

[TAB 11]

Group
Civil Penalty Appeals

Presented By:

John Whitlock, Paralegal

CONSENT AGENDA CIVIL PENALTY APPEALS AND REFERRALS

<p align="center">UNDER AS 15.13.390, 2 AAC 50.855-860</p> <p align="center">Campaign Financial Disclosure</p>	
--	--

January 14, 2026 Commission Meeting

ITEM #	APPEALED BY:	STAFF RECOMMENDATION:	PAGE #	COMMISSION ACTION:
--------	--------------	-----------------------	--------	--------------------

[illegible]



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

PREPARED BY: John Grover Whitlock

DATE: December 29, 2025

RESPONDENT: ATATruck PAC

CIVIL PENALTY

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

REASON FOR FILING: Ongoing group

LATE REPORT(S): • **Campaign Disclosure Reports**

- ☒ Group Registration
- ☒ Year End Report
- ☒ 7 Day Report
- ☒ 30 Day Report

DUE DATE OF LATE FILED REPORT: Multiple
REPORT FILED ON: Multiple
NUMBER OF DAYS LATE: 6,500 total days late for multiple violations
DATE PENALTY ASSESSMENT SENT: October 20, 2025
DATE PENALTY APPEAL RECEIVED: November 19, 2025
MAXIMUM STATUTORY PENALTY: \$296,150
PENALTY ASSESSED¹: \$296,150
RECOMMENDATION: **\$1,581**
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

¹ 2 AAC 50.855(b)(2)(C)(ii).

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Affiant Jamie Benson states no penalties should be assessed for the years 2021, 2022, and 2023 because there was no activity aside from administrative costs between November 2020 and September 2024.
2. Affiant states that the President/CEO of ATATruckPAC (herself) is an inexperienced filer.
3. The campaign contributions that ATATruckPAC provided to candidates were readily available to the public in another forum (candidate campaign disclosure reports).
4. The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

1. Affiant states that several years of no activity should be waived. Reports that include only administrative costs are eligible for greater than 50% reduction, up to a complete waiver under 2 AAC 50.865(b). Please see the chart below that discusses the application of this mitigating factor.
2. Affiant states that the President/CEO of ATATruckPAC (herself) is an inexperienced filer. APOC staff agrees that Ms. Benson is an individual with no filing experience prior to this year, but this reduction cannot be applied to ATATruckPAC as it is a group that has been in existence since 2012. A mitigator under 2 AAC 50.865(a)(1)(B) cannot be applied in this instance.
3. Affiant states that the campaign contributions made by ATATruckPAC in 2004 were available to the public in another forum (candidate reports). In this case, a mitigator cannot be applied under 2 AAC 50.865(b)(4) due to the existence of an aggravating factor under 2 AAC 50.865(d)(2)(A) – the group has had more than one late filing in the preceding 5 years (see check list below).
4. Affiant states that the civil penalty is significantly out of proportion to the degree of harm to the public for not having the information. In this case, the group only contributed \$5,000 to candidates between 2001 and 2004. The assessed penalty of \$296,150 exceeds the value of the transactions made by the group and qualifies for a greater than 50% reduction, up to a complete waiver under 2 AAC 50.865(b)(5).
5. Based on above factors and applicable statutory mitigators, APOC staff recommends a penalty assessment of **\$1,581.00**. Please see the charts below that discuss the application of all factors.

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

- ☐ Personal catastrophe/emergency or incapacitating illness. **2 AAC 50.865(b)(1)**
- ☐ APOC Staff error. **2 AAC 50.865(b)(2)**
- ☒ Report included only administrative costs. **2 AAC 50.865(b)(3)**

- ☐ No significant harm to the public and no aggravating factors.² **2 AAC 50.865(b)(4)**
- ☒ The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.³ **2 AAC 50.865(b)(5)**
- ☐ A unique circumstance. **2 AAC 50.865(b)(6)**

Report	Dates of Violation	Penalty Days	Daily Max	Maximum penalty of:	After 97.0% 2 AAC 50.865(b)(5) mitigation	After 100% 2 AAC 50.865(b)(3) mitigation
2021 Registration	12/13/21-8/1/25	1,309	\$50	\$65,450	-	Waived
2021 Year End Report	2/15/22 – 8/1/25	1,263	\$50	\$63,150	-	Waived
2022 Registration	12/31/22-8/1/25	945	\$50	\$47,250	-	Waived
2022 Year End Report	2/15/23 – 8/1/25	899	\$50	\$44,950	-	Waived
2023 Registration	12/31/23-8/1/25	580	\$50	\$29,000	-	Waived
2023 Year End Report	2/15/24-8/5/25	538	\$50	\$26,900	-	Waived
2024 Registration	12/31/24-8/1/25	214	\$50	\$10,700	\$321	\$321
2024 Year End Report	2/18/25-8/11/25	175	\$50	\$8,750	\$262.50	\$262.50
2024 7-day Report	10/29/24-8/15/25	291	\$500/\$50	\$17,600	\$528	\$528

² The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

³ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions.

2024 30-Day Report	10/7/24-8/15/25	313	\$50	\$15,650	\$469.5	\$469.5
Total				\$296,150	\$278,281	\$1,581

FILER'S REPORTING HISTORY:

2025

Group Registration filed on 7/11/25 Timely

2024

Year End Report 70 days late (subject to appeal)

Seven Day Report 291 days late (subject to appeal)

Thirty Day Report 313 days late (subject to appeal)

Group Registration filed on 8/1/25 214 days late (subject to appeal)

2023

Year End Report 538 days late (subject to appeal)

Group Registration filed on 8/1/25 580 days late (subject to appeal)

2022

Year End Report 899 days late (subject to appeal)

Group Registration filed on 8/1/25 945 days late (subject to appeal)

2021

Year End Report 1,263 days late (subject to appeal)

Group Registration filed on 8/1/25 1,309 days late (subject to appeal)

ACTIVITY ON LATE REPORT:

2024 Year End Report

Contributions: \$250

Expenditures: \$5,000

2023 Year End Report

Contributions: \$0

Expenditures: \$0

2022 Year End Report

Contributions: \$0

Expenditures: \$0

2021 Year End Report

Contributions: \$0

Expenditures: \$0

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

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

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

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

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

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

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

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

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

⁴ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

⁵ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

⁶ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions.

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

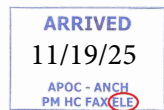
Aggravating Factors [2 AAC 50.865(d)]:

- ☐ Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.⁷ **2 AAC 50.865(d)(1)**
- ☒ More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- ☐ Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- ☐ Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- ☐ A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

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

- ☐ **Waived**
- ☒ **Reduced to \$1,581.00**
- ☐ **Upheld at the assessed amount of \$**

⁷ Value greater than \$1000.



