

**[TAB 5]**

# **Complaint 25-13-CD**

*Mike Alexander v. Ashley Carrick*

Presented By:

Kim Stone, Campaign Disclosure Coordinator



## **BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

## **NOTICE OF HEARING AND PROCEDURAL ORDER**

A hearing in these cases will take place before the Alaska Public Offices Commission at approximately 10:15 a.m. on Wednesday January 14, 2026.

The Commissioners will be present in person, by telephone, or via Microsoft Teams and will receive evidence regarding this matter. You may be present at the hearing either by telephone (1-907-202-7104, Access Code: 382 982 822#), in-person (2221 E. Northern Lights Blvd, Ste 128, Anchorage, Alaska), or via [Microsoft Teams Meeting](#).<sup>1</sup> You may be, but are not required to be, represented by an attorney or agent.

**If you wish to participate by telephone and are an individual who requires a special accommodation to participate, you must advise the Commission office on or before January 7, 2026, so that a special accommodation can be made.**

## PREHEARING AND HEARING PROCEDURES

- 1) **Parties.** The parties in this case are Commission Staff and Respondent.
- 2) **Issues.** At the hearing, the Commission will consider whether Respondent properly disclosed and detailed campaign expenditures during her 2024 campaign.
- 3) **Procedural history.** Complainant Michael Alexander filed a complaint against Respondent Ashley Carrick on August 18, 2025. Respondent Carrick filed a Response on September 19, 2025. Staff's investigation report recommending the complaint be dismissed was issued November 25, 2025.

1 Meeting ID: 237 734 363 936 42, Passcode: iz3Ps6vV

- 4) **Hearing procedures.** The hearing will be conducted as provided in AS 15.13.380, 2 AAC 50.891, and the Alaska Administrative Procedure Act, AS 44.62.330 – 44.62.630. All testimony must be presented or submitted under oath. A party may call witnesses, cross-examine witnesses, present and rebut evidence. If the respondent does not testify, the respondent may be called and examined as if under cross-examination.
- 5) **Evidence and exhibits.** All relevant evidence may be admissible at the hearing. In passing upon the admissibility of evidence, the Commission may consider, but is not bound to follow, the rules of evidence governing general civil proceedings in the courts of the State of Alaska. The Commission may exclude inadmissible evidence and order repetitive evidence discontinued.
- 6) **Prehearing filings.** No later than January 2, 2026, a party:
  - a) may file a list of witnesses expected to testify at the hearing;
  - b) may file copies of exhibits to be presented at the hearing that are marked and identified (for example, Resp.’s Ex. A);
  - c) may file a prehearing memorandum;
  - d) may file prehearing motions, including motions to dismiss, for summary judgment, or to exclude evidence, and
  - e) shall serve all parties and the Complainant with filings submitted.
- 7) **Response to motions and requests for subpoenas.** No later than January 9, 2026, a party
  - a) may respond to a motion; and
  - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing, and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) **Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) **Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

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

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

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

Dated: December 24, 2025



Heather Hebdon, Executive Director  
Alaska Public Offices Commission

<b>CERTIFICATE OF SERVICE:</b>	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Michael Alexander PO Box 521171 Big Lake, AK 99652 BigLakeMike907@outlook.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Rep. Ashley Carrick PO Box 82428 Fairbanks, AK 99707 Rep.Ashley.Carrick@akleg.gov	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email



12-24-25

Signature

Date





**TO:** APOC Commissioners  
**DATE:** November 25, 2025  
**FROM:** Kim Stone, Campaign Disclosure Coordinator  
**SUBJECT:** Staff Report 25-13-CD, *Michael Alexander v. Ashley Carrick*

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### **SUMMARY OF COMPLAINT AND RESPONSE**

Complainant Michael Alexander alleges Respondent Ashley Carrick failed to properly disclose campaign expenditures to two vendors.<sup>1</sup> Respondent Carrick responds that the identified expenditures meet campaign disclosure requirements and provides additional information concerning the vendors.<sup>2</sup>

### **SUMMARY OF STAFF RECOMMENDATIONS**

A preponderance of the evidence does not support a violation. Respondent properly described campaign expenditures and APOC staff recommends dismissal of the complaint.

### **BACKGROUND FACTS**

Respondent Carrick was a candidate for reelection to the State House during the 2024 state election. During her campaign, Respondent made expenditures to the **Alaska**

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<sup>1</sup> [Complaint 25-13-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27197), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27197>. As with several other complaints filed by Alexander, the electronic version of the complaint includes comments by a user identified as "Pat Martin."

