

[TAB 1]

Group Civil Penalty Appeals

Presented By:

John Whitlock, Paralegal



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

PREPARED BY: Mackenzie Pearson

DATE: May 15, 2026

RESPONDENT: Justin Creech

CIVIL PENALTY

ASSESSED UNDER: Campaign Disclosure: AS 15.13.390, 2 AAC 50.855

REASON FOR FILING:

LATE REPORT(S):

- **Campaign Disclosure Reports**
 - 15-5 Statement of Contributions

DUE DATE OF LATE FILED REPORT: March 13, 2026

REPORT FILED ON: April 5, 2026

NUMBER OF DAYS LATE: 23

DATE PENALTY ASSESSMENT SENT: April 15, 2026

DATE PENALTY APPEAL RECEIVED: May 8, 2026

MAXIMUM STATUTORY PENALTY: \$23,000

PENALTY ASSESSED: \$23,000

RECOMMENDATION: Reduction

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Affiant states that he is an inexperienced filer.
2. Affiant states that he was not aware at the time of his contribution that he had a personal filing obligation separate from the reports filed by the receiving entity. Affiant states that the contribution was independently reported by Friends of the Good Guys in its own filings, and his information as a contributor was part of the public record.

3. Affiant asserts that a complete waiver is appropriate under 2 AAC 50.855(b)(2)(A)(i) as he is a first-time filer. Affiant states that this is the first time he has ever been required to file a statement of contribution or any other disclosure document with APOC. Affiant asserts that the first-time filer exception applies across all filing types and does not exclude 24-hour reports.
4. Affiant asserts that under AS 15.13.040(r), the 24-hour reporting obligation applies to a contributor who “knows or has reason to know” that the recipient entity is likely to make independent expenditures. Affiant states that he did not have specific knowledge that Friends of the Good Guys had made or was likely to make independent expenditures in the April 7, 2026, election. Affiant asserts that if the knowledge element of AS 15.13.040(r) was not met at the time of the contributions, then the 24-hour reporting obligation was not triggered and no violation occurred.
5. Affiant asserts that, under 2 AAC 50.865(b)(5), his civil penalty is greatly out of proportion to the degree of harm to the public as it exceeds twice the value of the transaction that was reported late. Affiant also asserts that there has been no significant harm to the public as the contribution information was placed on public record through Friends of the Good Guys’ 7-day report filed on March 30, 2026.
6. Affiant states that he has had no late filings with APOC in the preceding 5 years.

STAFF’S ANALYSIS OF FACTS FOR COMMISSION REVIEW

- 1) Affiant contributed \$5,000 to Friends of the Good Guys on March 12, 2026. Friends of the Good Guys is an independent expenditure group whose purpose is to inform voters about their local government representatives and political candidates. Contributors to independent expenditure groups who intend to make independent expenditures in candidate elections are required to submit a Statement of Contributions form within 24 hours under AS 15.13.040. The Affiant cited 2 AAC 50.855(b)(2)(A)(i) as grounds for a complete waiver since Affiant was a first time filer. However, 2 AAC 50.855(b)(2)(A)(iv) prohibits waivers for those required to submit disclosures within 24 hours under AS 15.13.110 or AS 15.13.040.
- 2) Every individual, person, nongroup entity, or group that contributes more than \$2,000 in the aggregate in a calendar year to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent expenditures in one or more candidate elections in the current election cycle shall report making the contribution on a form prescribed by the commission not later than 24 hours after the contribution that requires the contributor to report under this subsection is made.¹ Whether or not Affiant had specific knowledge of the IE Group’s intentions, the Affiant still contributed \$5,000 to an independent expenditure group that made one or more independent expenditures in

¹ AS 15.13.040(r).

one or more candidate elections in the current election cycle, bringing the action within AS 15.13.040(r) and requiring him to file a 24-hour report.

- 3) The civil penalty in this matter may be reduced by a percentage up to 50% if the individual is an inexperienced filer, having been subject to a reporting requirement for less than 365 days² and a good filing history³ This is the Affiant's first 15-5 filing and first late filing.
- 4) A civil penalty may be reduced by a percentage greater than 50%, or waived entirely, if the penalty assessment is significantly out of proportion to the degree of harm suffered by the public and no aggravating factors are present.⁴ A penalty assessment is considered significantly out of proportion to degree of harm when it exceeds the value of the transactions that were reported late. Here, the value of the transactions reported late was \$5,000 and the penalty assessment was \$23,000 and there is no aggravating factors present.
- 5) A civil penalty may be reduced by a percentage greater than 50%, or waived entirely, if the missing information is readily available to the public through another forum.⁵ The unreported information was available to the public when the receiving group reported the contribution on its Seven Day Report March 30, 2026 (amended on April 5, 2026) and on its Independent Expenditure Form files on March 30, 2026 (amended on April 5, 2026)
- 6) Here, under all the circumstances, staff recommends that the maximum assessed penalty be reduced to \$200. Staff does not believe that a complete waiver is appropriate because the statute requires that a report be filed by the contributor whether or not the contribution is timely reported in another forum and because there are no unusual circumstances that would support a complete waiver.

FILER'S REPORTING HISTORY:

2026

Statement of Contributions 15-5 Late by 23 days

ACTIVITY ON LATE REPORT:

Contribution:	\$ 5,000
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² 2 AAC 50.865(a)(1)(B)
³ 2 AAC 50.865(a)(1)(A)
⁴ 2 AAC 50.865(b)(5)
⁵ 2 AAC 50.865(b)(4)

STAFF’S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff finds the following mitigation criteria applicable to the respondent’s appeal:

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- Good filing history (no late filings in the previous 5 years). **2 AAC 50.865(a)(1)(A)**
- Inexperienced filer.⁶ **2 AAC 50.865(a)(1)(B)**
- Technical error at APOC. **2 AAC 50.865(a)(2)**
- Reported information had a value of \$100 or less. **2 AAC 50.865(a)(3)**
- Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. **2 AAC 50.865(a)(4)**

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- Personal catastrophe/emergency or incapacitating illness. **2 AAC 50.865(b)(1)**
- APOC Staff error. **2 AAC 50.865(b)(2)**
- Report included only administrative costs. **2 AAC 50.865(b)(3)**
- No significant harm to the public and no aggravating factors.⁷ **2 AAC 50.865(b)(4)**
- The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.⁸ **2 AAC 50.865(b)(5)**
- A unique circumstance. **2 AAC 50.865(b)(6)**

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- Relying on another person or mailroom to mail, postmark or submit the statement on or before a due date. **2 AAC 50.865(c)(1)**
- Forgetting to file. **2 AAC 50.865(c)(2)**
- Being a volunteer. **2 AAC 50.865(c)(3)**
- Having no change in data from previous statements on file. **2 AAC 50.865(c)(4)**
- Relying on the filer’s staff to remind the filer of the filing deadline or to complete the report. **2 AAC 50.865(c)(5)**

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

⁷ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

⁸ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions

- Being too busy to file. **2 AAC 50.865(c)(6)**
- Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. **2 AAC 50.865(c)(7)**

Aggravating Factors [2 AAC 50.865(d)]:

- Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁹ **2 AAC 50.865(d)(1)**
- More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

- Waived**
- Reduced to \$200**
- Upheld at the assessed amount of \$**

⁹ Value greater than \$1000.

STATEMENT OF CONTRIBUTIONS FORM 15-5

COMPLETED

Submission Date: 04/05/2026

REPORT TYPE

Filing Reason: **Contributions of \$500 or more**Report Year: **2026**Filed As: **Individual**

FILING

Filer First Name: **Justin**Filer Middle Name: **D**Filer Last Name: **Creech**Filer Phone: **9073608945**Filer Email: **justintows@hotmail.com**Occupation: **Vulcan towing**Employer: **vulcan Towing**

INDIVIDUAL INFORMATION

First Name: **Justin**Last Name: **Creech**Address: **520 Fredricks Dr**City: **Anchorage**State: **Alaska****99504**Country: **United States**

CONTRIBUTIONS

Contribution Date	Recipient	Form of Contribution	Amount	Total Annual Contribution
03/12/2026	2026 - Friends of the Good Guys	Check Check Number: 15134	\$5,000.00	\$5,000.00

TRUE SOURCES

The Filer is the sole True Source for all contributed funds

REPORT SUMMARY

Number of Contributions Reported with this Report: 1

Total of Contributions Reported with this Report:

\$5,000.00

CAMPAIGN DISCLOSURE FORM

AMENDMENT

Amendment Description: Amend date for when campaign received contributions; original report used the date on the check and not when campaign chair received the checks.

COMPLETED

Submission Date: **04/05/2026**
 Filer First Name: **CHERYL**
 Filer Middle Name: **L**
 Filer Last Name: **FRASCA**
 Filer's Title: **APOC Reporting Administrator**
 Report Type: **Seven Day Report**

GROUP INFORMATION

Group Name: **2026 - Friends of the Good Guys**
 Group Abbreviation:
 Group Address: **8826 Sahalee Dr**
 City, State Zip: **Anchorage, Alaska 99516**

REPORT INFORMATION

Election Year: **2026**
 Election: **Anchorage Municipal Election**
 Report Type: **Seven Day Report**
 Reporting Period: From **03/07/2026** Through **03/28/2026**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$0.00				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$12,500.00	[+] ⇒	\$0.00	[=] ⇒	\$12,500.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$0.00	[+] ⇒	\$0.00	[=] ⇒	\$0.00
[=] ↓					
Closing Cash On Hand:	\$12,500.00				
[-] ↓					
Total Debts:	\$14,000.00				
[=] ↓					
Surplus/Deficit:	-\$1,500.00				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
03/20/2026	Check 2119	Bret, Kelly P.O. Box 244043 Anchorage, Alabama 99524	Occupation: President Employer: A-1 Lawn & Landscaping Description:	\$1,500.00
03/20/2026	Check 4745	Briley, Roger 3150 C St #200 Anchorage, Alaska 99503	Occupation: Realtor Employer: Briley & Associates Description:	\$2,000.00

Date Received	Payment Method	Contributor	Details	Amount
03/20/2026	Check 2237	BSI Consulting 3841 W. Dimond #200 Anchorage, Alaska 99502	Occupation: N/A Employer: N/A Description:	\$1,000.00
03/20/2026	Check 15134	Creech, Justin 520 Fredericks Dr Anchorage, Alaska 99504	Occupation: Operator Employer: Vulcan Towing Description:	\$5,000.00
03/20/2026	Check 1026	Kelly, Colby 725 E. 81st Avenue Anchorage, Alaska 99518	Occupation: Business Owner Employer: Self Description:	\$3,000.00
			Number of Contributions under \$100:	0
			Sum of Contributions under \$100:	\$0.00
			Income Total:	\$12,500.00

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
03/20/2026	Sockeye Red Services 440 Aurora Dr Anchorage, Alaska 99503	Design, placement of mail pieces in three Anchorage Assembly districts.	\$3,681.97	\$3,681.97
03/24/2026	AT Publishing & Printing 1720 Abbott Rd Anchorage, Alaska 99507	Printing, postage for mailers in three Anchorage Assembly districts.	\$10,318.03	\$10,318.03
			Remaining Debt Total:	\$14,000.00



Darryl L. Thompson, *Esq.* | AK, WA
Tyler Wright, *Esq.* | AK
Richard Hall, Paralegal
Pennelopy Lawson, Paralegal

May 8, 2026

Sent via Hand Delivery

Alaska Public Offices Commission
Attn: Civil Penalty Appeals
2221 E. Northern Lights Blvd., Room 128
Anchorage, Alaska 99503



Re: Civil Penalty Appeal

Dear APOC:

My office represents Justin Creech. He has asked that we provide to your office his affidavit in support of his Civil Appeal of the penalty assessed against him, as referenced in the accompanying affidavit.

Should you have any questions or concerns, please don't hesitate to contact me.

Sincerely,

/s/ Darryl L. Thompson.
Darryl L. Thompson, Esq.

cc: client file
Enclosures a/s

April 24, 2026

Alaska Public Offices Commission
Attn: Civil Penalty Appeals
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149

**RE: Civil Penalty Appeal — Notice of Penalty Assessment Dated April 15, 2026
Justin Creech — Late-Filed Statement of Contribution, AS 15.13.040(r)**

Dear Commission Staff and Commissioners:

I submit this affidavit to appeal the \$23,000 civil penalty assessed in the April 15, 2026 Notice regarding my late-filed Statement of Contribution for a March 12, 2026 contribution to Friends of the Good Guys (Entity 6903). I do not dispute that my filing was 23 days late. I take full responsibility for the violation. I respectfully request that the Commission waive or substantially reduce the penalty under the framework set out in 2 AAC 50.855 and 2 AAC 50.865, and that it consider suspending and setting aside any remaining penalty under AS 15.13.390(e).

Statement of Facts

On March 12, 2026, I made a single \$5,000 contribution to Friends of the Good Guys, an entity making independent expenditures in the April 7, 2026 Anchorage Municipal Election.

I have never previously registered with or filed any report, statement, or disclosure with the Alaska Public Offices Commission. A search of the APOC online reporting database confirms no prior filings under my name across all reporting categories, including Campaign Disclosure, POFD, and Lobbying. See Exhibit A (APOC database search results).