Civil Penalty Appeal Affidavit

AS 15.13 Alaska Campaign Disclosure Law

ATATruckPAC - Jamie Benson, President/CEO

Name of Appellant: _____

Office: N/A

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

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

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): 21/22/23/24

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

Statement:

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

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

Certification:

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

Signed/Date: _____

11/19/2025

Civil Penalty Appeal Affidavit (Cont.)

Staff has imposed a civil penalty of the maximum amount allowed by law against ATATruckPac. Accordingly, the total amount of the penalty is \$296,150. However, the penalty that was included in the Notice from APOC staff included the maximum fines set forth in AS 15.39.390. The statutory language provides that penalties may be imposed “up to” those amounts but does not require that penalties in those amounts be imposed.

Pursuant to 2 AAC 50.865(b), a civil penalty may be reduced by a percentage greater than 50 percent, or waived entirely based on the fact that the late or erroneous report only included administrative costs, and the late or incomplete report did not cause significant harm to the public. The Commission should apply 2 AAC 50.865(b) to the penalties assessed for the years 2021, 2022, and 2023, because there was no activity between November 2020 and September 2024, and the only costs were administrative, i.e. bank costs. Therefore, there was simply no regulated activity during such time period, and there was no significant harm to the public based on the late reporting. See Exhibit A, Bank Statements for 2021 – 2024. Therefore, ATATruckPac requests the following penalties be reduced to \$0.

Year	Report Due	Date Due	Date Filed	Days Late	Penalty	Request
2021	Registration	12/31/21	08/01/2025	1309	\$65,450	\$0
2021	Year End Report	02/15/22	08/01/2025	1263	\$63,150	\$0
2022	Registration	12/31/22	08/01/2025	945	\$47,250	\$0
2022	Year End Report	02/15/23	08/01/2025	899	\$44,950	\$0
2023	Registration	12/31/23	08/01/2025	580	\$29,000	\$0
2023	Year End Report	02/15/24	08/05/2025	538	\$26,900	\$0
TOTALS					\$276,700	\$0

Pursuant to 2 AAC 50.865(a), a civil penalty may be reduced up to 50 percent if the person required to file is an experienced filer. I, Jamie Benson, am an inexperienced filer. As soon as I became aware of the issue with the APOC reports, I undertook the necessary due diligence to bring all reports into compliance as quickly as possible. Therefore, I request that the remaining penalties be reduced. We request that the penalties be reduced beyond 50 percent given the amount of the activity that occurred between September 2024 and August 2025. This particularly as the information was available to the public from another source, as each of the candidates who received donations in late 2024 reported the donations on their respective APOC reports. Given that the total income for 2024 was only \$250 and total expenditures in the form of contributions were \$5,000, imposing a penalty of nearly \$300,000 is disproportionate under the facts and circumstances.¹ Therefore, on behalf of ATATruckPac respectfully request that the Commission exercise its discretion to substantially reduce or eliminate the remaining penalties, consistent with its authority and prior precedent (see, e.g., APOC Case No. 23-03-CD).


¹ See Year End Report (<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47791&ViewType=CD>).

Therefore, ATATruckPac requests that the total penalty to be imposed and paid to the APOC be reduced to the amount of \$2,635 as follows:

Year	Report Due	Date Due	Date Filed	Days Late	Penalty	Request
2024	Registration	12/31/24	08/01/2025	214	\$10,700	\$535
2024	Year End Report	02/18/25	08/11/2025	175	\$8,750	\$437.50
2024	7 Day Report	10/29/24	08/15/2025	291	\$17,600	\$880
2024	30 Day Report	10/07/24	08/15/2025	313	\$15,650	\$782.50
TOTAL					\$52,700	\$2,635

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

Dated this 19 day of November, 2025



Jamie Benson
President/CEO

GROUP REGISTRATION FORM

COMPLETED

Submission Date: **08/01/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name (Optional): **M**
 Filer Last Name: **BENSON**
 Filer's Title with Group: **President/CEO**

GROUP INFORMATION

Previously Registered: **Yes**
 Election Year: **2021**
 Group Name: **ATATruckPAC**
 Abbreviation:
 Purpose: **To promote the interests of the transportation industry in Alaska.**
 Group Type: **PAC**
 Group Mailing Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Additional Email Addresses to Notify: **jamie@aktrucks.org**

CHAIR

Name: **Joey Crum**
 Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **9072761149**
 E-mail: **joey@nitalaska.com**
 Fax (Optional): **Did Not Report**

TREASURER

Name: **Randy Efird**
 Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **9072791149**
 E-mail: **randye@wbiialaska.com**
 Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
Jeremy Miller	3443 Minnesota Drive Anchorage, Alaska 99503	Deputy Treasurer
Joey Crum	3443 Minnesota Drive Anchorage, Alaska 99503	Deputy Treasurer

TYPE OF GROUP

MEMBER OR EMPLOYEE PAC (Political Action Committee)
 PAC Name: **Alaska Trucking Association**
 PAC Type: **Professional or Trade (Non-Union)**

CAMPAIGN PLANS

No Campaign in 2021: Collect and expend funds to pay debts or administrative expenses for a 2022 campaign.

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Exempt From Entering

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **08/01/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name: **M**
 Filer Last Name: **BENSON**
 Filer's Title: **President/CEO**
 Report Type: **Year End Report**

GROUP INFORMATION

Group Name: **2021 - ATATruckPAC**
 Group Abbreviation:
 Group Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**

REPORT INFORMATION

Election Year: **0**
 Election: **N/A**
 Report Type: **Year End Report**
 Reporting Period: From **01/01/2021** Through **02/01/2022**

No Activity

FINANCIAL SUMMARY

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

INCOME

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

EXPENDITURES

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

DEBTS

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

GROUP REGISTRATION FORM

COMPLETED

Submission Date: **08/01/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name (Optional): **M**
 Filer Last Name: **BENSON**
 Filer's Title with Group: **President/CEO**

GROUP INFORMATION

Previously Registered: **Yes**
 Election Year: **2022**
 Group Name: **ATATruckPAC**
 Abbreviation:
 Purpose: **To promote the interests of the transportation industry in Alaska.**
 Group Type: **PAC**
 Group Mailing Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Additional Email Addresses to Notify: **Jamie@aktrucks.org**

CHAIR

Name: **Jamie Benson**
 Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **9072761149**
 E-mail: **Jamie@aktrucks.org**
 Fax (Optional): **Did Not Report**

TREASURER

Name: **Randy Efird**
 Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **9072791149**
 E-mail: **RandyE@wbiialaska.com**
 Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
Jeremy Miller	3443 Minnesota Drive Anchorage, Alaska 99503	Deputy Treasurer
Joey Crum	3443 Minnesota Drive Anchorage, Alaska 99503	Deputy Treasurer

TYPE OF GROUP

MEMBER OR EMPLOYEE PAC (Political Action Committee)
 PAC Name: **Alaska Trucking Association**
 PAC Type: **Professional or Trade (Non-Union)**

CAMPAIGN PLANS

No Campaign in 2022: Collect and expend funds to pay debts or administrative expenses for a 2023 campaign.

