

[TAB 8]

Complaint 25-16-CD

Mike Alexander v. Justin Ruffridge

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 1:00 p.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](#).¹ You may be, but are not required to be, represented by an attorney or agent.

If you wish to participate by telephone and are an individual who requires a special accommodation to participate, you must advise the Commission office on or before 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 his 2024 campaign.
- 3) **Procedural history.** Complainant Michael Alexander filed a complaint against respondent Justin Ruffridge on August 18, 2025. Respondent Ruffridge filed a response to the complaint on September 22, 2025. Staff's investigation report recommending the complaint be dismissed was issued November 20, 2025.

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

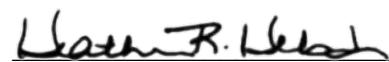
- 4) **Hearing procedures.** The hearing will be conducted as provided in AS 15.13.380, 2 AAC 50.891, and the Alaska Administrative Procedure Act, AS 44.62.330 – 44.62.630. All testimony must be presented or submitted under oath. A party may call witnesses, cross-examine witnesses, present and rebut 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

CERTIFICATE OF SERVICE:	
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. Justin Ruffridge PO Box 2755 Soldotna, AK 99669 Rep.Justin.Ruffridge@akleg.gov	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email



12-24-25

Signature

Date



TO: APOC Commissioners
DATE: November 20, 2025
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report 25-16-CD, *Michael Alexander v. Justin Ruffridge*

SUMMARY OF COMPLAINT AND RESPONSE

Complainant Michael Alexander alleges Respondent Justin Ruffridge violated “multiple sections” of Alaska Statute 15.13.040 and 2 AAC 50.321 through expenditures to three named vendors.¹ Respondent states that his reporting complied with campaign disclosure rules, and he provides additional information concerning one of the vendors.²

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 Ruffridge was a candidate for reelection to the State House during the 2024 state election. During his campaign, Respondent made expenditures to Martin Media, Docupost, and Addie Camp, reporting them on his 7-day primary,³ 7-day general,⁴ 30-day general,⁵ and year-end⁶ reports. In the reports, Respondent described the purpose of his \$1,369 Docupost purchase as “mailings” and the purpose of his \$2,627 Addie Camp

¹ [Complaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27200), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27200>.

² [Response to Complaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27241), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27241>.

³ [7-day primary report](#).

⁴ [7-day general report](#).

⁵ [30-day general report](#).

⁶ [Year-end report](#).

purchase as (an) “election night event.” He described the purpose of his three expenditures to Martin Media, totaling \$17,500, as “campaign media.”

In his **Response to Complaint**, Respondent provided additional detail and argument about the Martin Media expenditures:

- Martin Media provided campaign services including filming, editing, production, and final edits for campaign media, including photos, videos, and YouTube shorts;
- Martin Media did not purchase YouTube or Facebook advertisements for the campaign; rather, its scope of work was limited to the production and delivery of media;
- Respondent disclosed all digital advertising costs separately as independent APOC expenditures;
- Alaska law does not require candidates to break down costs within a single vendor contract to separately disclose filming, editing, and production costs;
- Respondent’s description of “campaign media” reflected bundled services provided by Martin Media under a single vendor agreement, and the description “campaign media” provides a fair and accurate disclosure to the public for filming, editing, and production work.

LAW

Alaska campaign disclosure law requires candidates to disclose expenditures and debts incurred by their campaigns. For each campaign, APOC standard reports include a year-start report, 30-day and 7-day reports for the primary and general elections, and a year-end report.⁷ 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.”⁸

⁷ AS 15.13.110.

⁸ AS 15.13.400(7)(A)(i).

For expenditures to vendors who provide general campaign goods and services, 2 AAC 50.321(a)(5) requires a candidate to report:

- (A) the date of payment;
- (B) the check number or the identifying transaction number. . . ;
- (C) the name and address of the payee;
- (D) the *purpose* of the expenditure; and
- (E) the amount of the expenditure . . .⁹

By comparison, for expenditures to advertising agencies or those who provide campaign consultation or management services, 2 AAC 50.321(d) requires a candidate to report “in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed, and the amount of the expenditure.”¹⁰

In addition to reporting requirements, Alaska campaign disclosure law separately imposes recordkeeping requirements for expenditures made to advertising agencies and businesses providing campaign consultation or management services.¹¹

When APOC receives a properly filed complaint, Commission staff must undertake an investigation and present the investigation report.¹² Staff bears the burden of proving a violation by a preponderance of the evidence.¹³ A complaint must include “a clear and concise description of facts that, if true,” would violate relevant statutes.¹⁴

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 expenditures to three vendors but does not articulate any argument specific to those expenditures.¹⁵ APOC

⁹ AS 15.13.040(a)(1)(A); 2 AAC 50.321(a)(5) (emphasis added).