This was the first contribution I have ever made that triggered the reporting requirement under AS 15.13.040(r). I have never before been subject to this specific filing obligation, and this is my first election cycle in which I have been required to file any statement of contribution with APOC. I have no late filings with APOC in the preceding five years.

I was not aware at the time of my contribution that I had a personal filing obligation separate from the reports filed by the receiving entity. When I became aware of my obligation, I promptly submitted the Statement of Contribution on April 5, 2026.

The contribution was independently reported by Friends of the Good Guys in its own filings. My identity as contributor, the amount, the date, and the recipient are part of the public record in the APOC campaign finance database.

Grounds for Waiver or Reduction

1. Complete Waiver: First-Time Filer Exception — 2 AAC 50.855(b)(2)(A)(i)

Under 2 AAC 50.855(b)(2)(A)(i), APOC staff may not assess a civil penalty if the person responsible for the filing is a first-time filer. I have never previously registered with or filed any

report with APOC. This is the first time I have ever been required to file a statement of contributions or any other disclosure document with the Commission. The first-time filer exception applies across all filing types and is not carved out for 24-hour reports, unlike the first-error exceptions for contribution statements and independent expenditure reports. If I qualify as a first-time filer under this provision, and I respectfully submit that I do, the penalty must be waived entirely.

2. Threshold Defense: Reporting Obligation May Not Have Been Triggered

Under AS 15.13.040(r), the 24-hour reporting obligation applies to a contributor who “knows or has reason to know” that the recipient entity is likely to make independent expenditures. At the time I made my March 12, 2026 contribution, I did not have specific knowledge that Friends of the Good Guys had made or was likely to make independent expenditures in the April 7, 2026 election. I contributed as a supporter of the candidates the organization was formed to advance; I was not informed of or involved in the entity’s independent expenditure activity. If the knowledge element of AS 15.13.040(r) was not met at the time of contribution, the 24-hour reporting obligation was not triggered, and no violation occurred. I raise this as an alternative defense and invite the Commission to address the knowledge element in any order it issues.

3. Penalty is Significantly Out of Proportion — 2 AAC 50.865(b)(5)

Under 2 AAC 50.865(b)(5), a civil penalty is significantly out of proportion to the degree of harm to the public if it exceeds twice the value of the transaction reported late. Twice my \$5,000 contribution is \$10,000. The \$23,000 assessed penalty is 4.6 times the value of the contribution and 2.3 times the regulatory disproportionality threshold. APOC imposed the maximum statutory penalty under AS 15.13.390(a)(2) with no apparent downward adjustment. This factor alone, under the regulation, authorizes reduction by a percentage greater than 50%, up to complete waiver. The Alaska Supreme Court affirmed APOC’s application of this disproportionality provision as grounds for penalty waiver in *Alaska Policy Forum v. Alaska Public Offices Commission*, 583 P.3d 701 (2026).

4. Good Filing History — 2 AAC 50.865(a)(1)(A)

I have no late filings with APOC in the immediately preceding five years.

5. Inexperienced Filer — 2 AAC 50.865(a)(1)(B)

This is my first election cycle as a filer of a statement of contribution under AS 15.13.040(r). Under 2 AAC 50.865(a)(1)(B), an inexperienced filer includes a person engaged in their first election cycle as a filer of the form at issue. This factor supports an additional reduction of up to 50%.

6. No Significant Harm to the Public — 2 AAC 50.865(b)(4)

None of the aggravating factors under 2 AAC 50.865(d) apply. There is no evidence of deliberate non-reporting. I have cooperated fully with Commission staff, have no prior violations of AS 15.13, and have not omitted any substantial financial interest. The contribution information was

placed on the public record through Friends of the Good Guys' 7-day report filed March 30, 2026, well before the April 7 election. The public's ability to make informed electoral decisions was not materially impaired by the delay in my personal filing.

7. Suspended Penalty — AS 15.13.390(e)

In the alternative, I request that the Commission suspend imposition of the civil penalty and order it set aside pursuant to AS 15.13.390(e). That provision authorizes complete penalty relief where the Commission finds that the violation:

- (1) was not a repeat violation or part of a series or pattern;
- (2) was inadvertent; (3) was quickly corrected; and
- (4) had no adverse effect on the campaign of another.

All four conditions are met here. I have no prior violations of AS 15.13. My failure to file within 24 hours was inadvertent. I did not know I had a personal reporting obligation separate from the entity's own filings. I filed my Statement of Contribution as soon as I became aware of the obligation. And there is no evidence that my late filing adversely affected any other candidate's campaign.

8. Request for Written Statement of Reasons

If the Commission declines to waive or substantially reduce the penalty, I respectfully request that it issue a written statement of reasons explaining why the assessed penalty is appropriate in light of the mitigating facts submitted in this affidavit, as required under *VECO International, Inc. v. Alaska Public Offices Commission*, 753 P.2d 703 (1988).

Request for Relief

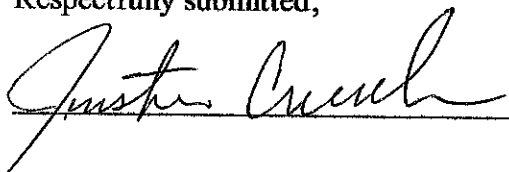
I acknowledge the violation, accept responsibility, and understand my ongoing obligations under AS 15.13.040(r). This will not happen again. I have consulted with counsel and am now fully informed of my reporting obligations going forward.

For the foregoing reasons, including first-time filer status, inexperienced filer status, the codified disproportionality of the assessed penalty, the absence of any aggravating factors or public harm, and the inadvertent nature of the violation, I respectfully request that the Commission:

- (1) waive the \$23,000 civil penalty in its entirety; or
- (2) substantially reduce the penalty consistent with 2 AAC 50.865; or
- (3) In the alternative, suspend imposition of the penalty under AS 15.13.390(e) and order it set aside upon a finding of no similar violation within one year.

I appreciate the Commission's consideration and am available to participate in any hearing, in person or telephonically.

Respectfully submitted,



Justin Creech
520 Fredricks Dr.
Anchorage, Alaska 99504
justintows@hotmail.com

CERTIFICATION

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct, and complete.

Justin Creech
Signature

5-4-24
Date

Subscribed and sworn to before me this 4 day of May, 2026.

Celeste Arellano-Reyes
Notary Public, State of ~~Alaska~~ Washington
My commission expires: 4/9/30



EXHIBIT A

APOC Online Database Search Results

Confirming No Prior APOC Filing History

Search 1: Statement of Contributions — Name: "creech"

Result: One filing only — the late-filed Statement of Contribution at issue in this appeal. No prior filings.

Search 2: POFD (Personal Financial Disclosure) — Name: "creech"

Result: Your Search Returned No Results.

Search 3: Lobbyist Registrations — Name: "creech"

Result: Your Search Returned No Results.

[Attach printed screenshots of APOC search results here]

STATE OF ALASKA

HOME | **POFD/LFD** | CAMPAIGN DISCLOSURE | LOBBYING | INDEPENDENT EXPENDITURES | COMMISSION ACTIONS

State of Alaska > Department of Administration > APOC > Online Reports > Campaigns > Statement of Contribution

STATEMENT OF CONTRIBUTION FORMS

Report Year: Status: Filed After: Filed Before: Any Name Filer Type:

Report Year	Filer Type	Name	Total Report	Contributions	Submitted	Status
2020	Individual	Creech, Justin	\$5,000.00	1	04/09/2020	Filed

Note: There are additional features and columns available by right-clicking the column headers. Columns may be grouped and un-grouped as desired. You may add and remove columns under the 'Additional Fields' sub-menu.

* Items with a black asterisk (*) have been Amended and may not represent the most current or accurate information.
 ** Items with two red asterisks (**) are Amendments.
 *** Items with three blue asterisks (***) have been filed by Apoc Staff members.

State of Alaska © 2020 Search Features

STATE OF ALASKA

HOME | **POFD/LFD** | CAMPAIGN DISCLOSURE | **LOBBYING** | INDEPENDENT EXPENDITURES | COMMISSION ACTIONS

State of Alaska > Department of Administration > APOC > Online Reports > Lobbying > Lobbyist Directory

LOBBYISTS DIRECTORY

Report Year: Lobbyist Name: Employer Name: Started After: Started Before: Terminated After: Terminated Before:

Report Year	Lobbyist Name	Employer Name	Start Date	Termination Date	Compensation	Amount
Your Search Returned No Results.						

Note: There are additional features and columns available by right-clicking the column headers. You may add and remove columns under the 'Additional Fields' sub-menu.

State of Alaska © 2020 Search Features

Exhibit A

APOC Online Reports

HOME POPD/LFD CAMPAIGN DISCLOSURE LOBBYING INDEPENDENT EXPENDITURES COMMISSION ACTIONS

State of Alaska > Department of Administration > APOC > Online Reports > POPD > Forms

POPD: FORMS

Report Year:
Status:
Filed After:
Filed Before:

Report Year	Name	Purpose	Search	Submitted	Status
Your Search Returned No Results.					

Note: There are additional features and columns available by right-clicking the column headers. You may add and remove columns under the 'Additional Fields' sub-menu.

* Items with a black asterisk (*) have been Amended and may not represent the most current or accurate information.

** Items with two red asterisks (**) are Amendments.

*** Items with three blue asterisks (***) have been filed by APOC Staff members.

Note: Only the financial statements of state and municipal candidates, seated legislators, the Governor and Lieutenant Governor are available online. Financial statements for other public officials are available upon written request.

Please send requests to apo.apoc@alaska.gov and include the name of the public official(s) and report year(s) you wish to receive.

Requests may also be mailed to: APOC, 2221 E Northern Lights Blvd. #128, Anchorage, AK 99508.

State of Alaska © 2020 Reportus Feedback

Exhibit A



April 15, 2026

Via Certified Mail, U.S. Mail, and Email

Justin Creech
520 Fredricks Dr.
Anchorage, Alaska 99504
justintows@hotmail.com

RE: Notice of Penalty Assessment
Late filed statement of contribution report¹

Dear Mr. Creech:

According to Alaska Public Offices Commission (APOC) records, you did not timely file a statement of contribution campaign disclosure report relating to your March 12, 2026 contribution of \$5,000 to Friends of the Good Guys, due March 13, 2026. Instead, the report was filed April 5, 2026 (23 days late). By law, a maximum penalty of \$1,000 accrues each day the report is late.² The maximum penalty APOC could assess you is **\$23,000**.³

Additionally, please be advised:

- 1) You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the "State of Alaska" to our office at the address above; visiting our [website](#)⁴ to make a payment by credit card; or by paying in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan or have any other question concerning this matter, please contact the APOC staff.
- 2) Alternatively, you have the right to appeal staff's conclusion that a violation has occurred or the penalty amount assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

¹ AS 15.13.040(r).

² AS 15.13.390(a)(2).

³ 2 AAC 50.855(a).

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

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

⁵ 2 AAC 50.831(a).

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in person or telephonically.

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General’s Office.⁶

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION

Iglas Dubed

Iglas Dubed
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Individual File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Justin Creech 520 Fredricks Dr. Anchorage, Alaska 99504 justintows@hotmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

Iglas Dubed
Paralegal

04/15/2026
Date

⁶ 2 AAC 50.895.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

May 15, 2026

Via Certified Mail and Email

Darryl Thompson
880 N. St., Ste 101
Anchorage, Alaska 99501
office@akdltlaw.com

RE: Commission Meeting Notice

Dear Mr. Creech:

The Commission will review the staff recommendations in this matter at its June 2-3, 2026 Commission Meeting in Anchorage, Alaska.

Currently, the matter is scheduled to be considered at **12:35 p.m. on Tuesday, June 2, 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 wish to present or make a statement to the Commission, please notify staff prior to the meeting so they can pull your matter from the agenda.

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

Encl: Staff Recommendations

CC: Justin Creech – email only

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Justin Creech 520 Fredricks Dr. Anchorage, Alaska 99504 justintows@hotmail.com	<input checked="" type="checkbox"/> Email
Darryl Thompson 880 N. St., Ste 101 Anchorage, Alaska 99501 office@akdltlaw.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

Cari Rousselle 05/15/2026

Signature Date

Rousselle, Cari J (DOA)

From: postmaster@akdltlaw.com
To: office@akdltlaw.com
Sent: Friday, May 15, 2026 3:25 PM
Subject: Delivered: Commission Meeting Notice

Your message has been delivered to the following recipients:

office@akdltlaw.com (office@akdltlaw.com)

Subject: Commission Meeting Notice



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

PREPARED BY: Mackenzie Pearson

DATE: May 15, 2026

RESPONDENT: David Frazier

CIVIL PENALTY

ASSESSED UNDER: Campaign Disclosure: AS 15.13.390, 2 AAC 50.855

REASON FOR FILING:

LATE REPORT(S):

- **Campaign Disclosure Reports**
 - 15-5 Statement of Contributions

DUE DATE OF LATE FILED REPORT: March 19, 2026

REPORT FILED ON: April 22, 2026

NUMBER OF DAYS LATE: 34

DATE PENALTY ASSESSMENT SENT: May 4, 2026

DATE PENALTY APPEAL RECEIVED: April 22, 2026

MAXIMUM STATUTORY PENALTY: \$34,000

PENALTY ASSESSED: \$34,000

RECOMMENDATION: Reduction

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Affiant states that he was not aware of the reporting requirement until he received the Notice of Deficiency letter on April 22, 2026. Affiant reported it was an unintentional mistake and asked that the penalty be waived due to his inexperience with the process.