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Exempt From Entering

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **08/01/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name: **M**
 Filer Last Name: **BENSON**
 Filer's Title: **President/CEO**
 Report Type: **Year End Report**

GROUP INFORMATION

Group Name: **2022 - ATATruckPAC**
 Group Abbreviation:
 Group Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**

REPORT INFORMATION

Election Year: **0**
 Election: **N/A**
 Report Type: **Year End Report**
 Reporting Period: From **01/01/2022** Through **02/01/2023**

No Activity

FINANCIAL SUMMARY

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

INCOME

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

EXPENDITURES

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

DEBTS

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

GROUP REGISTRATION FORM

COMPLETED

Submission Date: **08/01/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name (Optional): **M**
 Filer Last Name: **BENSON**
 Filer's Title with Group: **President/CEO**

GROUP INFORMATION

Previously Registered: **Yes**
 Election Year: **2023**
 Group Name: **ATATruckPAC**
 Abbreviation:
 Purpose: **To promote the interests of the transportation industry in Alaska.**
 Group Type: **PAC**
 Group Mailing Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Additional Email Addresses to Notify: **Jamie@aktrucks.org**

CHAIR

Name: **Jamie Benson**
 Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **9072761149**
 E-mail: **Jamie@aktrucks.org**
 Fax (Optional): **Did Not Report**

TREASURER

Name: **Randy Efird**
 Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **9072791149**
 E-mail: **joe@aktrucks.org**
 Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
Jeremy Miller	3443 Minnesota Drive Anchorage, Alaska 99503	Deputy Treasurer
Joey Crum	3443 Minnesota Drive Anchorage, Alaska 99503	Deputy Treasurer

TYPE OF GROUP

MEMBER OR EMPLOYEE PAC (Political Action Committee)
 PAC Name: **Alaska Trucking Association**
 PAC Type: **Professional or Trade (Non-Union)**

CAMPAIGN PLANS

No Campaign in 2023: Collect and expend funds to pay debts or administrative expenses for a 2024 campaign.

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Exempt From Entering

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **08/05/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name: **M**
 Filer Last Name: **BENSON**
 Filer's Title: **President/CEO**
 Report Type: **Year End Report**

GROUP INFORMATION

Group Name: **2023 - ATATruckPAC**
 Group Abbreviation:
 Group Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**

REPORT INFORMATION

Election Year: **0**
 Election: **N/A**
 Report Type: **Year End Report**
 Reporting Period: From **01/01/2023** Through **02/01/2024**

No Activity

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$5,850.79				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$0.00	[+] ⇒	\$0.00	[=] ⇒	\$0.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$0.00	[+] ⇒	\$0.00	[=] ⇒	\$0.00
[=] ↓					
Closing Cash On Hand:	\$5,850.79				
[-] ↓					
Total Debts:	\$0.00				
[=] ↓					
Surplus/Deficit:	\$5,850.79				

INCOME

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

EXPENDITURES

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

DEBTS

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

GROUP REGISTRATION FORM

COMPLETED

Submission Date: **08/01/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name (Optional): **M**
 Filer Last Name: **BENSON**
 Filer's Title with Group: **President/CEO**

GROUP INFORMATION

Previously Registered: **Yes**
 Election Year: **2024**
 Group Name: **ATATruckPAC**
 Abbreviation:
 Purpose: **To promote the interests of the transportation industry in Alaska.**
 Group Type: **PAC**
 Group Mailing Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Additional Email Addresses to Notify: **Jamie@aktrucks.org**

CHAIR

Name: **Jamie Benson**
 Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **9072761149**
 E-mail: **Jamie@aktrucks.org**
 Fax (Optional): **Did Not Report**

TREASURER

Name: **Randy Efird**
 Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **9072791149**
 E-mail: **joe@aktrucks.org**
 Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
Jeremy Miller	3443 Minnesota Drive Anchorage, Alaska 99503	Deputy Treasurer
Joey Crum	3443 Minnesota Drive Anchorage, Alaska 99503	Deputy Treasurer

TYPE OF GROUP

MEMBER OR EMPLOYEE PAC (Political Action Committee)
 PAC Name: **Alaska Trucking Association**
 PAC Type: **Other**
 PAC Other Type Description: **Non-profit**

CAMPAIGN PLANS

Election Type	Election	Municipality
State General	2024 - State General	

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **First National Bank Alaska**

Bank Address: **PO Box 100720**

City, State Zip: **Anchorage, Alaska 99510-0720**

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **08/15/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name: **M**
 Filer Last Name: **BENSON**
 Filer's Title: **President/CEO**
 Report Type: **Thirty Day Report**

GROUP INFORMATION

Group Name: **2024 - ATATruckPAC**
 Group Abbreviation:
 Group Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**

REPORT INFORMATION

Election Year: **2024**
 Election: **State General**
 Report Type: **Thirty Day Report**
 Reporting Period: From **02/02/2024** Through **10/04/2024**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$5,566.79				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$250.00	[+] ⇒	\$0.00	[=] ⇒	\$250.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$5,000.00	[+] ⇒	\$0.00	[=] ⇒	\$5,000.00
[=] ↓					
Closing Cash On Hand:	\$816.79				
[-] ↓					
Total Debts:	\$0.00				
[=] ↓					
Surplus/Deficit:	\$816.79				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
09/26/2024	Check 8733	Droop, Kelly 1639 Sunrise drive Anchorage, Alaska 99508	Occupation: Regional Manager Employer: Pape/Kenworth Description: Personal TRUCKPAC donation	\$250.00
Number of Contributions under \$100:				0
Sum of Contributions under \$100:				\$0.00
Income Total:				\$250.00

