

**[TAB 6]**

**Consolidated Complaints**  
**24-12-CD and 25-07-CD**  
***Alexander v. McCabe***

Presented By:

Kim Stone, Campaign Disclosure Coordinator

## BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Michael Alexander,	)	
	)	
Complainant,	)	
	)	
vs.	)	Case No. <b>24-12-CD / 25-07-CD</b>
	)	
Kevin McCabe	)	
	)	
Respondent.	)	
_____	)	

### NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing in these cases will take place before the Alaska Public Offices Commission at approximately 11:00 a.m. on Wednesday September 10, 2025.

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: 218 853 540#), 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 September 3, 2025, 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 public relations firms during his 2024 campaigns.
- 3) Procedural history.** Complainant Michael Alexander filed complaints against Kevin McCabe on December 27, 2024 and on July 1, 2025. Respondent McCabe filed responses on January 16, 2025 and July 15, 2025. Staff's investigation report recommending the consolidated complaints be upheld in part and dismissed in part was issued August 13, 2025.

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<sup>1</sup> Meeting ID: 234 956 901 993 7, Passcode: Yb9UE6WW


- 4) Hearing procedures.** The hearing will be conducted as provided in AS 15.13.380, 2 AAC 50.891, and the Alaska Administrative Procedure Act, AS 44.62.330 – 44.62.630. All testimony must be presented or submitted under oath. A party may call witnesses, cross-examine witnesses, present and rebut evidence. If the respondent does not testify, the respondent may be called and examined as if under cross-examination.
- 5) Evidence and exhibits.** All relevant evidence may be admissible at the hearing. In passing upon the admissibility of evidence, the Commission may consider, but is not bound to follow, the rules of evidence governing general civil proceedings in the courts of the State of Alaska. The Commission may exclude inadmissible evidence and order repetitive evidence discontinued.
- 6) Prehearing filings.** No later than August 29, 2025, 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 September 5, 2025, a party
- a) may respond to a motion; and
  - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing, and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

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

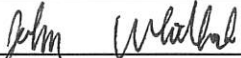
- a) pending motions, if any;
- b) complainant may present argument under 2 AAC 50.891(d)
- c) presentation of cases as follows, unless otherwise ordered by the Commission:
  - i) The Commission Staff's direct case, including the investigative report, evidence, and testimony of witnesses;
  - ii) Respondent's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

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

Dated: August 22, 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 <a href="mailto:mike@alexander728@gmail.com">mike@alexander728@gmail.com</a>	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Kevin McCabe PO Box 520248 Big Lake, Alaska 99652 <a href="mailto:kevin@kevinjmccabe.com">kevin@kevinjmccabe.com</a>	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

	8-22-25
Signature	Date





**TO:** APOC Commissioners  
**DATE:** August 13, 2025  
**FROM:** Kim Stone, Campaign Disclosure Coordinator  
**SUBJECT:** Staff Report  
24-12-CD, *Alexander v. McCabe*  
25-07-CD, *Alexander v. McCabe*<sup>1</sup>

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## **SUMMARY OF COMPLAINTS AND RESPONSES**

In Complaint 24-12-CD, *Alexander v. McCabe*, Complainant Michael Alexander alleges Respondent Kevin McCabe failed to disclose or delayed disclosing campaign advertising expenses incurred through Meta and insufficiently detailed expenditures.<sup>2</sup> McCabe responds that he properly disclosed the Meta expenses by timely reporting them as campaign expenditures made to Optima Public Relations, the public relations firm that handled the production and placement of the ads, and that he properly detailed those expenditures.<sup>3</sup>

In Complaint 25-07-CD, *Alexander v. McCabe*, Alexander alleges McCabe insufficiently detailed campaign expenditures made through Optima Public Relations in his year-end and amended 7-day general reports.<sup>4</sup> McCabe responds that he properly disclosed the expenses by timely reporting them and including detail consistent with regulatory requirements.<sup>5</sup>

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<sup>1</sup> Exhibit 1, Order granting consolidation. On July 28, 2025, upon APOC staff's request, the Commission ordered the cases consolidated for investigation and hearing.

<sup>2</sup> Exhibit 2, Complaint 24-12-CD. Alexander requested expedited consideration of the complaint, which the Commission denied after a December 31, 2024, hearing. See Exhibit 3, Order denying expedited consideration.

<sup>3</sup> Exhibit 4, McCabe January 16, 2025, Response to Complaint 24-12-CD.

<sup>4</sup> Exhibit 5, Complaint 25-07-CD. Alexander also asserts a reporting irregularity based upon an October 25, 2024, non-monetary contribution by McCabe's son and the campaign's corresponding non-monetary expenditure, but this allegation cites to a non-existent statute and APOC staff finds no violation in the manner or timing of the transactions.

<sup>5</sup> Exhibit 6, McCabe July 20, 2025, Response to Complaint 25-07-CD.

## **SUMMARY OF STAFF RECOMMENDATIONS**

### **Complaint 24-12-CD:**

- A preponderance of the evidence does not support the allegation that McCabe failed to report individual Facebook ads through Meta. APOC staff does, however, find that McCabe did not report a \$60 pre-paid Meta purchase that should have been disclosed on his 30-day general report and recommends a \$20 fine for this *de minimis* violation.
- APOC staff finds no violation based upon Alexander’s allegation of an “unpaid debt” for an October 21, 2024, Meta ad.
- A preponderance of the evidence does not support the allegation that McCabe failed to report an individual Meta expenditure for an ad that ran October 24, 2024, after Optima Public Relations had begun handling McCabe’s Meta purchases.
- APOC staff finds McCabe’s 7-day general report filed October 29, 2024 failed to sufficiently detail his expenditures through Optima but does not recommend penalties beyond those already imposed for the same violation in Complaint 25-01-CD, *Widney v. McCabe*.

### **Complaint 25-07-CD:**

- APOC staff finds McCabe’s year-end report filed February 16, 2025 sufficiently detailed expenditures to meet reporting regulations.

## **BACKGROUND FACTS**

Respondent McCabe was a candidate for reelection to the State House during the 2024 state election. During the campaign, McCabe had a “Vote Kevin McCabe” Facebook page and utilized Facebook’s parent company Meta for campaign messaging.

Facebook does not charge users for a page or a post. However, users who have a business page have the option to “boost” posts, which converts a regular, otherwise free post to an advertisement. Boosting posts allows posters to access a wider audience by making them visible to Facebook users beyond the poster’s standard algorithmic audience.

Once a user pays to boost a regular post it is considered an “ad,” but the only visual difference between them is that a boosted post is labeled “sponsored.”<sup>6</sup>

Beginning in July 2024, McCabe reported various expenditures to Meta, specifically to boost posts from his Vote Kevin McCabe Facebook page. He did not independently create Facebook ads but rather “pushed the button to boost a post.”<sup>7</sup> McCabe boosted six posts.

McCabe later engaged the services of Optima Public Relations (Optima) for his campaign. According to its website, Optima offers a variety of campaigns and elections services including digital and social media, graphic design, branding, and websites.<sup>8</sup> Optima took over management of the McCabe campaign in mid-October 2024 and “handled the production and placement of ads across multiple platforms, including Meta, Google, and various radio stations.”<sup>9</sup> An email dated August 16, 2024 from “becca@optimapublicrelations.com” references previous discussions with McCabe and outlines “a comprehensive plan for the general election,” including digital advertising, social media, radio advertising, mailers, text/call outreach and “E-blasts” and includes estimated budgets and dates for individual services,<sup>10</sup> among them:

**1. Digital Advertising**

**Platform:** Google Ads, Facebook/Instagram, YouTube, Search

**Estimated Budget:** \$3,5000

**Timeframe:** October 1- November 7

**2. Social Media**

**Platform:** Facebook, Instagram, Twitter

**Estimated Budget:** \$1,200

**Timeframe:** Ongoing, with a push in the last two weeks

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<sup>6</sup> See [Boosting Facebook Post | Meta for Business](https://www.facebook.com/business/learn/lessons/boost-your-post/) available at: <https://www.facebook.com/business/learn/lessons/boost-your-post/>.

<sup>7</sup> Exhibit 7, McCabe May 29, 2025 response to APOC request for information, p. 1.

<sup>8</sup> <https://optimapublicrelations.com/> last accessed May 7, 2025.

<sup>9</sup> Exhibit 4, McCabe January 16, 2025 Response to Complaint 24-12-CD, p.2

<sup>10</sup> *Id.*, p. 4.

### 3. **Radio Advertising**

**Stations:** KAGV 1110 AM (Big Lake), KAYO 1009 FM (Wasilla), KVNT 1020 AM (Eagle Rier), KMBQ FM 99.7 FM (Wasilla), KBBO-FM 92.1 FM (Houston), KXLW 96.3 FM (Houston) Spotify/iHeart Streaming (geotargeted)

**Estimated budget:** \$5,500 (including updated spot production)

**Timeframe:** October 26 – November 7.<sup>11</sup>

According to McCabe, on October 17, 2024, he told Optima to “go ahead with the entire plan” and thereafter “disclosed our contract with Optima”<sup>12</sup> on his 7-day general report<sup>13</sup> as an expenditure, as follows:

10/15/2024	Check 111	<b>OPTIMA PUBLIC RELATIONS</b> 73622 W PARKS HWY #665 WASILLA, Alaska 99623	ACCOUNT MANAGEMENT, GRAPHIC DESIGN, DIGITAL ADS, RADIO ADS, TEXT MESSAGING AND EMAIL, PRINTING AND POSTAGE	<b>\$16,825.00</b>
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Optima invoiced McCabe for these services on October 15, 2024, in the amount of \$16,825. The invoice reflected \$0.00 due as McCabe apparently paid the full amount on the same day – October 15, 2024. Optima’s invoice described the services rendered, the name of the business from which Optima purchased the campaign goods and services for the McCabe campaign, and described the media advertising that would be placed, as follows:<sup>14</sup>

\*Account Management & Campaign strategy

\*Graphic Design for 2 sets of 6 digital ad sizes

\*Digital Advertising from September through November 5 (partial pre-bill) through:

Google digital

Search

Facebook

YouTube

iHeart Video Integration

\*Radio Placement from October 16-November 5 through:

30-second and 60-second YouTube voice ads

Traditional radio stations

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<sup>11</sup> *Id.*, pp. 4-5.

<sup>12</sup> *Id.*, p. 2.

<sup>13</sup> [7-day report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570) filed October 29, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570>.

<sup>14</sup> Exhibit 8, Optima invoices to McCabe dated October 15, 2024 and November 5, 2024. McCabe provided the Optima invoices in response to APOC’s request for information related to complaint 24-12-CD.

- iHeart Morning shows
- Dan F (KVNT)
- Porcaro
- geotargeted streaming ads through Spotify/Pandora/iHeart
- video and podcast micro targeting
- \*Radio Ad Production
- \*Text Messaging & Email Targeting:
  - Images and written content for text messages
  - Design and content for responsive email marketing ads
  - Fees for graphic design and reports, set up, and data entry
- \*Printing / Postage for Mailers through
  - PIP Printing, for mailers, signage, and stickers for signage<sup>15</sup>

On November 5, 2024, Optima invoiced McCabe for a second conglomeration of work done for the campaign for \$6,983.<sup>16</sup> Optima's November 5, 2024, invoice described the services rendered, the name of business from which Optima purchased the campaign goods and services for the McCabe campaign, and described the media advertising that would be placed, in relevant part, as follows:<sup>17</sup>

- \*Graphic Design (*details omitted*)
- \*Digital Advertising (Final – November 5)
  - Google digital
  - Search
  - Animated Dynamic Ads
  - Facebook Advertising
  - YouTube OTT
  - iHeart Digital Video Integration
- \*Radio Placement (Final – November 2024)
- \*Printing / Postage for Mailers
  - PIP Printing (*details omitted*)

In his year-end report filed February 16, 2025, McCabe described the expenditure for Optima's November 5, 2024 invoiced work as follows:<sup>18</sup>

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<sup>15</sup> Exhibit 8, Optima invoices to McCabe dated October 15, 2024 and November 5, 2024, pp. 1-2.

<sup>16</sup> Exhibit 8, pp. 3-4.

<sup>17</sup> Exhibit 8, pp. 3-4.

<sup>18</sup> [Year-end report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46546?Type=570) filed February 16, 2025, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46546?Type=570>.

Date	Payment Method	Vendor	Purpose	Amount
10/27/2024	Check 113	<b>Optima Public Relations</b> 7362 W. Parks Hwy #665 Wasilla, Alaska 99623	Balance due after completion of multi-faceted and dynamic campaign strategy proposed/accepted/initiated 10/15/24, and carried out/evolved through election day, and afterward; graphic design for mailers, signage, social media support, thank you--post campaign; digital advertising on Google, Facebook, YouTube, iHeart, Animated ads; Radio placement on "traditional" stations, KVNT, KENI, iHeart stations; digital ads, text messaging, printing and postage for 2 mailers, printing signage.	<b>\$6,983.00</b>

## LAW

Under Alaska campaign disclosure law, an “expenditure” includes “a purchase or a transfer of money or anything of value, or a 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>19</sup> Candidates are required to disclose financial activity, including expenditures and debts incurred by their campaigns. For each campaign, the standard reports include a year-start report, 30-day and 7-day reports for the primary and general elections, and a year-end report.<sup>20</sup> If the value of any transaction in the report subsequently becomes incorrect, even if the value was accurate at the time of the initial filing, a candidate shall amend a report.<sup>21</sup>

For each paid 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>22</sup> Where a candidate or group makes expenditures to an advertising agency or to a business that provides campaign consultation 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>23</sup> In addition to reporting requirements, Alaska campaign disclosure law separately imposes recordkeeping requirements for expenditures made to

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<sup>19</sup> AS 15.13.400(7)(A)(i).

<sup>20</sup> AS 15.13.110.

<sup>21</sup> 2 AAC 50.321(g).

<sup>22</sup> 15.30.040(a)(1)(A); 2 AAC 50.321(a)(5).

<sup>23</sup> 2 AAC 50.321(d).

advertising agencies and businesses providing campaign consultation or management services.<sup>24</sup>

APOC’s 2024 Candidate Campaign training materials outline the details a candidate must provide when a campaign uses an advertising agency or campaign consultation or management services:

- Expenditure Rules [AS 15.13.082; AS 15.13.086; 2 AAC 50.321]
  - When reporting expenditures for campaign consulting or media buys, you must detail the services provided and subcontractors (includes identifying radio/tv stations where media was placed).<sup>25</sup>

APOC staff has in the past offered guidance relating to candidates’ reporting on use of advertising agencies, management consultants, and other campaign management services. In an email sent to all candidates and their treasurers and included in Alexander’s complaint, staff outlined how candidates could meet 2 AAC 50.321(d)’s requirements:

Basically, what this means is that the services provided must be disclosed along with any subcontractors used by the consultant, agency or service. An example might be, “Tom’s consulting service for creation and placing of social media on Facebook and Twitter” or “Tom’s consulting service for production and placement of radio and tv advertising on stations x, y and z.”<sup>26</sup>

When APOC receives a properly filed complaint, Commission staff must undertake an investigation and present the investigation report.<sup>27</sup> The staff bears the burden of proving a violation by a preponderance of the evidence.<sup>28</sup> A complaint must include “a clear and concise description of fact that, if true,” would violate relevant statutes.<sup>29</sup>

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<sup>24</sup> 2 AAC 50.320(a) and (b).

<sup>25</sup> Candidate Training Presentation at p. 13 available at: <https://apoc.doa.alaska.gov/media/edrdibcp/cdt-2024-candidate-training-manual.pdf> (emphasis in original).

<sup>26</sup> Ex. 9, APOC email guidance, July 22, 2020.

<sup>27</sup> 2 AAC 50.870; 2 AAC 50.891.

<sup>28</sup> 2 AAC 50.891(d).

<sup>29</sup> 2 AAC 50.870(b)(4).

## **ANALYSIS**

### **Complaint 24-12-CD:**

Complainant Alexander alleges McCabe refused or failed to disclose campaign advertising expenses “as required by AS 15.13.040, 15.13.110, 15.13.112 and 2 AAC 50.321.”<sup>30</sup>

In response to the allegations and additional APOC requests for information, McCabe outlined his direct, monetized activity with Meta as limited to “boosting” messaging already posted on his Vote for Kevin McCabe Facebook page.<sup>31</sup> McCabe reports that Optima took over Meta/Facebook messaging for the McCabe campaign around mid-October and that he allowed no person other than Optima to access his Meta/Facebook account.<sup>32</sup> McCabe provided documentation including (1) a Meta billing report for Vote Kevin McCabe account 861130320941171;<sup>33</sup> (2) a payment activity report for Kevin McCabe account 861130320941171;<sup>34</sup> (3) a Meta bill for \$119.77;<sup>35</sup> (4) Optima billing records;<sup>36</sup> and (5) documentation from Optima stating that many of the ads identified by the complainant do not appear in the Meta Ad Library for the campaign’s page identification number.<sup>37</sup>

APOC staff addresses the complaint’s specific allegations, as follows:

#### ***(1) Alexander’s assertion that McCabe’s Meta Ad Library contains advertisements for which McCabe did not file expenditure reports***

Alexander provided copies of several “Vote Kevin McCabe” Facebook communications, all identified as “sponsored,” from July 5, 2024 through November 6, 2024. Alexander also submitted what he alleges is “Kevin McCabe’s Meta Ad Library”

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<sup>30</sup> Exhibit 1, Complaint.

<sup>31</sup> Exhibit 7, McCabe May 29, 2025 response to APOC request for information, p. 1.

<sup>32</sup> *Id.*

<sup>33</sup> Exhibit 10, Meta Billing Report for Vote Kevin McCabe, Account 861130320941171.

<sup>34</sup> Exhibit 11, Meta payment activity July 1- Dec 31, 2024, Kevin McCabe (861130320941171).

<sup>35</sup> Exhibit 12, Meta bill for \$119.77.

<sup>36</sup> Exhibit 8, Optima invoices to McCabe dated October 15, 2024, and November 5, 2024.

<sup>37</sup> Exhibit 13, Optima “To Whom It May Concern” letter of December 30, 2024.



and a spreadsheet he (Alexander) created himself listing Facebook ads, identified by 15- and 16-digit “ad IDs,” that he alleges McCabe did not report as expenditures to APOC.<sup>38</sup>

In response, McCabe provided documentation showing Meta’s billings to him in the amount of \$300.36 and his payments to Meta of \$300.56 – supporting that McCabe paid for all Meta advertising services he received.<sup>39</sup> (McCabe reported that no one other than himself, and later Optima, had access to his Meta account.)

From July 22, 2024 through the end of the campaign, McCabe reported debts and expenditures to Meta as follows:

- \$20.00 expenditure incurred August 5, 2024, for “boost of Big Lake event flyer post,” listed on 7-day (primary) report filed August 13, 2024<sup>40</sup> [for debt incurred July 5, 2024, on amended 30-day (primary) report filed August 13, 2024]<sup>41</sup>
- \$17.00 expenditure incurred August 17, 2024, for “ad boost,” listed on 30-day (general) report filed October 7, 2024<sup>42</sup>
- \$83.79 expenditure incurred October 5, 2024, listed on 7-day (general) report submitted October 29, 2024<sup>43</sup> [for debt incurred September 16, 2024]
- \$119.77 expenditure incurred November 5, 2024, listed on year-end report filed February 16, 2025<sup>44</sup> [for debt incurred November 5, 2024, due to credit card decline for expenditure originally incurred October 21, 2024, reconciled as non-monetary contribution]

These expenditures to Meta reported to APOC total \$240.56.

McCabe, in response to the complaint, provided a statement of his payments to Meta for the period of July 1, 2024, through December 31, 2024.<sup>45</sup> The statement reflects the following transactions:

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<sup>38</sup> Exhibit 2, Complaint 24-12-CD, pp. 5-24.

<sup>39</sup> The \$.20 discrepancy likely stems from an unrecorded \$.20 refund to McCabe.

<sup>40</sup> [7-day primary report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44106?Type=570) filed Aug 13, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44106?Type=570>.

<sup>41</sup> [Amended 30-day primary report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44260?Type=570) filed Aug 13, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44260?Type=570>.

<sup>42</sup> [30-day general report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44973?Type=570) filed October 7, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44973?Type=570>.

<sup>43</sup> [7-day general report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570) submitted October 29, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570>.

<sup>44</sup> [Year-end report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46546?Type=570) submitted February 16, 2025, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46546?Type=570>.

<sup>45</sup> Exhibit 11, Meta payment activity July 1- Dec 31, 2024, Kevin McCabe (861130320941171).

- \$20.00 Paid – August 5, 2024
- \$60.00 *Funded* – August 17, 2024
- \$14.81 Prepaid balance – August 18, 2024
- \$19.08 Prepaid balance – August 19, 2024
- \$19.06 Prepaid balance – August 20, 2024
- \$7.05 Prepaid balance – August 21, 2024
- \$17.00 Paid – September 5, 2024
- \$83.79 Paid – October 5, 2024
- \$119.77 Paid – November 5, 2024

These payments to Meta total \$300.56.

In response to staff's request for additional information to help resolve issues presented in the complaint, McCabe provided a Meta billing report for the period of June 30, 2024, through December 31, 2024, reflecting:<sup>46</sup>

- \$20.00 "Meta Ads payment – Paid" dated August 17, 2024
- **\$60.00** "Meta Ads payment – *Funded*" dated August 17, 2024
- \$14.81 "Meta Ads payment – *Paid*" dated August 18, 2024
- \$19.08 "Meta Ads payment – *Paid*" dated August 19, 2024
- \$19.06 "Meta Ads payment – *Paid*" dated August 20, 2024
- \$7.05 "Meta Ads payment – *Paid*" dated August 21, 2024
- \$17.00 "Meta Ads payment – Paid" dated September 5, 2024
- -.20 "Meta Ads refund – Refunded" dated September 10, 2024
- \$83.79 "Meta Ads payment – Paid" dated October 5, 2024
- \$119.77 "Meta Ads payment – Paid" dated November 5, 2024

These billings to McCabe total \$360.36. However, understanding the \$60.00 "funded" amount to be a prepaid purchase, and the next four paid purchases (\$14.81, \$19.08, \$19.06, and \$7.05) totaling \$60.00 are taken from it, the amount is **\$300.36**

**To summarize:**

- McCabe reported **\$240.56** to APOC in Meta expenditures
- Meta billed McCabe **\$300.36.**
- McCabe paid Meta **\$300.56.**

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<sup>46</sup> Exhibit 10, Meta Billing Report for Vote Kevin McCabe, Account 861130320941171.

Commission staff has the burden to prove violations of Alaska’s campaign disclosure laws by a preponderance of the evidence. Complainant, by utilizing a publicly available Meta Ad Library, asserts McCabe’s Meta expenditures failed to account for each individual ad or boosted post. However, none of the ads for which Complainant provides a 16-digit ad identification number exist in McCabe’s Meta Ad Library. Still other ads Complainant points to are ads placed by Optima, so McCabe would not have separately reported them to APOC. McCabe, on the other hand, has shown proof of having paid the same amount to Meta as Meta billed him (excepting the \$60 pre-paid amount, discussed further below), supporting that McCabe *did not* have additional, unpaid Meta ads running. McCabe also averred that no one besides him, and later Optima, had access to his Meta account.

Under the circumstances presented, APOC staff cannot reconcile each ad purchase made by the candidate, any more than it can or should reconcile all expenditures, by individual item, made by a campaign from any vendor, whether it be the precise amount of stamps purchased for mailers or exact food bought for campaign events. Under the current circumstances, the evidence put forward in the complaint alleging McCabe did not report expenditures for specific individual ads fails to outweigh the evidence that McCabe was billed and paid for all Meta ads, with the exception of a \$60 expenditure addressed below. APOC staff does not find that a preponderance of evidence supports a violation of campaign disclosure law based on non-reporting of expenditures for specific named ads.

Based upon McCabe’s documentation, however, it appears his campaign failed to report a \$60 expenditure for a prepaid ad purchase on August 17, 2024. The Meta billing and payment records, when compared with APOC reporting records, support that McCabe should have reported the expenditure on his 30-day report due October 7, 2024, but didn’t, violating AS 15.13.040.

**(2) *Alexander’s assertion that an October 21, 2024 Meta ad “remains listed as unpaid debt in the APOC filings”***

The October 21, 2024 debt appeared on McCabe’s 7-day general report, filed October 29, 2024, in the amount of \$100 for “boosted posts.”<sup>47</sup> McCabe later amended the report to remove the debt noting that Meta debited McCabe’s personal credit card on November 5, 2024, because the campaign debit card was declined.<sup>48</sup> Because the boosted post was ultimately paid by McCabe (on his personal credit card), the debt was reconciled and reported as a non-monetary contribution from McCabe in the February 18, 2025, final report.<sup>49</sup> Accordingly, APOC staff does not find a preponderance of evidence to support McCabe violated AS 15.13.110.

**(3) *Alexander’s assertion that a high value Meta ad of October 24, 2024, “has no corresponding APOC disclosure” and McCabe omitted campaign spending through violations of 2 AAC 50.321(d) in his 7-day and year-end reports***

McCabe reported Optima took over Meta/Facebook messaging for the McCabe campaign around October 17, 2024. In his 7-day general report, McCabe reported a \$16,825 expenditure to Optima, describing its purpose as “account management, graphic design, digital ads, radio ads, text messaging and email, printing and postage.”<sup>50</sup> And in a response to APOC’s request for information, McCabe stated “around Mid October (15-17) I turned all the FB advertising over to Optima.”<sup>51</sup>

The October 24, 2024 ad that Complainant asserts has “no corresponding APOC disclosure” ran after Optima took over McCabe’s campaign and digital ads. APOC staff makes the preliminary finding that Optima Public Relations falls within the ambit of 2 AAC 50.321(d) and its reporting requirements for expenditures made to a business that

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<sup>47</sup> [7-day general report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570) filed October 29, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570>.

<sup>48</sup> [Amended 7-day general report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46556?Type=570) filed February 16, 2025, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46556?Type=570>.