STAFF’S ANALYSIS OF FACTS FOR COMMISSION REVIEW

- 1) Affiant contributed \$2,500 to Alaska Family Action, Inc. on March 18, 2026. Alaska Family Action, Inc. is an entity that educates and advocates on behalf of pro-family issues, as well as supporting or opposing legislation, public education campaigns, and candidates. Under AS 15.13.040(r), “every individual, person, nongroup entity, or group that contributes more than \$2,000 in the aggregate in a calendar year to an entity that made one or more independent expenditures” is required to “report making the contribution on a form prescribed by the commission not later than 24 hours after the contribution” is made. The Affiant did not file his 15-5 report until April 22, 2026.
- 2) The civil penalty in this matter may be reduced by a percentage up to 50% if the individual is an inexperienced filer, having been subject to a reporting requirement for less than 365 days.¹ This is the Affiant’s first 15-5 filing.
- 3) A civil penalty may be reduced by a percentage greater than 50%, or waived entirely, if the penalty assessment is significantly out of proportion to the degree of harm suffered by the public and no aggravating factors are present.² A penalty assessment is considered significantly out of proportion to degree of harm when it exceeds the value of the transactions that were reported late. Here, the value of the transaction reported late was \$2,500 and the penalty assessment was \$34,000 and there are no aggravating factors present. Additionally, the unreported information was available to the public when the receiving group reported the contribution on March 25, 2026.
- 4) Here, under all the circumstances, staff recommends the maximum assessed penalty be reduced to \$200. Staff does not believe that a complete waiver is appropriate because the statute requires that a report be filed by the contributor whether or not the contribution is timely reported in another forum and because there are no unique circumstances that would support a complete waiver.

FILER’S REPORTING HISTORY:

2026

Statement of Contributions 15-5 Late by 34 days

ACTIVITY ON LATE REPORT:

Contribution:	\$ 2,500
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¹ 2 AAC 50.865(a)(1)(B)

² 2 AAC 50.865(b)(5)

STAFF’S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff finds the following mitigation criteria applicable to the respondent’s appeal:

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- Good filing history (no late filings in the previous 5 years). 2 AAC 50.865(a)(1)(A)
- Inexperienced filer.³ 2 AAC 50.865(a)(1)(B)
- Technical error at APOC. 2 AAC 50.865(a)(2)
- Reported information had a value of \$100 or less. 2 AAC 50.865(a)(3)
- Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. 2 AAC 50.865(a)(4)

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- Personal catastrophe/emergency or incapacitating illness. 2 AAC 50.865(b)(1)
- APOC Staff error. 2 AAC 50.865(b)(2)
- Report included only administrative costs. 2 AAC 50.865(b)(3)
- No significant harm to the public and no aggravating factors.⁴ 2 AAC 50.865(b)(4)
- The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.⁵ 2 AAC 50.865(b)(5)
- A unique circumstance. 2 AAC 50.865(b)(6)

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- Relying on another person or mailroom to mail, postmark or submit the statement on or before a due date. 2 AAC 50.865(c)(1)
- Forgetting to file. 2 AAC 50.865(c)(2)
- Being a volunteer. 2 AAC 50.865(c)(3)
- Having no change in data from previous statements on file. 2 AAC 50.865(c)(4)

³ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁴ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

⁵ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions

- Relying on the filer’s staff to remind the filer of the filing deadline or to complete the report. **2 AAC 50.865(c)(5)**
- Being too busy to file. **2 AAC 50.865(c)(6)**
- Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. **2 AAC 50.865(c)(7)**

Aggravating Factors [2 AAC 50.865(d)]:

- Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁶ **2 AAC 50.865(d)(1)**
- More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

- Waived**
- Reduced to \$200**
- Upheld at the assessed amount of \$**

⁶ Value greater than \$1000.

COMPLETEDSubmission Date: **04/22/2026**

REPORT TYPE

Filing Reason: **Contributions in excess of \$2,000**Report Year: **2026**Filed As: **Individual**

FILING

Filer First Name: **DAVID**Filer Middle Name: **J**Filer Last Name: **FRAZIER**Filer Phone: **9072444815**Filer Email: **david.frazier@dfabenefits.com**Occupation: **Insurance Producer**Employer: **David Frazier and Associates Incorporated**

INDIVIDUAL INFORMATION

First Name: **DAVID**Last Name: **FRAZIER**Address: **2636 Shepherdia Drive**City: **Anchorage**State: **Alaska****99508**Country: **United States**

CONTRIBUTIONS

Contribution Date	Recipient	Form of Contribution	Amount	Total Annual Contribution
03/18/2026	2026 - Alaska Family Action, Inc. [IE]	Check Check Number: 9985	\$2,500.00	\$2,500.00

TRUE SOURCES

The Filer is the sole True Source for all contributed funds

REPORT SUMMARY

Number of Contributions Reported with this Report: **1**

Total of Contributions Reported with this Report:

\$2,500.00

COMPLETED

Submission Date: **03/25/2026**

FILER INFORMATION

Filer First Name: **Kimberly**
 Filer Middle Name: **Ann**
 Filer Last Name: **Hummer-Minnery**
 Filer Full Address: **PO Box 231425**
Anchorage, Alaska 99523-1425
 Filer Occupation: **Administrator**
 Filer Employer: **Alaska Family Council**
 Filer's Title with Other Entity: **Administrator**

REPORT INFORMATION

Report Year: **2026**
 Election Year: **2026**
 Report Type: **Ten Day**
 Filer Type: **Other**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Family Action, Inc.**
 Type of Business or Organization: **Registered Entity**
 Address: **PO Box 231425**
 City: **Anchorage**
 State: **Alaska**
99523
 Country: **United States**
 Business/Other Entity Contact Person: **James Minnery**
 Contact E-mail: **kim_aksci@hotmail.com**
 Contact Phone: **9072270346**

ELECTION INFORMATION

Election: **Anchorage Municipal Election**

OFFICERS

Name	Full Address	Title
Jake Libbey	PO Box 231425 Anchorage, Alaska 99523	Board Chair
John Fleming	PO Box 231425 Anchorage, Alaska 99523	Board Member
Nancy Bienvenue	PO Box 231425 Anchorage, Alaska 99523	Board Member
Tetyana Robbins	PO Box 231425 Anchorage, Alaska 99523	Board Member
Chris Brown	PO Box 231425 Anchorage, Alaska 99523	Board Member
Clayton Trotter	PO Box 231425 Anchorage, Alaska 99523	Board Member

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
03/20/2026	Petroleum Club 3301 C Street Anchorage, Alaska 99503	Credit Card	SUPPORT: 2026 - Bruce Vergason Election: Anchorage Municipal Election Q & A luncheon for Anchorage Assembly candidates to promote/support Dave Donley, Brian Flynn, Cody Anderson, Bruce Vergason, Donald Handeland.	\$2,900.00
03/20/2026	Fed Ex 300 East Dimond Blvd, suite A Anchorage, Alaska 99515	Credit Card	SUPPORT: 2026 - Bruce Vergason Election: Anchorage Municipal Election QR code card to promote electronic voter guide to share answers on survey for Anchorage Assembly candidates and school board candidates to include Dave Donley, Brian Flynn, Cody Anderson, Bruce Vergason, Donald Handeland, Nick Danger, Sharon Gibbons. Voter guide does not directly support or endorse candidates.	\$128.81
03/23/2026	Alaska Family Action PO Box 231425 Anchorage, Alaska 99523-1425	Non-Monetary Description: digital endorsement card	SUPPORT: 2026 - Bruce Vergason Election: Anchorage Municipal Election Creation of digital endorsement card to promote/endorse Anchorage Assembly candidates to include Dave Donley, Brian Flynn, Cody Anderson, Bruce Vergason, Donald Handeland.	\$100.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
03/15/2026	Type: Individual Name: Kim Minnery PO Box 231425 Anchorage, Alaska 99523	Occupation: Administrator Employer: Alaska Family Action , Alaska	\$500.00
Contributor is True Source			
03/18/2026	Type: Individual Name: David Frazier 2636 Shepherdia Drive Anchorage, Alaska 99508	Occupation: Retired Employer: Retired , Alaska	\$2,500.00
Contributor is True Source			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	3
Total of paid Expenditures:	\$3,128.81
<hr/>	
Previous Contributions:	\$1,575.00
Number of Contributions Reported with this Report:	2
Total of Contributions Reported with this Report:	\$3,000.00
Cumulative Contribution Amounts:	\$4,575.00
<hr/>	
Number of Officers:	6

Number of Debts Reported with this Report: 0

Total of Debts Incurred but not yet paid:

\$0.00

ARRIVED

APR 22 2026

APOC - ANCH
PM HC FAX ELE

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: David J. Frazier

Office: A.P.O.C.

Penalty issued in connection with (check box or boxes):

- | | | |
|---|--|---|
| <input type="checkbox"/> 30 Day Report | <input type="checkbox"/> 105 Day Report | <input checked="" type="checkbox"/> Statement of Contributions (15-5) |
| <input type="checkbox"/> 7 Day Report | <input type="checkbox"/> Year End Report | <input type="checkbox"/> Independent Expenditure (15-6) |
| <input type="checkbox"/> 24 Hour Report | <input type="checkbox"/> Registration | <input type="checkbox"/> Paid for By Identifier |
| <input type="checkbox"/> Other: _____ | | |

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): 2026 Anchorage Municipal election

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of the AS 15.13, the Alaska Campaign Disclosure Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

I made a contribution in good faith during the first quarter of 2026 to a local organization that helps "get out the vote" prior to election cycles in Anchorage. However, I have never before made a donation to this organization at this level, which was \$2500. The donation was reported to A.P.O.C. via the organization, and the first time I knew of the filing requirement for such a donation was when I received the letter today, April 22, 2026. I immediately filed the Statement of Contribution online, through "MyAlaska.gov". This was an unintentional mistake, and I ask that the penalty be waved due to my inexperience with this process.

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct, and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.


David J. Frazier, April 22, 2026

David Frazier

From: David Frazier
Sent: Wednesday, April 22, 2026 11:37 AM
To: john.whitlock@alaska.gov
Subject: Statement of Contributions 2026 - filed
Attachments: 2026 Statement of Contributions.pdf

Dear Mr. Whitlock,

This morning I received your certified mail dated April 21, 2026, and information regarding a requirement for filing a Statement of Contribution for a donation I made during the first quarter of 2026.

I apologize for not knowing that there was a requirement to report this donation to the State of Alaska within 24 hours.

Per your written instructions, I have filed the required form 15-5 through the "MyAlaska.gov" website, and have attached a copy with this email for your review.

You sent me a form titled "Civil Penalty Appeal Affidavit" with your letter. The letter states that this form must be filed within 30 days. I will hand deliver the Affidavit to your office today.

Please let me know if there is anything else I must do.

David Frazier
c: (907) 244-4815

David Frazier

From: David Frazier
Sent: Wednesday, April 22, 2026 12:29 PM
To: john.whitlock@alaska.gov
Subject: Civil Penalty Appeal Affidavit
Attachments: 2026 Affidavit_Civil Penalty Appeal.pdf

Dear Mr. Whitlock,

I have filled out the above referenced form per your instructions, and I'm attaching a copy of it to this email.

I will hand deliver this form to your office today.

David Frazier
DFA Benefits Inc.
Anchorage Alaska
c: (907) 244-4815



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

April 21, 2026

VIA CERTIFIED MAIL & U.S. MAIL

David Frazier
2636 Shepherdia Dr.
Anchorage, AK 99508

RE: Notice of Deficiency¹
Statement of Contributions Report – Due March 19, 2026

Dear Mr. Frazier:

According to our records, your Statement of Contributions Report that was due on March 19, 2026.² Every individual, person, nongroup entity, or group contributing more than \$2,000 in the aggregate in a calendar year to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent expenditures in one or more candidate elections in the current election cycle must file a Statement of Contributions disclosing the contribution and the total amount of contributions to the group within 24 hours of making the contribution.³ Failure to timely file a report results in the assessment of civil penalties for failure to comply with the provisions of the Campaign Disclosure law under Alaska Statute 15.13.

As of the date of this letter, your Statement of Contributions Report is **33** days late and the accrued maximum penalty is **\$33,000**. This penalty continues to accrue by law at a rate of \$1,000 per-day until your Statement of Contributions Report is filed.⁴

To stop the accrual of penalties, you must file your Statement of Contributions Report. After your statement is filed, you will be notified of the assessed penalty amount. You have a right to appeal the assessment of a penalty. To do so, **you must submit your delinquent report and the enclosed appeal affidavit to the Commission within 30 days.** APOC staff will review your affidavit and prepare a recommendation for the Commission.

¹ 2 AAC 50.850(b).