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
09/23/2024	Check 5204	Bauer, Lucy PO BOX 111587 Anchorage , Alaska 99511	Campaign donation	\$250.00
09/23/2024	Check 5201	Bjorkman, Jesse PO BOX 8293 Nikiski, Alaska 99635	Campaign donation	\$250.00
09/23/2024	Check 5204	Bynum, Jeremy PO BOX 8683 Ketchikan, Alaska 99501	Campaign donation	\$250.00
09/23/2024	Check 5207	Columbe, Julie 2439 Brookhill Circle Anchorage, Alaska 99516	Campaign donation	\$250.00
09/23/2024	Check 5208	Costello, Mia 5512 Yukon Charlie Loop Anchorage , Alaska 99502	Campaign donation	\$250.00
09/23/2024	Check 5203	Cronk, Mike PO BOX 365 Tok, Alaska 99780	Campaign donation	\$250.00
09/23/2024	Check 5202	Hajdukovich, Leslie PO BOX 73992 Fairbanks, Alaska 99707	Campaign donation	\$500.00
09/23/2024	Check 5206	Kaufman, James PO BOX 231434 Anchorage , Alaska 99523	Campaign donation	\$250.00
09/23/2024	Check 5213	Lebon, Bart PO BOX 84912 Fairbanks, Alaska 99709	Campaign donation	\$500.00
09/23/2024	Check 5212	McCabe, Kevin PO BOX 520248 Big Lake , Alaska 99652	Campaign donation	\$250.00
09/23/2024	Check 5211	Moore, Elexie 2851 North Earl Drive Wasilla, Alaska 99654	Campaign donation	\$500.00
09/23/2024	Check 5209	Nelson, David PO BOX 212386 Anchorage, Alaska 99521	Campaign donation	\$500.00
09/23/2024	Check 5214	Schwanke, Becky PO BOX 738 Glennallen, Alaska 99588	Campaign donation	\$500.00
09/23/2024	Check 5210	Wright , Stanley 959 Norman st. Anchorage , Alaska 99504	Campaign donation	\$500.00
			Expenditure Total:	\$5,000.00

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: **08/15/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name: **M**
 Filer Last Name: **BENSON**
 Filer's Title: **President/CEO**
 Report Type: **Seven Day Report**

GROUP INFORMATION

Group Name: **2024 - ATATruckPAC**
 Group Abbreviation:
 Group Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**

REPORT INFORMATION

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

No Activity

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$816.79				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$0.00	[+] ⇒	\$250.00	[=] ⇒	\$250.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$0.00	[+] ⇒	\$5,000.00	[=] ⇒	\$5,000.00
[=] ↓					
Closing Cash On Hand:	\$816.79				
[-] ↓					
Total Debts:	\$0.00				
[=] ↓					
Surplus/Deficit:	\$816.79				

INCOME

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

EXPENDITURES

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

DEBTS

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

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **08/11/2025**
 Filer First Name: **JAMIE**
 Filer Middle Name: **M**
 Filer Last Name: **BENSON**
 Filer's Title: **President/CEO**
 Report Type: **Year End Report**

GROUP INFORMATION

Group Name: **2024 - ATATruckPAC**
 Group Abbreviation:
 Group Address: **3443 Minnesota Drive**
 City, State Zip: **Anchorage, Alaska 99503**

REPORT INFORMATION

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

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$5,566.79				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$250.00	[+] ⇒	\$0.00	[=] ⇒	\$250.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$5,000.00	[+] ⇒	\$0.00	[=] ⇒	\$5,000.00
[=] ↓					
Closing Cash On Hand:	\$816.79				
[-] ↓					
Total Debts:	\$0.00				
[=] ↓					
Surplus/Deficit:	\$816.79				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
09/26/2024	Check 8733	Droop, Kelly 1639 Sunrise Drive Anchorage, Alaska 99508	Occupation: Regional manager Employer: pape kenworth Description: personal donation to truck pac	\$250.00
Number of Contributions under \$100:				0
Sum of Contributions under \$100:				\$0.00
Income Total:				\$250.00

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
09/23/2024	Check 5204	Bauer, Lucy PO BOX 111587 Anchorage, Alaska 99511	DONATION	\$250.00
09/23/2024	Check 5201	Bjorkman, Jesse PO box 8293 Nikiski, Alaska 99635	donation	\$250.00
09/23/2024	Check 5204	Bynum, Jeremy PO BOX 8683 Ketchikan, Alaska 99501	Campaign donation	\$250.00
09/23/2024	Check 5207	Columbe, Julie 2439 Brookhill Circle Anchorage, Alaska 99516	Donation	\$250.00
09/23/2024	Check 5208	Costello, Mia 5512 Yukon Charlie Loop Anchorage, Alaska 99502	Donation	\$250.00
09/23/2024	Check 5203	Cronk, Mike PO BOX 365 TOK, Alaska 99780	campaign donation	\$250.00
09/23/2024	Check 5202	hajdukovich, Leslie PO BOX 73992 Fairbanks, Alaska 99707	donation	\$500.00
09/23/2024	Check 5206	Kaufman, James PO BOX 231434 Anchorage , Alaska 99523	Donation	\$250.00
09/23/2024	Check 5213	LeBon, Bart PO BOX 84912 Fairbanks, Alaska 99709	Donation	\$500.00
09/23/2024	Check 5212	McCabe, Kevin PO BOX 520248 Big Lake, Alaska 99652	Donation	\$250.00
09/23/2024	Check 5211	Moore, Elexie 2851 North Earl Drive Wasilla, Alaska 99654	Donation	\$500.00
09/23/2024	Check 5209	Nelson, David PO BOX 212386 Anchorage, Alaska 99521	Donation	\$500.00
09/23/2024	Check 5214	Schwanke, Becky PO BOX 738 Glennallen, Alaska 99588	donation	\$500.00
09/23/2024	Check 5210	Wright , Stanley 959 Norman st. Anchorage , Alaska 99504	Donation	\$500.00
			Expenditure Total:	\$5,000.00

DEBTS

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



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

October 20, 2025

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

ATATruckPAC
Attn: Jamie Benson
3443 Minnesota Drive
Anchorage, Alaska 99503
Jamie@aktrucks.org

Re: Notice of Penalty – Late-Filed Registration for 2021, 2022, 2023, and 2024¹
Notice of Penalty – Late Filed Year End Reports for 2021, 2022, 2023, and 2024
Notice of Penalty – Late Filed 2024 Thirty Day and Seven Day Reports

Dear Ms. Benson:

You are receiving this notice for several reporting violations.

Because ATATruckPAC disclosed a surplus of \$16,379.00 on its 2020 Year End Report filed February 16, 2021, it was considered an “ongoing group.”² Campaign disclosure law requires ongoing groups to re-register each year and file a year-end report by February 15, as provided in AS 15.13.110.³

According to our records, ATATruckPAC did not timely file a group registration or a year-end report for 2021, 2022, 2023, and 2024 or a timely thirty-day report for 2024. By law, a maximum penalty of \$50 accrues each day ATATruckPAC was in violation of AS 15.13.⁴

Additionally, ATATruckPAC did not timely file a seven-day report for 2024. By law, a maximum penalty of \$500 accrues each day ATATruckPAC was in violation.⁵

¹ AS 15.13.050(a).
² 2 AAC 50.405(7).
³ 2 AAC 50.384(b)(1)
⁴ AS 15.13.390(a)(4).
⁵ AS 15.13.390(a)(1).

