subject:** Relayed: Commission Meeting Notice

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

[scott@cashiongilmore.com](mailto:scott@cashiongilmore.com) ([scott@cashiongilmore.com](mailto:scott@cashiongilmore.com))

[sam@cashiongilmore.com](mailto:sam@cashiongilmore.com) ([sam@cashiongilmore.com](mailto:sam@cashiongilmore.com))

Subject: Commission Meeting Notice



Commission  
Meeting Notice

**SENDER: COMPLETE THIS SECTION**

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

1. Article Addressed to:

Scott Kendall  
 Samuel Gottstein  
 510 L Street, STE 601  
 Anchorage AK 99501

9590 9402 9917 5335 2995 89



2. Article Number (Transfer from service label)

9589 0710 5270 1126 7219 13

07000

Mail Restricted Delivery

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 Agent  
 Addressee

B. Received by (Printed Name)  
 Steven Bahr  
 C. Date of Delivery

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type

- |  |   |
|--|---|
| <input type="checkbox"/> Adult Signature                         | <input type="checkbox"/> Priority Mail Express®                     |
| <input type="checkbox"/> Adult Signature Restricted Delivery     | <input type="checkbox"/> Registered Mail™                           |
| <input type="checkbox"/> Certified Mail®                         | <input type="checkbox"/> Registered Mail Restricted Delivery        |
| <input type="checkbox"/> Certified Mail Restricted Delivery      | <input type="checkbox"/> Signature Confirmation™                    |
| <input type="checkbox"/> Collect on Delivery                     | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery |   |