<sup>49</sup> [Amended year-end report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46546?Type=570) filed February 16, 2025, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46546?Type=570>.

<sup>50</sup> [7-day general report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570) submitted October 29, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45214?Type=570>.

<sup>51</sup> Exhibit 7, McCabe May 29, 2025 response to APOC request for information, p. 1.

“provides campaign consultation or management services.” Because Optima was making the digital ad purchases from Meta, McCabe was required to report them as expenditures to Optima, not Meta – which he did, in his 7-day general report. The regulation notably does not require a candidate who has engaged such a business to separately identify and report every individual purchase made through the company. That McCabe did not report an October 24, 2024 ad as an individual expenditure to Meta is consistent with Optima’s having taken over such purchases after October 17. Absent more evidence than Complainant presents showing the October 24, 2024 ad costs were improperly reported, Commission staff cannot find a preponderance of the evidence sufficient to establish a violation of AS 15.13.040.

Nonetheless, although McCabe reported expenditures to Optima for account management in his 7-day general report, he included insufficient detail to meet the requirements of 2 AAC 50.321(d). Because expenditures to a business providing campaign management or consulting services “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>52</sup> McCabe’s description of purpose lacked sufficient details of the services rendered or the placement or dissemination of his paid communications.

In Optima’s August 16, 2024 email to McCabe, two months before McCabe filed his 7-day general report describing his campaign’s \$16,825 expenditure, Optima provided details 2 AAC 50.321(d) requires. The email outlined “a comprehensive plan for the general election,” specifically naming the social media and digital ad platforms and radio stations where the ads could run, their expected costs, and the dates they could run.<sup>53</sup> Then, on October 15, 2024, Optima confirmed to McCabe full and complete details of the services and goods it would provide and named the subcontractors and the platforms and media outlets where it would place McCabe’s media advertising.

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<sup>52</sup> 2 AAC 50.321(d).

<sup>53</sup> Exhibit 4, McCabe January 16, 2025 response to complaint 24-12-CD, pp. 4-5.

At the time he filed his 7-day general report on October 29, 2024, McCabe had Optima’s itemized email from August 16, Optima’s detailed invoice from October 15,<sup>54</sup> and had already paid Optima’s \$16,825 bill. And Optima undoubtedly could have itemized the bill further had McCabe requested.<sup>55</sup>

McCabe argues in his response to the complaint that “we simply do not have access to Optima’s expenses, which were unknown at the time of the report, because Optima managed those sub-accounts.” The statement cannot be reconciled with the documentation McCabe himself provided.

The lack of detail rendered his 7-day general report incomplete in violation of AS 15.13.040. McCabe has been previously penalized for this incomplete report in another complaint (*Widney v. McCabe*, 25-01-CD), and therefore staff recommends no duplicative, second penalty for the same violation.

APOC staff finally suggests a straightforward approach by which the McCabe campaign could have met .321(d) requirements by simply copying information from Optima’s October 15, 2024, invoice into its 7-day general report:

#### EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
10/15/2024	Check 111	<b>Optima Public Relations</b> 73622 W Parks Hwy #655 Wasilla, Alaska 99623	*Account Management & Campaign strategy *Graphic Design for 2 sets of 6 digital ad sizes *Digital Advertising from September through November 5 (partial pre-bill) through: Google digital Search Facebook YouTube iHeart Video Integration *Radio Placement from October 16- November 5 through: 30-second and 60-second YouTube voice ads Traditional radio stations iHeart Morning shows Dan F (KVNT) Porcaro geotargeted streaming ads through Spotify/Pandora/iHeart video and podcast micro targeting *Radio Ad Production *Text Messaging & Email Targeting: Images and written content for text messages Design and content for responsive email marketing ads Fees for graphic design and reports, set up, and data entry *Printing / Postage for Mailers through PIP Printing, for mailers, signage, and stickers for signage	<b>\$16,825.00</b>

<sup>54</sup> Exhibit 8, Optima invoices to McCabe dated October 15, 2024 and November 5, 2024.

<sup>55</sup> See 2 AAC 50.320(b), requiring of those who provide advertising or campaign consultation and management services to keep records of “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.”

### **Complaint 25-07-CD:**

Complainant Alexander, in the subsequently filed **Complaint 25-07-CD**, alleges McCabe failed to disclose sufficient details of campaign expenditures made through Optima in his year-end report filed February 16, 2025. McCabe responds that he properly disclosed the expenses by timely reporting them and including detail consistent with regulatory requirements.<sup>56</sup>

It must be recognized that almost any company providing consultation, management, or advertising services to a campaign necessarily will make purchases and subcontract services through third parties on behalf of its client. Campaign expenditure reporting must reflect that reality. But Alexander asserts a level of specificity in APOC expenditure reporting under 2 AAC 50.321(d) not required by campaign disclosure law. McCabe's year-end report,<sup>57</sup> submitted after Alexander filed his initial complaint (24-12-CD), reflects a clear effort to comply with 2 AAC 50.321(d). It discloses services and goods Optima provided and purchased, and lists where Optima placed media advertising for the campaign, for the expenditure amount of \$6,983. From Optima's invoices, APOC staff is aware McCabe could have provided a fuller level of detail, as could any campaign that purchases thousands of dollars of consultation or management or advertising services. APOC staff suggests an approach that hews more closely to the example set forth above relating to McCabe's October 15, 2024, expenditure. Nevertheless, APOC staff finds McCabe's year-end report substantially complied with 2 AAC 50.321(d) and finds no violation of expenditure reporting.

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<sup>56</sup> Exhibit 6, McCabe July 20, 2025 Response to Complaint 25-07-CD. In his response, McCabe asserts "2 AAC 50.510" as grounds for dismissing the complaint, but 2 AAC 50.510 concerns lobbyist registration and reporting and was repealed in 1979. McCabe also asks APOC to disregard Complainant's references to McCabe's legislative actions concerning APOC, although it was McCabe himself who has pointed to his legislative actions in earlier hearings. APOC staff has not and does not regard McCabe's legislative activity as relevant to these proceedings.

<sup>57</sup> [Year-end report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46546?Type=570) filed February 16, 2025, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46546?Type=570>.

## **CONCLUSION**

APOC staff does not find McCabe failed to report individual Facebook ads through Meta but does find McCabe failed to report a \$60 pre-paid Meta purchase on his 30-day report.

APOC staff does not find a violation concerning Complainant’s allegation of an “unpaid debt” based on an October 21, 2024 Meta ad.

APOC staff does not find McCabe failed to report an individual Meta expenditure for an ad that ran October 24, 2024.

APOC staff finds McCabe’s 7-day general report failed to sufficiently detail his expenditures through Optima. APOC does not recommend further penalizing McCabe for this violation, however, as it was previously addressed in *Widney v. McCabe*, 25-01-CD.

APOC staff finds McCabe’s year-end report substantially complied with 2 AAC 50.321(d) and finds no violation of expenditure reporting.

## **MAXIMUM CIVIL PENALTIES**

The maximum civil penalty for reporting violations, other than a 7-day report, is \$50 per day for each day the violation continues.<sup>58</sup> For purposes of calculating the maximum civil penalty for his 30-day general report, the accrual of penalties began the day following the due date of the report, October 7, 2024, and was tolled on December 27, 2024, the day the Complaint was filed. This represents a penalty period of 80 days for a **maximum penalty of \$4,000.**

## **MITIGATION AND RECOMMENDATION**

When staff assesses a penalty, the starting point for calculating the penalty is 2 AAC 50.855. When the amount missing from a report is less than \$100, regulation,

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<sup>58</sup> AS 15.13.390(a)(1).



allows for a 50% reduction from the maximum penalty.<sup>59</sup> Here, the information missing from McCabe’s 30-day report was a \$60 prepaid Meta ad expenditure – less than \$100. Accordingly, the penalty may be assessed at \$2,000.

From there, mitigation criteria may be considered for further reductions. A civil penalty may be reduced by a percentage greater than 50% when the person has a good filing history, meaning they have no late filings in the immediately preceding five years.<sup>60</sup> Here, McCabe has no late filings, which qualifies this penalty for a 50% reduction. A civil penalty may also be reduced by a percentage greater than 50% or waived entirely if the penalty is significantly out of proportion to the degree of harm suffered by the public for not having the information.<sup>61</sup> A civil penalty is significantly out of proportion if it exceeds the value of the transactions at issue. Here, the civil penalty for McCabe’s incomplete 30-day reporting violation (\$2,000) greatly exceeds the \$60 value of the transaction that was not reported. Because the \$2,000 penalty is so significantly out of proportion to the degree of harm, and the *de minimis* value of the missing transaction, staff recommends the assessed penalty be reduced by 99% to **\$20**.

<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:	
Kevin McCabe PO Box 520248 Big Lake, Alaska 99652 <a href="mailto:kevin@kevinjmccabe.com">kevin@kevinjmccabe.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:mike@alexander728@gmail.com">mike@alexander728@gmail.com</a>	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

KIM STONE

08.13.25

Signature

Date

<sup>59</sup> 2 AAC 50.855(b)(2)(C)(i).

<sup>60</sup> 2 AAC 50.865(a)(1)(A).

<sup>61</sup> 2 AAC 50.865(b)(5).

**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

Michael Alexander,

Complainant,

v.

Kevin McCabe,

Respondent.

Case Nos. 24-12-CD  
& 25-07-CD

**ARRIVED**

7/28/2025

APOC - ANCH  
PM HC FAX/ELE

**ORDER GRANTING CONSOLIDATION**

The staff of the Alaska Public Offices Commission requests that two complaints filed by Michael Alexander against Kevin McCabe, Case Nos. 24-12-CD and 25-07-CD, be consolidated for the purposes of investigation and hearing. The Commission grants consolidation because doing so is efficient for the investigative and decision-making process without harming the interests of the complainant or respondent.

The respondent, Representative McCabe, objected to consolidation, arguing that the process for the first filed complaint, Case No. 24-12-CD, has taken so long that it violates his right to a speedy hearing. Although the investigation report in that matter is late,<sup>1</sup> the Commission is not required to and does not routinely dismiss cases when investigations are untimely absent prejudice or other compelling reasons.<sup>2</sup> And because

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<sup>1</sup> 2 AAC 50.875(c).

<sup>2</sup> Rep. McCabe may make arguments about untimeliness in his response to staff's investigation report or at hearing; staff also should consider explaining in the report the reasons for the investigative delay.

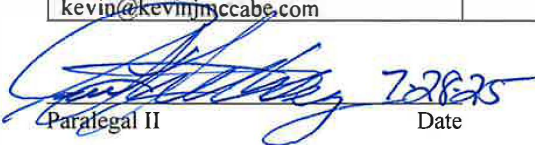
the complainant and respondent are the same,<sup>3</sup> and the allegations in both complaints involve campaign expenditures made to the same public relations firm, consolidation makes sense. This will save time and speed up the administrative process by addressing all the allegations in one investigation report and with one hearing if necessary. At this point, consolidation will serve Rep. McCabe's interest in a speedy resolution.

For the above reasons, the Commission orders the two above-captioned cases consolidated for investigation and hearing. This is not a final Commission order for the purposes of an appeal as of right to superior court.<sup>4</sup> The Commission retains jurisdiction to address the merits of both cases in a final order.

Dated: July 28, 2025

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION<sup>5</sup>

<b>Certificate of Service:</b> I hereby certify that on this date, I served, by <b>certified mail, US mail, and email</b> a true and correct copy of the foregoing in this proceeding on the following:	
Michael Alexander PO Box 521171 Big Lake, AK 99652 Mikealexander728@gmail.com	and by <b>email</b> to:  Heather Hebdon Executive Director Alaska Public Offices Commission heather.hebdon@alaska.gov
Kevin McCabe PO Box 520248 Big Lake, AK 99652 kevin@kevinmccabe.com	

 7-28-25  
Paralegal II Date

<sup>3</sup> The complainant did not object to consolidation.

<sup>4</sup> See AS 44.62.560 (providing for judicial review by the superior court of “a *final* administrative order” (emphasis added)).

<sup>5</sup> Commissioners Dan LaSota, Lanette Blodgett, Eric Feige, and Walt Monegan participated in this matter. The decision was made on a 4–0 vote.



# Alaska Public Offices Commission

## EXPEDITED COMPLAINT



EXPEDITED COMPLAINT REQUEST		ALL COMPLAINTS MUST INCLUDE:		APOC case name/number/date					
<p><b>PRIOR</b> to requesting expedited review, ensure your filing meets the factors required for expedited approval in AS 15.13.380(c). Those factors are whether the alleged violation:</p> <p><input type="checkbox"/> if not immediately restrained (stopped), could materially affect the outcome of an election or other impending event;</p> <p><input type="checkbox"/> could cause irreparable harm that penalties could not adequately remedy; and</p> <p><input type="checkbox"/> whether there is reasonable cause to believe that a violation has occurred or will occur</p> <p>Expedited review requires the <u>complainant</u> to prove the violation by a preponderance of the evidence.</p>		<ol style="list-style-type: none"><li>1. Complainant's name + contact info</li><li>2. Respondent's name + contact info</li><li>3. Laws, regulations allegedly violated</li><li>4. Description of allegations</li><li>5. Basis of knowledge of alleged facts</li><li>6. Documentation to support allegations</li><li>7. Notarized signature of the complainant</li><li>8. Proof that complaint and all supporting documents were served on respondent</li></ol> <p><b>APOC LAWS ALLEGEDLY VIOLATED</b> Specify section of law or regulation</p> <table border="1"><tr><td><b>Campaign Disclosure Law</b> <input checked="" type="checkbox"/> AS 15.13 <input checked="" type="checkbox"/> 2 AAC 50.250-405</td><td><b>Public Official Financial Disclosure</b> <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799</td></tr><tr><td><b>Lobbying Regulation</b> <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590</td><td><b>Legislative Financial Disclosure</b> <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799</td></tr></table>		<b>Campaign Disclosure Law</b> <input checked="" type="checkbox"/> AS 15.13 <input checked="" type="checkbox"/> 2 AAC 50.250-405	<b>Public Official Financial Disclosure</b> <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799	<b>Lobbying Regulation</b> <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590	<b>Legislative Financial Disclosure</b> <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799	<p><b>24-12-CD</b></p> <p><b>ARRIVED</b> 12/27/2024 APOC - ANCH PM HC FAX/ELE</p>	
<b>Campaign Disclosure Law</b> <input checked="" type="checkbox"/> AS 15.13 <input checked="" type="checkbox"/> 2 AAC 50.250-405	<b>Public Official Financial Disclosure</b> <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799								
<b>Lobbying Regulation</b> <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590	<b>Legislative Financial Disclosure</b> <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799								
<input type="checkbox"/> APOC <input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group	<b>COMPLAINANT</b> Michael Alexander		<input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group	<b>RESPONDENT</b> Person or group allegedly violating law Kevin McCabe					
<b>Address City / Zip</b>	PO Box 521171 Big Lake, AK 99652		2193 W Linn Marie Circle Big Lake, AK 99652 PO Box 520248, Big Lake, AK 99652						
<b>Phone/Fax</b>	(907) 892-4878		(907) 229-3721						
<b>E-mail</b>	mikealexander728@gmail.com		kevin@kevinjmccabe.com						
<b>COMPLAINANT'S REPRESENTATIVE</b>		<b>RESPONDENT'S REPRESENTATIVE</b>							
If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info									
<b>Name/Title</b>									
<b>Address</b>									
<b>Phone/Fax</b>									
<b>E-mail</b>									
<b>DESCRIPTION or SUMMARY of ALLEGED VIOLATION</b>		Use extra pages if needed	<input checked="" type="checkbox"/> <b>SUPPORTING DOCUMENTS – DESCRIBE:</b>						
Kevin McCabe refused or failed to disclose			Summary of Alleged Violations						
Campaign advertising expenses as required by AS 15.13.040, 15.13.110, 15.13.112, and AAC 50.321			Meta Ad Disclosures & Discrepancies						
			Meta Ad Library & Images						
<b>PROOF of SERVICE ATTACHED:</b>		<input type="checkbox"/> Fax – receipt confirmation <input type="checkbox"/> Certified mail – signed receipt							
<input type="checkbox"/> Process server – return of service <input type="checkbox"/> E-mail – delivery/read receipt <input type="checkbox"/> Other:									
<b>COMPLAINANT'S SWORN STATEMENT: To the best of my knowledge and belief, these statements are true</b>									
Signature <u>Michael R. Alexander</u>		Title		Date <u>12-20-24</u>					
Subscribed and sworn to and affirmed by me at <u>Big Lake</u> on <u>December 2024</u>									
Signature <u>C. Turner</u>		Title <u>Notary</u>							
APOC COMPLAINTS, RESPONSES, INVESTIGATION REPORTS & COMMISSION ACTIONS ARE PUBLIC DOCUMENTS									
<b>APOC ANCHORAGE</b>		<b>APOC JUNEAU</b>		<b>APOC COMPLAINT PROCESS: 2 AAC 50.450 -476</b>					
2221 E. NORTHERN LIGHTS #128		240 MAIN STREET #500		FILING COMPLAINTS: 2AAC 50.870 ANSWERING COMPLAINTS: 2AAC 50.880					
ANCHORAGE, AK 99508		P.O. BOX 110222		APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870					
907-276-4176 / FAX 907-276-7018		JUNEAU, AK 99811		INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891					
TOLL-FREE 800-478-4176		465-4864 / FAX 465-4832		RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c)					
WEB: <a href="http://doa.alaska.gov/apoc/">http://doa.alaska.gov/apoc/</a>		APOC FORMS: <a href="http://doa.alaska.gov/apoc/forms_all.html">http://doa.alaska.gov/apoc/forms_all.html</a>		APOC LAWS: <a href="http://doa.alaska.gov/apoc/apoclaws.html">http://doa.alaska.gov/apoc/apoclaws.html</a>					

# Proof of Delivery

Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

Tracking Number

1Z01109F4216615706

Weight

0.60 LBS

Service

UPS Ground

Shipped / Billed On

12/20/2024

Additional Information

Signature Required

Delivered On

12/24/2024 7:15 P.M.

Delivered To

BIG LAKE, AK, US  
Received By

KEVIN MCCABE

Left At

Residential

Please print for your records as photo and details are only available for a limited time.

Sincerely,

UPS

Tracking results provided by UPS: 12/26/2024 4:40 P.M. EST



Shipping

Tracking

Products & Services

The UPS Store

Delivered To  
BIG LAKE, AK US

- ✓ **Label Created**  
United States  
12/20/2024, 5:30 P.M.
- ✓ **We Have Your Package**  
Anchorage, AK, United States  
12/20/2024, 8:00 P.M.
- ✓ **On the Way**  
Anchorage, AK, United States  
12/24/2024, 5:59 A.M.
- ✓ **Second Delivery Attempted**  
Anchorage, AK, United States  
12/24/2024, 4:38 P.M.
- **Delivered**  
BIG LAKE, AK, US  
12/24/2024, 7:15 P.M.

[View All Shipping Details >](#)

## Proof of Delivery



Dear Customer,

This notice serves as proof of delivery for the shipment listed below.

**Tracking Number**

1Z01109F4216615706

**Weight**

0.60 LBS

**Service**

UPS Ground

**Shipped / Billed On**

12/20/2024

**Additional Information**

Signature Required

**Delivered On**

12/24/2024 7:15 P.M.

**Received By**

KEVIN MCCABE

**Delivered To**

BIG LAKE, AK, US

**Left At**

Residential

Please print for your records as photo and details are only available for a limited time.

Sincerely,

UPS

Tracking results provided by UPS: 12/26/2024 4:40 P.M. EST

[Print this page](#)

## **Complaint Regarding Campaign Finance Violations by Kevin McCabe**

**Date:** 12/20/2024

**Filed By:** Michael Alexander

**Contact Information:** PO Box 52117, Big Lake, AK 99652

**Respondent:** Kevin McCabe

**Contact Information:** 2193 W Linn Marie Circle, Big Lake, AK 99652 or PO Box 520248, Big Lake, Alaska 99652

### **Urgency and Public Interest Justifying Expedited**

I believe that Kevin McCabe's unresolved campaign finance violations threaten to divert his attention from his legislative responsibilities to District 30. Resolution of the complaint and public notice of the Commission's decision prior to the January 21, 2025 Legislative Session start will preserve the integrity of Alaska's campaign finance laws while maintaining Kevin McCabe's ability to serve District 30 and the people of Alaska without distraction. Allowing these violations to persist into the legislative session could undermine the credibility of both the representative and electoral processes.

### **Criteria for Expedited Review**

This complaint meets the criteria for expedited consideration under **AS 15.13.380(c)**:

1. The violations, if unresolved, could materially affect public trust in the respondent's capacity to serve during the legislative session.
2. The violations risk irreparable harm to the integrity of Alaska's campaign finance laws and electoral process.
3. The documented evidence provides reasonable cause to believe that violations have occurred and remain unresolved.



## Specific Laws and Regulations Violated

1. **AS 15.13.040** - Contributions, expenditures, and supplying of services to be reported:
  - Mandates full disclosure of all campaign expenditures, including purpose and amounts.
2. **AS 15.13.110** - Filing of reports:
  - Requires timely and accurate reporting of campaign expenditures and debts.
3. **AS 15.13.112** - Uses of campaign contributions:
  - Prohibits undisclosed or inaccurate reporting of campaign fund use.
4. **2 AAC 50.321** - Reporting by candidates, groups, or nongroup entities:
  - Stipulates detailed reporting of expenditures, including payment dates, amounts, and purposes.
5. **AS 15.13.114** - Disposition of prohibited contributions:
  - Requires transparency and forfeiture of undisclosed or non-compliant funds.

## Violations and Evidence

### Unreported Meta / Facebook Ads

Kevin McCabe's Meta Ad Library, Page ID 108455397202490, reveals at least seven instances of campaign advertisements for which no corresponding expenditures appear in the APOC filings. See attached spreadsheet for comprehensive list of Meta ads.

These ads include:

1. **Ad ID 473243895604464** (8/17/2024 - 8/20/2024): Spending range \$0-\$99.
2. **Ad ID 1225205111853990** (8/19/2024 - 8/21/2024): Spending range \$0-\$99.



3. **Ad ID 1068171291341660** (9/21/2024 - 9/29/2024): Spending range \$0-\$99.
4. **Ad ID 1313624632953800** (10/9/2024 - 10/29/2024): Spending range \$200-\$299.
5. **Ad ID 1095538085302610** (10/24/2024 - 11/6/2024): Spending range \$600-\$699.

These omissions violate the disclosure requirements under **AS 15.13.040(a)** and **AS 15.13.110**, which mandate full reporting of all campaign expenditures.

### **Delayed Reporting**

The October 21, 2024, Meta ad with a spending range of \$100-\$199 remains listed as unpaid debt in the APOC filings. There is no evidence of resolution or further disclosure of this expenditure.

### **Unexplained High-Spending Ad**

A Meta ad (Ad ID 1095538085302610) run on 10/24/2024 with a spending range of \$600-\$699 has no corresponding APOC disclosure. This discrepancy suggests either a failure to report or an intentional omission of significant campaign spending.

## **Violations of Public Trust**

Kevin McCabe's failure to disclose campaign expenditures demonstrates a clear disregard for Alaskans and the rule of law and undermines public confidence in the integrity of Alaska's electoral process. By concealing or delaying the disclosure of campaign spending, Kevin McCabe violated the fundamental principle of transparency enshrined in Alaska's campaign finance laws. These actions erode trust in the electoral system while bolstering the sense that candidates like Kevin McCabe believe – and act – as if they are above the law.