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

Year	Report Due	Date Due	Date Filed	Days Late	Penalty
2021	Registration	12/31/21	8/1/25	1,309	\$65,450
2021	Year End Report	2/15/22	8/1/25	1,263	\$63,150
2022	Registration	12/31/22	8/1/25	945	\$47,250
2022	Year End Report	2/15/23	8/1/25	899	\$44,950
2023	Registration	12/31/23	8/1/25	580	\$29,000
2023	Year End Report	2/15/24	8/5/25	538	\$26,900
2024	Registration	12/31/24	8/1/25	214	\$10,700
2024	Year End Report	2/18/25	8/11/25	175	\$8,750
2024	7 Day Report	10/29/24	8/15/25	291	\$17,600 ⁶
2024	30 Day Report	10/7/24	8/15/25	313	\$15,650
				Total	\$296,150

Please be advised:

- 1) You may pay the assessed penalties and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)⁷ to make a payment by credit card; or by paying in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.
- 2) Alternatively, you have the right to appeal staff’s conclusion that these violations occurred or the penalty amounts that have been assessed.⁸ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

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

⁶ 2 AAC 50.855(b)(5) states that “for reports required under AS 15.13.110(a)(2) or (b), the staff shall assess a penalty of not more than \$500 per day a deficiency exists before the relevant election and reduce the penalty to \$50 per day for each day a deficiency remains uncorrected after the relevant election . . .” Here, staff assessed a penalty of \$500 a day for 10/29/24 – 11/05/24 and \$50 a day from 11/6/24 – 8/15/25.

⁷ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

⁸ 2 AAC 50.831(a).

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General's Office.⁹

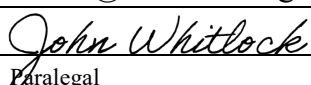
A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION


John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Group File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
ATATruckPAC 3443 Minnesota Drive Anchorage, Alaska 99503 Jamie@aktrucks.org	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email
 Paralegal	10/20/25 Date

⁹ 2 AAC 50.895.



THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

December 29, 2025

VIA EMAIL & CERTIFIED MAIL

ATATruckPAC

Attn: Jamie Benson

3443 Minnesota Drive

Anchorage, Alaska 99503

Jamie@aktrucks.org

SStone@hwb-law.com

RE: Commission Meeting Notice

Dear Ms. Benson, ATATruckPAC:

At its January 14, 2026 Commission Meeting in Anchorage, Alaska, the Commission will review the matter of the civil penalty appeal, *In re: ATATruckPAC*, concerning multiple penalties for late filed group registrations, year-end reports, and 2024 seven-day and thirty-day reports.

I have enclosed the Staff Recommendations that will be presented to the Commission for your review.

You have a right to participate at the meeting, either in person or by telephone (1-907-202-7104, Access Code: 382 982 822#), in-person (2221 Northern Lights Blvd, Ste 128, Anchorage, Alaska, 99508) or via [Microsoft Teams Meeting](#).¹ Please notify our office if you intend to participate. The Commission is expected to begin review of the matter at **2:30 p.m. on Wednesday, January 14, 2025.**


This matter will initially be presented to the Commission on a Consent Agenda. If you do not wish to present to the Commission concerning the issues addressed in the Staff Report, or make a statement to the Commission, and the matter is not removed from the agenda by a Commissioner, the Staff Recommendation will be approved without discussion or deliberation. If you do wish to present or make a statement before the Commission, please notify staff or the Commission prior to the approval of the consent agenda.

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

Staff will send you a copy of the Commission's final decision regarding the matter.

If you have any questions, please contact our office.

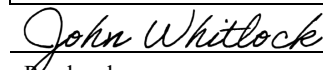
ALASKA PUBLIC OFFICES COMMISSION


John Grover Whitlock
Paralegal III

Encl: Staff Recommendation

cc: Group File

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
ATATruckPAC Attn: Jamie Benson 3443 Minnesota Drive Anchorage, Alaska 99503 Jamie@aktrucks.org SStone@hwb-law.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

	12/29/25
Paralegal	Date



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

PREPARED BY: John Grover Whitlock **DATE:** December 29, 2025

RESPONDENT: Natural Medicine AK

**CIVIL PENALTY
ASSESSED UNDER:** ☒ Campaign Disclosure:

REASON FOR FILING: 2025 Initiative Proposal Group

LATE REPORT(S): • Campaign Disclosure Reports
☒ Miscellaneous Independent Expenditure Reports

DUE DATE OF LATE FILED REPORT: Various¹
REPORT FILED ON: Various²
NUMBER OF DAYS LATE: Various³
DATE PENALTY ASSESSMENT SENT: November 6, 2025
DATE PENALTY APPEAL RECEIVED: December 5, 2025
MAXIMUM STATUTORY PENALTY: \$11,050
PENALTY ASSESSED⁴: \$5,525
RECOMMENDATION: Reduction
(See "Staff's Recommendation Based on Standard Mitigation Criteria")

AFFIANT'S STATEMENT OF MITIGATING FACTS:

1. Affiant states it is an inexperienced filer.

¹ Exhibit 1, Comprehensive Chart of Late-Filed Independent Expenditure Reports.

² *Id.*

³ *Id.*

⁴ 2 AAC 50.855(b)(2)(C)(i).

2. Affiant states it hired a compliance firm that experienced staff turnover and was not familiar with APOC's reporting process, and that these factors amount to a unique circumstance under 2 AAC 50.865(b)(6).

STAFF'S ANALYSIS OF FACTS FOR COMMISSION REVIEW

- 1) A civil penalty may be reduced by up to 50 percent if the person is an inexperienced filer (subject to APOC reporting criteria for less than 365 days).⁵ Natural Medicine AK filed its registration on May 29, 2025 and has been subject to APOC reporting requirements for less than 365 days. Since the person is an inexperienced filer, staff recommends the penalty be reduced by 50 percent.
- 2) Staff wants to exercise caution in deciding if the situation described by the affiant in their affidavit is a unique circumstance. In the past, the Commission has further reduced recommended penalties by staff by using its discretion in applying mitigating criteria⁶ and is urged to use its discretion in applying additional mitigation criteria in this matter.

FILER'S REPORTING HISTORY:

2025

Group Registration filed on 5/29/25

Second Quarterly Report..... timely

Third Quarterly Report..... timely

ACTIVITY ON FIRST LATE REPORT DUE ON 7/7 (3 Days Late)⁷:

Beginning Balance:	N/A
Income:	\$ 9,537.00
Expenses:	\$ 9,272.28
Debts:	\$ 12,610
Ending Balance:	N/A

ACTIVITY ON SECOND LATE REPORT DUE ON 7/18 (84 Days Late):

Beginning Balance:	N/A
Income:	\$ 0
Expenses:	\$ 0
Debts:	\$ 310,555
Ending Balance:	N/A

⁵ 2 AAC 50.865(a)(1)(B)

⁶ See, Final Order *IN RE: Interior Republicans*.