² 3/18/26, \$2,500 contribution to Alaska Family Action, Inc.

³ AS 15.13.040(r).

⁴ AS 15.13.390(a)(2)

You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in-person or telephonically.

Failure to respond to this notice by filing the report, making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the total accrued penalty as of the date of the order; and referral to the Attorney General's Office for appropriate action.⁵

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal II

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865
Filing Instructions

cc: Individual File (w/o enclosures)

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 Frazier 2636 Shepherdia Dr. Anchorage, AK 99508	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail

Cari Rousselle
Law Office Assistant

04/21/2026
Date

⁵ 2 AAC 50.895.

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:

David Frazier
2636 Shepherdia Dr
Anchorage AK 99508



9590 9402 9692 5199 6807 63

2. Article Number (Transfer from service label)

9489 0090 0027 6711 2469 62

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
William Anthony
B. Received by (Printed Name) Addressee
William Frazier Date of Delivery
4/22/20
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 | |

Domestic Return Receipt



May 12, 2026

Via Certified Mail, U.S. Mail, & Email

David Frazier
2636 Shepherdia Dr
Anchorage, AK 99508
David.frazier@dfabenefits.com

RE: Notice of Penalty Assessment
24 Hour True Source Statement of Contributions Report¹

Mr. Frazier:

According to our records you did not timely file your 24-Hour True Source Statement of Contributions Report that was due on March 19, 2026.² Instead, your report was filed on April 22, 2026 (34 days late). By law, a maximum penalty of \$1,000 accrues each day the report is late.³ **Accordingly the assessed penalty owed is \$34,000.**⁴

Additionally, please be advised:

- 1) You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the "State of Alaska" to our office at the address above; visiting our [website](#)⁵ to make a payment by credit card; or you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.

¹ AS 15.13.040(r).

² 3/18/2026 \$2,500 contribution to Alaska Family Action, Inc.

³ AS 15.13.390(a)(2).

⁴ 2 AAC 50.855(a).

⁵ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

- 2) Alternatively, you have the right to appeal staff’s conclusion that a violation has occurred or the penalty amount assessed.⁶ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in person or telephonically.

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General’s Office.⁷

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION

Mackenzie Pearson

Mackenzie Pearson
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Individual File (w/o enclosures)

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 Frazier 2636 Shepherdia Dr Anchorage, AK 99508 David.frazier@dfabenefits.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

Cari Rousselle

05/12/2026

Signature

Date

⁶ 2 AAC 50.831(a).

⁷ 2 AAC 50.895.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

May 15, 2026

Via Certified Mail and Email

David Frazier
2636 Shepherdia Dr
Anchorage, AK 99508
david.frazier@dfabenefits.com

RE: Commission Meeting Notice

Dear Mr. Frazier:

The Commission will review the staff recommendations in this matter at its June 2-3, 2026 Commission Meeting in Anchorage, Alaska.

Currently, the matter is scheduled to be considered at **12:35 p.m. on Tuesday, June 2, 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 wish to present or make a statement to the Commission, please notify staff prior to the meeting so they can pull your matter from the agenda.

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

Mackenzie Pearson
Mackenzie Pearson
Paralegal

Encl: Staff Recommendations

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 Frazier 2636 Shepherdia Dr Anchorage, AK 99508 david.frazier@dfabenefits.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

Cari Rousselle

05/15/2026

Signature

Date



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

PREPARED BY: Mackenzie Pearson

DATE: May 15, 2026

RESPONDENT: Colby Kelly

CIVIL PENALTY

ASSESSED UNDER: **Campaign Disclosure: AS 15.13.390, 2 AAC 50.855**

REASON FOR FILING:

LATE REPORT(S):

- **Campaign Disclosure Reports**
 - 15-5 Statement of Contributions

DUE DATE OF LATE FILED REPORT: March 11, 2026

REPORT FILED ON: April 7, 2026

NUMBER OF DAYS LATE: 27

DATE PENALTY ASSESSMENT SENT: April 15, 2026

DATE PENALTY APPEAL RECEIVED: April 29, 2026

MAXIMUM STATUTORY PENALTY: \$27,000

PENALTY ASSESSED: \$27,000

RECOMMENDATION: Reduction

(See "Staff's Recommendation Based on Standard Mitigation Criteria")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Affiant states that he is an inexperienced filer.
2. Affiant states that he was not aware at the time of his contribution that he had a personal filing obligation separate from the reports filed by the receiving entity. Affiant states that the contribution was independently reported by Friends of the Good Guys in its own filings, and his information as a contributor was part of the public record.

3. Affiant asserts that a complete waiver is appropriate under 2 AAC 50.855(b)(2)(A)(i) as he is a first-time filer. Affiant states that this is the first time he has ever been required to file a statement of contribution or any other disclosure document with APOC. Affiant asserts that the first-time filer exception applies across all filing types and does not exclude 24-hour reports.
4. Affiant asserts that under AS 15.13.040(r), the 24-hour reporting obligation applies to a contributor who “knows or has reason to know” that the recipient entity is likely to make independent expenditures. Affiant states that he did not have specific knowledge that Friends of the Good Guys had made or was likely to make independent expenditures in the April 7, 2026, election. Affiant asserts that if the knowledge element of AS 15.13.040(r) was not met at the time of the contributions, then the 24-hour reporting obligation was not triggered and no violation occurred.
5. Affiant asserts that, under 2 AAC 50.865(b)(5), his civil penalty is greatly out of proportion to the degree of harm to the public as it exceeds twice the value of the transaction that was reported late. Affiant also asserts that there has been no significant harm to the public as the contribution information was placed on public record through Friends of the Good Guys’ 7-day report filed on March 30, 2026.
6. Affiant states that he has had no late filings with APOC in the preceding 5 years.

STAFF’S ANALYSIS OF FACTS FOR COMMISSION REVIEW

- 1) Affiant contributed \$3,000 to Friends of the Good Guys on March 10, 2026. Friends of the Good Guys is an independent expenditure group whose purpose is to inform voters about their local government representatives and political candidates. Contributors to independent expenditure groups who intend to make independent expenditures in candidate elections are required to submit a Statement of Contributions form within 24 hours under AS 15.13.040. The Affiant cited 2 AAC 50.855(b)(2)(A)(i) as grounds for a complete waiver since Affiant was a first-time filer. However, 2 AAC 50.855(b)(2)(A)(iv) prohibits waivers for those required to submit disclosures within 24 hours under AS 15.13.110 or AS 15.13.040.
- 2) Every individual, person, nongroup entity, or group that contributes more than \$2,000 in the aggregate in a calendar year to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent expenditures in one or more candidate elections in the current election cycle shall report making the contribution on a form prescribed by the commission not later than 24 hours after the contribution that requires the contributor to report under this subsection is made.¹ Whether or not Affiant had specific knowledge of the IE Group’s intentions, the Affiant still contributed \$3,000 to an independent expenditure group that made one or more independent expenditures in

¹ AS 15.13.040(r).

one or more candidate elections in the current election cycle, bringing the action within AS 15.13.040(r) and requiring him to file a 24-hour report,

- 3) The civil penalty in this matter may be reduced by a percentage up to 50% if the individual is an inexperienced filer, having been subject to a reporting requirement for less than 365 days² and a good filing history³ This is the Affiant’s first 15-5 filing and first late filing.
- 4) A civil penalty may be reduced by a percentage greater than 50%, or waived entirely, if the penalty assessment is significantly out of proportion to the degree of harm suffered by the public and no aggravating factors are present.⁴ A penalty assessment is considered significantly out of proportion to degree of harm when it exceeds the value of the transactions that were reported late. Here, the value of the transactions reported late was \$3,000 and the penalty assessment was \$27,000 and there are no aggravating factors present.
- 5) A civil penalty may be reduced by a percentage greater than 50%, or waived entirely, if the missing information is readily available to the public through another forum.⁵ The unreported information was available to the public when the receiving group reported the contribution on its Seven Day Report March 30, 2026 (amended on April 5, 2026) and on its Independent Expenditure Form files on March 30, 2026 (amended on April 5, 2026)
- 6) Here, under all the circumstances, staff recommends that the maximum assessed penalty be reduced to \$200. Staff does not believe that a complete waiver is appropriate because the statute requires that a report be filed by the contributor whether or not the contribution is timely reported in another forum and because there are no unusual circumstances that would support a complete waiver.

FILER’S REPORTING HISTORY:

2026

Statement of Contributions 15-5 Late by 27 days

ACTIVITY ON LATE REPORT:

Contribution:	\$ 3,000
----------------------	-----------------

² 2 AAC 50.865(a)(1)(B)
³ 2 AAC 50.865(a)(1)(A)
⁴ 2 AAC 50.865(b)(5)
⁵ 2 AAC 50.865(b)(4)

STAFF’S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff finds the following mitigation criteria applicable to the respondent’s appeal:

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- Good filing history (no late filings in the previous 5 years). **2 AAC 50.865(a)(1)(A)**
- Inexperienced filer.⁶ **2 AAC 50.865(a)(1)(B)**
- Technical error at APOC. **2 AAC 50.865(a)(2)**
- Reported information had a value of \$100 or less. **2 AAC 50.865(a)(3)**
- Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. **2 AAC 50.865(a)(4)**

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- Personal catastrophe/emergency or incapacitating illness. **2 AAC 50.865(b)(1)**
- APOC Staff error. **2 AAC 50.865(b)(2)**
- Report included only administrative costs. **2 AAC 50.865(b)(3)**
- No significant harm to the public and no aggravating factors.⁷ **2 AAC 50.865(b)(4)**
- The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.⁸ **2 AAC 50.865(b)(5)**
- A unique circumstance. **2 AAC 50.865(b)(6)**

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- Relying on another person or mailroom to mail, postmark or submit the statement on or before a due date. **2 AAC 50.865(c)(1)**
- Forgetting to file. **2 AAC 50.865(c)(2)**
- Being a volunteer. **2 AAC 50.865(c)(3)**
- Having no change in data from previous statements on file. **2 AAC 50.865(c)(4)**
- Relying on the filer’s staff to remind the filer of the filing deadline or to complete the report. **2 AAC 50.865(c)(5)**

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

⁷ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

⁸ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions

- Being too busy to file. **2 AAC 50.865(c)(6)**
- Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. **2 AAC 50.865(c)(7)**

Aggravating Factors [2 AAC 50.865(d)]:

- Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁹ **2 AAC 50.865(d)(1)**
- More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

- Waived**
- Reduced to \$200**
- Upheld at the assessed amount of \$**

⁹ Value greater than \$1000.

COMPLETED

Submission Date: **04/07/2026**

REPORT TYPE

Filing Reason: **Contributions in excess of \$2,000**
 Report Year: **2026**
 Filed As: **Individual**

FILING

Filer First Name: **Colby**
 Filer Middle Name: **R**
 Filer Last Name: **Kelly**
 Filer Phone: **9079528929**
 Filer Email: **colby@kellyllc.net**
 Occupation: **self employed**
 Employer: **Kelly Lawn and Landscaping LLC**

INDIVIDUAL INFORMATION

First Name: **Colby**
 Last Name: **Kelly**
 Address: **725 e 81st Ave**
 City: **Anchorage**
 State: **Alaska**
99518
 Country: **United States**

CONTRIBUTIONS

Contribution Date	Recipient	Form of Contribution	Amount	Total Annual Contribution
03/10/2026	2026 - Friends of the Good Guys	Check Check Number: 1026	\$3,000.00	\$3,000.00

TRUE SOURCES

The Filer is the sole True Source for all contributed funds

REPORT SUMMARY

Number of Contributions Reported with this Report: 1
Total of Contributions Reported with this Report: \$3,000.00

CAMPAIGN DISCLOSURE FORM

AMENDMENT

Amendment Description: Amend date for when campaign received contributions; original report used the date on the check and not when campaign chair received the checks.