¹⁰ 2 AAC 50.321(d).

¹¹ 2 AAC 50.320(a) and (b).

¹² 2 AAC 50.870; 2 AAC 50.891.

¹³ 2 AAC 50.891(d).

¹⁴ 2 AAC 50.870(b)(4).

¹⁵ 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

staff surmises Complainant’s allegation is that Respondent provided insufficient detail about expenditures under 2 AAC 50.321 (as Complainant has alleged in complaints against several other legislators).

The first vendor is **Martin Media** which, per its website, offers “expert videography, dronography and photography” for businesses and special events.¹⁶ Its 2025 Alaska business license biennial report identifies the business as one of “motion picture and video production.”¹⁷ In Ruffridge’s Response to Complaint, he explained that Martin Media provided filming, editing, and production services for his campaign as a single vendor. Respondent further states the company did not purchase advertising for his campaign. APOC staff notes Martin Media’s website does not list advertising or social media services; rather it produces video that its clients can use for that purpose.

APOC staff concludes Martin Media is neither an advertising agency nor a business providing campaign consultation or management services. Respondent therefore did not need to meet 2 AAC 50.321(d)’s heightened reporting requirement. Instead, Respondent only needed to state the “purpose” of the expenditure pursuant to 2 AAC 50.321(a). While the complaint seems to suggest Respondent’s disclosure was insufficient because he did not itemize individual media elements, nothing in 2 AAC 50.321(a)(5) requires breaking down costs for individual tasks performed by one vendor. Respondent’s description of the expenditure purpose—“campaign media”—satisfied .321(a)(5) because it described the reason the expenditure was done or made.¹⁸ APOC staff notes that in this circumstance, a few more descriptive words might have assisted the public in understanding the purpose of

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.

¹⁶ [Martin Media](#), last accessed November 11, 2025.

¹⁷ [Martin Media 2025 Biennial Report](#) from State of Alaska Department of Commerce, Community, and Economic Development, last accessed November 18, 2025.

¹⁸ Oxford English Dictionary: purpose, n. The reason for which something is done or made.

the expenditure, given the myriad of possible services a “media” company might provide, but does not find that the lack of additional detail renders the reporting incomplete.

Regarding Respondent’s expenditures to **Docupost** and **Addie Camp**, APOC staff finds no evidence that those vendors were advertising agencies or provided campaign consultation or management services which would have required detailed descriptions under 2 AAC 50.321(d). Docupost, for which Respondent incurred an expenditure of \$1,369 for “mailings,” advertises as a “complete online postal mailing solution.”¹⁹ Addie Camp, for which Respondent incurred combined expenditures of \$2,627 for an “election night event,” appears to be a restaurant in Soldotna. If Complainant had made even a minimal effort to investigate his allegations, he would have quickly realized that Docupost and Addie Camp were not advertising agencies or campaign consulting businesses, and that regulations thus required listing only the purpose of the expenditure. Complainant offers nothing to support his allegation that Respondent violated campaign disclosure law—that expenditures to a mailing business for “mailings” and expenditures to a restaurant for an “election night event” somehow failed to describe their purposes.²⁰

APOC staff recommends the Commission find no violation relating to Respondent’s expenditures to Martin Media, Docupost, or Addie Camp.

CONCLUSION

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

¹⁹ [DocuPost - About](#), last accessed November 11, 2025.

²⁰ 2 AAC 50.321(a)(5).

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 Ruffridge PO Box 2755 Soldotna, AK 99669 ruffridgeak@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Mike Alexander PO Box 521171 Big Lake, AK 99652 BigLakeMike907@outlook.com	<input checked="" type="checkbox"/> US Mail <input checked="" type="checkbox"/> Email

John Whitlock

Signature

11/20/25

Date