⁷ *Id.*

ACTIVITY ON THIRD LATE REPORT DUE ON 8/11 (60 Days Late):

Beginning Balance:	N/A
Income:	\$ 0
Expenses:	\$ 0
Debts:	\$ 555.00
Ending Balance:	N/A

ACTIVITY ON FOURTH LATE REPORT DUE ON 9/5 (35 Days Late):

Beginning Balance:	N/A
Income:	\$ 0.00
Expenses:	\$ 5,362.00
Debts:	\$ 0.00
Ending Balance:	N/A

ACTIVITY ON FIFTH LATE REPORT DUE ON 9/11 (29 Days Late):

Beginning Balance:	N/A
Income:	\$ 0
Expenses:	\$ 100,010.00
Debts:	\$ 555.00
Ending Balance:	N/A

ACTIVITY ON SIXTH LATE REPORT DUE ON 9/29 (13 Days Late):

Beginning Balance:	N/A
Income:	\$ 0
Expenses:	\$ 5,000
Debts:	\$ 0.00
Ending Balance:	N/A

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

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

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

- ☐ Good filing history (no late filings in the previous 5 years). 2 AAC 50.865(a)(1)(A)
- ☒ Inexperienced filer.⁸ 2 AAC 50.865(a)(1)(B)

⁸ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

- ☐ Technical error at APOC. **2 AAC 50.865(a)(2)**
- ☐ Reported information had a value of \$100 or less. **2 AAC 50.865(a)(3)**
- ☐ Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. **2 AAC 50.865(a)(4)**

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

- ☐ Personal catastrophe/emergency or incapacitating illness. **2 AAC 50.865(b)(1)**
- ☐ APOC Staff error. **2 AAC 50.865(b)(2)**
- ☐ Report included only administrative costs. **2 AAC 50.865(b)(3)**
- ☐ No significant harm to the public and no aggravating factors.⁹ **2 AAC 50.865(b)(4)**
- ☐ The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.¹⁰ **2 AAC 50.865(b)(5)**
- ☐ A unique circumstance. **2 AAC 50.865(b)(6)**

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

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

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

⁹ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

¹⁰ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions

Aggravating Factors [2 AAC 50.865(d)]:

- ☐ Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.¹¹ **2 AAC 50.865(d)(1)**
- ☐ More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- ☐ Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- ☐ Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- ☐ A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

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

- ☐ **Waived**
- ☒ **Reduced by 50% to \$2,762.50**
- ☐ **Upheld at the assessed amount of \$**

¹¹ Value greater than \$1000.

**Natural Medicine AK
Comprehensive Chart of Late-Filed Independent Expenditure (IE) Reports**

Report Filed	Date(s) of IE(s)	Due Date	Days Late	Maximum Civil Penalty
7/10/25	6/27/25 to 7/7/25	7/7/25	3	\$0 – NOV issued
10/10/25	7/8/25 to 7/18/25	7/18/25	84	\$4,200
10/10/25	8/1/25	8/11/25	60	\$3,000
10/10/25	8/26/25 to 8/27/25	9/5/25	35	\$1,750
10/10/25	9/1/25 to 9/11/25	9/11/25	29	\$1,450
10/10/25	9/17	9/29	13	\$650
TOTAL				\$11,050

*The maximum penalty for late IE reports is \$50 each day it is not filed (2 AAC 50.855)



Civil Penalty Appeal Affidavit

AS 15.13 Alaska Campaign Disclosure Law

Name of Appellant: Natural Medicine Alaska

Office Sought: N/A

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

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

Year & Election, if late report (e.g., 2020 Primary, 2020 Muni, etc.): Nov 2028

Instructions: If you send payment, you need not file this. An affidavit is required only if you are appealing the civil penalty or violation.

Statement: State why the reporting violation occurred or why you believe it did not occur and the reasons the civil penalty should not be assessed (use additional pages if needed). I do hereby swear and affirm that:

In accordance with the attached APOC violation letter, please accept this statement in response to your November 6, 2025, letter regarding the assessed penalty of \$10,950 to Natural Medicine AK. For several reasons, the committee respectfully requests that the civil penalty be waived to zero (\$0) or reduced. The campaign took its compliance obligations seriously and hired an out-of-state political compliance firm. Unfortunately, a staff departure from that firm, their unfamiliarity in the changes in the APOC reporting rules and the state law's novel reporting requirements contributed to the inadvertent delay/ errors. We have since taken over APOC reporting ourselves, working closely with APOC to rectify any misreportings. We are trying to do everything correctly, but unfortunately are very unfamiliar with the APOC reporting process. The members of the campaign are novice to all accounting and APOC duties and are trying to learn the intricacies to properly report. We respectfully submit that the reporting delays were sincerely unintentional and given that the activity was ultimately disclosed there is no harm or significant harm to the general public or the goals of disclosure. We also believe the penalty is substantial considering there was no intent to harm, nor actual harm has resulted due to the mistaken reporting. Furthermore, we will do everything in our power to avoid any future violations, including strengthening compliance, and amending reports, if any, that have not been filed correctly, including self-reporting any potential violations, as well. In light of these facts and circumstances, we respectfully ask that the assessed penalty be waived or, alternatively, reduced. We strongly believe that the basis for waiver or reduction is justified by 2 AAC 50.865(b)(6), as these unique circumstances will not repeat themselves and were unintentional. In addition, this was the committee's first cycle and meets the requirements of the mitigating factor in 2 AAC 50.865(a)(1)(B). We thank APOC for its review of this assessed penalty in light of these mitigating factors and circumstances.

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

Signed/Date:  12/05/2025

CAMPAIGN DISCLOSURE FORM

AMENDMENT**Amendment Description:** To report a missed debt not filed.**COMPLETED**

Submission Date: **11/30/2025**
 Filer First Name: **Noria**
 Filer Middle Name:
 Filer Last Name: **Clark**
 Filer's Title: **Deputy Treasurer**
 Report Type: **Second Quarterly Report**

GROUP INFORMATION

Group Name: **2025 - NATURAL MEDICINE AK**
 Group Abbreviation: **NMA**
 Group Address: **PO BOX 90061**
 City, State Zip: **ANCHORAGE, Alaska 99509**

REPORT INFORMATION

Election Year: **0**
 Election: **N/A**
 Report Type: **Second Quarterly Report**
 Reporting Period: From **04/08/2025** Through **07/07/2025**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$0.00				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$9,537.00	[+] ⇒	\$0.00	[=] ⇒	\$9,537.00
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$9,272.28	[+] ⇒	\$0.00	[=] ⇒	\$9,272.28
[=] ↓					
Closing Cash On Hand:	\$264.72				
[-] ↓					
Total Debts:	\$12,610.00				
[=] ↓					
Surplus/Deficit:	-\$12,345.28				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
05/28/2025	Credit Card	Brunnhoelzl, Nickie 11231 E Amfay Dr Palmer, Alaska 99645	Occupation: Inn Keeper Employer: Self Description:	\$369.00