COMPLETED

Submission Date: **04/05/2026**
 Filer First Name: **CHERYL**
 Filer Middle Name: **L**
 Filer Last Name: **FRASCA**
 Filer's Title: **APOC Reporting Administrator**
 Report Type: **Seven Day Report**

GROUP INFORMATION

Group Name: **2026 - Friends of the Good Guys**
 Group Abbreviation:
 Group Address: **8826 Sahalee Dr**
 City, State Zip: **Anchorage, Alaska 99516**

REPORT INFORMATION

Election Year: **2026**
 Election: **Anchorage Municipal Election**
 Report Type: **Seven Day Report**
 Reporting Period: From **03/07/2026** Through **03/28/2026**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$0.00				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$12,500.00	[+] ⇒	\$0.00	[=] ⇒	\$12,500.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$0.00	[+] ⇒	\$0.00	[=] ⇒	\$0.00
[=] ↓					
Closing Cash On Hand:	\$12,500.00				
[-] ↓					
Total Debts:	\$14,000.00				
[=] ↓					
Surplus/Deficit:	-\$1,500.00				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
03/20/2026	Check 2119	Bret, Kelly P.O. Box 244043 Anchorage, Alabama 99524	Occupation: President Employer: A-1 Lawn & Landscaping Description:	\$1,500.00
03/20/2026	Check 4745	Briley, Roger 3150 C St #200 Anchorage, Alaska 99503	Occupation: Realtor Employer: Briley & Associates Description:	\$2,000.00

Date Received	Payment Method	Contributor	Details	Amount
03/20/2026	Check 2237	BSI Consulting 3841 W. Dimond #200 Anchorage, Alaska 99502	Occupation: N/A Employer: N/A Description:	\$1,000.00
03/20/2026	Check 15134	Creech, Justin 520 Fredericks Dr Anchorage, Alaska 99504	Occupation: Operator Employer: Vulcan Towing Description:	\$5,000.00
03/20/2026	Check 1026	Kelly, Colby 725 E. 81st Avenue Anchorage, Alaska 99518	Occupation: Business Owner Employer: Self Description:	\$3,000.00
			Number of Contributions under \$100:	0
			Sum of Contributions under \$100:	\$0.00
			Income Total:	\$12,500.00

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
03/20/2026	Sockeye Red Services 440 Aurora Dr Anchorage, Alaska 99503	Design, placement of mail pieces in three Anchorage Assembly districts.	\$3,681.97	\$3,681.97
03/24/2026	AT Publishing & Printing 1720 Abbott Rd Anchorage, Alaska 99507	Printing, postage for mailers in three Anchorage Assembly districts.	\$10,318.03	\$10,318.03
			Remaining Debt Total:	\$14,000.00

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: Colby Kelly

Office: _____

Penalty issued in connection with (check box or boxes):

- | | | |
|--|--|---|
| <input type="checkbox"/> 30 Day Report | <input type="checkbox"/> 105 Day Report | <input checked="" type="checkbox"/> Statement of Contributions (15-5) |
| <input type="checkbox"/> 7 Day Report | <input type="checkbox"/> Year End Report | <input type="checkbox"/> Independent Expenditure (15-6) |
| <input checked="" type="checkbox"/> 24 Hour Report | <input type="checkbox"/> Registration | <input type="checkbox"/> Paid for By Identifier |
| <input type="checkbox"/> Other: _____ | | |

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): 26 muni

Instructions: If you send payment, you need not file this form. An affidavit is required only if you are appealing the civil penalty assessment. An affidavit must be self-certified or notarized by any person authorized to administer oaths.

Statement:

I do hereby swear and affirm that this statement of facts is offered in mitigation of the civil penalty issued in connection with a violation of the AS 15.13, the Alaska Campaign Disclosure Law.

State the reasons why the reporting violation occurred and any reasons why the civil penalty should not be assessed:

See Attached Appeal

Certification:

I, the undersigned, certify that the information in this Statement is, to the best of my knowledge, true, correct, and complete. By statute, a person who makes a false sworn certification which s/he does not believe to be true is guilty of perjury.

Signed/Date: *Colby Kelly* 7/29/2026

2 AAC 50.865. Mitigating factors; aggravating factors

- (a) A civil penalty determined under 2 AAC 50.855 may be reduced by up to 50 percent if
- (1) a person required to file a statement or other filing
 - (A) has a good filing history; in this subparagraph, "good filing history" means
 - (i) no late filings in the immediately preceding five years; and
 - (ii) for groups, no more than \$500 in non-administrative activity shown on the group's overdue report; or
 - (B) is an inexperienced filer; in this subparagraph, "inexperienced filer" means a person required to file reports under this chapter if that person has been subject to a registration or reporting requirement for less than 365 days, or a person engaged in the person's first election cycle;
 - (2) a technical error at the commission, including a communication, facsimile machine, computer program, electronic filing system, or other equipment problem may have contributed to the late or incomplete filing;
 - (3) any unreported or mistakenly reported information had a value of \$100 or less; or
 - (4) any unreported or mistakenly reported information had a value higher than \$100 but no more than \$1,000, and a factor listed in (b) of this section also applies.
- (b) A civil penalty determined under 2 AAC 50.855 may be reduced by a percentage greater than 50 percent, or waived entirely based on the following factors:
- (1) the person required to file, or a family member of the person required to file, experienced a personal emergency, including a call for military service, a natural disaster, a civil disturbance, or an incapacitating illness that prevented the person from filing on or before the due date; this mitigating factor is only available to a natural person;
 - (2) a significant cause of the late filing is commission staff error, including
 - (A) furnishing reporting materials too late for filing on or before the due date;
 - (B) giving incorrect oral or written information to a person required to submit a statement or other filing; or
 - (C) failing to deliver required notices when due;
 - (3) a late or erroneous report included only administrative costs;
 - (4) a late or incomplete report did not cause significant harm to the public, and aggravating factors under (d) of this section do not exist; for purposes of this paragraph, a late or incomplete report did not cause significant harm to the public if
 - (A) the dollar amount missing from a form or disclosure is \$100 or less;
 - (B) the dollar amount for the information missing from a form or disclosure is more than \$100 but no more than \$1,000, and the person required to file self-reported the error; for purposes of this subparagraph, the error is self-reported if the person notified the staff of the error, but filing the late or missing information without notifying the staff does not constitute self-reporting; or

(C) except for a disclosure that must be submitted within 24 hours under AS 15.13.110 or 15.13.040, the missing or incomplete information is readily available to the public through another forum;

(5) the civil penalty assessment is significantly out of proportion to the degree of harm to the public for not having the information; for purposes of this paragraph, absent the presence of aggravating factors in (d) of this section, an assessed penalty is significantly out of proportion if it exceeds the value of the transactions that were not reported or were reported late, or, in the case of seven-day or 24-hour reports, exceeds twice the value of the transactions that were not reported or were reported late; or

(6) a unique circumstance justifies reducing or waiving the penalty.

(c) The commission will not accept any of the following as mitigating factors to reduce the amount of a penalty:

(1) relying on another person or mailroom to mail, postmark, or submit the statement on or before a due date;

(2) forgetting to file;

(3) being a volunteer;

(4) having no change in reportable information from previous filed statements;

(5) relying on the responsible person's staff to remind the person of the filing deadline or to complete or file the report;

(6) being too busy to file;

(7) absence caused by travel, unless the travel was unplanned or unavoidable, including travel for a personal emergency, or weather-related travel problems.

(d) A civil penalty determined under 2 AAC 50.855 may be increased to the maximum amount allowed under the applicable statute if a person required to file a statement or other filing has

(1) failed to substantially comply with financial disclosure requirements by omitting a significant source of income, interest in real property, business interest, loan, trust, or other substantial financial interest; in this paragraph, "substantial financial interest" means an interest with a value greater than \$1,000; or

(2) a poor reporting history; indicators of a poor reporting history include any of the following:

(A) more than one late filing in the immediately preceding five years;

(B) evidence suggesting deliberate non-reporting;

(C) failure to cooperate with the staff;

(D) a violation of any provision of AS 15.13, AS 24.45, AS 24.60.200 - 24.60.260, AS 39.50, or this chapter in the preceding five years.

April 24, 2026

Alaska Public Offices Commission
Attn: Civil Penalty Appeals
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149

**RE: Civil Penalty Appeal — Notice of Penalty Assessment Dated April 15, 2026
Colby Kelly — Late-Filed Statement of Contribution, AS 15.13.040(r)**

Dear Commission Staff and Commissioners:

I submit this affidavit to appeal the \$27,000 civil penalty assessed in the April 15, 2026 Notice regarding my late-filed Statement of Contribution for a March 10, 2026 contribution to Friends of the Good Guys (Entity 6903). I do not dispute that my filing was 27 days late. I take full responsibility for the violation. I respectfully request that the Commission waive or substantially reduce the penalty under the framework set out in 2 AAC 50.855 and 2 AAC 50.865, and that it consider suspending and setting aside any remaining penalty under AS 15.13.390(e).

Statement of Facts

On March 10, 2026, I made a single \$3,000 contribution to Friends of the Good Guys, an entity making independent expenditures in the April 7, 2026 Anchorage Municipal Election.

I have never previously registered with or filed any report, statement, or disclosure with the Alaska Public Offices Commission. A search of the APOC online reporting database confirms no prior filings under my name across all reporting categories, including Campaign Disclosure, POFD, and Lobbying. See Exhibit A (APOC database search results).

This was the first contribution I have ever made that triggered the reporting requirement under AS 15.13.040(r). I have never before been subject to this specific filing obligation, and this is my first election cycle in which I have been required to file any statement of contribution with APOC. I have no late filings with APOC in the preceding five years.

I was not aware at the time of my contribution that I had a personal filing obligation separate from the reports filed by the receiving entity. When I became aware of my obligation, I promptly submitted the Statement of Contribution on April 7, 2026.

The contribution was independently reported by Friends of the Good Guys in its own filings. My identity as contributor, the amount, the date, and the recipient are part of the public record in the APOC campaign finance database.

Grounds for Waiver or Reduction

1. Complete Waiver: First-Time Filer Exception — 2 AAC 50.855(b)(2)(A)(i)

Under 2 AAC 50.855(b)(2)(A)(i), APOC staff may not assess a civil penalty if the person responsible for the filing is a first-time filer. I have never previously registered with or filed any

report with APOC. This is the first time I have ever been required to file a statement of contributions or any other disclosure document with the Commission. The first-time filer exception applies across all filing types and is not carved out for 24-hour reports, unlike the first-error exceptions for contribution statements and independent expenditure reports. If I qualify as a first-time filer under this provision — and I respectfully submit that I do — the penalty must be waived entirely.

2. Threshold Defense: Reporting Obligation May Not Have Been Triggered

Under AS 15.13.040(r), the 24-hour reporting obligation applies to a contributor who “knows or has reason to know” that the recipient entity is likely to make independent expenditures. At the time I made my March 10, 2026 contribution, I did not have specific knowledge that Friends of the Good Guys had made or was likely to make independent expenditures in the April 7, 2026 election. I contributed as a supporter of the candidates the organization was formed to advance; I was not informed of or involved in the entity’s independent expenditure activity. If the knowledge element of AS 15.13.040(r) was not met at the time of contribution, the 24-hour reporting obligation was not triggered, and no violation occurred. I raise this as an alternative defense and invite the Commission to address the knowledge element in any order it issues.

3. Penalty is Significantly Out of Proportion — 2 AAC 50.865(b)(5)

Under 2 AAC 50.865(b)(5), a civil penalty is significantly out of proportion to the degree of harm to the public if it exceeds twice the value of the transaction reported late. Twice my \$3,000 contribution is \$6,000. The \$27,000 assessed penalty is nine times the value of the contribution and 4.5 times the regulatory disproportionality threshold. APOC imposed the maximum statutory penalty under AS 15.13.390(a)(2) with no apparent downward adjustment. This factor alone, under the regulation, authorizes reduction by a percentage greater than 50%, up to complete waiver. The Alaska Supreme Court affirmed APOC’s application of this disproportionality provision as grounds for penalty waiver in *Alaska Policy Forum v. Alaska Public Offices Commission*, 583 P.3d 701 (2026).

4. Good Filing History — 2 AAC 50.865(a)(1)(A)

I have no late filings with APOC in the immediately preceding five years.

5. Inexperienced Filer — 2 AAC 50.865(a)(1)(B)

This is my first election cycle as a filer of a statement of contribution under AS 15.13.040(r). Under 2 AAC 50.865(a)(1)(B), an inexperienced filer includes a person engaged in their first election cycle as a filer of the form at issue. This factor supports an additional reduction of up to 50%.

6. No Significant Harm to the Public — 2 AAC 50.865(b)(4)

None of the aggravating factors under 2 AAC 50.865(d) apply. There is no evidence of deliberate non-reporting. I have cooperated fully with Commission staff, have no prior violations of AS 15.13, and have not omitted any substantial financial interest. The contribution information was placed on the public record through Friends of the Good Guys’ 7-day report filed March 30, 2026,

well before the April 7 election. The public's ability to make informed electoral decisions was not materially impaired by the delay in my personal filing.

7. Suspended Penalty — AS 15.13.390(e)

In the alternative, I request that the Commission suspend imposition of the civil penalty and order it set aside pursuant to AS 15.13.390(e). That provision authorizes complete penalty relief where the Commission finds that the violation: (1) was not a repeat violation or part of a series or pattern; (2) was inadvertent; (3) was quickly corrected; and (4) had no adverse effect on the campaign of another. All four conditions are met here. I have no prior violations of AS 15.13. My failure to file within 24 hours was inadvertent — I did not know I had a personal reporting obligation separate from the entity's own filings. I filed my Statement of Contribution as soon as I became aware of the obligation. And there is no evidence that my late filing adversely affected any other candidate's campaign.

8. Request for Written Statement of Reasons

If the Commission declines to waive or substantially reduce the penalty, I respectfully request that it issue a written statement of reasons explaining why the assessed penalty is appropriate in light of the mitigating facts submitted in this affidavit, as required under *VECO International, Inc. v. Alaska Public Offices Commission*, 753 P.2d 703 (1988).

Request for Relief

I acknowledge the violation, accept responsibility, and understand my ongoing obligations under AS 15.13.040(r). This will not happen again. I have consulted with counsel and am now fully informed of my reporting obligations going forward.

