

[TAB 10]

Complaint 25-26-CD
McClure v. Wilson

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Jerad McClure,	)	
	)	
Complainant,	)	
	)	
vs.	)	Case No. 25-26-CD
	)	
David Wilson,	)	
	)	
Respondent.	)	
_____	)	

NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing in these cases will take place before the Alaska Public Offices Commission at approximately 1:30 p.m. on Wednesday, August 26, 2026.

The Commissioners will be present in person, by telephone, or via Microsoft Teams and will receive evidence regarding this matter. You may be present at the hearing either by telephone (1-907-202-7104, Access Code: 845 091 354#), 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 special accommodation to participate, you must advise the Commission office on or before August 19, 2026, so that a special accommodation can be made.

PREHEARING AND HEARING PROCEDURES

- 1) Parties.** The parties in this case are Commission Staff and Respondent.
- 2) Issues.** At the hearing, the Commission will consider whether Respondent violated campaign disclosure law by failing to disburse campaign assets on his Year End Campaign Disclosure Report.
- 3) Procedural history.** Complainant Jerad McClure filed a complaint against Respondent David Wilson on November 3, 2025. Staff's investigation report recommending the complaint be dismissed was issued July 14, 2026.

¹ Meeting ID: 250 016 996 214 088, Passcode: ss9Fo9K9

- 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 August 18, 2026, a party:
- a) may file a list of witnesses expected to testify at the hearing;
 - b) may file copies of exhibits to be presented at the hearing that are marked and identified (for example, Resp.'s Ex. A);
 - c) may file a prehearing memorandum;
 - d) may file prehearing motions, including motions to dismiss, for summary judgment, or to exclude evidence, and
 - e) shall serve all parties and the Complainant with filings submitted.
- 7) Response to motions and requests for subpoenas.** No later than August 25, 2026, a party
- a) may respond to a motion; and
 - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

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

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

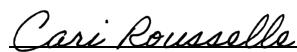
10) Decision and Order. The Commission will issue an order no later than 10 days after the close of the record.

Dated: August 7, 2026



Heather Hebdon, Executive Director
Alaska Public Offices Commission

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Jerad McClure 2521 E Mountain Village Dr Suite B, PMB 660 Wasilla, AK 99654 jeradmccclure@outlook.com	☒ Certified Mail ☒ Email
David Wilson 3001 E Danny's Ave Wasilla, AK 99654 Dw22@rocketmail.com	☒ Certified Mail ☒ Email


Signature

08/07/2026

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: dw22@rocketmail.com
Sent: Friday, August 7, 2026 2:28 PM
Subject: Relayed: NOTICE OF HEARING AND PROCEDURAL ORDER

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

dw22@rocketmail.com (dw22@rocketmail.com)

Subject: NOTICE OF HEARING AND PROCEDURAL ORDER



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Rousselle, Cari J (DOA)

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NOTICE OF
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Rousselle, Cari J (DOA)

From: postmaster@outlook.com
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Your message has been delivered to the following recipients:

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- ☐ 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:

David Wilson
3001 E Danny's Ave
Wasilla AK 99654

9590 9402 9917 5335 2977 69



2. Article Number (Transfer from service label)

9589 0710 5270 1126 7201 45

COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ X

David Wilson

☐ Agent
☐ Addressee

B. Received by (Printed Name)

David Wilson

C. Date of Delivery

8/5/26

D. Is delivery address different from item 1? ☐ Yes

If YES, enter delivery address below: ☐ No

3. Service Type

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

45

all Restricted Delivery



TO: APOC Commissioners
DATE: July 14, 2026
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report *Jerad McClure v. David Wilson*, 25-26-CD

SUMMARY OF COMPLAINT AND RESPONSE

Complainant Jerad McClure filed complaint 25-26-CD alleging Respondent Wilson in 2020 made five expenditures not allowed by campaign disclosure rules on his year-end report.¹ Respondent did not file an answer to the complaint but provided information in response to APOC staff's request for information.²

SUMMARY OF STAFF RECOMMENDATIONS

APOC staff recommends the Commission find no violation relating to Respondent's expenditures and recommends dismissal of the complaint.

LAW

Alaska campaign disclosure law requires candidates to disclose expenditures and debts incurred by their campaigns. For expenditure, a candidate must describe the date of payment, check number or the identifying transaction number, name and address of the payee, purpose of the expenditure, and amount of the expenditure.³

Campaign funds held by a candidate may be used only to pay the expenses of the candidate that reasonably relate to election campaign activities and may not be used to give

¹ [Complaint 25-26-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27311), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27311>.

² Exhibit 1, Wilson Response to APOC request for information.