Date Received	Payment Method	Contributor	Details	Amount
05/28/2025	Credit Card	Clark-White, Eleanor PO Box 846 Snowflake, Arizona 85937	Occupation: Retired Employer: Retired Description:	\$1,248.00
05/28/2025	Credit Card	DeMolina, Michael 1326 P St Anchorage, Alaska 99501	Occupation: Psychotherapist Employer: Wisdom Traditions Description:	\$250.00
05/28/2025	Credit Card	Edwards, Larry 304 N 8th St Conway Springs, Kansas 67031	Occupation: Airframe & Powerplant Technician Employer: Textron Aviation Description:	\$100.00
05/28/2025	Credit Card	Emerson, Amy 38 Ridge Rd Fairfax, California 94930	Occupation: Retired Employer: Retired Description:	\$350.00
05/28/2025	Credit Card	Griffith, Ryan 1380 S Shelby Dr Wasilla, Alaska 99623	Occupation: Technician Employer: GCI Description:	\$100.00
05/28/2025	Credit Card	Law, Beth PO Box 870962 Wasilla, Alaska 99687	Occupation: Retired Employer: Retired Description:	\$100.00
05/28/2025	Credit Card	Lubitsh, Tamar 1101 Hollywood Drive Anchorage, Alaska 99501	Occupation: Psychologist Employer: Lubitsh Counseling Description:	\$250.00
05/28/2025	Credit Card	Moline, Mary 9601 Copper Drive Anchorage, Alaska 99507	Occupation: Retired Employer: Retired Description:	\$300.00
05/28/2025	Credit Card	Rieck, Kelli 9198 W Parkview Terrace Loop Eagle River, Alaska 99577	Occupation: Real Military Division Realtor Employer: Greater Anchorage Area Description:	\$250.00
05/28/2025	Credit Card	Rivas, Shila 1405 N Pioneer Peak Dr Wasilla, Alaska 99654	Occupation: Emergency Fire Fighter Employer: Division of Forestry Description:	\$350.00
05/28/2025	Credit Card	Schuster, Kristine 3787B Richard Evelyn Byrd St Anchorage, Alaska 99517	Occupation: Retired Employer: Retired Description:	\$250.00
05/28/2025	Credit Card	Silva, Carissa 303 Fireoved dr, C Anchorage, Alaska 99508	Occupation: Strategy Employer: Providence Description:	\$500.00
05/28/2025	Credit Card	Stevens, Janiese 2705 Mill Bay Rd, 205 Kodiak, Alaska 99615	Occupation: Self Employer: Wallstrum Stevens CPA Description:	\$1,000.00
05/28/2025	Credit Card	Verzone, Ana 3740 Clay Products Dr Anchorage, Alaska 99517	Occupation: Coach Employer: Self Description:	\$350.00

Date Received	Payment Method	Contributor	Details	Amount
06/19/2025	Credit Card	Nash, Anthony 712 Concord Way Burlingame, California 94010	Occupation: Student Employer: Student Description:	\$100.00
06/24/2025	Cash	Nash, Josiah 8480 Jewel Lake Rd, Apt #17 Anchorage, Alaska 99502	Occupation: Program Manager Employer: Intelligent Energy Solutions Description: Refund in Process Post Close of Period	\$3,000.00
Number of Contributions under \$100:				20
Sum of Contributions under \$100:				\$670.00
Income Total:				\$9,537.00

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
06/27/2025	Check 1001	Birch Horton Bittner & Cherot 510 L Street, Suite 700 Anchorage, Alaska 99501	Legal Services	\$9,000.00
06/30/2025	Electronic Funds Transfer	Anedot 1340 Poydras St #1770 New Orleans, Louisiana 70112	Credit Card Processing Fees	\$272.28
Expenditure Total:				\$9,272.28

DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
05/08/2025	Birch Horton Bittner & Cherot 510 L Street, Suite 700 Anchorage, Alaska 99501	Legal Services	\$1,610.00	\$0.00
06/01/2025	Birch Horton Bittner & Cherot 510 L Street, Suite 700 Anchorage, Alaska 99501	Legal Services	\$20,000.00	\$12,610.00
Remaining Debt Total:				\$12,610.00

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **10/10/2025**
 Filer First Name: **Haley**
 Filer Middle Name:
 Filer Last Name: **Wadsworth**
 Filer's Title: **Treasurer**
 Report Type: **Third Quarterly Report**

GROUP INFORMATION

Group Name: **2025 - NATURAL MEDICINE AK**
 Group Abbreviation: **NMA**
 Group Address: **PO BOX 90061**
 City, State Zip: **ANCHORAGE, Alaska 99509**

REPORT INFORMATION

Election Year: **0**
 Election: **N/A**
 Report Type: **Third Quarterly Report**
 Reporting Period: From **07/08/2025** Through **10/07/2025**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$264.72				
[+] ↓		Year To Date Income Total: (From Box A of previous report)		Total Income To Date: (Box A)	
Total Income Reported:	\$114,718.50	[+] ⇒	\$9,537.00	[=] ⇒	\$124,255.50
[-] ↓		Year to Date Expense Total: (From Box B of previous report)		Total Expense To Date: (Box B)	
Total Expenditures Reported:	\$112,318.55	[+] ⇒	\$9,272.28	[=] ⇒	\$121,590.83
[=] ↓					
Closing Cash On Hand:	\$2,664.67				
[-] ↓					
Total Debts:	\$312,220.00				
[=] ↓					
Surplus/Deficit:	-\$309,555.33				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
08/19/2025	Credit Card	BRIEN, MARY 7748 W. STILLWATER CIR. WASILLA, Alaska 99654	Occupation: ACCOUNTING Employer: VALLEY BOOKS INC Description:	\$100.00
08/20/2025	Credit Card	TALLEY, JUNIPER PO BOX 1086 HAINES, Alaska 99827	Occupation: PMHNP Employer: RECYCLED STARDUST SERVICES Description:	\$250.00
08/21/2025	Credit Card	SMITH, FORD 1503 ALAMEDA DRIVE AUSTIN, Texas 78704	Occupation: FOUNDER Employer: ULRANATIVE Description:	\$1,000.00