For the foregoing reasons — including first-time filer status, inexperienced filer status, the codified disproportionality of the assessed penalty, the absence of any aggravating factors or public harm, and the inadvertent nature of the violation — I respectfully request that the Commission: (1) waive the \$27,000 civil penalty in its entirety; or (2) substantially reduce the penalty consistent with 2 AAC 50.865; or (3) in the alternative, suspend imposition of the penalty under AS 15.13.390(e) and order it set aside upon a finding of no similar violation within one year.

I appreciate the Commission's consideration and am available to participate in any hearing, in person or telephonically.

Respectfully submitted,



Colby Kelly
725 E. 81st Avenue
Anchorage, Alaska 99518 | colby@kellyllc.net

EXHIBIT A
APOC Online Database Search Results
Confirming No Prior APOC Filing History

Search 1: Statement of Contributions — Name: “colby”

Result: One filing only — the late-filed Statement of Contribution at issue in this appeal. No prior filings.

Search 2: POFD (Personal Financial Disclosure) — Name: “colby kelly”

Result: Your Search Returned No Results.

Search 3: Lobbyist Registrations — Name: “colby Kelly”

Result: Your Search Returned No Results.

State of Alaska myAlaska My Government Resident Business in Alaska Visiting Alaska State Employees

APOC Online Reports

HOME **POFD/LFD** CAMPAIGN DISCLOSURE LOBBYING INDEPENDENT EXPENDITURES COMMISSION ACTIONS

State of Alaska > Department of Administration > APOC > Online Reports > Campaign > Statement of Contribution

STATEMENT OF CONTRIBUTION FORMS

Report Year: Status: Filed After: Filed Before: Any Name: Filer Type:

Report Year	Filer Type	Name	Total Report	Contributions	Submitted	Status
2026	Individual	Kelly Colby	\$3,000.00	1	04/07/2026	Filed

Note: There are additional features and columns available by right-clicking the column headers. Columns maybe grouped and un-grouped as desired. You may add and remove columns under the 'Additional Fields' submenu.

* Items with a black asterisk (*) have been Amended and may not represent the most current or accurate information.
 ** Items with two red asterisks (**) are Amendments.
 *** Items with three blue asterisks (***) have been filed by Apoc Staff members.

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APOC Online Reports

HOME **POFD/LFD** CAMPAIGN DISCLOSURE LOBBYING INDEPENDENT EXPENDITURES COMMISSION ACTIONS

State of Alaska > Department of Administration > APOC > Online Reports > POFD > Forms

POFD: FORMS

Report Year: Status: Filed After: Filed Before: Any Name: Report Type:

Report Year	Name	Purpose	Branch	Submitted	Status
Your Search Returned No Results.					

Note: There are additional features and columns available by right-clicking the column headers. You may add and remove columns under the 'Additional Fields' submenu.

* Items with a black asterisk (*) have been Amended and may not represent the most current or accurate information.
 ** Items with two red asterisks (**) are Amendments.
 *** Items with three blue asterisks (***) have been filed by Apoc Staff members.

Note: Only the financial statements of state and municipal candidates, seated legislators, the Governor and Lieutenant Governor are available online. Financial statements for other public officials are available upon written request.

Please send requests to doe.apoc@alaska.gov and include the name of the public official(s) and report year(s) you wish to receive.
 Requests may also be mailed to: APOC, 2221 E Northern Lights Blvd. #126, Anchorage, AK 99508.

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APOC Online Reports

HOME POFDA/FD CAMPAIGN DISCLOSURE LOBBYING INDEPENDENT EXPENDITURES COMMISSION ACTIONS

State of Alaska > Department of Administration > APOC > Online Reports > Lobbying > Lobbyist Directory

LOBBYISTS DIRECTORY

Report Year: Lobbyist Name: Employer Name: Started After: Started Before: Terminated After: Terminated Before:

(Any) kally, colby

Search Export Clear

Report Year	Lobbyist Name	Employer Name	Start Date	Termination Date	Compensation	Amount
Your Search Returned No Results.						

Note: There are additional features and columns available by right-clicking the column headers. You may add and remove columns under the 'Additional Fields' submenu.

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April 15, 2026

Via Certified Mail, U.S. Mail, & Email

Colby Kelly
725 E 81st Ave
Anchorage, AK 99518
colby@kellyllc.net

RE: Notice of Penalty Assessment
Late filed Statement of Contributions report¹

Mr. Kelly:

According to Alaska Public Offices Commission (APOC) records, you did not timely file a statement of contribution campaign disclosure report relating to your March 10, 2026 contribution of \$3,000 to Friends of the Good Guys, due March 11, 2026. Instead, the report was filed April 7, 2026 (27 days late). By law, a maximum penalty of \$1,000 accrues each day the report is late.² The maximum penalty APOC could assess you is **\$27,000**.³

Additionally, please be advised:

- 1) You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the "State of Alaska" to our office at the address above; visiting our [website](#)⁴ to make a payment by credit card; or by paying in cash at our offices. **Payment must be made within thirty days of the date of this letter**. If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.

¹ AS 15.13.040(r).

² AS 15.13.390(a)(2).

³ 2 AAC 50.855(a).

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

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

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

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in person or telephonically.

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

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION

Mackenzie Pearson

Mackenzie Pearson
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Individual File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Colby Kelly 725 E 81 st Ave Anchorage, AK 99518 colby@kellyllc.net	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

Mackenzie Pearson
Paralegal

4/15/2026

Date

⁵ 2 AAC 50.831(a).

⁶ 2 AAC 50.895.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

May 15, 2026

Via Certified Mail and Email

Colby Kelly
725 E 81st Ave
Anchorage, AK 99518
colby@kellyllc.net

RE: Commission Meeting Notice

Dear Mr. Kelly:

The Commission will review the staff recommendations in this matter at its June 2-3, 2026 Commission Meeting in Anchorage, Alaska.

Currently, the matter is scheduled to be considered at **12:35 p.m. on Tuesday, June 2, 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 wish to present or make a statement to the Commission, please notify staff prior to the meeting so they can pull your matter from the agenda.

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

Mackenzie Pearson

Mackenzie Pearson
Paralegal

Encl: Staff Recommendations

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Colby Kelly 725 E 81st Ave Anchorage, AK 99518 colby@kellyllc.net	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

<i>Cari Rousselle</i>	05/15/2026
Signature	Date

Rousselle, Cari J (DOA)

From: postmaster@kellyllc.net
To: colby@kellyllc.net
Sent: Friday, May 15, 2026 3:29 PM
Subject: Delivered: Commission Meeting Notice

Your message has been delivered to the following recipients:

[colby@kellyllc.net \(colby@kellyllc.net\)](mailto:colby@kellyllc.net)

Subject: 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:

Colby Kelly
 725 E 81st Ave
 Anchorage AK 99518



2. Article Number (Transfer from service label)

9589 0710 5270 1126 7220

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

Agent

Addressee

B. Received by (Printed Name)

Erica Markberg

C. Date of Delivery

D. Is delivery address different from item 1? If YES, enter delivery address below:

Yes
 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 | |

40

(over \$500) all Restricted Delivery

Domestic Return Receipt



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

PREPARED BY: Iqlas Dubed

DATE: May 15, 2026

RESPONDENT: Tongass Conservatives of S.E. Alaska

CIVIL PENALTY

ASSESSED UNDER: Campaign Disclosure: AS 15.13.110, 2 AAC 50.384(b)(1),
2 AAC 50.405(7), AS 15.13.390(a)(4)

REASON FOR FILING: 2023 Registered Group

LATE REPORT(S):

- Campaign Disclosure Reports
 - 2024 Group Year End Report
 - 2024 Group Registration Report

DUE DATE OF LATE FILED REPORT: December 31, 2024

REPORT FILED ON: October 22, 2025

NUMBER OF DAYS LATE: 295

DATE PENALTY ASSESSMENT SENT: December 8, 2025

DATE PENALTY APPEAL RECEIVED: January 7, 2026

MAXIMUM STATUTORY PENALTY: \$27,550

PENALTY ASSESSED¹: \$27,550

RECOMMENDATION: **Waived**
(See “Staff’s Recommendation Based on Standard Mitigation Criteria”)

BACKGROUND AND AFFIANT’S STATEMENT OF MITIGATING FACTS:

1. Affiant states that initially, an individual named Darlene Svenson was the leader of Tongass Conservatives of S.E. Alaska and registered it with APOC in March of 2023.

¹ 2 AAC 50.855(b)(2)(B)(i).

2. Affiant states that Darlene Svenson later resigned from the group and that others involved (Yvonne Ripley, Sharyl Yeisley, and Hanna Ramiskey) were not aware that APOC requirements existed or that Darlene Svenson included their names in a group registration. However, staff notes Sharyl Yeisley, as vice chair, filed the group’s registration amendment after Svenson left, a document that named herself, Yvonne Ripley as chair, and included ramiskey@kpunet.net as an additional email address to notify for the group.² Ms. Yeisley also filed the groups 2023 year end report citing no activity and leaving a balance of \$649.25.³
3. Affiant states that the remaining group members understood the group existed only for educational purposes. For example, members of Tongass Conservatives of S.E. Alaska would meet and ask questions of municipal and school district officials about local issues. APOC staff notes the group’s listed purpose is “to gather other likeminded individuals to assist in influencing local and State policy . . . to educate citizens on the ever-changing world around us . . . to open the doors of communication for Southeast”
4. Affiant states that the core of this group transitioned into an association called “Ketchikan Area Conservatives” which serves only a social and educational function. When the group was contacted by APOC staff regarding not filing a 2024 group registration and year end report, the group filed their 2024 registration and filed a year end report indicating the group disbanded and disbursed all funds. Hannah Ramiskey told APOC staff that in early 2024 the group talked with a former APOC staff member and understood that they had no additional reporting requirements since they planned to disband the group.

STAFF’S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. Members of the group state they were unaware they needed to file reports with the Alaska Public Offices Commission and that they were added to the group registration without their consent or knowledge.
2. The group did not participate in campaign activities, nor did they intend to influence the outcome of an election.
3. A civil penalty may be reduced by a percentage greater than 50% or waived entirely when the late report included only administrative costs.⁴ Here, the report only

² [Group Registration Form](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=5941&ViewType=GR>, filed April 18, 2023 by Sharyl Yeisley.

³ [2023 Year End Report](#)

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=42817&ViewType=CD>, filed February 15, 2024 by Sharly Yeisley.

⁴ 2 AAC 50.865(b)(3).

included administrative costs associated with venues for group dinners and functions. With this being the case, a mitigator under section 2 AAC 50.865(b)(3) will be applied.

4. Here, under all the circumstances, staff recommend that the maximum assessed penalty be reduced by 99.75%. Staff is not granting a full waiver in this case since the group was likely briefed on how to disband the group but failed to do so back in 2024.

FILER’S REPORTING HISTORY:

2024 Group Reports

Year End Report.....**Late by 256 Days (Subject of Appeal)**
Registration.....**Late by 295 Days (Subject of Appeal)**

2023 Group Report

Year End Report.....Timely
30 Day Report (MOA Election).....**Late by 163 Days**

ACTIVITY ON LATE REPORT:

Beginning Balance:	\$00.00
Income:	\$00.00
Expenses:	\$649.25
Debts:	\$00.00
Ending Balance:	\$00.00

STAFF’S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

Staff finds the following mitigation criteria applicable to the respondent’s appeal:

Criteria for up to 50% reduction of the maximum civil penalty [2 AAC 50.865(a)]:

- Good filing history (no late filings in the previous 5 years). **2 AAC 50.865(a)(1)(A)**
- Inexperienced filer.⁵ **2 AAC 50.865(a)(1)(B)**
- Technical error at APOC. **2 AAC 50.865(a)(2)**
- Reported information had a value of \$100 or less. **2 AAC 50.865(a)(3)**
- Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. **2 AAC 50.865(a)(4)**

Criteria for greater than 50% reduction, up to complete waiver [2 AAC 50.865(b)]:

- Personal catastrophe/emergency or incapacitating illness. **2 AAC 50.865(b)(1)**
- APOC Staff error. **2 AAC 50.865(b)(2)**
- Report included only administrative costs. **2 AAC 50.865(b)(3)**
- No significant harm to the public and no aggravating factors.⁶ **2 AAC 50.865(b)(4)**
- The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.⁷ **2 AAC 50.865(b)(5)**
- A unique circumstance. **2 AAC 50.865(b)(6)**

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

⁶ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

⁷ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions.

Non-mitigating factors [2 AAC 50.865(c)]:

The Commission will not accept the following mitigating factors to reduce the amount of a penalty.

- Relying on another person or mailroom to mail, postmark or submit the statement on or before a due date. **2 AAC 50.865(c)(1)**
- Forgetting to file. **2 AAC 50.865(c)(2)**
- Being a volunteer. **2 AAC 50.865(c)(3)**
- Having no change in data from previous statements on file. **2 AAC 50.865(c)(4)**
- Relying on the filer's staff to remind the filer of the filing deadline or to complete the report. **2 AAC 50.865(c)(5)**
- Being too busy to file. **2 AAC 50.865(c)(6)**
- Absence caused by travel, unless the travel was unplanned or unavoidable such as travel for personal emergency or weather-related travel problems. **2 AAC 50.865(c)(7)**

Aggravating Factors [2 AAC 50.865(d)]:

- Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁸ **2 AAC 50.865(d)(1)**
- More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

Based on the applicable standard mitigation criteria, staff recommends that the maximum civil penalty assessment be:

- Waived**
- Reduced by 99.75% to \$68.75**
- Upheld at the assessed amount**

⁸ Value greater than \$1000.