DATE	BUSINESS	AMOUNT	AD / CONTRACTOR INFO	AD RUN TIME	PURPOSE (Apparent)	APOC SUBMISSION	ELECTION	TYPE	REPORT
7/5/2024	META	\$20.00	1430408434333470 Debt Reported(?)	Jul 5, 2024 - Jul 15, 2024	Campaign Kickoff	8/13/2024	2024 - State Primary	State Primary	Seven Day Report
8/5/2024	META	\$20.00	1430408434333470 Debt Paid(?)		BOOST OF BIG LAKE EVENT,	8/13/2024	2024 - State Primary	State Primary	Seven Day Report
8/17/2024	META	\$17.00	No Meta Ad ID Available		AD BOOST	10/7/2024	2024 - State General	State General	Thirty Day Report
8/19/2024	META	\$100.00	1225205111853990	Aug 19, 2024 - Aug 21, 2024	vote KMC; 4 Ads Ran on This Site	Not Submitted			
9/16/2024	META	\$83.79	1217732276211890	Sep 16, 2024 - Sep 30, 2024	KMC Poser Look- Alike Ad	10/29/2024	2024 - State General	State General	Thirty Day Report
9/21/2024	META	\$100.00	1068171291341660	Sep 21, 2024 - Sep 29, 2024	Pizza and Politics	Not Submitted			
10/18/2024	META	\$100.00	1173022787644170	Oct 18, 2024 - Oct 24, 2024	Healy Meet n Greet	Not Submitted			
10/21/2024	META	\$100.00	878721744227219	Oct 21, 2024 - Oct 21, 2024	Early Voting Ad	10/29/2024	2024 - State General	State General	Seven Day Report
10/21/2024	META	\$200.00	1524069881572480	Oct 21, 2024 - Nov 5, 2024	Poser Look- Alike Ad	Not Submitted			
10/21/2024	META	\$100.00	865129065834320	Oct 21, 2024 - Nov 3, 2024	Early Voting Ad	Not Submitted			
10/24/2024	META	\$600.00	1095538085302610	Oct 24, 2024 - Nov 6, 2024	Swamp the Vote Ad	Not Submitted			
10/28/2024	META	\$300.00	914086297335838	Oct 28, 2024 - Oct 29, 2024	vote KMC; 4 Ads Ran on This Site	Not Submitted			
10/28/2024	META	\$100.00	1095514545254240	Oct 28, 2024 - Nov 3, 2024	Begin Endorsement Ad	Not Submitted			

[https://www.facebook.com/ads/library/?active\\_status=all&ad\\_type=political\\_and\\_issue\\_ads&country=US&media\\_type=all&search\\_type=page&source=ad-report&view\\_all\\_page\\_id=108455397202490](https://www.facebook.com/ads/library/?active_status=all&ad_type=political_and_issue_ads&country=US&media_type=all&search_type=page&source=ad-report&view_all_page_id=108455397202490)

PAGE ID & NAME 108455397202490	AD ID	SPENDING RANGE	APOC SUBMISSION	AD CREATED	AD START	AD STOP
Vote Kevin McCabe	1430408434333470	Lower Boundary: \$0 Upper Boundary: \$99	8/13/2024	7/5/2024	7/5/2024	7/15/2024
Vote Kevin McCabe	473243895604464	Lower Boundary: \$0 Upper Boundary: \$99	NONE	8/17/2024	8/17/2024	8/20/2024
Vote Kevin McCabe	1225205111853990	Lower Boundary: \$0 Upper Boundary: \$99	NONE	8/19/2024	8/19/2024	8/21/2024
Vote Kevin McCabe	1217732276211890	Lower Boundary: \$0 Upper Boundary: \$99	10/29/2024	9/16/2024	9/16/2024	9/30/2024
Vote Kevin McCabe	1068171291341660	Lower Boundary: \$0 Upper Boundary: \$99	NONE	9/21/2024	9/21/2024	9/29/2024
Vote Kevin McCabe	1313624632953800	Lower Boundary: \$200 Upper Boundary: \$299	NONE	10/9/2024	10/9/2024	10/29/2024
Vote Kevin McCabe	1173022787644170	Lower Boundary: \$0 Upper Boundary: \$99	NONE	10/18/2024	10/18/2024	10/24/2024
Vote Kevin McCabe	878721744227219	Lower Boundary: \$0 Upper Boundary: \$99	10/29/2024	10/21/2024	10/21/2024	10/21/2024
Vote Kevin McCabe	865129065834320	Lower Boundary: \$100 Upper Boundary: \$199	NONE	10/21/2024	10/21/2024	11/3/2024
Vote Kevin McCabe	1524069881572480	Lower Boundary: \$100 Upper Boundary: \$199	NONE	10/21/2024	10/21/2024	11/5/2024
Vote Kevin McCabe	1095538085302610	Lower Boundary: \$600 Upper Boundary: \$699	NONE	10/24/2024	10/24/2024	11/6/2024
Vote Kevin McCabe	914086297335838	Lower Boundary: \$0 Upper Boundary: \$99	NONE	10/28/2024	10/28/2024	10/29/2024
Vote Kevin McCabe	1095514545254240	Lower Boundary: \$0 Upper Boundary: \$99	NONE	10/28/2024	10/28/2024	11/3/2024
<a href="https://www.facebook.com/ads/library/?active_status=all&amp;ad_type=political_and_issue_ads&amp;country=US&amp;media_type=all&amp;search_type=page&amp;source=ad-report&amp;view_all_page_id=108455397202490">https://www.facebook.com/ads/library/?active_status=all&amp;ad_type=political_and_issue_ads&amp;country=US&amp;media_type=all&amp;search_type=page&amp;source=ad-report&amp;view_all_page_id=108455397202490</a>						

Inactive

Library ID: 914086297335838

Oct 28, 2024 - Oct 29, 2024

Platforms  

Categories 

2 ads use this creative and text

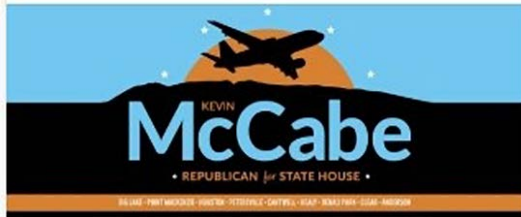
See summary details



### Vote Kevin McCabe

Sponsored • Paid for by Vote Kevin McCabe

Together, we can build a stronger Alaska with jobs, education, and freedom at the forefront. Vote Kevin McCabe on November 5th for a better future for our communities. #McCabeForAlaska




Inactive

Library ID: 1095514545254242

Oct 28, 2024 - Nov 3, 2024

Platforms 

Categories 

Estimated audience size: 100K - 500K 

Amount spent (USD): <\$100 

Impressions: 8K - 9K 

See ad details



### Vote Kevin McCabe

Sponsored • Paid for by Vote Kevin McCabe

 Proud to have the support of Nick Begich! us

With leaders like Nick by our side, we're ready to keep Alaska moving forward. Thank you for your endorsement, Nick! Early voting is still underway, so let's get out there and make sure you cast your ballot. Every vote counts - Stay safe and ...



VOTEKEVINMCCABE.ORG  
Vote Kevin McCabe - For Alaska State House  
Vote Kevin McCabe Republican for State House, District 30 Voter Resources Donate...

Learn mo...

 Inactive



...

Library ID: 1095538085302617

Oct 24, 2024 - Nov 6, 2024

Platforms  

Categories 

 Estimated audience size: 100K - 500K 

 Amount spent (USD): \$600 - \$699 

 Impressions: 70K - 80K 

See ad details



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe

Proven Leadership. Real Results.  Vote to Re-Elect Kevin McCabe for District 30.

#SwampTheVote #Alaska #Leadership 



VOTEKEVII  
Vote  
Kevin...

Learn Mo...



VOTEKEVII  
McCabe  
for...

Learn Mo


Inactive

Library ID: 865129065834320

Oct 21, 2024 - Nov 3, 2024

Platforms  

Categories 

Estimated audience size: 100K - 500K 

Amount spent (USD): \$100 - \$199 

Impressions: 15K - 20K 

See ad details



**Vote Kevin McCabe**

Sponsored · Paid for by Vote Kevin McCabe

👉 Early Voting Has Started! 🗳️ It's time to make your voice heard! Early voting for the November 5th election is officially open. This is your chance to cast your ballot before Election Day and ensure your vote counts.

As your representative, I've been working hard t...



VOTEKEVINMCCABE.ORG  
Vote Kevin McCabe -- For Alaska State House  
Vote Kevin McCabe Republican for State House, District 30 Voter Resources Donate...

Learn mo...


Inactive

Library ID: 878721744227219

Oct 21, 2024 - Oct 21, 2024

Platforms  

Categories 

Estimated audience size: 100K - 500K 

Amount spent (USD): <\$100 

Impressions: <1K 

See ad details



**Vote Kevin McCabe**

Sponsored · Paid for by Vote Kevin McCabe

👉 Early Voting Has Started! 🗳️ It's time to make your voice heard! Early voting for the November 5th election is officially open. This is your chance to cast your ballot before Election Day and ensure your vote counts.

As your representative, I've been working hard t...



VOTEKEVINMCCABE.ORG  
Vote Kevin McCabe  
Vote Kevin McCabe Republican for State House, District 30 Voter Resources Donate...

Learn mo...

Inactive

...

Library ID: 1524069881572481

Oct 21, 2024 - Nov 5, 2024

Platforms

Categories

Estimated audience size: 100K - 500K

Amount spent (USD): \$100 - \$199

Impressions: 7K - 8K

See ad details



Vote Kevin McCabe

Sponsored · Paid for by Vote Kevin McCabe

A campaign graphic with a dark blue background and white stars. It features three circular portraits of men. To the right of the portraits is a list of five bullet points, each with a red checkmark. At the bottom is a red banner with white text.

- ✓ PRO-ALASKA
- ✓ PRO-RESOURCE DEVELOPMENT
- ✓ AMERICAN OIL FROM AMERICAN SOIL
- ✓ OPEN ALASKA FOR ALASKANS
- ✓ LESS FEDERAL GOVERNMENT IN ALASKA
- ✓ RETURN ALASKA LAND TO ALASKA

**ON NOVEMBER 5, VOTE TRUMP, BEGICH & MCCABE**

VOTEKEVINMCCABE.ORG

Vote Kevin McCabe – For Alaska State House

Vote Kevin McCabe Republican for State House, District 30 Voter Resources Donate...

Learn more...

Inactive

...

Library ID: 1173022787644175

Oct 18, 2024 - Oct 24, 2024

Platforms

Categories

Estimated audience size: 1K - 5K

Amount spent (USD): <\$100

Impressions: 1K - 2K

See ad details



Vote Kevin McCabe

Sponsored · Paid for by Vote Kevin McCabe

A campaign graphic with a dark blue background and white stars. It features a portrait of Kevin McCabe. The text is white and yellow. At the bottom right is a small logo for the Alaska Republican Party.

**Meet n' Greet in Healy!**  
District 30 Voters of all parties.  
Come say hi to Representative Kevin McCabe. This is a good time for anyone to ask questions and tell him your thoughts and Ideas.

Thurs. Oct 24  
Aurora Denali Lodge  
Taiga Room  
6PM until 8PM  
Light Appetizers provided – please join us

**ALASKA REPUBLICAN PARTY**

VOTEKEVINMCCABE.ORG

Vote Kevin McCabe – For Alaska State House

Vote Kevin McCabe Republican for State House, District 30 Voter Resources Donate...

Learn more...



Inactive

...

Library ID: 1068171291341663

Sep 21, 2024 - Sep 29, 2024

Platforms

Categories

Estimated audience size: 100K - 500K

Amount spent (USD): <\$100

Impressions: 2K - 3K

See ad details



Vote Kevin McCabe

Sponsored · Paid for by Vote Kevin McCabe

Join Rep. McCabe for great pizza and conversation about Alaska politics and District 30.

With Co-hosts:  
Eric and CJ Koan  
Cathy Tilton...



SUN, SEP 29, 2024

Pizza & Politics

Susitna Brewing Company, LLC

Pizza & Politics

INTERES...

Inactive

...

Library ID: 1217732276211892

Sep 16, 2024 - Sep 30, 2024

Platforms

Categories

Estimated audience size: 50K - 100K

Amount spent (USD): <\$100

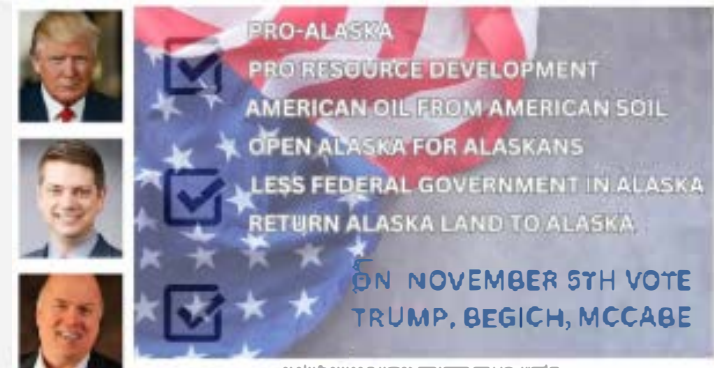
Impressions: 4K - 5K

See ad details



Vote Kevin McCabe

Sponsored · Paid for by Vote Kevin McCabe



VOTEKEVINMCCABE.ORG

Kevin McCabe for State House - Kevin McCabe

As a Republican candidate, and incumbent, for State House District 30 (covering Pt...

Learn mo...



# Launched August 2024

Aug 19, 2024 - Aug 21, 2024

Platforms  

Categories 

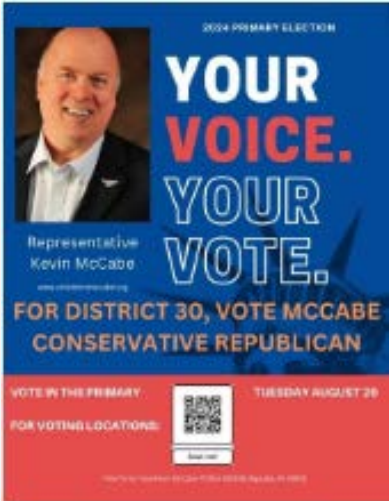
2 ads use this creative and text

See summary details



## Vote Kevin McCabe

Sponsored • Paid for by Vote Kevin McCabe



Inactive

Library ID: 1225205111853997

Aug 19, 2024 - Aug 21, 2024

Platforms  

Categories 

Estimated audience size: 50K - 100K 

Amount spent (USD): <\$100 

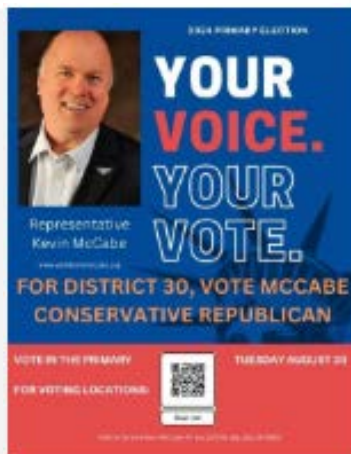
Impressions: 1K - 2K 

See ad details



Vote Kevin McCabe

Sponsored • Paid for by Vote Kevin McCabe



Vote Kevin McCabe

The official campaign page for Rep. Kevin McCabe, District 30 (Big Lake, Houston, Pt Mack, Willow, Trapper Creek, Talkeetna, Cantwell, Healy, Dena...

Inactive

Library ID: 473243895604464

Aug 17, 2024 - Aug 20, 2024

Platforms  

Categories 

Estimated audience size: >1M 

Amount spent (USD): <\$100 

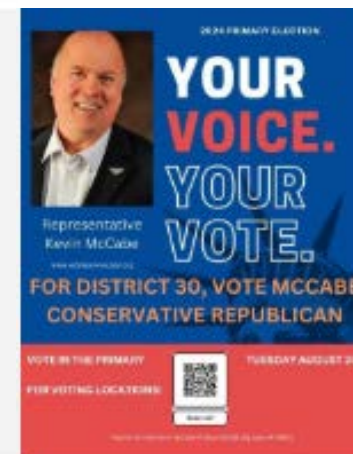
Impressions: 4K - 5K 

See ad details



Vote Kevin McCabe

Sponsored • Paid for by Vote Kevin McCabe



Vote Kevin McCabe

The official campaign page for Rep. Kevin McCabe, District 30 (Big Lake, Houston, Pt Mack, Willow, Trapper Creek, Talkeetna, Cantwell, Healy, Dena...

Inactive

...

Library ID: 1430408434333475

Jul 5, 2024 - Jul 15, 2024

Platforms  

Categories 

 Estimated audience size: 50K - 100K



 Amount spent (USD): <\$100 

 Impressions: 3K - 4K 

See ad details



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe

Please join us!



VOTEKEVINMCCABE.ORG

Kevin McCabe for State House - Kevin McCabe

As a Republican candidate, and incumbent, for State House District 30...

Learn mo...

Inactive

Library ID: 708674733456163

Oct 29, 2022 - Nov 9, 2022

Platforms

Categories

Estimated audience size: 100K - 500K

Amount spent (USD): <\$100

Impressions: 8K - 9K

See ad details

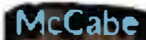


Vote Kevin McCabe

Sponsored · Paid for by Vote Kevin McCabe

I love it when my opponent goes negative and makes public statements that I "did nothing" as a Rep. It gives me a chance to correct the record and focus on my strengths, rather than his weaknesses.

So for the record, in the 32nd legislature, I Co...



Prime Bills Sponsored

Bill	Item Title	Current Status
HB 143	DRIVABLE REGISTRATION FEES	Introduced - working on introduction of bill into State House
HB 186	ONE LICENSE PLATE PER VEHICLE	PASSED Immediate savings to state budget of \$332,000 per year
HB 162	OSLO AND SILVER SPRING AS A LEGAL TOWN	Had 3 hearings. Will be filed again
HB 361	SURCHARGE: OIL EXPORTED TO CERTAIN STATES	The draft took in getting which is to allow them to increase the amount to pay for the oil to change policy
HB 362	REGULATION OF FOOD PRODUCTS	Introduced in getting Gov. Rutledge's food security task force to look at getting some food into the state
HB 363	FISHERY LANDING TAX SURCHARGE	The draft took in getting which is to allow them to increase the amount to pay for the oil to change policy and more

VOTEKEVINMCCABE.ORG  
Kevin McCabe for State House - Kevin McCabe

As a Republican candidate for our community's State House District 30...

Learn more

Inactive

Library ID: 1233690740526547

Oct 28, 2022 - Nov 8, 2022

Platforms

Categories

Estimated audience size: 100K - 500K

Amount spent (USD): <\$100

Impressions: 2K - 3K

See ad details



Vote Kevin McCabe

Sponsored · Paid for by Vote Kevin McCabe

<https://votekevinmccabe.org>



VOTEKEVINMCCABE.ORG  
Kevin McCabe for State House - Kevin McCabe  
As a Republican candidate for our community's State House District 30 (covering Pt MacKenzie, Big Lake, Houston, Willow, Talkeetna...

Inactive

Library ID: 457595946355598

Oct 21, 2022 - Nov 10, 2022

Platforms

Categories

2 ads use this creative and text

See summary details



Vote Kevin McCabe

Sponsored · Paid for by Vote Kevin McCabe



Inactive

Library ID: 599528291971047

Oct 17, 2022 - Oct 21, 2022

Platforms

Categories

Estimated audience size: 100K - 500K

Amount spent (USD): <\$100

Impressions: 2K - 3K

See ad details



Vote Kevin McCabe

Sponsored · Paid for by Vote Kevin McCabe



VOTEKEVINMCCABE.ORG  
Kevin McCabe for State House - Kevin McCabe

As a Republican candidate for our community's State House District 30...

Learn more

Inactive

Library ID: 599883738502560

Oct 8, 2022 - Nov 13, 2022

Platforms

Categories

Estimated audience size: 100K - 500K

Amount spent (USD): <\$100

Impressions: 5K - 6K

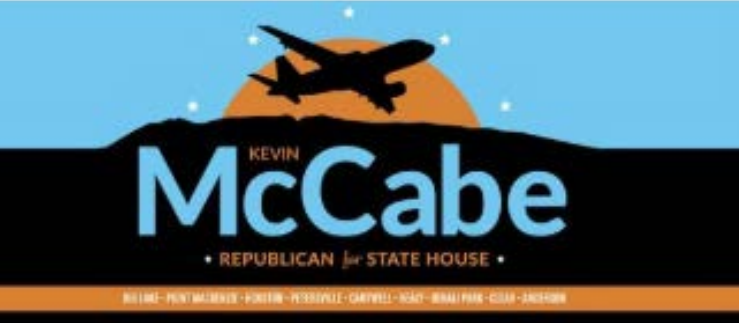
See ad details



Vote Kevin McCabe

Sponsored · Paid for by Vote Kevin McCabe

The official campaign page for Rep. Kevin McCabe, District 30 (Big Lake, Houston, Pt Mack, and North)



Vote Kevin McCabe  
Politician  
902 people like this

Like Page



Inactive

Library ID: 1187531458473342

Sep 23, 2022 - Sep 29, 2022

Platforms

Categories

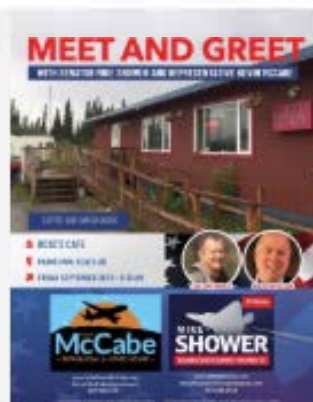
2 ads use this creative and text

See summary details



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe



Inactive

Library ID: 1063739874324696

Sep 24, 2022 - Sep 29, 2022

Platforms

Categories

Estimated audience size: 1K - 5K

Amount spent (USD): <\$100

Impressions: 1K - 2K

See ad details



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe

lets talk!



VOTEKEVINMCCABE.ORG  
Kevin McCabe for State House - Kevin McCabe  
As a Republican candidate for our community's State House District 30...

Learn mo...

Inactive

Library ID: 775133613706038

Sep 20, 2022 - Oct 5, 2022

Platforms

Categories

Estimated audience size: 100K - 500K

Amount spent (USD): <\$100

Impressions: 3K - 4K

See ad details



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe



VOTEKEVINMCCABE.ORG  
Kevin McCabe for State House - Kevin McCabe  
As a Republican candidate for our community's State House District 30...

Learn mo...


Inactive

Library ID: 797774517928690

Aug 30, 2022 - Sep 3, 2022

Platforms  

Categories 

Estimated audience size: 100K - 500K 

Amount spent (USD): <\$100 

Impressions: 2K - 3K 

See ad details



**Vote Kevin McCabe**

Sponsored · Paid for by Vote Kevin McCabe

Here's another great opportunity to talk with Alaska Senate and House of Representatives candidates, as well as a candidate for Houston City Council. See you there!



VOTEKEVINMCCABE.ORG

Kevin McCabe for State House - Kevin McCabe

As a Republican candidate for our community's State House District 30...

Learn mo...

Inactive

Library ID: 3158760884439659

Aug 30, 2022 - Sep 3, 2022

Platforms  

Categories 

Estimated audience size: 10K - 50K 

Amount spent (USD): <\$100 

Impressions: 1K - 2K 

See ad details



**Vote Kevin McCabe**

Sponsored · Paid for by Vote Kevin McCabe

Making ourselves available to the People in Senate District "O" and House District 30. We want to hear from you and answer any questions you may have. Please join us!



VOTEKEVINMCCABE.ORG

Kevin McCabe for State House - Kevin McCabe

As a Republican candidate for our community's State House District 30...

Learn mo...

Inactive


Library ID: 357267453280324

Aug 25, 2022 - Aug 28, 2022

Platforms  

Categories 

Estimated audience size: 50K - 100K 

Amount spent (USD): <\$100 

Impressions: 1K - 2K 

See ad details



**Vote Kevin McCabe**

Sponsored · Paid for by Vote Kevin McCabe

If you can't make it to the Pt Mack event Sunday afternoon, come on over to the Big Lake Rec Center! Or do both!



Inactive

Library ID: 773079490661366

Aug 24, 2022 - Aug 28, 2022

Platforms  

Categories 

Estimated audience size: 50K - 100K 

Amount spent (USD): <\$100 

Impressions: 1K - 2K 

See ad details



**Vote Kevin McCabe**

Sponsored · Paid for by Vote Kevin McCabe

Hope to see you there!



Inactive


Library ID: 795938731819495

Aug 16, 2022 - Aug 20, 2022

Platforms  

Categories 

Estimated audience size: 50K - 100K 

Amount spent (USD): <\$100 

Impressions: 5K - 6K 

This ad has multiple versions 

See ad details



**Vote Kevin McCabe**

Sponsored · Paid for by Vote Kevin McCabe

As a Republican candidate for our community's State House District 30 (covering Big Lake, Point Mackenzie, Houston, Petersburg, Cantwell, Healy, Denali Park, Clear and Anderson) I am asking you to support me in my candidacy so that I can serve you and our communities with the conservative values.



McCabe for AK House D30

Apply Now

Inactive


...


Library ID: 348990759529383

Oct 25, 2020 - Nov 3, 2020

Platforms  

Categories 

Estimated audience **100K -**  
size: **500K** 

Amount spent (USD): <\$100 

Impressions: 1K - 2K 

See ad details



### Vote Kevin McCabe

Sponsored • Paid for by **Vote Kevin McCabe**

As a Republican candidate for our community's State House District 8 (covering Big Lake, Knik-Fairview, Point Mackenzie, and parts of Meadow Lakes) I am asking you to support me in my candidacy so that I can serve you and our communities with the conservative values we all deserve.



KEVINJMCABE.COM

Kevin McCabe For State

As a Republican candidate for our community's State House District 8...

Learn mo...

Inactive


...


Library ID: 3389379281169000

Oct 25, 2020 - Nov 1, 2020

Platforms 

Categories 

Estimated audience **100K -**  
size: **500K** 

Amount spent (USD): <\$100 


Impressions: 1K - 2K 

See ad details




### Vote Kevin McCabe

Sponsored • Paid for by **Vote Kevin McCabe**

  
This content was removed  
because it didn't follow our  
[Advertising Standards](#).



 Inactive



...



Library ID: 352880999107649

Oct 23, 2020 - Nov 3, 2020

Platforms  

Categories 

 Estimated audience 100K - 500K 

 Amount spent (USD): <\$100 

 Impressions: 25K - 30K 

This ad has multiple versions 

See ad details



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe



This content was removed  
because it didn't follow our  
[Advertising Standards](#).

 Inactive



...

Library ID: 392896542066817

Oct 22, 2020 - Oct 22, 2020

Platforms  

Categories 

 Estimated audience 100K - 500K 

 Amount spent (USD): <\$100 

 Impressions: <1K 

See ad details



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe



This content was removed  
because it didn't follow our  
[Advertising Standards](#).

 Inactive

...

Library ID: 611361263073146

Aug 13, 2020 - Aug 18, 2020

Platforms 

Categories 

 Estimated audience size: 1K - 5K 

 Amount spent (USD): <\$100 

 Impressions: 1K - 2K 

See ad details



## Vote Kevin McCabe

Sponsored • Paid for by Vote Kevin McCabe

The official Kevin McCabe for District 8 Representative (Meadow Lakes, Big Lake, Knik-Fairview, and Point Mackenzie, AK) campaign page.

Paid for by: Vote Kevin McCabe Big Lake AK.  
PO Box 520248...



Vote Kevin McCabe  
Politician  
902 people like this

 Like Pa...

 Inactive

...

Library ID: 1124895534545313

Jun 28, 2020 - Jul 3, 2020

Platforms 

Categories 

 Estimated audience size: 10K - 50K 

 Amount spent (USD): <\$100 

 Impressions: 1K - 2K 

See ad details



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe

Good Sunday everyone. Does everyone know how broken Juneau is? Have you seen the editorials and calls for civility? Have you seen the calls for leadership or decrying the lack of leadership?

There are 60 wildly disparate ideas in the ...



KEVINJMCCABE.COM

Kevin McCabe for State House - Kevin McCabe

As a Republican candidate for our community's State House District 8...

Learn mo...