³ AS 15.13.040(a)(1)(A); 2 AAC 50.321(a)(5) (emphasis added).

a personal benefit to the candidate.⁴ After the date of the general election, a candidate with unused campaign funds shall distribute the funds to pay bills incurred for expenditures reasonably related to the campaign under AS 15.13.116.⁵ A candidate may retain the ownership of one computer that was acquired by and for use in the campaign.⁶

When APOC receives a properly filed complaint, Commission staff must undertake an investigation and present the investigation report.⁷ Staff bears the burden of proving a violation by a preponderance of the evidence.⁸

BACKGROUND FACTS AND ANALYSIS

Respondent Wilson was a candidate for the state senate during the general election. During his campaign, Respondent made expenditures to campaign vendors, reporting them on his regularly scheduled campaign reports required under AS 15.13.040 and AS 15.13.110.

Complainant alleged five of Respondent's expenditures on his 2020 year-end report⁹ were not acquired for use in the campaign:

11/02/2020	Credit Card	Best Buy 1200 N. Muldoon Rd Anchorage, Alaska 99504	Campaign computer, protection plan, and screen protector	\$2,659.93
11/02/2020	Credit Card	Computer Renaissance 1830 E. Park Hwy Suite A-113 Wasilla, Alaska 99654	Computer cables for display	\$97.34
11/13/2020	Credit Card	Best Buy 1200 N. Muldoon Rd Anchorage, Alaska 99504	Software-Office home and business	\$262.00
11/13/2020	Credit Card	Holiday Stationstore 225 N. Boundary St. Wasilla, Alaska 99654	Fuel for Campaign	\$40.80
11/20/2020	Credit Card	Best Buy 1200 N. Muldoon Rd Anchorage, Alaska 99504	Docking station and keyboard	\$319.77

Complainant points to the closeness of the purchase dates to the date of the election as his sole support for his allegations that Respondent violated campaign disclosure law. He

⁴ AS 15.13.112(a) and (b)(1).

⁵ 15.13.116(a)(1).

⁶ AS 15.13.116 (b).

⁷ 2 AAC 50.870; 2 AAC 50.891.

⁸ 2 AAC 50.891(d).

⁹ [Year-end report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=32883&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=32883&ViewType=CD>.

provides no evidence that the funds expended did not reasonably relate to election campaign activities or pay bills incurred for expenditures reasonably related to the campaign pursuant to AS 15.13.112 and AS 15.13.116.

In response to the allegations, Respondent observes:

The complaint incorrectly assumes that campaign activity ceases on Election Day. In reality, campaigns continue to have legal, administrative, and operational responsibilities after an election. Candidates remain responsible for completing final reporting requirements, preserving campaign records, managing campaign assets, and concluding campaign operations.¹⁰

Specific to the four computer related purchases Complainant questions, Respondent explains the campaign computer he had been using failed and needed to be replaced, to use for election related communications, documentation, and APOC reporting requirements including to “completion of ongoing campaign obligations after Election Day.” Specific to his November 13, 2020 purchase of \$40.80 in fuel, reported as “fuel for campaign,” Respondent reports the fuel was used to retrieve campaign signs scattered throughout the Senate district following the general election, “a normal and necessary component of concluding a campaign.”¹¹

CONCLUSION

APOC staff recommends the Commission find no violation relating to Respondent’s expenditures and recommends dismissal of the complaint.

¹⁰ Exhibit 1, Wilson Response to APOC request for information, p.2.

¹¹ *Id.*

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
David S. Wilson 3001 E. Danny's Ave. Wasilla, AK 99654 Dw22@rocketmail.com	☒ Certified Mail ☒ Email
Jerad McClure 2521 E. Mountain Village Dr. Ste B, PMB 600 Jeradmccclure@outlook.com	☒ Certified Mail ☒ Email

Cari Rousselle

Signature

07/14/2026

Date

From: [David](#)
To: [Stone, Kim S \(DOA\)](#)
Subject: Re: APOC request for information
Date: Wednesday, July 8, 2026 6:59:33 AM



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

I respectfully submit the following response to the complaint alleging improper campaign expenditures reported on my 2020 Year End Report.

Introduction

The allegations contained in the complaint are based on incorrect assumptions regarding the purpose and use of several campaign expenditures. The expenditures identified were legitimate campaign-related expenses incurred for campaign operations, post-election campaign activities, reporting obligations, and the preservation of campaign assets and records.

At no time were campaign funds converted to personal income or used for personal benefit in violation of Alaska campaign finance laws.

Fuel Purchases

The complaint challenges a fuel purchase reported on November 13, 2020, in the amount of \$40.80 at Holiday Stationstore. According to my report, this expenditure was accurately disclosed as "Fuel for Campaign."

This fuel purchase was made while using my personal vehicle to tow a trailer and collect campaign signs that were scattered throughout the Senate district following the General Election. Removal of campaign signs after an election is a normal and necessary component of concluding a campaign. The travel associated with locating, retrieving, transporting, and storing campaign signs was campaign-related activity, not personal travel.

Accordingly, the fuel expense was incurred directly in connection with campaign business and was properly reported as a campaign expenditure.