GROUP REGISTRATION FORM

COMPLETED

Submission Date: 10/22/2025
Filer First Name: Sharyl
Filer Middle Name (Optional): E
Filer Last Name: Yeisley
Filer's Title with Group: Assigned user

GROUP INFORMATION

Previously Registered: Yes
Election Year: 2024
Group Name: Tongass Conservatives Of S.E. Alaska
Abbreviation: Tongass Conservatives of S.E.A.
Purpose: Our purpose is to gather other like minded individuals to assist in influencing local and State policy. To educate citizens on the ever changing world around us.To open the doors of communication for Southeast
Group Type: Special Interest
Group Mailing Address: c/o 9737 Mud Bay Road Suite #103
City, State Zip: Ketchikan, Alaska 99901
Additional Email Addresses to Notify: sharylyeisley@gmail.com;yvonneripley@yahoo.com;ramiskey@kpunet.net

CHAIR

Name: Yvonne Ripley
Address: 9737 Mud Bay Rd. #103
City, State Zip: Ketchikan, Alaska 99901
Phone: 907-617-0585
E-mail: yvonneripley@yahoo.com
Fax (Optional): Did Not Report

TREASURER

Name: Sharyl Yeisley
Address: 3609 Tongass Avenue #5284
City, State Zip: Ketchikan, Alaska 99901
Phone: 9072541690
E-mail: sharylyeisley@gmail.com
Fax (Optional): Did Not Report

DEPUTY TREASURERS / CO-CHAIRS

Table with 3 columns: Name, Address, Title. Row 1: Sharyl Whitesides Yeisley, P.O. Box 5284 Ketchikan, Alaska 99901, Deputy Treasurer

TYPE OF GROUP

SPECIAL INTEREST GROUP

CAMPAIGN PLANS

No Campaign in 2024: Collect and expend funds to pay debts or administrative expenses for a 2025 campaign.

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Exempt From Entering

I certify that this group expects to be exempt from entering its bank information. If these conditions change, an amendment must be filed with the required information.

CAMPAIGN DISCLOSURE FORM

AMENDMENT

Amendment Description: need to add beginning cash on hand

COMPLETED

Submission Date: **10/22/2025**
 Filer First Name: **Sharyl**
 Filer Middle Name: **E**
 Filer Last Name: **Yeisley**
 Filer's Title: **assigned user**
 Report Type: **Year End Report**

GROUP INFORMATION

Group Name: **2024 - Tongass Conservatives Of S.E. Alaska**
 Group Abbreviation: **Tongass Conservatives of S.E.A.**
 Group Address: **c/o 9737 Mud Bay Road Suite #103**
 City, State Zip: **Ketchikan, Alaska 99901**

REPORT INFORMATION

Election Year: **0**
 Election: **N/A**
 Report Type: **Year End Report**
 Reporting Period: From **02/01/2024** Through **02/01/2025**

FINAL REPORT

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$649.25				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$0.00	[+] ⇒	\$0.00	[=] ⇒	\$0.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$649.25	[+] ⇒	\$0.00	[=] ⇒	\$649.25
[=] ↓					
Closing Cash On Hand:	\$0.00				
[-] ↓					
Total Debts:	\$0.00				
[=] ↓					
Surplus/Deficit:	\$0.00				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
No Income / Nothing to Report				
			Number of Contributions under \$100:	0
			Sum of Contributions under \$100:	\$0.00

Date Received	Payment Method	Contributor	Details	Amount
			Income Total:	\$0.00

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
02/16/2024	Cash	Alaskan and Proud 3816 Tongass Ave Ketchikan, Alaska 99901	food, paper products, drinks	\$215.57
02/16/2024	Cash	Elks Club 1830 Tongass Ave Ketchikan, Alaska 99901	use of Elks for gathering and movie showing	\$100.00
03/15/2024	Cash	Alaskan and Proud 3816 Tongass Ave Ketchikan, Alaska 99901	food, cheese, crackers, drinks paper products	\$75.00
10/18/2024	Cash	Alaska and Proud 3816 Tongass Avenue Ketchikan, Alaska 99901	paper products, food, snacks, and supplies	\$125.00
10/18/2024	Cash	Elks Club 1830 Tongass Avenue Ketchikan, Alaska 99901	use of Elks for a townhall gathering no parties involved, drinks and tips	\$133.68
			Expenditure Total:	\$649.25

DEBTS

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



January 1, 2026

Alaska Public Offices Commission
2221 E Northern Lights, Room 128
Anchorage, AK 99508-4149

Dear Sir or Madam,

I am writing in response to a penalty letter sent to ‘Tongass Conservatives of SE Alaska’. I believe that the confusion regarding this account has been on going for more than four years now. The more I look into this, the stranger it becomes. I will try to format this to make it easier to understand. All of this that follows happened in Ketchikan, AK.

Before 2023 Darlene Svenson and John Harrington started an organization titled North Tongass GOP group. At some point Darlene began to change things to Tongass Conservatives as John withdrew. Then someone with APOC contacted her and said they knew it was an essentially the same group as before (defined as to ‘influence elections’). Yvonne, Sharyl, & Hannah had nothing to do with this-did not know about it.

In early 2023 several (4-5) Ketchikan citizens were discussing the fact that Ketchikan had lost so many opportunities for regular people to meet and talk about local issues- ie: the VFW had closed down, most service organizations were now bars, and the only forums, etc were done by the Chamber of Commerce – a closed membership-only organization. It was discussed that per the First Amendment, Americans have a right to assemble and maybe they should look into organizing some events where anyone could ask questions about local issues. Public official meetings don’t allow for give and take.

Upon further discussion, the Teddy Roosevelt quote, “Do what you can, When you can, Where you are.”-- held appeal as a goal.

The biggest issue would be to find an inexpensive place to meet. From the first discussions, all agreed that this was not an official group who would endorse candidates, nor would the group give money to any campaign nor lend credence to one.

Then along comes Darlene Svenson. A new American citizen of a couple years from Canada. She was very interested in what was being discussed and full of ideas of things to do. She’d had some blowups with the Republican leadership- but this wasn’t a political group. We met a few times and the next thing we know she was taking over- not that anyone objected- she got a lot done. She decided that Yvonne should be the chairman of the group, Darlene would be the Vice Chair, Sharyl would be the secretary, and Robb the treasurer. We hadn’t thought to be that kind of group. She decided there would be a big event at the N. Tongass Community Club, had talked to a restaurant in town about food, decided there would be a donation bar, and was ready to put an ad in the local weekly free paper. She even had a line put in her house so people could make a

reservation for dinner if they wanted to eat at the event. It had a life of its own. The event was February 25, 2023. Lots of work went into it and the event itself went off well. 73 people showed up and had a great time. The Boro mayor led the pledge of allegiance, some city council members showed up---- people asked questions about some Ketchikan issues and spent lots of time talking to others they hadn't seen in a long time. And the snow began in earnest- lots of it. No campaign stuff.

As the guests left about 10:30 pm, the clean up began. Darlene did not help with any of that. Sharyl grabbed the bar money, counted it with Robb as a witness and gave the money bag to him as he had been designated as the treasurer. Darlene came over and yelled at Sharyl for bothering to count the money- Sharyl was firm, she felt there should be two witnesses to verify the amount. By 11:30 pm or so, the place was clean, and only Darlene, her husband, and Yvonne were left. Yvonne had been cleaning the kitchen mess. About that time, Terri, the property manager of the Community Hall showed up to make sure that it was clean and the doors were properly locked and secured. She walked into Darlene screaming obscenities at Yvonne who was cornered in the galley kitchen. Gather it was vile stuff using the C and F words. Telling Yvonne she couldn't do anything right, she was useless, etc. Darlene then went out into the parking lot and started in on her husband.

The next morning the phone calls began. Darlene had called Robb and said she needed the money to pay the restaurant for the food—snow storm, Sunday 8-9 am in cash?. Robb said he would need a receipt before spending money; Darlene told him SHE was in charge and he was a nothing. He left the group that day. At this point Darlene had yelled or screamed at the three people she had appointed as officers. Robb did go to restaurant, got a receipt and paid the bill. It was double what Darlene had told the others it would cost. She had also bought a personal membership to the Community Hall with the money from the event receipts. That was Sunday the 26th of February. Other foods she had offered to donate were now to be paid to her. By early the next week, there was a meeting with Darlene about the major differences between her and the goals of the rest of the people who organized this event. They reiterated that they had no intention of being involved in bigger state issues, nor being a political force at all. The bad behavior was not acceptable. Darlene stormed out and quit.

At this point Darlene had been using her Facebook page titled Tongass Conservatives of SE Alaska. The others withdrew any postings on that page and have never gone near it again. Darlene was apparently, still affiliated with APOC from her time with the N. Tongass GOP group.

In her anger, Darlene decided in March, with no knowledge of the others, to assign the APOC account she had opened to Sharyl and Yvonne, (with Hannah -as a person to be notified). In fact, the three were ignorant and later would be very confused as the little group who had no campaign intentions, nor political donations, nor endorsements were dumped in a mess not of their making. In fact, until the Letter of Penalty, none of the three had ever seen Darlene's purpose statement of "Our Purpose is to gather other like minded individuals to assist in influencing local and State policy. "" To educate citizens on the ever changing world around us. To open the doors of communication for Southeast."" All were appalled at the arrogance and false claims now attributed to people who had no clue about APOC or it's rules. HOW WAS DARLENE ABLE

TO TRANSFER THIS APOC ACCOUNT THAT HAD BEEN GOING SINCE THE DAYS OF THE N. TONGASS GOP GROUP--- to an unsuspecting couple of people?

A little later, Sharyl was contacted by Charles from APOC who listened to her story of the events. He felt they had done nothing wrong- Sharyl was continuing to pay bills from the event (and would later use the little amount left to pay for use of the Elks Lodge for another event- some local candidates for school board, Borough, and City offices. 45 people attended and were able to ask questions of those candidates. Neither Sharyl, nor Yvonne endorsed anyone—only introduced them to the attendees). However, Charles helped her attested that no money had been given to campaigns. In the confusion of why their needed to be APOC affiliation at all, that point was lost. Sharyl assumed they were cleared from APOC.

By 2024, John Whitlock contacted Sharyl about filing for 2024 and that the title of the APOC account needed to be transferred to her, Yvonne and Hannah(as a person to be contacted). Sharyl tried to explain that we shouldn't be there at all. John was insistant in helping her through the process and state that again there had been no campaign donations. Sharyl again left that contact unsure, confused, and intimidated by the process ---- still thinking that this time we were finished with APOC filing -----we had never been anything but a small number of Americans exercising their right to assemble. No money, no endorsements ever as a group to a candidate or political cause. Of course there were no campaign donations. It is possible that Sharyl did not give John all the crazy circumstances surrounding the unfortunate situation with Ms. Svenson – it was embarrassing to be dumb enough to be caught up in the whole situation. We are still shaking our heads.

Again, The group that Darlene signed up with APOC originally is still being used on her Facebook account as Tongass Conservatives of SE Alaska..... to this day it is her active Facebook with herself as one of the administrators of the page. Neither, Yvonne, Sharyl, nor Hannah have been near that account in years---- Hannah has never even been a member of Facebook. Darlene still owns that account name (and yet transferred that named APOC account to three women who had no idea until later that it even existed).

This penalty and said correspondence is addressed both by mail and by certified letter to that name with Yvonne's address. Yvonne hasn't opened the envelopes as we believe it's a federal crime to open mail not addressed to you. John explained that it's the same information in the sent email.

We are appealing this fine. Sharyl assumed when John agreed that there was no money left from the past event, that none had political attachment that would interest APOC- that we were clear. Also, we have never collected a dime from anyone since 2023 February. In addition, in 2025, Sharyl has been sent out of Ketchikan over 6 times for medical events and issues as well as having taken on her three grandchildren due to a family unfortunate situation. Yvonne for the past 15 plus months has been caring for life long difficult father who has full blown dementia, placed in the Sitka Pioneer Home this year, abusive to people there, is back in Ketchikan and such a drain on her life now. This really needs to be cleaned up and taken off the board finally. Possibly no one's fault, but hopefully, the full blown crazy explanation will help clarify the mess. We had no events in 2025 because of the above, but hopefully not because we can't someday assemble with others. We have never, as a group, given money or an endorsement

to any candidate or campaign- for anything. Please help us get out from under this on-going nightmare.

Sincerely,

Yvonne Ripley

Sharyl Yeisley

Hannah Ramiskey (person to be notified)



December 8, 2025

Via Certified Mail, U.S. Mail, and Email

Tongass Conservatives of S.E. Alaska
9737 Mud Bay Road Ste #103
Ketchikan, AK 99901
sharyleysley@gmail.com
yvonneripley@yahoo.com
ramiskey@kpunet.net

Re: Notice of Penalty – Late-Filed Registration for 2024
Notice of Penalty – Late Filed Year End Report for 2024

To Whom it May Concern:

You are receiving this notice for two reporting violations.