## CAMPAIGN DISCLOSURE FORM

**COMPLETED**

Submission Date: **02/15/2024**

Filer First Name: **Linn**

Filer Middle Name: **M**

Filer Last Name: **MCCABE**

Filer's Title: **Treasurer**

Report Type: **Year Start Report**

### CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**

Candidate Address: **PO Box 520248**

City, State Zip: **Big Lake, Alaska 99652**

### REPORT INFORMATION

Election Year: **2024**

Election: **State Primary**

Report Type: **Year Start Report**

Reporting Period: From **07/29/2023** Through **02/01/2024**

### FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	<b>\$4,199.36</b>				
[+] ↓		Previous Campaign Income: (From Box A of previous report)		Campaign Income Total: (Box A)	
Total Income Reported:	<b>\$702.16</b>	[+] ⇒	<b>\$0.00</b>	[=] ⇒	<b>\$702.16</b>
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)		Campaign Expense Total: (Box B)	
Total Expenditures Reported:	<b>\$0.00</b>	[+] ⇒	<b>\$0.00</b>	[=] ⇒	<b>\$0.00</b>
[=] ↓					

Closing Cash On Hand:	<b>\$4,901.52</b>
[-] ↓	
Total Debts:	<b>\$0.00</b>
[=] ↓	
Surplus/Deficit:	<b>\$4,901.52</b>

## INCOME

Date Received	Payment Method	Contributor	Details	Amount
11/27/2023	Check 2692	<b>Alaska's Doctors of Optometry PAC</b> 3706 Arctic Blvd #575 Anchorage, Alaska 99503	Occupation: PAC Employer: PAC	<b>\$200.00</b>
12/13/2023	Check 2812	<b>Alaska Miners Association PAC</b> 121 W Fireweed Lane, Suite 120 Anchorage, Alaska 99503	Occupation: PAC Employer: PAC	<b>\$500.00</b>
12/31/2023	Bank Interest	<b>Global Credit Union</b> PO Box 3200 Spokane, Washington 99220-3200	Occupation: Bank Employer: Bank	<b>\$2.16</b>
			<b>Income Total:</b>	<b>\$702.16</b>

## EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
<b>No Expenditures / Nothing to Report</b>				
			<b>Expenditure Total:</b>	<b>\$0.00</b>

## DEBTS

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

## CAMPAIGN DISCLOSURE FORM

**COMPLETED**

Submission Date: **08/13/2024**  
 Filer First Name: **Linn**  
 Filer Middle Name: **M**  
 Filer Last Name: **MCCABE**  
 Filer's Title: **Treasurer**  
 Report Type: **Seven Day Report**

## CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**  
 Candidate Address: **PO Box 520248**  
 City, State Zip: **Big Lake, Alaska 99652**

## REPORT INFORMATION

Election Year: **2024**  
 Election: **State Primary**  
 Report Type: **Seven Day Report**  
 Reporting Period: From **07/20/2024** Through **08/10/2024**

## FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	<b>\$6,154.68</b>				
[+] ↓		Previous Campaign Income: (From Box A of previous report)		Campaign Income Total: (Box A)	
Total Income Reported:	<b>\$5,770.31</b>	[+] ⇒	<b>\$6,620.99</b>	[=] ⇒	<b>\$12,391.30</b>
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)		Campaign Expense Total: (Box B)	
Total Expenditures Reported:	<b>\$2,988.24</b>	[+] ⇒	<b>\$4,665.67</b>	[=] ⇒	<b>\$7,653.91</b>
[=] ↓					
Closing Cash On Hand:	<b>\$8,936.75</b>				
[-] ↓					
Total Debts:	<b>\$50.00</b>				
[=] ↓					
Surplus/Deficit:	<b>\$8,886.75</b>				

## INCOME

Date Received	Payment Method	Contributor	Details	Amount
07/21/2024	Non-Monetary HOODIES AND TSHIRTS	<b>MCCABE, KEVIN</b> PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	<b>\$163.94</b>
07/23/2024	Credit Card	<b>SHOWER, MICHAEL</b> 3500 NORTH TRAVELAIR DR WASILLA, Alaska 99654	Occupation: PILOT Employer: FEDEX	<b>\$250.00</b>
07/23/2024	Check 1277	<b>WORLAND, PEGGY</b> 552 N BEAVER LODGE RD WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$200.00</b>
07/29/2024	Credit Card	<b>HALL, JESS</b> PO BOX 1987 PALMER, Alaska 99645	Occupation: BUILDER Employer: HALL QUALITY HOMES	<b>\$1,041.98</b>
07/29/2024	Credit Card	<b>SIMON, LORALI</b> 1940 DRIFTWOOD CI PALMER, Alaska 99645	Occupation: VP EXTERNAL AFFAIRS Employer: USIBELLI COAL MINE	<b>\$104.48</b>
07/29/2024	Check 535	<b>SMITH, MELODY LYNN</b> PO BOX 521565 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
07/30/2024	Credit Card	<b>SUMNER, JESSE</b> PO BOX 872992 WASILLA, Alaska 99687	Occupation: LEGISLATOR Employer: STATE OF ALASKA	<b>\$100.00</b>
08/01/2024	Check 10970	<b>GORLICK, TERRANCE</b> PO BOX 524818 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$500.00</b>
08/01/2024	Check 10969	<b>GORLICK, JACQUELINE</b> 222 E 7TH AVE APT 401 ANCHORAGE, Alaska 99501-3655	Occupation: RETIRED Employer: RETIRED	<b>\$500.00</b>



Date Received	Payment Method	Contributor	Details	Amount
08/05/2024	Credit Card	<b>ROTH, DOUG</b> 10360 PRINCE WILLIAM CIRCLE ANCHORAGE, Alaska 99515	Occupation: PILOT Employer: ATLAS AIR	<b>\$208.65</b>
08/06/2024	Check 2840	<b>AMAPAC</b> 121 W FIREWEED LN STE 120 ANCHORAGE, Alaska 99503	Occupation: PAC Employer: PAC	<b>\$250.00</b>
08/06/2024	Credit Card	<b>HALL, ROBERT</b> PO BOX 871906 WASILLA, Alaska 99687	Occupation: SALES Employer: SELF	<b>\$1,041.98</b>
08/08/2024	Check 2327	<b>SMITH, LILA</b> 2436 LEE ST ANCHORAGE, Alaska 99504-3120	Occupation: RETIRED Employer: RETIRED	<b>\$1,000.00</b>
08/08/2024	Credit Card	<b>TALERICO, DAVID</b> 341 BRIARBROOK LN HAINES CITY, Florida 33844	Occupation: RETIRED Employer: RETIRED	<b>\$52.40</b>
08/10/2024	Credit Card	<b>CARHART, STEVEN</b> PO BOX 520902 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$104.48</b>
08/10/2024	Cash	<b>CONN, YVONNE</b> 429 N BEAVER LAKE RD WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
08/10/2024	Credit Card	<b>TORRISON, CLARA</b> PO BOX 671656 CHUGIAK, Alaska 99567	Occupation: COMMERCIAL FISHER Employer: SELF	<b>\$52.40</b>
			<b>Income Total:</b>	<b>\$5,770.31</b>

## EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
07/21/2024	Non-Monetary HOODIES AND TSHIRTS	<b>MCCABE, KEVIN</b> PO BOX 520248 BIG LAKE, Alaska 99652		<b>\$163.94</b>
07/22/2024	Check 103	<b>CITY OF HOUSTON</b> PO BOX 940027 HOUSTON, Alaska 99694	PERMIT FOR CAMPAIGN SIGN	<b>\$25.00</b>
07/29/2024	Debit Card	<b>CARIBOU VIXENS VINYL</b> 3120 S BIG LAKE RD BIG LAKE , Alaska 99623	IMPRINT LOGO ON HOODIES AND TSHIRTS	<b>\$330.05</b>
07/30/2024	Check 104	<b>USPS</b> 2809 BIG LAKE RD BIG LAKE , Alaska 99652	POSTAGE	<b>\$219.00</b>
07/31/2024	Debit Card	<b>CAMPAIGN VERIFY</b> 1215 31ST STREET NW WASHINGTON, District of Columbia 20007-9998	VERIFY IDENTITY FOR WIRELESS CARRIERS	<b>\$95.00</b>
07/31/2024	Debit Card	<b>PIP PRIINTING AND MARKETING SERVICES</b> 833 E 4TH AVE ANCHORAGE, Alaska 99501	4X8 SIGNS	<b>\$776.49</b>
07/31/2024	Debit Card	<b>REPUBLICAN ADS LLC</b> 700 PENNSYLVANIA AVE SE 2ND FLOOR WASHINGTON, District of Columbia 20003	DIGITAL ADS	<b>\$685.00</b>
08/05/2024	Debit Card	<b>META</b> 1 HACKER WAY MENLO PARK, California 94025	BOOST OF BIG LAKE EVENT, ENTERED AS A DEBT FOR JULY 5, 2024 OF \$20.50 IN 30 DAY REPORT. ACTUAL AMOUNT 20.00, PAID 8/5/24	<b>\$20.00</b>

Date	Payment Method	Vendor	Purpose	Amount
08/07/2024	Debit Card	<b>HOGOSHA LLC</b> 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, South Dakota 57702	DIGITAL VIDEO AD (ENTERED AS DEBT FOR 7/16/24 IN 30 DAY REPORT) PD 8/7/24	<b>\$480.00</b>
08/08/2024	Debit Card	<b>PIP PRINTING AND MARKETING SERVICES</b> 833 E 4TH AVE ANCHORAGE, Alaska 99501	REMITTANCE ENVELOPES	<b>\$72.79</b>
08/10/2024	Bank Fee	<b>ANEDOT INC</b> 1340 POYDRAS ST STE 1770 NEW ORLEANS, Louisiana 70112	BANK FEES ON CREDIT CARD DONATIONS FROM JULY 20 THRU AUGUST 10, 2024	<b>\$120.97</b>
<b>Expenditure Total:</b>				<b>\$2,988.24</b>

## DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
07/05/2024	<b>META</b> 1 HACKER WAY MENLO PARK, California 94025	BOOST OF POST. LISTED AS DEBT ON 30-DAY REPORT. LISTED AS \$20.50; ACTUAL CHARGE \$20.00. PAID AUGUST 6, 2024.	<b>\$20.00</b>	<b>\$0.00</b>
07/15/2024	<b>RESULTS ADVERTISING WERKS</b> PO BOX 877556 WASILLA, Alaska 99687	VOICE RECORDING FOR AD. BILL NOT YET RECEIVED.	<b>\$50.00</b>	<b>\$50.00</b>
07/16/2024	<b>HOGOSHA</b> 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, South Dakota 57702	WEBITE MAINTENANCE AND DIGITAL AD PRODUCTION. LISTED AS DEBT ON 30-DAY REPORT. PAID IN FULL 8/7/24.	<b>\$480.00</b>	<b>\$0.00</b>
			<b>Remaining Debt Total:</b>	<b>\$50.00</b>

## CAMPAIGN DISCLOSURE FORM

## AMENDMENT

**Amendment Description:** DEBT TO META LISTED AS \$20.50 IS ACTUALLY \$20.00. 50 CENT CORRECTION.

## COMPLETED

Submission Date: **08/13/2024**  
 Filer First Name: **KEVIN**  
 Filer Middle Name: **J**  
 Filer Last Name: **MCCABE**  
 Filer's Title: **Treasurer**  
 Report Type: **Thirty Day Report**

## CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**  
 Candidate Address: **PO Box 520248**  
 City, State Zip: **Big Lake, Alaska 99652**

## REPORT INFORMATION

Election Year: **2024**  
 Election: **State Primary**  
 Report Type: **Thirty Day Report**  
 Reporting Period: From **02/02/2024** Through **07/19/2024**

## FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	<b>\$4,901.52</b>				
[+] ↓		Previous Campaign Income: (From Box A of previous report)	Campaign Income Total: (Box A)		
Total Income Reported:	<b>\$5,918.83</b>	[+] ⇒	<b>\$702.16</b>	[=] ⇒	<b>\$6,620.99</b>
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)	Campaign Expense Total: (Box B)		
Total Expenditures Reported:	<b>\$4,665.67</b>	[+] ⇒	<b>\$0.00</b>	[=] ⇒	<b>\$4,665.67</b>
[=] ↓					
Closing Cash On Hand:	<b>\$6,154.68</b>				
[-] ↓					
Total Debts:	<b>\$550.00</b>				
[=] ↓					
Surplus/Deficit:	<b>\$5,604.68</b>				

## INCOME

Date Received	Payment Method	Contributor	Details	Amount
03/31/2024	Bank Interest	<b>GLOBAL CREDIT UNION</b> PO BOX 196613 ANCHORAGE, Alaska 99519	Occupation: BANK Employer:	<b>\$1.22</b>
05/21/2024	Credit Card	<b>MCCABE, KEVIN</b> PO BOX 520258 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	<b>\$25.00</b>
05/28/2024	Non-Monetary DEPOSIT FOR HOTEL ROOM IN HEALY FOR EVENT	<b>MCCABE, LINN</b> PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$35.00</b>
06/07/2024	Credit Card	<b>MCCABE, LINN</b> PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$208.52</b>
06/08/2024	Credit Card	<b>BOYLE, DAVID</b> 2001 BARROW ST #1 ANCHORAGE, Alaska 99501	Occupation: RETIRED Employer: RETIRED	<b>\$200.00</b>
06/08/2024	Credit Card	<b>WILLIAMS, BEBE</b> PO BOX 870275 WASILLA, Alaska 99645	Occupation: RETIRED Employer: RETIRED	<b>\$50.00</b>
06/09/2024	Credit Card	<b>MCCABE, KEVIN</b> PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	<b>\$25.00</b>
06/09/2024	Credit Card	<b>MOORE, GAIL</b> 5200 N DOROTHY DR PALMER, Alaska 99645	Occupation: RETIRED Employer: RETIRED	<b>\$25.00</b>
06/10/2024	Credit Card	<b>Stephl, Angela</b> PO BOX 873671 WASILLA, Alaska 99687	Occupation: LEGISLATIVE AIDE Employer: STATE OF ALASKA	<b>\$100.00</b>
06/10/2024	Credit Card	<b>TILTON, CATHY</b> PO BOX 871753 WASILLA, Alaska 99687	Occupation: LEGISLATOR Employer: STATE OF ALASKA	<b>\$208.65</b>

Date Received	Payment Method	Contributor	Details	Amount
06/12/2024	Check 1605	<b>ANDERSON, THOMAS</b> 7362 W PARKS HWY #665 WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$50.00</b>
06/13/2024	Non-Monetary SCREWS FOR SIGNS	<b>MCCABE, KEVIN</b> PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	<b>\$18.00</b>
06/16/2024	Credit Card	<b>MCCABE, BRIAN</b> 12904 NORTH BAY TRAIL SIDE LAKE, Minnesota 55781	Occupation: RETIRED Employer: RETIRED	<b>\$1,041.98</b>
06/17/2024	Non-Monetary INK CARTRIDGES FOR PRINTER	<b>MCCABE, KEVIN</b> PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: LEGISLATOR Employer: STATE OF ALASKA	<b>\$187.98</b>
06/19/2024	Non-Monetary STAMPS	<b>MCCABE, LINN</b> PO BOX 520248 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$13.00</b>
06/24/2024	Check 7984	<b>QUARLES, JAMES</b> 96117 OYSTER BAY DR AMELIA ISLAND, Florida 32034	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
06/28/2024	Check 4713	<b>MCKAY, THOMAS</b> 11136 BAYSHORE DR ANCHORAGE, Alaska 99515	Occupation: LEGISLATOR Employer: STATE OF ALASKA	<b>\$100.00</b>
07/02/2024	Check 5392	<b>WILSON, LANCE</b> PO BOX 940065 HOUSTON, Alaska 99694-0064	Occupation: RETIRED Employer: RETIRED	<b>\$200.00</b>
07/09/2024	Credit Card	<b>MCCOLLUM, KATHY</b> 5780 W BIRCH HARBOR DR WASILLA, Alaska 99623	Occupation: SCHOOL BOARD MEMBER Employer: MSBSD	<b>\$100.00</b>
07/13/2024	Check 1049	<b>BREINER, LINDA</b> HC 89 BOX 8182 TALKEETNA, Alaska 99676-9701	Occupation: IOLA ENTERPRISES INC Employer: OFFICE MANAGER	<b>\$500.00</b>

Date Received	Payment Method	Contributor	Details	Amount
07/13/2024	Check 2359	<b>MATSU REPUBLICAN WOMENS CLUB EST 1947</b> PO BOX 875662 WASILLA, Alaska 99687	Occupation: PAC Employer: PAC	<b>\$500.00</b>
07/14/2024	Credit Card	<b>CARHART, STEVEN</b> PO BOX 520902 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
07/14/2024	Cash	<b>CHANDLER, C.H.</b> BOX 520312 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
07/14/2024	Check 8574	<b>CONN, YVONNE</b> 429 N BEAVER LAKE RD WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
07/14/2024	Credit Card	<b>GRAHAM, JENNIFER</b> 3705 ARCTIC BLVD 933 ANCHORAGE, Alaska 99503	Occupation: FINANCE Employer: SELF	<b>\$150.00</b>
07/14/2024	Check 5106	<b>HALLFORD, LYNN</b> 1201 N OLD TOWNE DR PALMER, Alaska 99645	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
07/14/2024	Credit Card	<b>JOHNSON, STEVEN</b> PO BOX 944 PALMER, Alaska 99645	Occupation: RETIRED Employer: RETIRED	<b>\$250.00</b>
07/14/2024	Cash	<b>MALO, DAVE</b> PO BOX 521457 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
07/14/2024	Check 1684	<b>MARTIN, NATALIE</b> 3901 E PALMDALE DR WASILLA, Alaska 996654	Occupation: HOME SCHOOL MOM Employer: SELF	<b>\$25.00</b>

Date Received	Payment Method	Contributor	Details	Amount
07/14/2024	Cash	<b>MOBLEY, DORTE</b> 575 JEROME DR WASILLA, Alaska 99654	Occupation: FIREFIGHTER Employer: MATSU BOROUGH	<b>\$100.00</b>
07/14/2024	Check 2819	<b>SOLMONSON, JOELLEN</b> PO BOX 521797 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
07/14/2024	Check 1927	<b>STALLONE, JOHN</b> 7362 W PARKS HWY PMB 860 WASILLA, Alaska 99623	Occupation: CORPORATE SAFETY OFFICER Employer: NEESER CONSTRUCTION INC	<b>\$200.00</b>
07/14/2024	Credit Card	<b>STEPHL, DAN</b> PO BOX 873671 WASILLA, Alaska 99697	Occupation: MILLWORK Employer: ROBINSON MILWORK	<b>\$104.48</b>
07/15/2024	Check 4222	<b>KOAN, CJ</b> 3420 SECLUDED MEADOWS LP WASILLA, Alaska 99623	Occupation: CONSULTANT Employer: SELF	<b>\$50.00</b>
07/17/2024	Credit Card	<b>YUNDT, TRENTIE</b> 1165 E WESPOINT DR WASILLA, Alaska 99654	Occupation: RESIDENTIAL HOME BUIIDER Employer: ROBERT YUNDT HOMES, LLC	<b>\$500.00</b>
07/19/2024	Check 10	<b>HALLER, BILL</b> PO BOX 521801 BIG LAKE, Alaska 99652	Occupation: REAL ESTATE Employer: SELF-EMPLOYED	<b>\$250.00</b>
			<b>Income Total:</b>	<b>\$5,918.83</b>

## EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
05/25/2024	Debit Card	<b>HOGOSHA LLC</b> 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, North Dakota 57702	WEBSITE DEVELOPMENT, RACK CARD EDITS, CAMPAIGN KICKOFF FLYER	<b>\$955.80</b>
05/28/2024	Non-Monetary DEPOSIT FOR HOTEL ROOM IN HEALY FOR EVENT	<b>MCCABE, LINN</b> PO BOX 520248 BIG LAKE, Alaska 99652		<b>\$35.00</b>



Date	Payment Method	Vendor	Purpose	Amount
05/31/2024	Electronic Funds Transfer	<b>MATANUSKA VALLEY FCU</b> 1020 S BAILEY ST PALMER, Alaska 99645	CHECKS	<b>\$20.46</b>
06/04/2024	Debit Card	<b>AURORA DENALI LODGE</b> PO BOX 458 HEALY, Alaska 99743	HOTEL FOR OVERNIGHT STAY BEFORE MORNING EVENT ON 7/05/24	<b>\$176.88</b>
06/05/2024	Debit Card	<b>ROSE'S CAFE</b> MILE 249.5 PARKS HWY HEALY , Alaska 99743	SNACKS AND TIP FOR MEET AND GREET	<b>\$172.50</b>
06/10/2024	Debit Card	<b>DIVISION OF ELECTIONS</b> PO BOX 110017 JUNEAU, Alaska 99811	VOTER LIST	<b>\$20.00</b>
06/12/2024	Debit Card	<b>HOME DEPOT</b> 1255 E PALMER WASILLA HWY WASILLA, Alaska 99654	STAKES FOR SIGNS	<b>\$35.88</b>
06/13/2024	Non-Monetary SCREWS FOR SIGNS	<b>MCCABE, KEVIN</b> PO BOX 520248 BIG LAKE, Alaska 99652		<b>\$18.00</b>
06/17/2024	Non-Monetary INK CARTRIDGES FOR PRINTER	<b>MCCABE, KEVIN</b> PO BOX 520248 BIG LAKE, Alaska 99652		<b>\$187.98</b>
06/17/2024	Debit Card	<b>PIP PRINTING AND MARKETING SERVICES</b> 833 E 4TH AVE ANCHORAGE, Alaska 99501	YARD SIGNS	<b>\$721.73</b>
06/19/2024	Non-Monetary STAMPS	<b>MCCABE, LINN</b> PO BOX 520248 BIG LAKE, Alaska 99652		<b>\$13.00</b>
06/26/2024	Debit Card	<b>DIVISION OF ELECTIONS</b> PO BOX 110017 JUNEAU, Alaska 99811	OFFICIAL ELECTION PAMPHLET	<b>\$100.00</b>

Date	Payment Method	Vendor	Purpose	Amount
07/02/2024	Debit Card	<b>COSTCO</b> 4125 DEBARR RD ANCHORAGE, Alaska 99508	CANDY FOR 4TH OF JULY PARADE IN WILLOW	<b>\$359.42</b>
07/03/2024	Debit Card	<b>PIP PINTING AND MARKETING SERVICES</b> 833 E 4TH AVE ANCHORAGE, Alaska 99501	RACK CARDS	<b>\$440.54</b>
07/08/2024	Check 102	<b>CITY OF HOUSTON</b> PO BOX 940027 HOUSTON, Alaska 99694	FOUNDER'S DAY SPECIAL EVENT VENTDOR PERMIT APPLICATION	<b>\$10.00</b>
07/08/2024	Debit Card	<b>PIP PRINTING AND MARKETING SERVICES</b> 833 E 4TH AVE ANCHORAGE, Alaska 99501	LETTERHEAD AND ENVELOPES	<b>\$595.58</b>
07/08/2024	Debit Card	<b>UPS STORE #4347</b> 7362 W PARKS HWY WASILLA, Alaska 99623	COPIES OF FLYER FOR EVENT	<b>\$16.25</b>
07/08/2024	Check 101	<b>USPS</b> 2809 BIG LAKE RD BIG LAKE, Alaska 99652	POSTAGE	<b>\$136.00</b>
07/14/2024	Debit Card	<b>FLOATER'S</b> 2990 S BIG LAKE RD BIG LAKE, Alaska 99652	FOOD AND TIP FOR EVENT	<b>\$232.61</b>
07/17/2024	Debit Card	<b>PIP PRINTING AND MARKETING SERVICES</b> 833 E 4TH AVE. ANCHORAGE, Alaska 99501	PRINTED ENVELOPES	<b>\$126.51</b>
07/18/2024	Debit Card	<b>SHELL</b> 14468 W HOLLYWOOD RD BIG LAKE, Alaska 99652	GAS FOR POV FOR DELIVERY OF SIGNS	<b>\$102.12</b>

Date	Payment Method	Vendor	Purpose	Amount
07/18/2024	Debit Card	<b>SHELL</b> 14469 W HOLLYWOOD RD BIG LAKE, Alaska 99652	GAS FOR POV FOR DELIVERY OF SIGNS	<b>\$62.78</b>
07/19/2024	Bank Fee	<b>ANEDOT INC</b> 1340 Poydras Street Suite 1770 NEW ORLEANS, Louisiana 70112	CREDIT CARD FEES FOR CURRENT REPORTING PERIOD.	<b>\$126.63</b>
<b>Expenditure Total:</b>				<b>\$4,665.67</b>

## DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
07/05/2024	<b>META</b> 1 HACKER WAY MENLO PARK, California 94025	BOOST OF BIG LAKE EVENT FLYER POST. AMENDED TO CORRECT: ORIGINALLY LISTED AT \$20.50; ACTUAL IS \$20.00.	<b>\$20.00</b>	<b>\$20.00</b>
07/15/2024	<b>RESULTS ADVERTISING WERKS</b> PO BOX 877556 WASILLA, Alaska 99687	VOICE RECORDING FOR AD	<b>\$50.00</b>	<b>\$50.00</b>
07/16/2024	<b>HOGOSHA</b> 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, South Dakota 57702	WEBSITE MAINTENANCE AND DIGITAL AD PRODUCTION.	<b>\$480.00</b>	<b>\$480.00</b>
			<b>Remaining Debt Total:</b>	<b>\$550.00</b>

## CAMPAIGN DISCLOSURE FORM

## AMENDMENT

**Amendment Description: TO ADD 21.15 CREDIT CARD FEES PAID BY DONOR, AND CORRECT TOTAL TO \$521.15**

## TWENTY-FOUR HOUR REPORT

## COMPLETED

Submission Date: **10/06/2024**

Filer First Name: **LINN**

Filer Middle Name: **M**

Filer Last Name: **MCCABE**

Filer's Title: **Treasurer**

Report Type: **24 Hour Report**

## CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**

Candidate Address: **PO Box 520248**

City, State Zip: **Big Lake, Alaska 99652**

## REPORT INFORMATION

Election Year: **2024**

Election: **State Primary**

Report Type: **24 Hour Report**

Reporting Period: From **08/11/2024** Through **08/19/2024**

## INCOME

Date Received	Payment Method	Contributor	Details	Amount
08/15/2024	Credit Card	Morris , Julie		\$521.15
			Income Total:	\$521.15