Computer and Computer Equipment Purchases

The complaint also challenges computer-related purchases made on November 2, November 13, and November 20, 2020, including:

- Computer, protection plan, and screen protector (\$2,659.93)
- Computer cables for display (\$97.34)
- Microsoft Office Home and Business software (\$262.00)

- Docking station and keyboard (\$319.77)

These purchases were made because the campaign computer I had been using failed and needed to be replaced. The replacement computer and related equipment were acquired for campaign use and were necessary to continue campaign operations and comply with campaign reporting requirements.

Following the election, significant campaign work remained to be completed, including:

- Preparing and filing required APOC disclosure reports.
- Maintaining and preserving campaign financial records.
- Storing and organizing digital campaign assets and records.
- Managing campaign communications and documentation.
- Completing end-of-campaign presentations and reporting activities.
- Preparing for the proper disposition and retention of campaign records as required by law.

The software, docking station, keyboard, cables, and related accessories were purchased to make the replacement computer functional for these campaign purposes. These items were not purchased for personal use but rather to replace failed equipment and allow completion of ongoing campaign obligations after Election Day.

Post-Election Campaign Activity

The complaint incorrectly assumes that campaign activity ceases on Election Day. In reality, campaigns continue to have legal, administrative, and operational responsibilities after an election. Candidates remain responsible for completing final reporting requirements, preserving campaign records, managing campaign assets, and concluding campaign operations.

The expenditures cited in the complaint were incurred during this post-election period and were directly related to those continuing responsibilities.

Good Faith Compliance

I have consistently made good-faith efforts to comply with Alaska campaign finance laws and APOC reporting requirements. The challenged expenditures were fully disclosed on my campaign reports, accurately described, and incurred for legitimate campaign purposes.

The complaint provides no evidence that campaign funds were converted to personal income or used for personal benefit. Instead, it relies solely upon speculation regarding expenditures that were clearly related to campaign operations, campaign asset management, and post-election reporting obligations.

Conclusion

For the reasons stated above:

1. The fuel expenditures were incurred while conducting campaign-related travel to retrieve campaign signs throughout the Senate district following the election.
2. The computer and related equipment were purchased to replace a failed computer and to enable completion of required campaign reporting, preservation of campaign records, storage of digital campaign assets, and end-of-campaign activities.
3. The expenditures were legitimate campaign expenses and were properly reported.
4. No campaign funds were converted to personal income or used for personal benefit.

Accordingly, I respectfully request that the Commission dismiss the complaint.

Respectfully submitted,

David Wilson

On Friday, June 26, 2026 at 05:28:11 PM AKDT, Stone, Kim S (DOA) <kim.stone@alaska.gov> wrote:

Good afternoon, Mr. Wilson:

Please see the attached APOC request for information relating to 25-26-CD, *McClure v. Wilson*. As this request will not reach you by close of business today, I have dated it June 29, 2026. (I have attached a copy of the complaint, for convenience.)

Thank you in advance for your assistance. Feel free to contact me if you have any questions.

Respectfully,

Kim Stone
Campaign Disclosure Coordinator
Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, Alaska 99508
Phone: (907) 276-4176
Fax: (907) 276-7018

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Subject: Staff Report Jerad McClue v. David Wilson, 25-26-CD



Staff Report Jerad
McClue v. D...

Rousselle, Cari J (DOA)

From: postmaster@outlook.com
To: jeradmclure@outlook.com
Sent: Tuesday, July 14, 2026 10:59 AM
Subject: Delivered: Staff Report Jerad McClue v. David Wilson, 25-26-CD

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Subject: Staff Report Jerad McClue v. David Wilson, 25-26-CD

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:

Jerad McClue
2521 E Mountain Village Dr
STE B, PMB 600
Wasilla AK 99654

9590 9402 9917 5335 2984 14



2. Article Number (Transfer from service label)

9549 0710 5270 1426 7222 62

Restricted Delivery

COMPLETE THIS SECTION ON DELIVERY

A. Signature ☒ Agent ☐ Addressee	
B. Received by (Printed Name) Jacey Ellis	C. Date of Delivery 7-16-76
D. Is delivery address different from item 1? ☐ Yes ☒ No If YES, enter delivery address below:	

3. Service Type

☐ Adult Signature	☐ Priority Mail Express®
☐ Adult Signature Restricted Delivery	☐ Registered Mail™
☐ Certified Mail®	☐ Registered Mail Restricted Delivery
☐ Certified Mail Restricted Delivery	☐ Signature Confirmation™
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1. Article Addressed to:

David S Wilson
3001 E Danny's Ave
Waila AK 99654



9590 9402 9917 5335 2984 07

2. Article Number (Transfer from service label)

9589 0710 5270 1126 7222 79

PS Form 3811, July 2020 PSN 7530-02-000-9053

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A. Signature

☒ X

☐ Agent
☐ Addressee

B. Received by (Printed Name)

David Wilson

C. Date of Delivery

D. Is delivery address different from item 1?

If YES, enter delivery address below:

☐ Yes
☐ No

3. Service Type

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

Restricted Delivery

Domestic Return Receipt