Because Tongass Conservatives of S.E. Alaska disclosed a surplus of \$649.25 on its 2023 year-end report filed February 15, 2024, it was considered an “ongoing group.”¹ Campaign disclosure law requires ongoing groups to re-register each year and file a year-end report by February 15, as provided in AS 15.13.110.²

According to our records, Tongass Conservatives of S.E. Alaska did not timely file a group registration or a year-end report for 2024. By law, a maximum penalty of \$50 accrues each day Tongass Conservatives of S.E. Alaska was in violation of AS 15.13.³

Accordingly, the civil penalties assessed by the Alaska Public Offices Commission are as follows:

Year	Report Due	Date Due	Date Filed	Days Late	Penalty
2024	Registration	12/31/24	10/22/25	295	\$14,750
2024	Year End Report	2/18/25	10/22/25	256	\$12,800
				Total	\$27,550

Please be advised:

- 1 2 AAC 50.405(7).
- 2 2 AAC 50.384(b)(1).
- 3 AS 15.13.390(a)(4).

- 1) You may pay the assessed penalties and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)⁴ to make a payment by credit card; or by paying in cash at our offices. **Payment must be made within thirty days of the date of this letter**. If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other questions concerning this matter, please contact the APOC staff.

- 2) Alternatively, you have the right to appeal staff’s conclusion that these violations occurred or the penalty amounts that have been assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter**.

If you appeal, staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in person or telephonically.

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General’s Office.⁶

A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION


John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Group File (w/o enclosures)

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

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

⁵ 2 AAC 50.831(a).

⁶ 2 AAC 50.895.

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Tongass Conservatives of S.E. AK 9737 Mud Bay Road Ste #103 Ketchikan, AK 99901 sharylyeisley@gmail.com yvonneripley@yahoo.com ramiskey@kpunet.net	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

John Whitlock 12/8/25
Paralegal Date

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

- 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.

A. Signature
 X *[Handwritten Signature]* Agent Addressee

B. Received by (Printed Name) *Yuan Puyshu* C. Date of Delivery *12.16*

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

1. Article Addressed to:
**Tongass Conservatives of S.E.
 Alaska
 9737 Mud Bay Road Ste #103
 Ketchikan, AK 99901**



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 checked="" 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 | |

2. Article Number (Transfer from service label)
 9489 0090 0027 6610 9621 61

Delivery



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

May 15, 2026

Via Certified Mail and Email

Tongass Conservatives of S.E. Alaska
9737 Mud Bay Road Ste #103
Ketchikan, AK 99901
sharyleyisley@gmail.com
yvonneripley@yahoo.com
ramiskey@kpunet.net

RE: Commission Meeting Notice

Dear Tongass Conservatives of S.E. Alaska:

The Commission will review the staff recommendations in this matter at its June 2-3, 2026 Commission Meeting in Anchorage, Alaska.

Currently, the matter is scheduled to be considered at **12:35 p.m. on Tuesday, June 2, 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 wish to present or make a statement to the Commission, please notify staff prior to the meeting so they can pull your matter from the agenda.

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

Mackenzie Pearson
Mackenzie Pearson
Paralegal

Encl: Staff Recommendations

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Tongass Conservatives of S.E. Alaska 9737 Mud Bay Road Ste #103 Ketchikan, AK 99901 sharyleisley@gmail.com yvonneripley@yahoo.com ramiskey@kpunet.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: ramiskey@kpunet.net
Sent: Friday, May 15, 2026 3:34 PM
Subject: Relayed: Commission Meeting Notice

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

ramiskey@kpunet.net (ramiskey@kpunet.net)

Subject: Commission Meeting Notice



Commission
Meeting Notice

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: yvonneripley@yahoo.com
Sent: Friday, May 15, 2026 3:34 PM
Subject: Relayed: Commission Meeting Notice

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

yvonneripley@yahoo.com (yvonneripley@yahoo.com)

Subject: Commission Meeting Notice



Commission
Meeting Notice

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: sharyleyisley@gmail.com
Sent: Friday, May 15, 2026 3:34 PM
Subject: Relayed: Commission Meeting Notice

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

sharyleyisley@gmail.com (sharyleyisley@gmail.com)

Subject: Commission Meeting Notice



Commission
Meeting Notice



**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION
FINDINGS AND ORDER**

**In the matter of a civil penalty assessment
against Right to Life Action**

On June 2, 2026, the Alaska Public Offices Commission (Commission) reviewed the assessed civil penalty for Right to Life Action's late-filed 30-Day Report. The late-filed report's penalty is currently assessed at **\$25**. To facilitate collection proceedings by the Department of Law, the Commission issues the following Findings and Order.

Findings of Fact

1. Right to Life Action filed a Group Registration on February 3, 2026, to participate in the 2026 election cycle and became subject to AS 15.13, Campaign Disclosure Law.
2. Pursuant to AS 15.13.110(a)(1), Right to Life Action's 30-Day Report was due on March 9, 2026.
3. On March 10, 2026, Right to Life Action filed their 30-Day Report, one day late.
4. On March 18, 2026, staff sent a Notice of Penalty informing Right to Life Action of the assessed penalty for their late-filed 30-Day Report. The notice included an appeal affidavit and sent via E-Mail and Certified Mail. The email server provided delivery confirmation. The Certified Mail was delivered and signed for on March 31, 2026.
5. On May 1, 2026, staff issued a Notice of Referral regarding Right to Life Action's outstanding civil penalty. This notice informed Right to Life Action that their right to appeal had expired. Additionally, it requested that Right to Life Action remit payment for the assessed civil penalty or the matter would be presented to the Commission for a Final Order. The notice was sent via E-Mail and Certified Mail. The email server provided delivery confirmation. The Certified Mail was delivered and signed for on May 6, 2026

Conclusions of Law

Due to Right to Life Action's failure to timely file their 30-Day Report, and their failure to pay, appeal, or dispute the assessed penalty in a timely manner, the Commission upholds a penalty assessment of **\$25.00** under the provisions of AS 15.13.390 and 2 AAC 50.855.

Commission staff has exhausted efforts to collect the penalty assessed against Right to Life Action now due and owing to the State of Alaska under 2 AAC 50.895.

The Commission approves the referral of this case to the Office of the Attorney General to begin the formal collection process.

Decision and Order of the Commission

In accordance with the above findings of fact and conclusions of law, the Commission orders Right to Life Action to pay a civil penalty of **\$25.00** for failing to timely file their 30-Day Report and refers this matter for collection to the Office of the Attorney General.

BY ORDER OF THE COMMISSION ON JUNE 2, 2026

NOTICE TO RESPONDENT

You must pay the penalty of \$25.00 to the State of Alaska within thirty days from the date this order is mailed or otherwise distributed to you. To obtain judicial review of this order consistent with AS 44.62.560-570, you must file an appeal with the Superior Court within thirty days from the date this order is mailed or otherwise distributed to you.



March 18, 2026

Via Certified Mail, U.S. Mail, and Email

Right to Life Action
Attn: Pat Martin
PO Box 201134
Anchorage, Alaska 99520
RLA@AlaskaRightToLife.org

RE: Notice of Penalty
Late filing of 30-day campaign disclosure report

Dear Mr. Martin,

According to Alaska Public Office Commission (APOC) records, you did not timely file your 30-day report that was due March 9, 2026. Instead, the report was filed on March 10, 2026 (one day late). By law a maximum penalty of \$50 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$50.²

Staff is reducing the penalty to 50% of the maximum civil penalty that could have been assessed because the missing information had a value under \$100.³ **Accordingly, the assessed penalty owed is \$25.**

Additionally, please be advised:

- 1) You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the "State of Alaska" to our office at the address above; visiting our [website](#)⁴ to make a payment by credit card; or by paying in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.

¹ AS 15.13.390(a).

² 2 AAC 50.855(a).

³ 2 AAC 50.855(b)(2)(C)(ii).

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

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

Rousselle, Cari J (DOA)

From: Rousselle, Cari J (DOA)
Sent: Wednesday, March 18, 2026 9:31 AM
To: juli@ak4be.com
Cc: Hebdon, Heather R (DOA); Stone, Kim S (DOA); Whitlock, John G (DOA)
Subject: Notice of Penalty
Attachments: 260318 Alaskans for Better Elections, Inc. CPA.pdf

Importance: High

Tracking:	Recipient	Delivery	Read
	juli@ak4be.com		
	Hebdon, Heather R (DOA)	Delivered: 3/18/2026 9:31 AM	
	Stone, Kim S (DOA)	Delivered: 3/18/2026 9:32 AM	
	Whitlock, John G (DOA)	Delivered: 3/18/2026 9:31 AM	Read: 3/18/2026 10:22 AM

Good Morning,

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

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:

Right to Life Action
Attn: Pat Martin
PO Box 201134

Anchorage AK 99520

9590 9402 9819 5266 9585 09




2. Article Number (Transfer from service label)

9489 0090 0027 6610 9645 23

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

COMPLETE THIS SECTION ON DELIVERY

- A. Signature Agent
 X 
- B. Received by (Printed Name) Addressee
Pat Martin 63/30/26
- C. Date of Delivery
- D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

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

Domestic Return Receipt



May 1, 2026

VIA CERTIFIED MAIL and EMAIL

Right to Life Action
ATTN: Pat Martin
PO Box 201134
Anchorage, AK 99520

Re: NOTICE OF REFERRAL TO COMMISSION
30-Day Report

Mr. Martin:

On March 18, 2026, the Alaska Public Offices Commission notified you that you were subject to a civil penalty of \$25 for your failure to timely file a 30-Day Report which was due on March 10, 2026. As of the date of this letter, you have not paid the penalty. In that same letter, this office also informed you of your right to appeal the penalty assessment within thirty (30) days and supplied you with an appeal affidavit form. You did not file an appeal within the thirty (30) days; therefore, your right to appeal has expired.

Pursuant to 2AAC 50.895, staff will refer this matter to the Commission for entry of a final order of assessment of the penalty due. The Commission will consider this matter at its June 3, 2026, public meeting.

If you would like to avoid further Commission action, please remit your payment of **\$25** to our office.

Finally, should you have any questions, please contact this office at 907-276-4176. If you are calling long distance to Anchorage from within the state, you may call toll-free at 800-478-4176.

ALASKA PUBLIC OFFICES COMMISSION

Mackenzie Pearson

Mackenzie Pearson
Paralegal

Enclosure: Civil Penalty Assessment

cc: 2026 Group File (w/o enclosures)

CERTIFICATE OF SERVICE:	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Right to Life Action ATTN: Pat Martin PO Box 201134 Anchorage, AK 99520 RLA@AlaskaRightToLife.org	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

Mackenzie Pearson 5/1/2026
Signature Date

Rousselle, Cari J (DOA)

From: postmaster@NETORGFT10426696.onmicrosoft.com
To: RLA@alaskarighttolife.org
Sent: Friday, May 1, 2026 10:57 AM
Subject: Delivered: Notice of Referral to Commission

Your message has been delivered to the following recipients:

[RLA@alaskarighttolife.org \(rla@alaskarighttolife.org\)](mailto:RLA@alaskarighttolife.org)

Subject: Notice of Referral to Commission

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:

Right to Life Action
 Attn: Pat Martin
 PO Box 201134
 Anchorage AK 99520



9590 9402 9692 5199 6810 81

2. Article Number (Transfer from service label)

9489 0090 0027 6710 2489 04

COMPLETE THIS SECTION ON DELIVERY

A. Signature Agent
 X  Addressee

B. Received by (Printed Name) C. Date of Delivery
 Pat Martin 5.6.20

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

3. Service Type

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



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

May 15, 2026

Via Certified Mail and Email

Right to Life Action
Attn: Pat Martin
PO Box 201134
Anchorage, AK 99502
RLA@alaskarighttolife.org

RE: Commission Meeting Notice

Dear Mr. Martin:

The Commission will review the proposed Order for Referral at its June 2-3, 2026 Commission Meeting in Anchorage, Alaska.

Currently, the matter is scheduled to be considered at **12:35 p.m. on Tuesday, June 2, 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 wish If you do not attend the meeting, staff will send you a final order notifying you of the Commission's decision. If you wish to present or make a statement to the Commission, please notify staff prior to the meeting so they can pull your matter from the agenda.

If you have any questions, please contact our office.

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

Encl: Proposed Order for Referral

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Right to Life Action Attn: Pat Martin PO Box 201134 Anchorage, AK 99502 RLA@alaskarighttolife.org	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

Cari Rousselle

05/15/2026

Signature

Date

Rousselle, Cari J (DOA)

From: postmaster@NETORGFT10426696.onmicrosoft.com
To: rla@alaskarighttolife.org
Sent: Friday, May 15, 2026 3:39 PM
Subject: Delivered: Commission Meeting Notice

Your message has been delivered to the following recipients:

[rla@alaskarighttolife.org \(rla@alaskarighttolife.org\)](mailto:rla@alaskarighttolife.org)

Subject: Commission Meeting Notice