<sup>2</sup> [Carrick Response to Complaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27215), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27215>.

**Democratic Party and Last Frontier Mediactive**, reporting the expenditures on her 30-day primary,<sup>3</sup> 7-day primary,<sup>4</sup> and 30-day general<sup>5</sup> reports.

Respondent described the purpose of her five expenditures to the Alaska Democratic Party alternately as “coordinated campaign fee” or “coordinated campaign buy-in.” The purchases totaled approximately \$3,000. Respondent described the purpose of her two expenditures to Last Frontier Mediactive as “radio ads.” The purchases totaled approximately \$6,200.

Complainant points to Respondent’s reporting of these two campaign vendors as a violation of campaign disclosure law.

## **LAW**

Under Alaska campaign disclosure law, an “expenditure” includes “a purchase or a transfer of money or anything of value, or promise or agreement to purchase or transfer money or anything of value, incurred or made for the purpose of . . . influencing the nomination or election of a candidate.”<sup>6</sup> Candidates are required to disclose financial activity, including expenditures and debts incurred by their campaigns, on reports. For each campaign, mandatory APOC reports include a year-start report, 30-day and 7-day reports for the primary and general elections, and a year-end report.<sup>7</sup>

For each general expenditure, a candidate must report its date and amount as well as the check number or identifying transaction number, the name and address of the payee, and the purpose of the expenditure.<sup>8</sup> In comparison, when a candidate or group makes expenditures to an advertising agency or to a business that provides campaign consultation

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<sup>3</sup> [30-day primary report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=43776&ViewType=CD),  
<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=43776&ViewType=CD>.

<sup>4</sup> [7-day primary report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=44112&ViewType=CD),  
<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=44112&ViewType=CD>.

<sup>5</sup> [30-day general report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=44954&ViewType=CD),  
<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=44954&ViewType=CD>.

<sup>6</sup> AS 15.13.400(7)(A)(i).

<sup>7</sup> AS 15.13.110.

<sup>8</sup> AS 15.13.040(a)(1)(A); 2 AAC 50.321(a)(5).

or management services, “the report must disclose in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed....”<sup>9</sup>

In addition to reporting requirements, Alaska campaign disclosure law also imposes separate recordkeeping requirements for expenditures made to advertising agencies and businesses providing campaign consultation or management services.<sup>10</sup>

When APOC receives a properly filed complaint, Commission staff must undertake an investigation and present the investigation report.<sup>11</sup> The staff bears the burden of proving a violation by a preponderance of the evidence.<sup>12</sup> A complaint must include “a clear and concise description of facts that, if true,” would violate relevant statutes.<sup>13</sup>

## **ANALYSIS**

As a preliminary matter, Complainant has filed nine complaints in the past year, most of them raising allegations made by a third party during a previous Commission hearing.

In this matter, Complainant specifically calls out Respondent’s purchases of campaign services from Last Frontier Mediactive and the Alaska Democratic Party but does not articulate any argument specific to those expenditures.<sup>14</sup> APOC staff surmises Complainant’s allegation is that Respondent provided insufficient detail about the

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<sup>9</sup> 2 AAC 50.321(d).

<sup>10</sup> 2 AAC 50.320(a) and (b).

<sup>11</sup> 2 AAC 50.870; 2 AAC 50.891.

<sup>12</sup> 2 AAC 50.891(d).

<sup>13</sup> 2 AAC 50.870(b)(4).

<sup>14</sup> Instead, Alexander lists campaign disclosure statutes and regulations without explaining how Respondent violated them. His complaint also includes several pages of references to Internal Revenue Service, Occupational Safety and Health Administration, Federal Motor Carrier Safety Administration, Federal Aviation Administration, and Federal Election Commission provisions, along with citations to unnamed state traffic laws, the National Electrical Code, and State of Alaska statutes and Matanuska-Susitna Borough code provisions. Finally, Alexander included in his complaint documents an offensive caricature drawing of an Alaska legislator, irrelevant to this matter, which must be understood to serve only his personal political purposes.

expenditures under 2 AAC 50.321 (as Complainant has alleged in complaints against several other legislators).

The **Alaska Democratic Party** is “an entity recognized under Alaska State Statute and Federal law and by the Democratic National Committee, in order to secure the passage of legislation . . . and to elect representatives pledged to Democratic Party principles.”<sup>15</sup> Its state business license classifies it as a “civic and social [organization].”<sup>16</sup>

APOC staff finds no evidence that the Alaska Democratic Party is an advertising agency or a business that provides campaign consultation or management services, as described in 2 AAC 50.321(d). Respondent therefore did not need to meet 2 AAC 50.321(d)’s requirement to “disclose in detail all services rendered.” Instead, Respondent was only required to provide a basic description of the expenditure’s “purpose” under 2 AAC 50.321(a)(5). Complainant fails to allege how Carrick’s descriptions—“coordinated campaign fee” or “coordinated campaign buy-in”—inadequately identified the purpose of her expenditures under 2 AAC 50.321(a)(5).