## CAMPAIGN DISCLOSURE FORM

## AMENDMENT

**Amendment Description:** TO ADD DONATION WHICH WAS MADE ON 10/4/24 AND ADD ANEDOT TRANSACTION FEES FROM THAT DONATION.

## COMPLETED

Submission Date: **10/28/2024**  
 Filer First Name: **LINN**  
 Filer Middle Name: **M**  
 Filer Last Name: **MCCABE**  
 Filer's Title: **Treasurer**  
 Report Type: **Thirty Day Report**

## CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**  
 Candidate Address: **PO Box 520248**  
 City, State Zip: **Big Lake, Alaska 99652**

## REPORT INFORMATION

Election Year: **2024**  
 Election: **State General**  
 Report Type: **Thirty Day Report**  
 Reporting Period: From **08/11/2024** Through **10/04/2024**

## FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	<b>\$8,936.75</b>				
[+] ↓		Previous Campaign Income: (From Box A of previous report)		Campaign Income Total: (Box A)	
Total Income Reported:	<b>\$8,699.50</b>	[+] ⇒	<b>\$12,391.30</b>	[=] ⇒	<b>\$21,090.80</b>
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)		Campaign Expense Total: (Box B)	
Total Expenditures Reported:	<b>\$5,187.48</b>	[+] ⇒	<b>\$7,653.91</b>	[=] ⇒	<b>\$12,841.39</b>
[=] ↓					
Closing Cash On Hand:	<b>\$12,448.77</b>				
[-] ↓					
Total Debts:	<b>\$133.79</b>				
[=] ↓					
Surplus/Deficit:	<b>\$12,314.98</b>				

## INCOME

Date Received	Payment Method	Contributor	Details	Amount
08/12/2024	Check 11514	<b>HUTTON, JIM</b> PO BOX 520022 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$200.00</b>
08/13/2024	Check 907	<b>STALLONE, BARBARA</b> 7362 W PARKS HWY #860 WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$250.00</b>
08/15/2024	Credit Card	<b>MORRIS, JULIE</b> PO BOX 3035 ANDERSON, Alaska 99744	Occupation: LEGISLATIVE STAFF Employer: STATE OF ALASKA	<b>\$521.15</b>
08/16/2024	Cash	<b>HANIFIN, STEVE AND DEBI</b> 266 CLUB HOUSE WAY TRACY, California 95376	Occupation: RETIRED Employer: RETIRED	<b>\$50.00</b>
08/16/2024	Cash	<b>KOAN, CJ AND ERIC</b> 6420 W SECLUDED MEADOWS LP WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$20.00</b>
08/16/2024	Check 2114	<b>KOAN, CJ AND ERIC</b> 3420 SECLUDED MEADOWS LP WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$50.00</b>
08/17/2024	Cash	<b>WOOD, JOHN</b> PO BOX 743 WILLOW, Alaska 99688	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
09/13/2024	Credit Card	<b>CRUM, ADAM</b> 146 E BIRCHTREE DR WASILLA, Alaska 99654	Occupation: COMMISSIONER Employer: STATE OF ALASKA	<b>\$104.48</b>
09/14/2024	Check 2370	<b>MATSU REPUBLICAN WOMENS CLUB EST 1947</b> PO BOX 875662 WASILLA, Alaska 99687	Occupation: PAC Employer: PAC	<b>\$2,000.00</b>

Date Received	Payment Method	Contributor	Details	Amount
09/14/2024	Credit Card	<b>MORRIS, WILLIAM</b> PO BOX 3035 ANDERSON, Alaska 99744	Occupation: PLUMBER Employer: SELF	<b>\$521.15</b>
09/16/2024	Check 7835/3110	<b>BACKFORD, LOUANN</b> 925 W 7TH APT 106 ANCHORAGE, Alaska 99501	Occupation: RETIRED Employer: RETIRED	<b>\$25.00</b>
09/18/2024	Cash	<b>CRANDALL, KAREN</b> 14041 W BIG LAKE RD WASILLA, Alaska 99623	Occupation: ARTIST Employer: SELF	<b>\$60.00</b>
09/18/2024	Credit Card	<b>CRUM, JOEY</b> 4543 W TWIN PEAKS DR WASILLA, Alaska 99654	Occupation: CEO Employer: NIT	<b>\$100.00</b>
09/20/2024	Check 737	<b>GOARD, KEVIN</b> 16609 W TAMARACK COVE DR WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$200.00</b>
09/20/2024	Credit Card	<b>TROMBLEY, ADAM</b> 5803 GRAND TETON LP ANCHORAGE, Alaska 99502	Occupation: STATE DIRECTOR Employer: UNITED STATES SENATOR	<b>\$100.00</b>
09/21/2024	Credit Card	<b>BOYLE, DAVID</b> 5341 S OUTRIGGER DR WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$150.00</b>
09/25/2024	Credit Card	<b>KAJDAN, CHERYL</b> PO BOX 500 PALMER, Alaska 99645	Occupation: Employer:	<b>\$36.77</b>
09/25/2024	Credit Card	<b>MARTENSEN, MARTEN</b> 5115 OLD SEWARD HWY ANCHORAGE, Alaska 99503	Occupation: CAR DEALER Employer: CONTINENTAL AUTO GROUP	<b>\$521.15</b>

Date Received	Payment Method	Contributor	Details	Amount
09/27/2024	Check 1509	<b>BERGEY, TOM</b> 17777 E SULLIVAN AVE PALMER, Alaska 99645	Occupation: FARMER Employer: SELF	<b>\$100.00</b>
09/28/2024	Check 503	<b>ALDERMAN, MARK</b> 1265 E LOLLY DR WASILLA, Alaska 99654	Occupation: PRESIDENT Employer: MAT-SU MECHANICAL, INC	<b>\$400.00</b>
09/29/2024	Credit Card	<b>ALEXANDER, TAMMI</b> PO BOX 520643 BIG LAKE, Alaska 99652	Occupation: EXECUTIVE ADMINISTRATOR Employer: AK PREMIER TRANSPORTATION LLC	<b>\$521.15</b>
09/29/2024	Cash	<b>BREWER, WILLIAM</b> PO BOX 506 WILLOW, Alaska 99688	Occupation: Employer:	<b>\$10.00</b>
09/29/2024	Cash	<b>CARHART, STEVE</b> 4094 S OLD YACHT CLUB BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
09/29/2024	Check 7208	<b>HALL, AMY</b> PO BOX 871906 WASILLA, Alaska 99687	Occupation: SALES Employer: SELF	<b>\$1,000.00</b>
09/29/2024	Check 142	<b>JOHNSON, JANET</b> 3350 S MARTIN RD PALMER, Alaska 99645	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
09/29/2024	Cash	<b>JOY, REGGIE</b> PO BOX 521055 BIG LAKE, Alaska 99652	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
09/29/2024	Check 1288	<b>MCCOLLUM, PAT</b> 5780 W BIRCH HARBOR DR WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
09/29/2024	Check 121	<b>STEPHL, ANGELA</b> PO BOX 873671 WASILLA, Alaska 99687	Occupation: STATE OF ALASKA Employer: LEGISLATIVE STAFF	<b>\$100.00</b>



Date Received	Payment Method	Contributor	Details	Amount
09/30/2024	Check 5212	<b>ALASKA TRUCKING ASSOC INC</b> 3443 MINNESOTA DR ANCHORAGE, Alaska 99503	Occupation: PAC Employer: PAC	<b>\$250.00</b>
09/30/2024	Check 1113	<b>VRWAK</b> PO BOX 876739 WASILLA, Alaska 99687	Occupation: PAC Employer: PAC	<b>\$700.00</b>
10/04/2024	Credit Card	<b>SULLIVAN LEONARD, COLLEEN</b> BOX 874380 WASILLA, Alaska 99654	Occupation: RETIRED Employer: RETIRED	<b>\$208.65</b>
<b>Income Total:</b>				<b>\$8,699.50</b>

## EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
08/12/2024	Debit Card	<b>HOME DEPOT</b> 1255 E PALMER WASILLA HWY WASILLA, Alaska 99654	SIGN FRAME MATERIALS	<b>\$108.58</b>
08/16/2024	Debit Card	<b>PIP PRINTING AND MARKETING SERVICE</b> 833 E 4TH AVE ANCHORAGE, Alaska 99501	SIGNS	<b>\$721.73</b>
08/17/2024	Debit Card	<b>META</b> 1 HACKER WAY MENLO PARK, California 94025	AD BOOST	<b>\$17.00</b>
08/19/2024	Debit Card	<b>ACE HARDWARE</b> 14468 W HOLLYWOOD RD BIG LAKE, Alaska 99623	SIGN FRAME MATERIALS	<b>\$35.95</b>

Date	Payment Method	Vendor	Purpose	Amount
08/21/2024	Debit Card	<b>CARIBOU VIXENS</b> 3120 S BIG LAKE RD SUITE G BIG LAKE, Alaska 99623	HATS AND PROMOTIONAL ITEMS WITH LOGO	<b>\$341.46</b>
08/24/2024	Debit Card	<b>LOWES</b> 2561 EAST SUN MOUNTAIN AVE WASILLA, Alaska 99654	SIGN FRAME MATERIALS	<b>\$40.66</b>
08/31/2024	Debit Card	<b>LOWES HOME CENTERS LLC</b> 2561 EAST SUN MOUNTAIN AVE WASILLA, Alaska 99654	SIGN FRAME MATERIALS	<b>\$311.31</b>
09/06/2024	Debit Card	<b>AT&amp;T</b> 208 S AKARD ST DALLAS, Texas 75202	DATA FOR CELL PHONE	<b>\$75.13</b>
09/12/2024	Debit Card	<b>SUSITNA BREWING COMPANY</b> 5120 S BIG LAKE RD WASILLA, Alaska 99623	FOOD AND TIP FOR "PIZZA AND POLITICS" EVENT	<b>\$405.00</b>
09/17/2024	Debit Card	<b>ALASKA WATCHMAN LLC</b> 1625 W EDLUND RD WASILLA, Alaska 99654	DIGITAL ADVERTISING	<b>\$875.00</b>
09/23/2024	Debit Card	<b>HOGOSHA LLC</b> 3808 SHERIDAN LAKE RD STE 202 RAPID CITY, South Dakota 57702	GRAPHIC DESIGN FOR "PIZZA AND POLITICS" AND GRAPHICS AND PRINTING FOR TSHIRTS	<b>\$516.00</b>
09/24/2024	Check 106	<b>BIG LAKE POST OFFICE</b> 2809 S BIG LAKE RD BIG LAKE, Alaska 99652	POSTAGE	<b>\$365.00</b>

Date	Payment Method	Vendor	Purpose	Amount
09/25/2024	Check 107	<b>BIG LAKE POST OFFICE</b> 2809 S BIG LAKE RD BIG LAKE , Alaska 99652	POSTAGE	<b>\$18.15</b>
09/27/2024	Debit Card	<b>PIP PRINTING AND MARKETING SERVICES</b> 833 E 4TH AVE ANCHORAGE, Alaska 99501	LETTERHEAD AND RACK CARDS	<b>\$797.16</b>
09/30/2024	Debit Card	<b>WALMART</b> 1350 S SEWARD MERIDIAN PKWY WASILLA, Alaska 99654	PRINTER CARTRIDGES	<b>\$79.95</b>
10/02/2024	Check 108	<b>BIG LAKE POST OFFICE</b> 2809 S BIG LAKE RD BIG LAKE, Alaska 99652	POSTAGE	<b>\$365.00</b>
10/04/2024	Bank Fee	<b>ANEDOT INC</b> 1340 POYDRAS STREET STE 1770 NEW ORLEANS, Louisiana 70112	CREDIT CARD FEES DEDUCTED FROM DONATIONS FROM 8/12/24 THROUGH 10/4/24. Modified 10/28/24 to reflect additional 8.65 deducted from \$208.65 donation received from Colleen Sullivan Leonard on Oct 4 2024.	<b>\$114.40</b>
			<b>Expenditure Total:</b>	<b>\$5,187.48</b>

## DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
07/15/2024	<b>RESULTS ADVERTISINGN WERKS</b> PO BOX 877556 WASILLA, Alaska 99687	RECORDED AS DEBT IN PRIMARY 7-DAY REPORT. BILL NOT YET RECEIVED.	<b>\$50.00</b>	<b>\$50.00</b>
09/16/2024	<b>META</b> 1 HACKER WY MENLO PARK, California 94025	BOOSTED POSTS.	<b>\$83.79</b>	<b>\$83.79</b>

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
			Remaining Debt Total:	\$133.79

## CAMPAIGN DISCLOSURE FORM

## TWENTY-FOUR HOUR REPORT

COMPLETED

Submission Date: **10/29/2024**Filer First Name: **LINN**Filer Middle Name: **M**Filer Last Name: **MCCABE**Filer's Title: **Treasurer**Report Type: **24 Hour Report**

## CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**Candidate Address: **PO Box 520248**City, State Zip: **Big Lake, Alaska 99652**

## REPORT INFORMATION

Election Year: **2024**Election: **State General**Report Type: **24 Hour Report**Reporting Period: From **10/27/2024** Through **11/04/2024**

## INCOME

Date Received	Payment Method	Contributor	Details	Amount
10/28/2024	Check 0111	CONSERVATIVE LEADERSHIP TEAM PAC		\$1,000.00
			Income Total:	\$1,000.00

**CAMPAIGN DISCLOSURE FORM****TWENTY-FOUR HOUR REPORT****COMPLETED**Submission Date: **11/04/2024**Filer First Name: **LINN**Filer Middle Name: **M**Filer Last Name: **MCCABE**Filer's Title: **Treasurer**Report Type: **24 Hour Report****CANDIDATE INFORMATION**Candidate Name: **Kevin J. McCabe**Candidate Address: **PO Box 520248**City, State Zip: **Big Lake, Alaska 99652****REPORT INFORMATION**Election Year: **2024**Election: **State General**Report Type: **24 Hour Report**Reporting Period: From **10/27/2024** Through **11/04/2024****INCOME**

Date Received	Payment Method	Contributor	Details	Amount
11/04/2024	Check 3416	EWING, SHELL		\$500.00
11/04/2024	Check 8200	USIBELLI, JOSEPH		\$1,000.00
			Income Total:	\$1,500.00

## CAMPAIGN DISCLOSURE FORM

**COMPLETED**

Submission Date: **10/29/2024**  
 Filer First Name: **Linn**  
 Filer Middle Name: **M**  
 Filer Last Name: **MCCABE**  
 Filer's Title: **Treasurer**  
 Report Type: **Seven Day Report**

## CANDIDATE INFORMATION

Candidate Name: **Kevin J. McCabe**  
 Candidate Address: **PO Box 520248**  
 City, State Zip: **Big Lake, Alaska 99652**

## REPORT INFORMATION

Election Year: **2024**  
 Election: **State General**  
 Report Type: **Seven Day Report**  
 Reporting Period: From **10/05/2024** Through **10/26/2024**

## FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$12,448.77				
[+] ↓		Previous Campaign Income: (From Box A of previous report)		Campaign Income Total: (Box A)	
Total Income Reported:	\$10,742.65	[+] ⇒	\$21,090.80	[=] ⇒	\$31,833.45
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)		Campaign Expense Total: (Box B)	
Total Expenditures Reported:	\$19,919.10	[+] ⇒	\$12,841.39	[=] ⇒	\$32,760.49
[=] ↓					
Closing Cash On Hand:	\$3,272.32				
[-] ↓					
Total Debts:	\$100.00				
[=] ↓					
Surplus/Deficit:	\$3,172.32				

## INCOME

Date Received	Payment Method	Contributor	Details	Amount
10/05/2024	Check 2092	ALASKA SEA PILOT 1621 TONGASS AVE KETCHIKAN, Alaska 99901	Occupation: PAC Employer: PAC	\$300.00

Date Received	Payment Method	Contributor	Details	Amount
10/07/2024	Check 15064	<b>ALASKA REPUBLICANS INC</b> PO BX 110707 ANCHORAGE, Alaska 99511	Occupation: PAC Employer: PAC	<b>\$3,000.00</b>
10/07/2024	Check 1529	<b>BRANDENBURG, BRYAN</b> 1630 N RIVER ROCK CIRCLE PALMER, Alaska 99645	Occupation: EXECUTIVE DIRECTOR Employer: ALASKA ADDICTION REHABILITATION SERVICES	<b>\$100.00</b>
10/07/2024	Cash	<b>LYONS, TERRI</b> 3001 E BEECH WAY WASILLA, Alaska 99654	Occupation: RETIRED Employer: RETIRED	<b>\$100.00</b>
10/07/2024	Check 1343	<b>SHOWER, MICHELLE</b> 3500 N TRAVELAIR DR WASILLA, Alaska 99654	Occupation: RETIRED Employer: RETIRED	<b>\$250.00</b>
10/07/2024	Check 6930	<b>SMOLDON, CARRIE</b> PO BOX 410 WILLOW, Alaska 99688	Occupation: TEACHER Employer: MSBSD	<b>\$100.00</b>
10/07/2024	Check 1504	<b>TRAXLER, MICHELLE</b> PO BOX 520907 BIG LAKE, Alaska 99652	Occupation: BOOKKEEPER Employer: PAPOOSE MILLING	<b>\$200.00</b>
10/07/2024	Credit Card	<b>WILLIAMS, CASEY</b> BOX 870275 WASILLA, Alaska 99687	Occupation: RETIRED Employer: RETIRED	<b>\$200.00</b>
10/08/2024	Credit Card	<b>HUGHES, SHELLEY</b> PO BOX 1496 PALMER, Alaska 99645	Occupation: SENATOR/PROJECT CONSULTANT Employer: STATE OF AK/SELF	<b>\$208.65</b>
10/08/2024	Credit Card	<b>MCCOLLUM, PAT</b> 5780 WEST BIRCH HARBOR DR WASILLA, Alaska 99623	Occupation: RETIRED Employer: RETIRED	<b>\$150.00</b>
10/09/2024	Credit Card	<b>BARIOS, TRAVIS</b> 3032 GLACIER ST ANCHORAGW, Alaska 99508	Occupation: PARTS MANAGER Employer: ANCHORAGE CHRYSLER CENTER	<b>\$100.00</b>
10/09/2024	Check 9113	<b>CLIFFORD, BRITT</b> 12255 BROOKWOOD CIR ANCHORAGE, Alaska 99516	Occupation: SALES Employer: AFFORDABLE USED CARS	<b>\$500.00</b>
10/09/2024	Check 9515	<b>MARTENSEN, KARIN</b> 12520 GINAMI ST ANCHORAGEW, Alaska 99516	Occupation: RETIRED Employer: RETIRED	<b>\$500.00</b>



Date Received	Payment Method	Contributor	Details	Amount
10/09/2024	Check 179	<b>MARTENSEN ROSS, KERSTEN</b> 12520 GINAMI ST ANCHORAGW, Alaska 99516	Occupation: BOOKKEEPER Employer: CONTINENTAL AUTO GROUP	<b>\$500.00</b>
10/09/2024	Check 4156	<b>NICHOLS, JULIE</b> 2052 VAN HORN CT FAIRBANKS, Alaska 99701	Occupation: PROPERTY MANAGER Employer: SELF EMPLOYED	<b>\$250.00</b>
10/09/2024	Check 917	<b>ROSS, MIKE</b> 12520 GINAMI ST ANCHORAGE, Alaska 99516	Occupation: RETIRED Employer: RETIRED	<b>\$500.00</b>
10/09/2024	Credit Card	<b>SWENSON, RICHARD</b> 13300 WINDRUSH CIRCLE ANCHORAGE, Alaska 99516	Occupation: FIXED OPERATIONS DIRECTOR Employer: CONTINENTAL AUTO GROUP	<b>\$100.00</b>
10/10/2024	Credit Card	<b>BEN, RUSTY</b> 11740 SUNCREST CIRCLE ANCHORAGE , Alaska 99515	Occupation: SHOP FOREMAN Employer: ANCHORAGE CHRYSLER	<b>\$50.00</b>
10/10/2024	Credit Card	<b>BITNEY, JOHN</b> PO BOX 521072 BIG LAKE, Alaska 99652	Occupation: LEGISLATIVE STAFF Employer: STATE OF ALASKA	<b>\$200.00</b>
10/10/2024	Credit Card	<b>GARRETT, MARTI</b> 9606 RELIANCE DR ANCHORAGE, Alaska 99507	Occupation: ACCOUNTING DIRECTOR Employer: LITHIA MOTORS	<b>\$25.00</b>
10/10/2024	Credit Card	<b>GARZA, KEVIN</b> 5301 E 98TH AVE ANCHORAGE, Alaska 99507	Occupation: SERVICE ADVISOR Employer: ANCHORAGE CHRYSLER DODGE	<b>\$50.00</b>
10/10/2024	Credit Card	<b>GREEN, JUSTIN</b> 2223 SORBUS WAY ANCHORAGE, Alaska 99508	Occupation: SALES Employer: ANCHORAGE CHRYSLER	<b>\$50.00</b>
10/10/2024	Credit Card	<b>HOLEMAN, CURTIS</b> PO BOX 521118 BIG LAKE, Alaska 99652	Occupation: SENIOR SALES ENGINEER Employer: LONG BUILDING TECH	<b>\$104.48</b>
10/10/2024	Credit Card	<b>NOVAK, TODD</b> 711 N STREET ANCHORAGE, Alaska 99501	Occupation: FIXED OPERATIONS DIRECTOR Employer: ANCHORAGE CHRYSLER	<b>\$50.00</b>

Date Received	Payment Method	Contributor	Details	Amount
10/10/2024	Credit Card	<b>TRAUGHBER, CHARLES</b> 7074 NORTH 5TH EAST IDAHO FALLS, Idaho 83401	Occupation: CERTIFIED AUTOMOTIVE TECHNICIAN Employer: ANCHORAGE CHRYSLER	<b>\$50.04</b>
10/10/2024	Credit Card	<b>WALTON, KENNETH</b> 14820 SIERRA WAY ANCHORAGE, Alaska 99516	Occupation: FIXED OPS MANAGER Employer: LITHIA MOTORS INC	<b>\$100.00</b>
10/13/2024	Credit Card	<b>HILLMAN, HARRY</b> 3060 NORTH LAZY EIGHT COURT STE 3; PMB-497 WASILLA, Alaska 99654	Occupation: RETIRED Employer: RETIRED	<b>\$104.48</b>
10/13/2024	Credit Card	<b>WEBER, JOAN</b> BOX 208756 WASILLA, Alaska 99629	Occupation: RETIRED Employer: RETIRED	<b>\$50.00</b>
10/15/2024	Check 1978	<b>ALASKA REALTORS PAC</b> PO BOX 2658 SOLDOTNA, Alaska 99669	Occupation: PAC Employer: PAC	<b>\$1,000.00</b>
10/15/2024	Check 2726	<b>ALASKA'S DOCTORS OF OPTOMETRY</b> 3705 ARCTIC BLVD #675 ANCHORAGE, Alaska 99503	Occupation: PAC Employer: PAC	<b>\$500.00</b>
10/15/2024	Credit Card	<b>MEYERS, COREY</b> 7111 E CHESTER HEIGHTS CIR ANCHORAGE, Alaska 99504	Occupation: GENERAL MANAGER Employer: ANCHORAGE CHRYSLER	<b>\$1,000.00</b>
10/25/2024	Non-Monetary DIGITAL AD	<b>MCCABE, KYLE</b> 6701 W SCATTERS WAY WASILLA, Alaska 99623	Occupation: WEB DEVELOPER Employer: SELF	<b>\$250.00</b>
10/26/2024	Check 1219	<b>MILLS, BRYAN</b> PO BOX 356 WILLOW, Alaska 99688	Occupation: WOODWORKER Employer: SELF	<b>\$100.00</b>
			<b>Income Total:</b>	<b>\$10,742.65</b>

## EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
10/06/2024	Debit Card	<b>A T &amp; T</b> 208 S AKARD ST DALLAS, Texas 75202	DATA FOR CELL PHONE	<b>\$80.13</b>
10/11/2024	Debit Card	<b>FRED MEYER</b> 1501 E PARKS HWY WASILLA, Alaska 99654	THANK YOU CARDS	<b>\$15.38</b>
10/11/2024	Check 109	<b>USPS</b> 401 N MAIN ST WASILLA, Alaska 99654	POSTAGE	<b>\$73.00</b>
10/15/2024	Check 111	<b>OPTIMA PUBLIC RELATIONS</b> 73622 W PARKS HWY #665 WASILLA, Alaska 99623	ACCOUNT MANAGEMENT, GRAPHIC DESIGN, DIGITAL ADS, RADIO ADS, TEXT MESSAGING AND EMAIL, PRINTING AND POSTAGE	<b>\$16,825.00</b>
10/16/2024	Credit Card	<b>AK DIVISION OF ELECTION</b> 240 MAIN ST STE 300 JUNEAU, Alaska 99801	VOTER LIST	<b>\$20.00</b>
10/16/2024	Debit Card	<b>AURORA DENALI LODGE</b> PO BOX 458 HEALY, Alaska 99743	EVENT VENUE AND APPETIZERS	<b>\$535.00</b>
10/16/2024	Debit Card	<b>AURORA DENALI LODGE</b> PO BOX 458 HEALY, Alaska 99743	LODGING	<b>\$230.26</b>
10/18/2024	Check 110	<b>USPS</b> 2809 BIG LAKE RD BIG LAKE AK , Alaska 99652	POSTAGE	<b>\$219.00</b>
10/24/2024	Debit Card	<b>THREE BEARS</b> M 248.5 S GEORGE PARKS HWY HEALY, Alaska 99743	POMV GAS FOR TRIP TO HEALY	<b>\$27.69</b>
10/25/2024	Non-Monetary DIGITAL AD	<b>MCCABE, KYLE</b> 6701 W SCATTERS WAY WASILLA, Alaska 99623		<b>\$250.00</b>

Date	Payment Method	Vendor	Purpose	Amount
10/25/2024	Debit Card	<b>REPUBLICAN ADS, LLC</b> 700 PENNSYLVANIA AVE SE WASHINGTON, District of Columbia 2000.	DIGITAL AD	<b>\$1,376.00</b>
10/25/2024	Debit Card	<b>THREE BEARS</b> 14468 W HOLLYWOOD RD BIG LAKE, Alaska 99652	POMV GAS FOR TRIP HOME FROM HEALY	<b>\$27.47</b>
10/25/2024	Debit Card	<b>WALMART</b> 1350 S SEWARD MERIDIAN WASILLA, Alaska 99654	PRINTER INK	<b>\$79.95</b>
10/26/2024	Bank Fee	<b>ANEDOT INC</b> 1340 POYDRAS STREET STE 1770 NEW ORLEANS, Louisiana 70112	CREDIT CARD TRANSACTION FEES FOR DONATIONS MADE BETWEEN 10/05/24 AND 10/26/24	<b>\$108.81</b>
10/26/2024	Debit Card	<b>HOME DEPOT</b> 1255 E PALMER WASILLA HWY WASILLA, Alaska 99654	SAND BAGS FOR SIGNS	<b>\$51.41</b>
<b>Expenditure Total:</b>				<b>\$19,919.10</b>

## DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
07/15/2024	<b>RESULTS ADVERTISING WERKS</b> PO BOX 877556 WASILLA, Alaska 99687	PAID 10/7/24	<b>\$50.00</b>	<b>\$0.00</b>
09/16/2024	<b>META</b> 1 HACKER WAY MENLO PARK, California 94025	PAID 10/5/24	<b>\$83.79</b>	<b>\$0.00</b>
10/21/2024	<b>META</b> 1 HACKER WAY MENLO PARK, California 94025	BOOSTED POSTS	<b>\$100.00</b>	<b>\$100.00</b>
			<b>Remaining Debt Total:</b>	<b>\$100.00</b>

**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

MICHAEL ALEXANDER,

Complainant,

v.

KEVIN MCCABE,

Respondent.

APOC Case No. **24-12-CD**



**ORDER DENYING EXPEDITED CONSIDERATION**

On December 27, 2024, Michael Alexander filed a complaint against Representative-elect Kevin McCabe, alleging violations of Alaska’s campaign disclosure laws.<sup>1</sup> Mr. Alexander also asked the Commission to expedite consideration of the complaint.<sup>2</sup> On December 31, within the two-day window required by statute, the Commission held a hearing on the request for expedited consideration and denied the request on the record.<sup>3</sup> For the reasons explained below, the complaint is REMANDED to staff for consideration on a regular basis.

When deciding whether to expedite a complaint, the Commission considers “whether the alleged violation, if not immediately restrained, could materially affect the outcome of an election or other impending event; whether the alleged violation could cause irreparable harm that penalties could not adequately remedy; and whether there is

<sup>1</sup> AS 15.13; 2 AAC 50.250-.405.

<sup>2</sup> AS 15.13.380(c); 2 AAC 50.888.

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

reasonable cause to believe that a violation has occurred or will occur.”<sup>4</sup> The party requesting expedited consideration has the burden to prove that it is necessary, and the request “must be accompanied by [supporting] evidence.”<sup>5</sup>

The complaint at issue does not meet the standard for granting expedited consideration. Mr. Alexander argued that expedited consideration was necessary because “unresolved campaign finance violations threaten to divert [Representative-elect McCabe’s] attention from his legislative responsibilities.” But this is not the type of consideration that warrants expedited consideration. Rather, expedited consideration is for addressing unlawful conduct that threatens to alter the course of an election or cause other irreversible harm.<sup>6</sup> The fear that a single legislator might be distracted while in office simply does not rise to that level. Even if it did, Mr. Alexander merely speculated that an unresolved APOC complaint would harm Representative-elect McCabe’s ability to carry out official duties. Such speculation is not enough because the statute requires “evidence to support expedited consideration.”<sup>7</sup> Finally, if the Commission accepted Mr. Alexander’s arguments, it would likely need to expedite every outstanding complaint against every legislator before every legislative session. That would frustrate the Commission’s ability to conduct full investigations before rendering decisions, and it

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<sup>4</sup> AS 15.13.380(c).

<sup>5</sup> *Id.*; 2 AAC 50.888(c).

<sup>6</sup> *See* AS 15.13.380(c).

<sup>7</sup> *Id.*

would undermine the procedures outlined in statute and regulation.<sup>8</sup> The Commission therefore denies expedited consideration and refers the complaint to staff for investigation.

This is a not a final Commission order for the purposes of an appeal to superior court because the Commission has not yet resolved the issues raised in the complaint.

Dated: January 2, 2025.

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION<sup>9</sup>

**Certificate of Service:**

I hereby certify that on this date, I served, by **certified mail** and **email** a true and correct copy of the foregoing in this proceeding on the following:

Michael Alexander  
PO Box 521171  
Big Lake, AK 99652  
Mikealexander728@gmail.com

Kevin McCabe  
2193 W. Linn Marie Circle  
Big Lake, AK 99652  
kevin@kevinimccabe.com

And by **Email** to:

Heather Hebdon  
Executive Director  
Alaska Public Offices Commission  
Heather.hebdon@alaska.gov

  
Paralegal II

1.2.25  
Date

<sup>8</sup> AS 15.13.380; 2 AAC 50.888-.891.

<sup>9</sup> Commissioners Richard Stillie, Dan LaSota, Eric Feige, Lanette Blodgett, and Walt Monegan participated in this decision. The decision was made on a 5-0 vote. Commissioner Monegan was not present at the emergency hearing, but he reviewed the administrative record and was present for deliberations before participating in the vote.

**Kevin McCabe**  
**PO Box 520248**  
**Big Lake, AK 99652**

**01/16/2025**

**Response to Complaint by Alexander. 24-12-CD**

To Whom it may concern:

This complaint appears premature, as the final report is not due until February 18, 2025. I am responding to his complaint in the time required by APOC rules, however there will be a campaign reconciliation done for the final APOC report to be filed on February 18, 2025 which may address some of his concerns.

Nonetheless, Mr. Alexander has raised allegations regarding my campaign's APOC reporting and he deserves a response. While I acknowledge the challenges he and others face navigating these reports, the complexity of APOC requirements—particularly for those unfamiliar with Meta's business platform and reporting structures—does create confusion, especially when attempting to audit accounts without complete information.

I want to emphasize that we strive for the utmost accuracy in our APOC reporting, even as we contend with the inherent difficulties of reconciling APOC reporting periods with the timing of payments from digital platforms such as Meta as well as other vendors.

Mr. Alexander identifies a few instances of alleged undisclosed ads, citing some by ad number and some by description.

For instance, regarding the claim labeled "Unexplained High-Spending Ad," which corresponds to item #5 on his list: this ad was part of a campaign managed, and paid for, by Optima over several weeks; which concluded after the "seven-day" APOC reporting period prior to the November 5<sup>th</sup> general election. The final invoice for this expenditure was received from Optima nearly a month after that reporting period closed and will be included in our next APOC filing, due February 18, 2025. Supporting documentation, including a letter from Optima, should already be in the complaint file for review; and further details will appear in the February 18 report.



Similarly, Mr. Alexander's reference to the October 21, 2024, "Delayed Reporting" ad stems from a payment made for an invoice after the APOC filing deadline for the seven-day report. This payment will also be reconciled and identified in our next report, as required.

We recognize the difficulties in interpreting campaign reports from the outside, especially when they involve contracts with advertising firms. These firms often provide proposals with estimated costs for services such as digital media, radio, and other ads in advance, but the actual costs and timing of placements are subject to change based on campaign dynamics. Because of limited funds, our campaign operated on a retainer basis with Optima, which handled the production and placement of ads across multiple platforms, including Meta, Google, and various radio stations. The Campaign proposal, found in an email from Optima dated August 16<sup>th</sup> is appended to the bottom of this letter. Again, it is important to note that, due to limited funds, to my knowledge, none of this proposal, requiring an expenditure, was executed until October 17<sup>th</sup>, 2024, when I verbally told Optima to go ahead with the entire plan.

APOC rules under **AS 15.13.040(a)(1)(A)** require campaigns to disclose the date and amount of all expenditures. We have complied with this requirement by reporting known payments and agreements to pay. For instance, we reported Optima as the recipient rather than providing more granular details, such as Optima's payments to Meta or other platforms. This is because we simply do not have access to Optima's expenses, which were unknown at the time of the report, because Optima managed those sub-accounts. In addition, specific details about ad timing or placements are not required by APOC and are deliberately excluded from public disclosures to maintain the competitive nature of campaigns.

In our October 29, 2024, APOC filing (page 6 of 7), we disclosed our contract with Optima, specifying:

**Purpose:** ACCOUNT MANAGEMENT, GRAPHIC DESIGN, DIGITAL ADS, RADIO ADS, TEXT MESSAGING AND EMAIL, PRINTING AND POSTAGE

This arrangement allowed Optima to allocate resources strategically across various mediums in response to the campaign's evolving needs and funding. It also allowed the campaign to adjust the level of services provided by Optima based on donations received to the campaign and responses required to address opposing candidates, activists, or independent expenditure (IE) ads.

While the campaign reported these expenditures as a retainer, the final costs for specific services were unknown until those services were executed, sub-vendor invoices were finalized, and the final billing statement was sent from Optima to the campaign. These expenditures, as well as any corrections or amendments, will all be reported by the candidate, as required by **2 AAC 50.321**, which states:

*(d) If an expenditure required to be reported under (a) or (b) of this section is made to an advertising agency or to an individual or business that provides campaign consultation 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, and the amount of the expenditure.*

It is important to note that the language in **2 AAC 50.321** is in past tense, requiring the full reporting of expenditures finally known *after* they have been made. Accordingly, we will report all details provided by the vendor, based on the final bill, in the next reporting period, as defined by APOC rules.

Our commitment to transparency remains unwavering. We meticulously reconcile all financial records, including expenditures with entities such as Anedot, Meta, PIP, and Optima. Any discrepancies, usually stemming from timing differences between vendor invoices and APOC reporting periods, are promptly addressed in subsequent filings or the final report.

Although Mr. Alexander's complaint appears retaliatory, we are fully committed to adhering to APOC communication standards and fulfilling all statutory reporting obligations, regulations, and requirements. We appreciate your guidance as we work to ensure complete transparency, maintain full compliance, and ensure that Mr. Alexander's complaint is thoroughly reviewed and adjudicated.

A handwritten signature in black ink, appearing to read 'K. McCabe', with a stylized flourish at the end.

Sincerely,  
Kevin McCabe

----- Forwarded message -----

From: **Becca Koonce** <[becca@optimapublicrelations.com](mailto:becca@optimapublicrelations.com)>

Date: Fri, Aug 16, 2024 at 4:21 PM

Subject: General Election Campaign Plan Re: PSA Radio Opportunity - Kevin McCabe

To: Kevin McCabe <[kevinj.mccabe@gmail.com](mailto:kevinj.mccabe@gmail.com)>

Cc: Danika Baldwin <[danika@optimapublicrelations.com](mailto:danika@optimapublicrelations.com)>, Linn McCabe <[linn.mccabe@gmail.com](mailto:linn.mccabe@gmail.com)>,

Angela Stephl <[asteph1907@gmail.com](mailto:asteph1907@gmail.com)>, Sarah Paulus <[sarah@optimapublicrelations.com](mailto:sarah@optimapublicrelations.com)>

Hi Kevin,

Hope all is well. I wanted to circle back with you on the plan for the general campaign and how we can help. Based on our previous discussions, I've put together a comprehensive plan for the general election. This plan includes digital advertising, social media, radio, mailers, text/call outreach, and e-blasts, similar to what we did last time, with adjustments to improve effectiveness. This is all just a ballpark on options and can be customized/scaled/adjusted depending on how you see the best fit to move forward. In the breakdown below we've outlined each portion with an estimated budget and timeframe:

### **1. Digital Advertising**

**Platform:** Google Ads, Facebook/Instagram, YouTube, Search

**Focus:** PFD theme, Second Amendment, Education, and Resource Development

**Strategy:**

- Geo-targeting specific areas in District 30
- Video ads with voiceovers emphasizing key policy points
- Retargeting ads for website visitors and social media engagers

**Estimated Budget:** \$3,500

**Timeframe:** October 1 - November 7

### **2. Social Media**

**Platform:** Facebook, Instagram, Twitter

**Focus:** Daily updates, voter engagement, policy posts, and key messaging content

**Strategy:**

- Frequent posting with a mix of video, graphics, and text
- Boosting posts around key issues and events
- Leveraging local endorsements and community groups

**Estimated Budget:** \$1,200

**Timeframe:** Ongoing, with a push in the last two weeks

### **3. Radio Advertising**

**Stations:** KAGV 1110 AM (Big Lake), KAYO 100.9 FM (Wasilla), KVNT 1020 AM (Eagle River), KMBQ-FM 99.7 FM (Wasilla), KBBO-FM 92.1 FM (Houston), KXLW 96.3 FM (Houston)

**Contd:** Spotify/ iHeart Streaming (geotargeted)

**Focus:** Promoting key issues like the PFD, Second Amendment, and Limited Government  
**Strategy:**

- 60-second spots during peak listening times (6 AM - 10 AM, 3 PM - 7 PM)
  - Rotate spots highlighting different issues
- Estimated Budget:** \$5,500 (including updated spot production)  
**Timeframe:** October 26 - November 7

#### **4. Mailers**

**Focus:** Highlighting positions on key issues, including Equality, Education, and Resource Development  
**Strategy:**

- Two rounds of mailers: one in early October, one in late October
  - Targeted to likely voters in District 30 **Budget:** \$3,000
- Timeframe:** October 5 and October 25

#### **5. Text/Call Outreach**

**Focus:** Voter turnout, reminders about early voting, and key dates  
**Strategy:**

- Use voter data to send personalized texts
  - Call campaign focusing on undecided voters and previous supporters **Budget:** \$1,000
- Timeframe:** October 15 - November 7

#### **6. E-Blasts**

**Focus:** Updates on the campaign, key issues, and reminders for voting  
**Strategy:**

- Weekly e-blasts to the campaign's email list
  - Special updates as necessary (e.g., new endorsements, key events) **Budget:** \$500
- Timeframe:** Weekly, with additional blasts as needed

#### **Action Items:**

- Finalize radio station agreements and spot placements
- Review and approve digital ad creatives and mailer designs
- Confirm dates for text/call outreach and e-blasts
- Schedule and promote campaign events/fundraisers
- EIN Verification for Digital Ads
- Social Media Access for Content & Ad Placement
- Updated Agency Agreement (required for radio placements)

Please review the plan and let me know if there are any adjustments or additions you'd like to make. Once approved, we can begin execution right away. I have included in the attachments your PSA from iHeart, some previous radio spots, digital ads, and updated creative options for your review.

*Looking forward to your feedback!*

*Becca*



# Alaska Public Offices Commission

## COMPLAINT



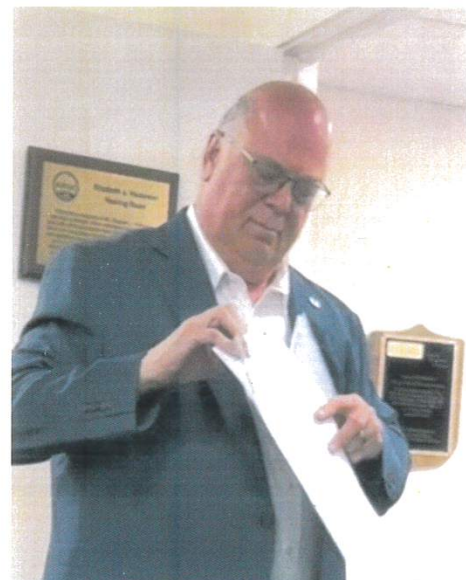
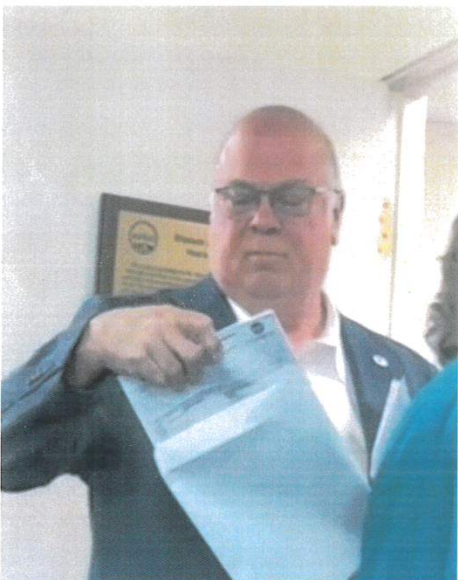
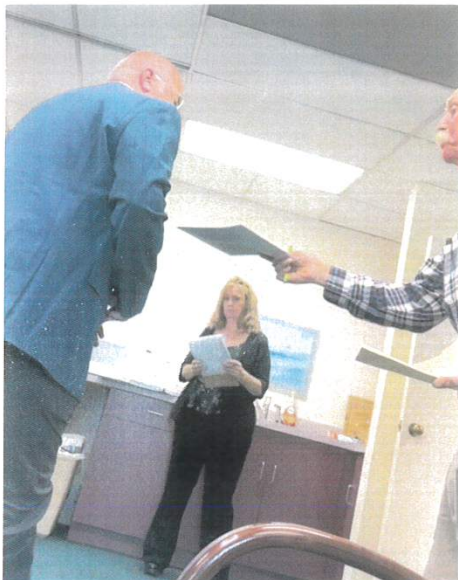
FILING A COMPLAINT <i>To be accepted, complaint must include</i>		APOC LAWS ALLEGEDLY VIOLATED <i>Specify section of law or regulation</i>		APOC case name/number/date	
1. Complainant's name + contact info 2. Respondent's name + contact info 3. Laws, regulations allegedly violated 4. Description of allegations 5. Basis of knowledge of alleged facts 6. Documentation to support allegations 7. Notarized signature of the complainant 8. Proof that complaint and all supporting documents were served on respondent		Campaign Disclosure Law	<input checked="" type="checkbox"/> AS 15.13 <input checked="" type="checkbox"/> 2 AAC 50.250-405	<div><b>ARRIVED</b> <b>JUL 01 2025</b> <b>APOC - ANCH</b> <b>PM HC FAX ELE</b></div> 25-07-CD	
		Public Official Financial Disclosure	<input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799		
		Legislative Financial Disclosure	<input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799		
		Lobbying Regulation	<input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590		
<i>If complaint meets requirements for acceptance, APOC will investigate the allegations and notify the respondent of the right to respond. APOC will notify Complainant and Respondent when APOC accepts or rejects a complaint.</i>					
<input type="checkbox"/> APOC <input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group		<b>COMPLAINANT</b> Michael Alexander		<b>RESPONDENT</b> <i>Person or group allegedly violating law</i> <input checked="" type="checkbox"/> Person Kevin McCabe <input type="checkbox"/> Party <input type="checkbox"/> Group	
Address City / Zip		PO Box 521171 Big Lake, AK 99652		2193 W Linn Marie Cir PO Box 520248, Big Lake, AK 99652	
Phone/Fax		(907) 892-4878		(907) 229-3721	
E-mail		mikealexander728@gmail.com		kevin@kevinjmccabe.com	
<b>COMPLAINANT'S REPRESENTATIVE</b>		<b>RESPONDENT'S REPRESENTATIVE</b>			
<i>If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info</i>					
Name/Title					
Address					
Phone/Fax					
E-mail					
DESCRIPTION or SUMMARY of ALLEGED VIOLATION		Use extra pages if needed	<input checked="" type="checkbox"/> SUPPORTING DOCUMENTS – DESCRIBE:		
McCabe again violates AS 15.13.110(a)(1)			Summary of Alleged Violations & Statutes		
and 2 AAC 50.321(d) by refusing to			Campaign Disclosures		
disclose expenditure details as required by			Case 25-01-CD		
AS 15.13.110(1) and 2 AAC 50.321(d).		Video Evidence of Service 5/25/2025			
PROOF of SERVICE ATTACHED: <input type="checkbox"/> Fax – receipt confirmation <input type="checkbox"/> Certified mail – signed receipt <input type="checkbox"/> Process server – return of service <input type="checkbox"/> E-mail – delivery/read receipt <input checked="" type="checkbox"/> Other: PERSONAL SERVICE 5/25/2025					
<b>COMPLAINANT'S SWORN STATEMENT: To the best of my knowledge and belief, these statements are true</b>					
Signature <i>Michael R Alexander</i>		Title		Date <i>6-30-25</i>	
Subscribed and sworn to or affirmed by me at <i>Big Lake Alaska</i> on <i>30th June 2025</i>					
Signature <i>[Signature]</i>		Title <i>Notary</i>			
APOC COMPLAINTS, RESPONSES, INVESTIGATION REPORTS & COMMISSION ACTIONS ARE PUBLIC DOCUMENTS					
APOC ANCHORAGE		APOC JUNEAU		APOC COMPLAINT PROCESS: 2 AAC 50.450 - 476	
2221 E. NORTHERN LIGHTS #128		240 MAIN STREET #500		FILING COMPLAINTS: 2 AAC 50.870	
ANCHORAGE, AK 99508		P.O. BOX 110222		ANSWERING COMPLAINTS: 2 AAC 50.880	
907-276-4176 / FAX 907-276-7018		JUNEAU, AK 99811		APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870	
TOLL-FREE 800-478-4176		465-4864 / FAX 465-4832		INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891	
WEB: <a href="http://doa.alaska.gov/apoc/">http://doa.alaska.gov/apoc/</a>		APOC FORMS: <a href="http://doa.alaska.gov/apoc/forms_all.html">http://doa.alaska.gov/apoc/forms_all.html</a>		APOC LAWS: <a href="http://doa.alaska.gov/apoc/apoclaws.html">http://doa.alaska.gov/apoc/apoclaws.html</a>	



## 6/25/2025 ALEXANDER V MCCABE COMPLAINT SERVICE

On June 25, 2025 at or about 3:30 PM Alaska time, I served the attached complaint to Kevin McCabe at the APOC offices at 2221 E Northern Lights Blvd, Ste 128 in Anchorage Alaska.

Witnesses were present, including APOC staff as shown in the images below and video evidence provided to APOC.



## KEVIN MCCABE SHOWS REPEATED REFUSAL TO LAWFULLY DISCLOSE EXPENDITURES

Kevin McCabe's campaign has again refused to meet the campaign finance reporting requirements set by Alaska law, particularly by filing an amendment to the 2024 State General Seven Day Report on 2/16/2025 – and despite the assurances made by McCabe in the 12/30/2025 hearing, Mr. McCabe refused to provide the required details of the 10/15/2024 Payment to Optima PR of \$16,825 for "ACCOUNT MANAGEMENT, GRAPHIC DESIGN, DIGITAL ADS, RADIO ADS, TEXT MESSAGING AND EMAIL, PRINTING AND POSTAGE" even though he is under investigation for that specific expenditure.

It's hard to imagine a more resolute display of willful disregard for the Commission, the law, and the people of Alaska than refusing to amend the Seven Day Report with the required expenditure details.

Additionally, Mr. McCabe's Amended 2024 Seven Day General Election Report also shows a non-monetary donation by his son Kyle McCabe of \$250 on 10/25/2024 and a corresponding non-monetary expenditure to Kyle McCabe on 10/25/2024. Regardless of how a campaign makes a non-monetary expense of \$250, the contribution report, and the expenditure are both 110 days late per AS 15.13.110(b)(8).

Beyond belief, Mr. McCabe delivered an even more stunning disregard for the law on his Year End Report on 2/16/2025, particularly with respect to the \$6,983 expenditure to Optima Public Relations on **10/27/2024**.

The expenditure reporting is 236 days past the November 1, 2024 filing deadline as of this complaint filing.

Additionally, the campaign's filing lacks the detailed information required under **AS 15.13.040** and **2 AAC 50.321(d)** and appears to intentionally obscure the vendors used, services rendered, and amounts spent across various platforms and subcontractors.

The campaign disclosure includes only a single bundled entry:

**10/27/2024 \$6,983.00 to Optima Public Relations**

*"Balance due after completion of multi-faceted and dynamic campaign strategy; graphic design for mailers, signage, social media support, thank you-post campaign; digital advertising on Google, Facebook, YouTube, iHeart, Animated ads; Radio placement on*



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*KVNT, KENI, iHeart stations; digital ads, text messaging, printing and postage for 2 mailers, printing signage."*

This expenditure falls within the 7-day pre-general election reporting period and should have been reported in the campaign's **7-day report due November 1, 2024**. The lack of transparency and detail in a last-minute expenditure of this magnitude, just days before the election, heightens the seriousness of the violation.

Moreover, this report was filed as part of McCabe's **2024 End of Year Report on February 15, 2025—a full month after he responded to a separate APOC complaint that already found him in violation of AS 15.13.040 and 2 AAC 50.321(d)** for similar concealment and vague disclosures. This repeated conduct demonstrates a pattern of willful noncompliance.

Despite being under formal investigation for these reporting practices, McCabe once again failed to disclose vendor names, addresses, itemized purposes, or amounts. He has still not submitted the Optima and other invoices necessary to establish transparency. This is not the behavior of a first-time candidate unfamiliar with the law, but of a repeat offender.

#### **Penalty Considerations, Mitigation, and Aggravating Factors**

##### **1. Single Infraction Penalty (if treated as one reporting failure):**

- Under **AS 15.13.390**, the civil penalty may be up to **\$500 per day** if the violation occurs within nine days of an election, as is the case here. Since the expenditure was made on **October 27, 2024—exactly nine days before the November 5, 2024 General Election**—it qualifies for the maximum daily penalty threshold.
- APOC has discretion to determine the exact penalty amount based on factors such as willfulness, prior violations, harm to the public interest, and failure to amend or cooperate.
- Therefore, the expenditure may result in a fine of **up to \$500 per day × number of days late**, at APOC's discretion.

##### **2. Aggregate Infraction Penalty (if each vendor/subcontractor is a separate violation): (if each vendor/subcontractor is a separate violation):**

- 17 unreported vendors/subcontractors × **\$500/day** × days overdue.
- Example: If 90 days overdue = **17 × 500 × 90 = \$765,000 maximum cumulative penalty.**

### **Mitigation and Aggravating Factors**

While APOC has authority to reduce penalties based on mitigating factors, only one might arguably apply here: the dollar amount of the original expenditure. APOC has, in some cases, noted this as a mitigating factor for minor expenditures. However, the \$6,983 amount is significantly above APOC's informal "small expenditure" threshold and occurred in the final days before the election, making mitigation inappropriate in this context.