In her Response to the Complaint, Carrick explained that the “Coordinated Campaign” is a function of the Alaska Democratic Party that provides support for Alaska State House and Senate campaigns. While this additional information would assist the public in better understanding the purpose of the expenditure, APOC staff does not find that Respondent’s failure to include it in her reports renders them incomplete in violation of .321(a)(5).

APOC staff recommends the Commission find no violation relating to Carrick’s expenditures to the Alaska Democratic Party.

Regarding **Last Frontier Mediactive**, APOC staff found little information on the company through basic searching. Two Alaska business licenses exist for the company; one describes the business as “lessors of nonresidential buildings” and one categorizes the business as “other services related to advertising.”<sup>17</sup> According to Respondent, Last

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<sup>15</sup> [ADP Party Plan of Organization](#), Article I at p. 1, last accessed November 20, 2025.

<sup>16</sup> [Alaska business license for Alaska Democratic Party](#), last accessed November 20, 2025.

<sup>17</sup> [Alaska Business License Search](#), last accessed November 20, 2025.

Frontier Mediactive is the parent company for several radio stations in the Fairbanks area.<sup>18</sup> Respondent states that her expenditures to Last Frontier Mediactive paid strictly for the placement of radio ads on stations owned by that business and did not pay for any subcontractors or sub-vendors of the company.

Respondent also provides account statements from the company that show that its charges to Carrick were for specific ad spots, and identify the ads' corresponding dates, times, and quantity.<sup>19</sup> The account statements further indicate that Last Frontier Mediactive performed a limited service: transmitting a finished product to a general audience. In contrast, an advertising agency is “[a] business organization specializing in planning and handling advertising on behalf of clients” and advertising agency services “[include] booking advertising space, designing and producing advertisements, devising media schedules, commissioning research, providing sales promotion advice, and acting as a marketing consultant . . .”<sup>20</sup> The company did not subcontract to other vendors or place media advertising with other outlets; rather, it performed the limited service of broadcasting Respondent’s finished campaign messaging in the same way that a billboard company would be paid to display a candidate’s billboard.

APOC staff concludes Respondent’s expenditures to Last Frontier Mediactive were not made to an advertising agency or a business providing campaign consultation or management services. Respondent therefore did not need to provide the more detailed level of reporting required by 2 AAC 50.321(d). Instead, Respondent needed only to state the “purpose” of the expenditure pursuant to 2 AAC 50.321(a)(5). Respondent’s description of the expenditures’ purpose – “radio ads” – satisfied .321(a)(5) because it described the reason the expenditure was done or made. APOC staff points out that when a campaign vendor’s business name does not make clear to the public what type of services it provides,

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<sup>18</sup> [Carrick Response to Complaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27215), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27215>, p.1.

<sup>19</sup> [Carrick Response to Complaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27215), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27215>, pp. 3-20.

<sup>20</sup> *Advertising agency*, OXFORD REFERENCE DICTIONARY (3<sup>rd</sup> ed. 2025), <https://www.oxfordreference.com/display/10.1093/oi/authority.20110803095352932> (last visited November 20, 2025).

a candidate's description ideally would include more information about the expenditure's purpose to allow the public to better understand the services provided—in this case, something like "broadcast of completed radio ads on its local radio stations." However, APOC staff does not find that the lack of additional detail about the expenditures renders Respondent's reporting incomplete under campaign disclosure law.

APOC staff recommends the Commission find no violation relating to Carrick's expenditures to Last Frontier Mediactive.

## **CONCLUSION**

APOC staff finds Respondent's reporting of campaign expenditures met campaign disclosure law requirements and recommends dismissal of the complaint.

<b>CERTIFICATE OF SERVICE:</b>	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Ashley Carrick PO Box 82428 Fairbanks, AK 99707 <a href="mailto:ashley@ashleyforalaska.com">ashley@ashleyforalaska.com</a>	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Mike Alexander PO Box 521171 Big Lake, AK 99652 <a href="mailto:BigLakeMike907@outlook.com">BigLakeMike907@outlook.com</a>	<input checked="" type="checkbox"/> US Mail <input checked="" type="checkbox"/> Email

*John Whitlock* 11/25/25  
Signature Date