In contrast, the number and severity of **aggravating factors** in this case fully justify APOC imposing the **maximum penalties allowed by law**. These include:

- **Willfulness:** McCabe continued the same vague, bundled reporting methods after already being cited for them.
- **Prior Violations:** APOC previously found McCabe in violation of AS 15.13.040 and 2 AAC 50.321(d).
- **Failure to Correct:** As of the date of this complaint (June 25, 2025), no amended report has been filed.
- **Delay in Filing:** The expenditure has been improperly reported for **236 days** and counting.
- **Proximity to Election:** The \$6,983 was spent **exactly 9 days before the 2024 General Election**.
- **Size of Expenditure:** This is a large, pre-election payment likely to influence public perception.
  - Additionally, McCabe indicates in his 2024 Year End Report that this \$6,983 expenditure is in addition to McCabe's \$16,825 payment to Optima on 10/15/2024.
    - \$23,808 was paid to Optima within a 12-day period.

- **Public Harm:** Concealing the expenditure until after the election denied voters access to relevant financial information.
- **Attempt to Obscure Details:** The vague description (“multi-faceted campaign strategy,” etc.) concealed subcontractor and service information.
- **Retaliation Against Oversight:** McCabe attempted to eliminate APOC’s funding via **Amendment 27 to CSHB 53** in April 2025.

Taken together, these aggravating factors weigh heavily in favor of maximum penalties and a formal investigation.

#### **Violation Window and Maximum Fines**

The reporting violation occurred on **October 27, 2024**, and the legally required 7-day pre-general election report was due on **November 1, 2024**. McCabe did not disclose the \$6,983 expenditure to Optima Public Relations with the required detail in that report. Instead, the campaign bundled the expense into its **Year-End Report filed on February 15, 2025**—which itself did not include the itemization required under **AS 15.13.040** and **2 AAC 50.321(d)**.

If delayed reporting were the only violation, then the violation window would have closed on 2/16/2025 when McCabe filed his 2024 Year End Report.

However, because the report filed on 2/16/2025 remains legally noncompliant, and no amended, corrected report has been submitted, the violation is ongoing. Therefore, I argue the **violation window remains open until the date of this complaint: June 25, 2025**, making it **236 days late**.

This position is supported by:

- **AS 15.13.040(a)(5)**, which requires detailed and timely disclosure of each expenditure.
- **2 AAC 50.321(d)**, which states that expenditures made through ad agencies must disclose in detail all subcontractors and services rendered.

Since those details were never provided, the report remains deficient.

McCabe listed 17 separate expenditures under the \$6,983 paid Optima PR services. The Commission has previously

I ask the Commission to consider the following maximum fine estimates:

**1. Single Infraction Penalty (lumped):**

- $\$500/\text{day} \times 236 \text{ days} = \$118,000 \text{ maximum}$

**2. Aggregate Infraction Penalty (itemized):**

- $17 \text{ violations} \times \$500/\text{day} \times 236 \text{ days} = \$2,006,000 \text{ maximum cumulative penalty}$

These figures reflect the gravity and duration of the reporting failures and underscore that the violation window should remain open until full compliance is achieved.

**Conclusion: A Pattern of Willful Concealment, Hostility Toward Oversight, and Undermining of Democratic Participation**

Kevin McCabe's reporting practices from 2019 through 2025 reveal a sustained, deliberate effort to conceal campaign expenditures. The three campaign finance complaints filed against him in 2024 and 2025 are not isolated incidents—they are part of an emerging pattern.

Since the first complaint against Mr. McCabe was filed on **December 24, 2024**, McCabe has exhibited open hostility toward the regulatory process. Rather than correcting his behavior, he became combative towards Mike Widney and myself, and McCabe showed hostility to the oversight process itself. On **April 14, 2025**, Representative McCabe offered **Amendment 27**, to CSHB 53(FIN), which proposed eliminating the entire **\$1,272,500 APOC operating budget**. The amendment failed, but its intent was unmistakable: **McCabe was attempting to defund the very agency responsible for requiring transparent expenditure reporting.**

This conduct, combined with his refusal to disclose subcontractor details or provide requested documentation (e.g., invoices from Optima Public Relations), confirms that these violations are not the result of confusion or clerical error. They are the calculated actions of a candidate who truly believes he is **above the law**.

Furthermore, McCabe's conduct sends a dangerous message to law-abiding candidates across Alaska. When incumbents like McCabe learn how to game the system—obscuring campaign activity, ignoring reporting rules, and retaliating against regulators—honest candidates are discouraged from running for office. They know they cannot compete

with well-financed incumbents who use every loophole, violate the law with impunity, and then attempt to defund the agency meant to ensure fairness. This pattern not only undermines public trust but actively deters qualified individuals from participating in the electoral process. Transparency is the goal of Alaska's campaign finance system, and fairness is a byproduct of transparency — not the other way around.

But what about the perverse incentive provided similarly corrupt candidates and groups: hire a single PR firm for fundraising and campaign expenditures — and then bundle all the money raised, and all the money spent under a single vendor, pay a petty fine, and nobody knows where the money came from, or where the money went — we're back to the wild west of campaign finance before APOC was formed.

Additionally, under **2 AAC 50.352(c)**, any advertising agency, campaign consultant, or campaign management service — such as Optima Public Relations — is legally required to retain invoices and documentation of services for **at least six years** and must provide those records to the Commission **upon request**.

While McCabe is not legally compelled to submit Optima's invoices himself, he is required to file detailed reports under **AS 15.13.040(a)(5)** and cooperate with any investigation initiated by the Commission. To date, no such invoices have been disclosed by McCabe, and he has not demonstrated any intention to bring his reporting into compliance.

## ANALYSIS OF 2024 YEAR END REPORT FILED 2/16/20125

Expenditure: Optima Public Relations

Due Date: November 1, 2024

10/27/2024

\$6,983.00 to Optima Public Relations

*"Balance due after completion of multi-faceted and dynamic campaign strategy; graphic design for mailers, signage, social media support, thank you-post campaign; digital advertising on Google, Facebook, YouTube, iHeart, Animated ads; Radio placement on KVNT, KENI, iHeart stations; digital ads, text messaging, printing and postage for 2 mailers, printing signage."*

This type of vague, bundled reporting violates statutory and regulatory requirements because it does not provide the legally required information for each expenditure and service. Below is a breakdown of what **should have been reported**, highlighting where the campaign omitted or concealed information:

## REQUIRED DETAILS PER AS 15.13.040 AND 2 AAC 50.321(D)

### 1. Google

[insert date]

Payment Method: [insert payment method]

Vendor: **Google**

Address: [insert address]

Description: *"Digital advertising on Google"*

#### Violations:

- No amount reported (AS 15.13.040(a)(5)(E))
- No date of expenditure (AS 15.13.040(a)(5)(A))
- No vendor address (AS 15.13.040(a)(5)(C))
- No purpose detail beyond platform name (AS 15.13.040(a)(5)(D))
- No indication of ad type or content, which is functionally required under 2 AAC 50.321(d) to explain the nature of services rendered

### 2. Facebook

[insert date]

Payment Method: [insert payment method]

Vendor: **Facebook**

Address: [insert address]

Description: *"Digital advertising on Facebook"*

#### Violations:

- No amount reported (AS 15.13.040(a)(5)(E))
- No date of expenditure (AS 15.13.040(a)(5)(A))
- No vendor address (AS 15.13.040(a)(5)(C))
- No detailed purpose description (AS 15.13.040(a)(5)(D))

- No disclosure of targeting, issue content, or subcontractor involvement (2 AAC 50.321(d))

### 3. YouTube

[insert date]

Payment Method: [insert payment method]

Vendor: YouTube

Address: [insert address]

Description: *"Digital advertising on YouTube"*

**Violations:**

- No amount reported (AS 15.13.040(a)(5)(E))
- No date of expenditure (AS 15.13.040(a)(5)(A))
- No vendor address (AS 15.13.040(a)(5)(C))
- No disclosure of whether video content was produced, by whom, or where placed (2 AAC 50.321(d))

### 4. iHeart

[insert date]

Payment Method: [insert payment method]

Vendor: iHeart

Address: [insert address]

Description: *"Digital advertising on iHeart"*

**Violations:**

- No amount reported (AS 15.13.040(a)(5)(E))
- No vendor address (AS 15.13.040(a)(5)(C))
- No description of ad format or placement (audio, display, etc.) (2 AAC 50.321(d))
- No indication of targeting, dates, or subcontractor relationship (2 AAC 50.321(d))



## 5. KVNT

[insert date]

Payment Method: [insert payment method]

Vendor: KVNT

Address: [insert address]

Description: *"Radio placement on KVNT"*

### Violations:

- No cost or frequency of ad placement (AS 15.13.040(a)(5)(E))
- No script or message description (AS 15.13.040(a)(5)(D))
- No subcontractor or production disclosure (2 AAC 50.321(d))
- No broadcast dates or targeting information (AS 15.13.040(a)(5)(A))

## 6. KENI

[insert date]

Payment Method: [insert payment method]

Vendor: KENI

Address: [insert address]

Description: *"Radio placement on KENI"*

### Violations:

- No cost or breakdown of services (AS 15.13.040(a)(5)(E))
- No vendor address (AS 15.13.040(a)(5)(C))
- No dates of broadcast (AS 15.13.040(a)(5)(A))
- No subcontractor involvement or content creation attribution (2 AAC 50.321(d))

## 7. iHeart stations

[insert date]

Payment Method: [insert payment method]

Vendor: iHeart stations

Address: **[insert address]**

Description: *"Radio placement on iHeart stations"*

**Violations:**

- No identification of specific stations (2 AAC 50.321(d))
- No cost allocation per station (AS 15.13.040(a)(5)(E))
- No address listed (AS 15.13.040(a)(5)(C))
- No timeframe, schedule, or contract disclosed (AS 15.13.040(a)(5)(A), (D))

**8. Animated ads**

**[insert date]**

Payment Method: **[insert payment method]**

Vendor: **[insert vendor]**

Address: **[insert address]**

Description: *"Animated ads"*

**Violations:**

- No detail on where these were shown (platform or medium)
- No subcontractor or creator identified (2 AAC 50.321(d))
- No cost or breakdown (AS 15.13.040(a)(5)(E))
- No dates or campaign linkage (AS 15.13.040(a)(5)(A))

**9. Multi-faceted and dynamic campaign strategy**

**[insert date]**

Payment Method: **[insert payment method]**

Vendor: **Optima Public Relations**

Address: **[insert address]**

Description: *"Multi-faceted and dynamic campaign strategy"*

**Violations:**

- No breakdown of specific services rendered (2 AAC 50.321(d))
- No contract terms or scope of work (AS 15.13.040(a)(5)(D))
- No identification of subcontractors used (2 AAC 50.321(d))
- Phrase lacks any measurable or verifiable detail

**10. Graphic design for mailers, signage**

[insert date]

Payment Method: [insert payment method]

Vendor: [insert vendor]

Address: [insert address]

Description: *"Graphic design for mailers, signage"*

**Violations:**

- No vendor or subcontractor named for the design (2 AAC 50.321(d))
- No quantity or output identified (AS 15.13.040(a)(5)(D))
- No service date or deliverables shown (AS 15.13.040(a)(5)(A))

**11. Social media support**

[insert date]

Payment Method: [insert payment method]

Vendor: [insert vendor]

Address: [insert address]

Description: *"Social media support"*

**Violations:**

- No vendor or consultant identified (AS 15.13.040(a)(5)(C))
- No platforms, content types, or services described (2 AAC 50.321(d))
- No time range or usage specified

## **12. Thank-you post campaign**

**[insert date]**

Payment Method: **[insert payment method]**

Vendor: **[insert vendor]**

Address: **[insert address]**

Description: *"Thank-you post campaign"*

### **Violations:**

- No identification of format (mailer, ad, social post, etc.)
- No named vendor for printing, design, or delivery
- No content or timing specified (AS 15.13.040(a)(5)(D))
- No subcontractor disclosure (2 AAC 50.321(d))

## **13. Digital ads**

**[insert date]**

Payment Method: **[insert payment method]**

Vendor: **[insert vendor]**

Address: **[insert address]**

Description: *"Digital ads"*

### **Violations:**

- Redundant and vague
- No platform specified
- No amount, dates, targeting, or purpose provided
- No vendor or subcontractor identified (2 AAC 50.321(d))

## **14. Text messaging**

**[insert date]**

Payment Method: **[insert payment method]**

Vendor: [insert vendor]  
Address: [insert address]  
Description: "Text messaging"

**Violations:**

- No vendor or platform listed (AS 15.13.040(a)(5)(C))
- No recipient data, volume, or dates (AS 15.13.040(a)(5)(A))
- No description of message content or campaign scope (AS 15.13.040(a)(5)(D))

**15. Printing signage**

[insert date]  
Payment Method: [insert payment method]  
Vendor: [insert vendor]  
Address: [insert address]  
Description: "Printing signage"

**Violations:**

- No printer identified (2 AAC 50.321(d))
- No quantity or description of signage (AS 15.13.040(a)(5)(D))
- No cost or invoice disclosed (AS 15.13.040(a)(5)(E))

**16. Postage for 2 mailers**

[insert date]  
Payment Method: [insert payment method]  
Vendor: [insert vendor or USPS class]  
Address: [insert address]  
Description: "Postage for 2 mailers"

**Violations:**

- No mail house or USPS service identified
- No quantity, geography, or mailing dates

- No supporting invoice (2 AAC 50.321(d), AS 15.13.040(a)(5))

#### **17. Printing of 2 mailers**

**[insert date]**

Payment Method: **[insert payment method]**

Vendor: **[insert vendor]**

Address: **[insert address]**

Description: *"Printing of 2 mailers"*

**Violations:**

- No printer named
- No details of format, quantity, or delivery
- No breakdown of cost or services (AS 15.13.040(a)(5)(E))

## COMPARATIVE ENFORCEMENT MEMORANDUM: JUSTIFICATION FOR PER-DISCLOSURE PENALTY

The following comparisons provide a compelling rationale for APOC to treat Kevin McCabe's approximately 17 omitted vendor disclosures in his 10/27/2024 expenditure to Optima Public Relations as **17 separate violations** — not a single infraction.

### 1. Internal Revenue Service (IRS)

**Statutes & Regulations:** IRC §§ 6721, 6722, 6723

**Doctrine:** Each missing or incorrect information return (e.g., Form 1099) is treated as an **individual penalty-triggering event**. Penalties are assessed **per return** — not per batch.

**Relevance:** Just as each 1099 must be filed with correct name, address, amount, and ID, each vendor in McCabe's bundled expenditure must be separately disclosed.

### 2. Traffic Enforcement (State Example)

**Doctrine:** A motorist stopped for speeding, with a broken taillight, missing side mirror, and expired registration, receives **separate citations** for each offense. These are **not bundled** into a single penalty because each endangers public safety differently.

**Relevance:** Similarly, each undisclosed vendor and purpose in a campaign report presents a distinct risk to electoral transparency and voter trust.

### 3. Occupational Safety and Health Administration (OSHA)

**Policy:** Instance-by-Instance (IBI) Citation Policy (2023 revival of 1990 directive)

**Doctrine:** OSHA issues **separate citations** for each violation — per employee, per safety device, per hazard — found during a single inspection.

**Relevance:** Just as 10 untrained workers at a site can yield 10 distinct citations, McCabe's 17 unreported subcontractors constitute 17 reportable violations under AS 15.13.040 and 2 AAC 50.321(d).

#### **4. Federal Motor Carrier Safety Administration (FMCSA – DOT)**

**Regulations:** 49 CFR 396.9; CSA Safety Measurement System

**Doctrine:** Each vehicle defect (e.g., brake issue, tire tread, lighting) is cited **individually**, and each affects the carrier's compliance score.

**Relevance:** Like a commercial vehicle inspection, a campaign expenditure disclosure must identify every compliance-relevant detail. Each omission matters.

#### **5. Federal Aviation Administration (FAA)**

**Regulations:** 14 CFR 13.14, 13.16

**Doctrine:** FAA assigns **separate civil penalties** for each regulatory violation found in an investigation, regardless of whether they stemmed from a single triggering incident.

**Relevance:** A campaign cannot cite “one payment” to avoid accountability for as many as 17 separate reporting requirements.

#### **6. State & Local Building Code Enforcement**

##### **Statutes & Ordinances:**

- Alaska Statutes: **AS 18.60.580** (adopts the National Electrical Code)
- Matanuska-Susitna Borough Ordinance: adopts **NEC** and enforces per-outlet and per-system violations independently

**Doctrine:** During inspections, each non-compliant item (e.g., incorrectly wired outlets, code-deficient plumbing, lack of fire caulking) results in a **separate citation** — even if part of one home.

**Relevance:** Like faulty outlets, each missing disclosure in McCabe's report has potential legal and public consequence. As many as 17 distinct violations may exist in his bundled expenditure report.



## 7. State & Local Property Valuation Enforcement

### Statutes & Ordinances:

- Alaska Statutes: **AS 29.45.105** (regarding the duty of property owners to report taxable property)
- Matanuska-Susitna Borough Code: **MSB 3.15.010** (establishing assessment duties and procedures)

**Doctrine:** In Matanuska-Susitna Borough and under Alaska property tax law, when a homeowner fails to report substantial improvements (e.g., from dry cabin to modern residence), assessors may investigate and impose back taxes and penalties for **each year** of underreporting — **not just the year of discovery**.

**Relevance:** Just as each year of concealment is treated as a separate infraction in tax assessment and subject to separate valuation and enforcement action, APOC must treat each undisclosed vendor, service, or amount in McCabe's campaign report as a **separate, retroactively enforceable violation**.

## 8. Federal Election Commission (FEC)

**Regulations:** 11 CFR 109.10, 111.1, 111.43

**Doctrine:** Each omitted report (e.g., 48-hour notice, independent expenditure disclosure) or data field is penalized **independently**.

**Relevance:** Campaigns cannot avoid multiple fines by lumping multiple reporting failures into one form. FEC upholds **transparency through granularity**.

### Conclusion and Request

Across every relevant regulatory system — tax, traffic, workplace safety, transportation, aviation, campaign finance, and building code — the standard enforcement doctrine is clear:

**Each omission or violation is treated individually, even if discovered as part of a single payment, action, or inspection.**

APOC should apply the same logic and precedent in McCabe's case. The 10/27/2024 payment to Optima Public Relations concealed **as many as 17 distinct services and**

**subcontractors**, none of which were disclosed as required under AS 15.13.040 and 2 AAC 50.321(d).

I also remind the Commission that every act governed under AS 15.13 is inherently political — each dollar contributed or spent reflects political will, opposition, speech, and policy intent. Alaska's Constitution, Article I, Section 2, declares: "All political power is inherent in the people. All government originates with the people, is founded upon their will only, and is instituted solely for the good of the people as a whole."

APOC exists as an extension of that will — and McCabe's attempt to defund the Commission was rejected by the Legislature, confirming that the people of Alaska, through their representatives, still support its role.

Therefore, before any mitigation or discretion is applied, APOC must fulfill its foundational duty: to enforce the law as written. Every omission is a violation — and every violation demands recognition.

In light of Mr. McCabe's continued refusal to lawfully disclose his campaign expenditures, I respectfully ask APOC to investigate these contribution(s) and expenditures and require:

1. Amended reports with full itemization.
2. Disclosure of all invoices, subcontractors and service providers.
3. Treat each omitted disclosure as a **separate and independent violation**;
4. Impose maximum civil penalties for willful or continued negligent reporting violations under AS 15.13.390.
5. Uphold transparency and deter future concealment.
6. Consideration of pattern-based enforcement remedies under the Commission's authority.

Respectfully submitted,  
Michael Alexander  
Big Lake, Alaska

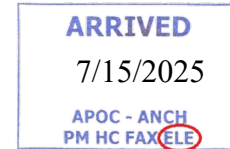
BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

In the Matter of: Michael Alexander, Complainant, v. Kevin McCabe, Respondent

Case No. 25-07-CD

RESPONDENT'S ANSWER TO COMPLAINT

Date: July 20, 2025



TO THE ALASKA PUBLIC OFFICES COMMISSION:

Respondent Kevin McCabe submits this Answer to the Complaint filed by Michael Alexander on June 25, 2025, alleging violations of AS 15.13.040, AS 15.13.110, and 2 AAC 50.321(d) concerning campaign expenditure disclosures.

The Complaint is without merit, misinterprets applicable law, and appears to be a collaborative, retaliatory effort to harass Respondent. It cites legislative actions that are protected by the constitution, demands exaggerated penalties, and continues a pattern of politically motivated complaints and abuse of the APOC office to harass a member of the legislature they do not agree with. Respondent respectfully requests dismissal under 2 AAC 50.510.

The Complaint alleges inadequate disclosure of two expenditures to Optima Public Relations, one for \$16,825, which was the total amount estimated, on October 15, 2024, and one for \$6,983 on October 27, 2024, which was the final Optima bill after negotiation of final invoice. It also lists a \$250 non-monetary contribution involving Respondent's son, Kyle McCabe, which was a donation in kind to the campaign. It claims multiple violations and seeks penalties of up to \$765,000 based on a 236-day violation period. Respondent asserts:

- The amended reports fully comply with AS 15.13.040 and 2 AAC 50.321(d).
- No amendment deadline exists under AS 15.13.110 or 2 AAC 50, rendering the 236-day claim frivolous and invalid.
- Complainant's demand for platform-specific itemization exceeds what the regulations require.
- The Complaint is retaliatory and improperly cites Respondent's sponsorship of Amendment 27 to CSHB 53, a protected legislative act.

Under AS 15.13.040(a)(5), expenditure reports must include the date, amount, purpose, and vendor. The amended Seven-Day General Election Report (filed February 16, 2025) and Year-End Report (filed February 16, 2025) disclose the payments to Optima Public Relations and describe services such as graphic design, signage, digital advertising (Google, Facebook, YouTube, iHeart), radio placements (KVNT, KENI, iHeart stations), text messaging, printing, and postage. These disclosures satisfy statutory requirements and are more robust than any other state or local candidate campaign reporting to APOC.

2 AAC 50.321(d) requires disclosure of services rendered by advertising agencies, including vendors and subcontractors. Respondent listed Optima, on the date the expenditure occurred, as the vendor, and identified the types of services that were envisioned to be provided, based on Optima's bundled estimate, a standard industry practice. In addition, the regulation does not require cost breakdowns for each platform or subcontractor unless specifically requested by APOC.

The \$250 non-monetary contribution was disclosed as in-kind donation from Kyle McCabe, Respondent's son, in the Year-End Report. This disclosure complies with AS 15.13.040(b) and 2 AAC 50.321. Complainant offers no evidence to support a claim of insufficiency.

The claim of a 236-day violation period is unsupported by law. Significantly, neither AS 15.13.110 nor 2 AAC 50 imposes a time limit for amending campaign finance reports. Under AS 15.13.110(b), corrections may be made until the campaign account is closed or the candidate's term ends. The Year-End Report was timely filed under AS 15.13.110(a)(2); and the amended Seven-Day Report, submitted upon receipt of Optima's invoice, as well as the year end report defining the sub-contractors, demonstrates good-faith compliance with 2 AAC 50.306.

The initial Seven-Day Report, filed November 1, 2024, listed the vendor and expenditure amounts in accordance with AS 15.13.040(a)(5). The amendments and the year end report provided additional detail once Optima's final invoice became available; again, far exceeding other campaigns reporting. This has become standard campaign practice and reflects no willful noncompliance or intent to deceive on the part of the Respondent.

The Complaint demands itemized financial disclosure for each platform or service (e.g., Google, Facebook, signage). This far exceeds regulatory requirements. Vendors like Optima issue aggregated invoices covering campaign services across multiple platforms. Itemized cost breakdowns are not industry-standard and are not required under 2 AAC 50.321(d) unless APOC specifically requests them. In fact, there is no place in the electronic reports to submit digital copies of invoices as attachments.

The payment to Optima constitutes a single transaction under 2 AAC 50.321(d). Complainant's assertion of 17 separate violations misreads the regulation. APOC has never required disaggregation of bundled advertising expenditures in this manner.

The Complaint improperly targets Respondent for protected legislative actions and relies on exaggerated and unprecedented penalty structures.

Complainant cites Respondent's sponsorship of Amendment 27 to CSHB 53 as an "aggravating factor" (Complaint, Page 6). This is constitutionally protected legislative activity under Article I, Section 5 and Article II, Section 6 of the Alaska Constitution. Legislators may not be held to answer before a tribunal for statements or actions undertaken in their official capacity. See *State v. Alaska Civil Liberties Union*, 978 P.2d 597, 603 (Alaska 1999). This improper reference to protected legislative speech underscores the retaliatory nature of the Complaint and independently warrants dismissal of this frivolous complaint under 2 AAC 50.510.

Complainant has filed prior complaints against Respondent, as has Mike Widney (mentioned in this complaint), in apparent intentional collaboration. This is confirmed by his reference to the Widney complaint, typed in the description of his complaint, and dated the day of the Widney hearing. These repeated efforts to discredit Respondent, combined with inflammatory language branding Respondent a “repeat offender,” or “hostile towards the process” reveal a coordinated attempt to weaponize APOC’s process. In addition, the statement that the Respondent “became combative towards Mike Widney and myself” (page 5) is blatantly untrue, unsupported, and continues to demonstrate the collaborative nature of these complaints.

The requested penalties of \$118,000 to \$765,000 are based on a mischaracterized violation period and an unprecedented misinterpretation of 2 AAC 50.321(d). AS 15.13.390(a) grants the Commission discretion to consider the absence of harm and Respondent’s cooperation. factors that warrant minimal or no penalty. See In re APOC Case No. 10-02-CD (2010).

The \$6,983, \$16,825, and \$250 expenditures represent a small portion of the campaign’s total budget and were fully disclosed in the Year-End and amended Seven-Day Reports. There is no evidence that any voter was misled or that the November 5, 2024 election was impacted. The public received accurate, timely information, fulfilling the purpose of Alaska’s campaign finance laws.

Respondent respectfully requests the Commission:

1. Dismiss the Complaint under 2 AAC 50.510 as frivolous, retaliatory, and without legal or factual merit.
2. Disregard references to Amendment 27, as they involve protected legislative activity under the Alaska Constitution.
3. Impose no penalty under AS 15.13.390(a), considering Respondent’s cooperation, amendments, and transparency (see year end report) and the absence of public harm.
4. Permit submission of supplemental documentation, including Optima’s invoice, under 2 AAC 50.352(c) if the Commission deems it necessary.

This Complaint is a retaliatory action aimed at punishing Respondent’s protected legislative conduct, his votes on the budget and PFD, and his own complaint against Alexander. It misrepresents the requirements of 2 AAC 50.321(d) and seeks excessive penalties without basis in law or fact. Respondent’s campaign reports comply with AS 15.13.040, and no regulatory deadline for amendments was violated. APOC should dismiss this Complaint under 2 AAC 50.510 to preserve the integrity of the Commission’s oversight function and prevent political misuse of its authority.

Respectfully submitted,

Kevin McCabe

No person was allowed to boost or advertise on the Vote Kevin McCabe page other than Optima Public Relations. The time frame is a bit fuzzy but generally around Mid October (15-17) I turned all the FB advertising over to Optima.

I did not do any FB “Ads” personally. I only boosted six posts that I can find. Some of the posts shown in my ad library I know to be Optima (essentially all of those I did not claim below). I am unclear how many they did as actual FB “Ads” from Optima or how many they boosted from my FB account.

Optima personnel did have access to my FB account for boosting and editing purposes.

The actual date, I pushed the button to boost a post in META is a bit hard to parse. Some of them were done well in advance of the event listed in the ad. Going through “approval” emails is not helpful as it often takes more than a day for META to approve political adds.

All my Meta ads were reported on APOC reports.

The issue seems to be that the public does not know, or care, about APOC reporting periods and procedures. For instance, APOC procedures require the date reported on the form be the date the expense was incurred. Yet META only bills monthly. So, the date the money is actually paid out is often different. And if there are two ads in META for the same month, the bills are lumped together by META and reported as a single “payment” on APOC. This fact alone makes APOC reporting one of the most difficult and error prone aspects of any campaign and makes any errors, whether intentional or not, available for political purposes such as this one.

08.05.24 Debit Meta Boost of Big Lake Event,  
entered as a debt for July 5. So was boosted on that day.

\$20.00

7-day report filed 08.13.24

Impressions: 3K - 4K

**Vote Kevin McCabe**  
Sponsored • Paid for by Vote Kevin McCabe  
Library ID: 1430408434333475




Please join us!









*You're Invited!*  
Sunday, July 14, 4-6pm  
**KEVIN MCCABE**  
CAMPAIGN KICK-OFF  
At Floaters Pub & Restaurant  
in Big Lake  
**McCabe**  
REPUBLICAN 3rd STATE HOUSE

[VOTEKEVINMCCABE.ORG](https://VOTEKEVINMCCABE.ORG)


**Inactive**

Library ID: 1430408434333475  
Jul 5, 2024 - Jul 15, 2024  
Platforms    
Categories 

 Estimated audience size: 50K - 100K   
 Amount spent (USD): <\$100   
 Impressions: 3K - 4K 

**Vote Kevin McCabe**  
Sponsored • Paid for by Vote Kevin McCabe  
Library ID: 1430408434333475

Please join us!



*You're Invited!*  
Sunday, July 14, 4-6pm

08.17.24 Debit  
Meta Ad boost on 8/17/2024  
\$17.00  
30-day report filed 10.07.24



*This is the same ad but with two ID numbers. I selected the wrong audience so it had to be adjusted mid-stream (you can verify that by looking at the audience size – I boosted the initial post on the 17<sup>th</sup> and adjusted it on the 19<sup>th</sup>). The APOC report has the date for when the ad was initially contracted for. No more money was spent but adjusting the audience apparently creates a new ad ID.*


2 ads Any filters you applied to the search results are also applied to this group of ads. To adjust the filters, go back to the search results.


Inactive


Library ID: 1225205111853997


Aug 19, 2024 - Aug 21, 2024

Platforms  

Categories 

Estimated audience size: 50K - 100K 

Amount spent (USD): <\$100 



Impressions: 1K - 2K 


See ad details


Inactive


Library ID: 473243895604464


Aug 17, 2024 - Aug 20, 2024

Platforms  

Categories 

Estimated audience size: >1M 

Amount spent (USD): <\$100 


Impressions: 4K - 5K 


See ad details

Summary Data

2 ad versions


See ad details


 **Vote Kevin McCabe**  
Sponsored · Paid for by Vote Kevin McCabe



**Vote Kevin McCabe**  
The official campaign page for Rep. Kevin McCabe, District 30 (Big Lake, Houston, Pt Mack, Willow, Trapper Creek, Talkeetna, Cantwell, Healy, Denali and North). Paid for...

See ad details

 **Vote Kevin McCabe**  
Sponsored · Paid for by Vote Kevin McCabe



**Vote Kevin McCabe**  
The official campaign page for Rep. Kevin McCabe, District 30 (Big Lake, Houston, Pt Mack, Willow, Trapper Creek, Talkeetna, Cantwell, Healy, Denali and North). Paid for...

Exhibit 7  
Page 3 of 6



10.05.24 Debit  
Meta Paid in full, for debt incurred 09.16.24 for boosted posts  
\$83.79  
7-day report (amended) filed 02.16.25

*This post was boosted on 9/16/2024 for an event 10 days in advance and was supposed to run from the 21<sup>st</sup> to the 29<sup>th</sup> when the event was held. I believe the bill from Meta was combined with ad ID# 1217732276211892*

**Ad Details**

Inactive

Library ID: 1068171291341663

Sep 21, 2024 - Sep 29, 2024

Platforms

Categories

Estimated audience size: **100K - 500K**

Amount spent (USD): **<\$100**

Impressions: **2K - 3K**

**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe

Library ID: 1068171291341663

Join Rep. McCabe for great pizza and conversation about Alaska politics and District 30.

With Co-hosts:  
Eric and CJ Koan

**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe

Library ID: 1068171291341663

Join Rep. McCabe for great pizza and conversation about Alaska politics and District 30.

With Co-hosts:  
Eric and CJ Koan  
Cathy Tilton  
Dan and Angie Stephl...

**PIZZA&POLITICS**

*A Meet & Greet with Representative Kevin McCabe*

Sunday, Sept. 29, 3pm-5pm | Susitna Brewing - 5120 S. Big Lake Rd.

With Co-hosts:



Eric and CJ Koan	Matt and Mark McKenna
Cathy Tilton	Terry and Jacqui Gorlick
Dan and Angie Stephl	Robert Hall
Mike and Michelle Shower	Tammil Alexander
Pat and Kathy McCollum	Curt Nielsen
Colleen Sullivan Leonard	John and Barbara Stallone


*This one was charged, by Meta, at the same time as Ad ID# 1068171291341663. If I remember correctly, they were submitted for publication on the same day.*



Inactive



Library ID: 1217732276211892



Sep 16, 2024 - Sep 30, 2024


Platforms  

Categories 


 Estimated audience size: **50K - 100K** 



 Amount spent (USD): **<\$100** 


 Impressions: **4K - 5K** 



**Vote Kevin McCabe**  
Sponsored • Paid for by Vote Kevin McCabe  
Library ID: 1217732276211892







**PRO-ALASKA**  
**PRO RESOURCE DEVELOPMENT**  
**AMERICAN OIL FROM AMERICAN SOIL**  
**OPEN ALASKA FOR ALASKANS**

*These two were billed my META together. There was, however, an issue with the campaign credit card so META defaulted to my personal credit card and we did not immediately catch it. META billing showed 10/21 because of the second ad which did not need advance timing, so that is what we used for the report. I have included the email from META that shows 10/5 for the first ad. This may have been our error or it may have been the credit card issue. Finding an actual person to talk to at META is near impossible.*

*The easiest way to resolve it was to let it go and file it as a non-monetary donation from myself to the campaign which does not show up as a "payment" for an ad. We tried to resolve this in the year-end report.*



11.05.24 non-Monetary KM to Meta


For debt incurred for 10/5/24 as near as I can tell -  
\$119.77 Year-end report  
filed 02.16.25



Inactive



Library ID: 1173022787644175



Oct 18, 2024 - Oct 24, 2024


Platforms  

Categories 

 Estimated audience size: 1K - 5K 

 Amount spent (USD): <\$100 


 Impressions: 1K - 2K 



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe



Library ID: 1173022787644175






Inactive



Library ID: 1524069881572481



Oct 21, 2024 - Nov 5, 2024


Platforms  

Categories 

 Estimated audience size: 100K - 500K 

 Amount spent (USD): \$100 - \$199 

 Impressions: 7K - 8K 



**Vote Kevin McCabe**

Sponsored • Paid for by Vote Kevin McCabe

Library ID: 1524069881572481




Exhibit 7  
Page 6 of 6



Optima Public Relations  
907-202-5516  
7362 W. Parks Hwy, #665  
Wasilla, AK 99623

**Billed To**  
Kevin McCabe  
McCabe for State House

**Date of Issue**  
10/15/2024  
  
**Due Date**  
10/29/2024

**Invoice Number**  
24-158-VKM

**Amount Due (USD)**  
**\$0.00**

Description	Rate	Qty	Line Total
Account Management & Campaign Strategy July 15 - Nov 5, 2024   Fixed Fee Staff: Becca Client Coordination (Misc phone calls, weekly meetings and emails re: campaign, project assistance)	\$500.00	2	\$1,000.00
Graphic Design 6 Digital Ad Sizes x 2 Sets Absentee Mailer Early Voting Mailer Additional Mailer Signage FB Graphics Web Digital Graphics for Streaming/Google Absentee Voting Mailer Absentee Voting Digital Ad Set Proven Leadership. Real Purpose. Social Media Endorsements McCabe Mailer Edits Postcard Early Voting Signage Video Assets Animated Ads	\$150.00	6.5	\$975.00
Digital Advertising Launch Sept - Nov 5 (Parital Pre-Bill) Google Digital Search Facebook Youtube iHeart Video Integration	\$3,500.00	1	\$3,500.00

Radio Placement	\$3,000.00	1	\$3,000.00
Oct16 - Nov 5			
30-second ad voiced KM & 60, Sec YT Voice			
Traditional Radio Stations			
iHeart Morning Shows w/ 3rd Party Platform Integration			
Dan F (KVNT)			
Porcaro			
Streaming (Spotify/Pandora/iHeart) - geotargeted			
Video & Podcast Micro Targeting			

Radio Ad Production	\$350.00	1	\$350.00
Voice over edits w/ KM & Previous YT Voice			
4 Final Version w/ sound rights (30 sec/60 sec) + 15 sec (for YT bumper ads)			

Text Messaging & Email Targeting	\$2,000.00	1	\$2,000.00
6 Text Messages ( Image & written content with link)			
6 Reppsnoive Email Marketing Ads (includes design and content/copy)			
@ appx 4000-5550 recipients			

+ \$250 Per Text  
+ \$150 Per Email

ONE TIME FEE(s):  
Graphic Design & Reports (\$120)  
Set-Up Fee (\$100)  
Data Entry/Upload "opt-in" verification for each List (\$125)

Printing / Postage for Mailers	\$6,000.00	1	\$6,000.00
PIP Printing			
+ Mailer 1- Early Voting			
+ Mailer 2 ?			
+ 4x8 Signage x 6			
+ Sticker/Badge for Signage			
(prepayment - will adjust with final bill or credit)			

Subtotal	16,825.00
----------	-----------

Tax	0.00
-----	------

Total	16,825.00
-------	-----------

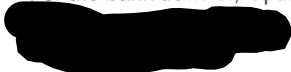
Amount Paid	16,825.00
-------------	-----------

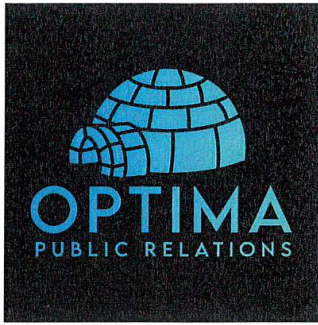
Amount Due (USD)	\$0.00
------------------	--------

#### Terms

#### PAYMENT INFO:

For the bank transfer, Optima Public Relations's Business Account Info:





Optima Public Relations  
907-202-5516  
7362 W. Parks Hwy, #665  
Wasilla, AK 99623

Billed To  
Kevin McCabe  
McCabe for State House

Date of Issue  
11/05/2024  
  
Due Date  
11/19/2024

Invoice Number  
24-170-VKM

Amount Due (USD)  
**\$0.00**

Description	Rate	Qty	Line Total
Graphic Design Staff: Cecil Sanders Final - Nov 2024 + Email Newsletter & Template Edits + Caption McCabe Mailer + Who is Kevin Mailer + Endorsements + Trump/Begich/McCabe Sign & Add On + Social Media Graphic Support + Thank You Post Campaign	\$125.00	4	\$500.00
Digital Advertising Final - Nov 5 + Google Digital + Search + Animated Dynamic Ads + Facebook Advertising + YouTube OTT + iHeart Digital Video Integration  Prepaid: \$3500, Final total \$5,100	\$1,000.00	1	\$1,000.00
Radio Placement Added Placement/Final Bill - November 2024  Prepaid: \$3000 + \$1000 Additional Placements Final: \$5670 + \$960	\$3,630.00	1	\$3,630.00
Printing / Postage for Mailers PIP Printing	\$2,153.00	1	\$2,153.00

- + Mailer 1- Early Voting/General
- + Mailer 2 - Capt Kevin
- + 4x8 Signage x 6
- + Sticker/Badge for Signage x 6

Invoices:

- #376529 - Mailer 1
- #376601 - Mailer 1 Postage
- #376227 - Mailer 2
- #376134 - Mailer 2 Postage
- #376199 - 6 Large Signs
- #376049 = 6 Sign Add Ons

Final Costs: \$8153 (minus \$6000 Prepayment)

Credit for GOP Endorsement Signage	-\$300.00	1	-\$300.00
Subtotal			6,983.00
Tax			0.00
Total			6,983.00
Amount Paid			6,983.00
Amount Due (USD)			\$0.00

Terms

PAYMENT INFO:

For the bank transfer, Optima Public Relations's Business Account Info:





----- Forwarded message -----

From: **Lucas, Tom R (DOA)** <[tom.lucas@alaska.gov](mailto:tom.lucas@alaska.gov)>

Date: Wed, Jul 22, 2020 at 4:55 PM

Subject: Reporting services from advertising agencies, campaign management consultants and campaign management services

To: Lucas, Tom R (DOA) <[tom.lucas@alaska.gov](mailto:tom.lucas@alaska.gov)>

Cc: Hebdon, Heather R (DOA) <[heather.hebdon@alaska.gov](mailto:heather.hebdon@alaska.gov)>, Odena, Jacqueline S (DOA) <[jacqueline.odena@alaska.gov](mailto:jacqueline.odena@alaska.gov)>, Collins, Dacia C (DOA) <[dacia.collins@alaska.gov](mailto:dacia.collins@alaska.gov)>, Stormont, Charles R (DOA) <[charles.stormont@alaska.gov](mailto:charles.stormont@alaska.gov)>

Dear Candidates and their Treasurers,

We are receiving many inquiries concerning insufficient detail in campaign disclosure reports when reporting expenditures for advertising agencies, management consultants and other campaign management services. Simply stating “campaign advertising” or “management consultant”, for example is not consistent with the following regulation found at [2 AAC 50.321\(d\)](#):

**d) If an expenditure required to be reported under (a) or (b) or this section is made to an advertising agency or to an individual or business that provides campaign consultation 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, and the amount of the expenditure.**

Basically, what this means is that the services provided must be disclosed along with any subcontractors used by the consultant, agency or service. An example might be, “Tom’s consulting service for creation and placing of social media on Facebook and Twitter” or Tom’s consulting service for production and placement of radio and tv advertising on stations x, y and z”.

If your campaign has not been doing this, your 30 day report should be amended to come into compliance. If you have any questions or desire any help in doing so, please do not hesitate to contact our office.

Thomas R. Lucas  
Campaign Disclosure Coordinator

Alaska Public Offices Commission  
2221 E. Northern Lights Blvd., Rm. 128  
Anchorage, Alaska 99508  
Phone: (907) 276-4176





Meta Platforms, Inc.  
1 Meta Way  
Menlo Park, CA 94025  
United States

Account: 861130320941171  
Business: Vote Kevin McCabe  
Box 520248  
Big Lake, AK 99652  
United States

## Billing Report: 06/30/2024 - 12/31/2024

Date	Transaction ID	Transaction Description	Payment Method	Amount	Payment Status
11/05/2024	8694548433992122-877080 8619699430	Meta Ads payment	Visa · 3949	\$119.77 USD	Paid
10/05/2024	8456373834476253-845637 3841142919	Meta Ads payment	Visa · 6058	\$83.79 USD	Paid
09/10/2024	8088025994644368-824136 8985976735	Meta Ads refund	N/A	-\$0.20 USD	Refunded
09/05/2024	8047086308738334-813098 3337015305	Meta Ads payment	Visa · 6058	\$17.00 USD	Paid
08/21/2024	8071374589642841-808763 8698016434	Meta Ads payment	N/A	\$7.05 USD	Paid
08/20/2024	8034973883282918-810342 2053104764	Meta Ads payment	N/A	\$19.06 USD	Paid

08/19/2024	8088025994644368-794419 7662360533	Meta Ads payment	N/A	\$19.08 USD	Paid
08/18/2024	8094640080649630-817952 9132160718	Meta Ads payment	N/A	\$14.81 USD	Paid
08/17/2024	8048544578592509-148046 85	Meta Ads payment	N/A	\$60.00 USD	Funded
08/05/2024	8099274513519514-785889 3937557573	Meta Ads payment	Visa · 6058	\$20.00 USD	Paid
				<b>Total Amount Billed</b>	\$300.36 USD
				<b>Total Funds Added</b>	\$60.00 USD

Meta Ads payment  
Payment Method: Ad Credit

Date	Transaction ID	Amount	Payment Status
09/17/2024	8139212622859035-8286351331478505	\$0.20 USD	Paid
Total Amount Billed			\$0.20 USD
Total Funds Added			\$0.00 USD

Payment activity  
Kevin McCabe (861130320941171)

Filters

Ad account ID is 108455397202490

Advanced filters

Open tour card

Ad accounts  
WhatsApp Business accounts  
Ad account  
**Kevin McCabe (861130320941171)**  
Current balance  
**\$0.21**

Pay now


Transactions






Search





Advanced filters



Jul 1, 2024 – Dec 31, 2024

Download

Transaction ID	Date	Amount	Payment method	Payment status	VAT invoice ID	Action
<a href="#">8694548433992122-8770808619699430</a>	Nov 5, 2024	\$119.77	 Visa · 3949 58USSELJG2	<b>Paid</b> Paid	FBADS-372-103881258	Download PDF

Transaction ID	Date	Amount	Payment method	Payment status	VAT invoice ID	Action
<a href="#">8673047699475531-8526617794118514</a>	Nov 5, 2024	\$119.77	 Visa · 6058 L2KWUEUJG2	<b>Failed</b> Failed		Download PDF
<a href="#">8456373834476253-8456373841142919</a>	Oct 5, 2024	\$83.79	 Visa · 6058 9MEBVCUJG2	<b>Paid</b> Paid	FBADS-372-103793625	Download PDF
<a href="#">8139212622859035-8286351331478505</a>	Sep 17, 2024	\$0.20	 Advertising credit	<b>Paid</b> Paid		Download PDF
<a href="#">8088025994644368-8241368985976735</a>	Sep 10, 2024	\$0.20	 Prepaid balance	<b>Refunded</b> Refunded		Download PDF
<a href="#">8047086308738334-8130983337015305</a>	Sep 5, 2024	\$17.00	 Visa · 6058 B5U84A8JG2	<b>Paid</b> Paid	FBADS-372-103704430	Download PDF

Transaction ID	Date	Amount	Payment method	Payment status	VAT invoice ID	Action
<a href="#">8071374589642841-8087638698016434</a>	Aug 21, 2024	\$7.05	 Prepaid balance	<b>Total spent</b> Total spent		Download PDF
<a href="#">8034973883282918-8103422053104764</a>	Aug 20, 2024	\$19.06	 Prepaid balance	<b>Total spent</b> Total spent		Download PDF
<a href="#">8088025994644368-7944197662360533</a>	Aug 19, 2024	\$19.08	 Prepaid balance	<b>Total spent</b> Total spent		Download PDF
<a href="#">8094640080649630-8179529132160718</a>	Aug 18, 2024	\$14.81	 Prepaid balance	<b>Total spent</b> Total spent		Download PDF
<a href="#">8048544578592509-14804685</a>	Aug 17, 2024	\$60.00	App Store's In-App Purchase	<b>Funded</b> Funded		Download PDF

Transaction ID	Date	Amount	Payment method	Payment status	VAT invoice ID	Action
<a href="#">8099274513519514-7858893937557573</a>	Aug 5, 2024	\$20.00	 Visa · 6058 N9JLP84KG2	 Paid	FBADS-372-103618870	Download PDF

Billing & payments


 Kevin McCabe

[Payment settings](#)

[Payment activity](#)

Transaction details

[Download PDF](#)

Amount	Transaction ID	Date	Ad account
<b>\$119.77</b>	8694548433992122-8770808619699430	Nov 5, 2024, 6:16 AM	861130320941171
Subtotal: \$119.77 Tax: \$0.00	Payment method	Reference number	Status
Billing reason	 Visa · 3949	58USSELJG2	Paid
Ads spend since Oct 17, 2024.			Product
			Facebook

**Post: ""**  
From Oct 18, 2024, 12:00 AM to Nov 4, 2024, 11:59 PM

Ad set name	Results	Amount	Ad set ID
Post: ""	1,298	\$19.98	120214383591300...
Totals	1,298 Impressions	\$19.98	

**Post: "Vote Kevin McCabe is in Big Lake."**  
From Oct 18, 2024, 12:00 AM to Nov 4, 2024, 11:59 PM

Ad set name	Results	Amount	Ad set ID
Post: "Vote Kev..."	7,819	\$99.79	120214427704060...
Totals	7,819 Impressions	\$99.79	

Need help? [Get help](#)





**December 30, 2024**

To Whom It May Concern,

**Re: Documentation of Social Advertising on Behalf of Rep. Kevin McCabe**

Optima Public Relations, as the agency providing advertising services for Representative Kevin McCabe's 2024 general election campaign, is submitting the following information to outline the social advertising we managed, placed, and invoiced on behalf of the campaign. All advertisements were paid for by the campaign and provided to Kevin McCabe and his campaign treasurer for proper submission to the Alaska Public Offices Commission (APOC) and other reporting agencies.

**Findings on Ad IDs**

Upon review of the flagged Ad IDs mentioned in the recent complaint, our findings are as follows:

**Ad IDs Not Found or Not Associated**

The following Ad IDs do not appear in the Meta Ad Library for the campaign's Page ID (108455397202490), nor do they match any records of advertisements placed by Optima Public Relations:

- **1068171291341660**
- **1225205111853990**
- **1095514545254240**
- **1095538085302610**
- **1524069881572480**
- **1173022787644170**
- **1313624632953800**
- **1217732276211890**



Screenshots of the Meta Ad Library have been included to demonstrate these findings.

### **Verified and Accounted-for Ads**

The following Ad IDs have been verified as placed by Optima Public Relations on behalf of Kevin McCabe's campaign. These ads are documented in our records and were paid for in full by the campaign:

1. **Ad ID 914086297335838**
2. **Ad ID 865129065834320**
3. **Ad ID 473243895604464**

Invoices related to these ads include #24-158-VKM and #24-170-VKM. Receipts and screenshots are provided to confirm placement and payment.

### **Supporting Documentation**

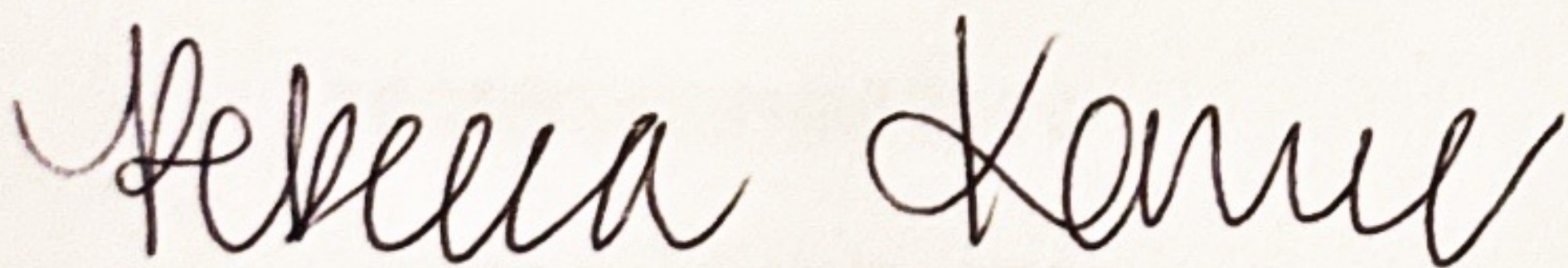
We have included the following materials with this correspondence:

1. Screenshots from the Meta Ad Library verifying the existence of the above-listed Ad IDs.
2. Receipts for advertising services rendered.
3. Invoices #24-158-VKM and #24-170-VKM, which detail the charges and payments for the campaign's advertising services.

### **Conclusion**

Optima Public Relations is committed to providing accurate information regarding the advertising we placed on behalf of Representative Kevin McCabe's campaign. This documentation reflects our findings and aligns with the services we provided. For any additional questions or clarifications, please do not hesitate to contact us.

Sincerely,



Rebecca Koonce  
Optima Public Relations  
Email: Becca@optimapublicrelations.com  
Phone: 702.738.7305