Date Received	Payment Method	Contributor	Details	Amount
08/21/2025	Credit Card	WAITMAN, BRENDA PO BOX 872966 WASILLA, Alaska 99687	Occupation: YOGA VST Employer: HALF ANGEL HARMONY Description:	\$100.00
08/22/2025	Electronic Funds Transfer	HARRIS, KEITH PO BOX 67966 ALBUQUERQUE, New Mexico 87193	Occupation: RETIRED Employer: RETIRED Description:	\$100,000.00
08/22/2025	Credit Card	SHERLOCK, SHERIDAN 1820 BUCCANEER PL ANCHORAGE, Alaska 99501	Occupation: BOOKKEEPER Employer: VEIT AND VEIT CPAS Description:	\$100.00
08/28/2025	Credit Card	HOFFMAN, MARK 5 HIGHLAND AVE. HULL, Massachusetts 02045	Occupation: RETIRED Employer: RETIRED Description:	\$100.00
08/29/2025	Electronic Funds Transfer	WUNDERLY, JENNY 10800 GENASCI ROAD NEVADA CITY, California 95959	Occupation: DIRECTOR Employer: VISION WALKERS COLLECTIVE Description:	\$10,000.00
09/12/2025	Credit Card	KELLY, JOSEPH 2106 E. M. FRANKLIN AVENUE AUSTIN, Texas 78723	Occupation: CEO Employer: UNCHAINED Description:	\$100.00
09/13/2025	Credit Card	SETZER, JOSHUA 4418 CLOVERDALE ST JUNEAU, Alaska 99801	Occupation: HANDYMAN Employer: STELLAR J HANDYMAN SERVICES LLC Description:	\$100.00
09/16/2025	Credit Card	COPELIN, NICOLE LYNN 2920 JONES AVE ANCHORAGE, Alaska 99517	Occupation: INFORMATION REQUESTED Employer: INFORMATION REQUESTED Description:	\$250.00
09/21/2025	Credit Card	MILITELLO, MARK 7926 OLD SEWARD HIGHWAY ANCHORAGE, Alaska 99518	Occupation: OWNER Employer: TRUE LOVE ASSISTED LIVING Description:	\$1,000.00
10/02/2025	Credit Card	BRAUN, ANDREW 4110 VISCOUNTS CIR ANCHORAGE, Alaska 99502	Occupation: RN Employer: PROVIDENCE ALASKA MEDICAL CENTER Description:	\$104.48
10/03/2025	Credit Card	HUGHES, RHONDA 3400 E COTTLE LOOP, 100 WASILLA, Alaska 99654	Occupation: PRESIDENT Employer: PERFECT CIRCLE Description:	\$1,041.98
10/04/2025	Credit Card	DOERR, PAMELA 7930 S SETTERS BAY DRIVE WASILLA, Alaska 99623	Occupation: STUDENT Employer: STUDENT Description:	\$104.48
Number of Contributions under \$100:				13
Sum of Contributions under \$100:				\$367.56
Income Total:				\$114,718.50

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
08/26/2025	Check 1002	KARABELNIKOFF, DAVID 2731 N MOSIER CT WASILLA, Alaska 99654	CAMPAIGN CONSULTING RETAINER	\$5,000.00

Date	Payment Method	Vendor	Purpose	Amount
08/27/2025	Debit Card	USPS 240 MULDOON RD ANCHORAGE, Alaska 99504	PO BOX	\$345.00
08/27/2025	Debit Card	USPS 240 MULDOON RD ANCHORAGE, Alaska 99504	POSTAGE	\$17.00
09/11/2025	Cash	ON THE BALLOT, LLC PO BOX 1136 DENVER, Colorado 80201	SIGNATURE GATHERING	\$100,010.00
09/17/2025	Electronic Funds Transfer	BIRCH HORTON BRITTNER & CHEROT 510 L STREET, STE 700 ANCHORAGE, Alaska 99501	LEGAL SERVICES	\$5,000.00
09/22/2025	Check 1003	NASH, JOSIAH 8480 JEWEL LAKE RD, APT #17 ANCHORAGE, Alaska 99502	REFUND OF CONTRIBUTION	\$1,750.00
10/07/2025	Electronic Funds Transfer	ANEDOT 1340 POYDRAS ST, STE 1770 NEW ORLEANS, Louisiana 70112	CREDIT CARD PROCESSING FEE	\$196.55
			Expenditure Total:	\$112,318.55

DEBTS

Date Incurred	Name	Description or Purpose	Original Amount	Balance Remaining
07/08/2025	AXCAPITAL 655 METRO PL S, STE 700 DUBLIN, Ohio 43017	COMPLIANCE AND ACCOUNTING	\$555.00	\$555.00
07/17/2025	VANGUARD FIELD STRATEGIES 800 W 47TH ST KANSAS CITY, Missouri 64112	FIELD STRATEGY	\$310,000.00	\$310,000.00
08/01/2025	AXCAPITAL 655 METRO PL S, STE 700 DUBLIN, Ohio 43017	COMPLIANCE AND ACCOUNTING	\$555.00	\$555.00
09/01/2025	AXCAPITAL 655 METRO PL S, STE 700 DUBLIN, Ohio 43017	COMPLIANCE AND ACCOUNTING	\$555.00	\$555.00
10/01/2025	AXCAPITAL 655 METRO PL S, STE 700 DUBLIN, Ohio 43017	COMPLIANCE AND ACCOUNTING	\$555.00	\$555.00
			Remaining Debt Total:	\$312,220.00



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

November 6, 2025

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

Natural Medicine AK
Attn: Regina Randall
PO Box 90061
Anchorage, AK 99509
naturalmedicinealaska@gmail.com

RE: Notice of Violation – Independent Expenditure Report Due on July 7, 2025
Notice of Penalty – Late filed Independent Expenditure Reports

Dear Ms. Randall:

According to Alaska Public Offices Commission (APOC) records, and based on the 15-6 Independent Expenditure report filed October 20, 2025, it appears Natural Medicine AK did not timely file Independent Expenditure Reports that must be filed within 10 days after an expenditure is made.

The group's first failure to report, for which you are receiving this Notice of Violation, is based upon the group's failure to timely file an Independent Expenditure Report that should have been filed no later than July 7, 2025, for expenditures incurred from June 27, 2025 through July 7, 2025. Instead, these expenditures were first disclosed on your Second Quarterly Report filed July 10, 2025 (three days late). Under Alaska law, a maximum penalty of \$50 accrues each day the report is late,¹ resulting in a maximum penalty APOC could have assessed of \$150.00.² **APOC is not assessing a penalty for the violation because this was the group's first independent expenditure reporting error.**³

However, multiple additional violations were found, as follows:

Expenditures during the period of July 8, 2025 through July 18, 2025 should have been disclosed by July 18, 2025. Instead, these expenditures were first disclosed on October 10, 2025 – 84 days late.

¹ AS 15.13.390(a).

² 2 AAC 50.855(a).

³ 2 AA 50.855(b)(2)(A)(v)

Expenditures occurring August 1, 2025 should have been disclosed by August 11, 2025. Instead, these expenditures were first disclosed October 10, 2025 – 60 days late.

Expenditures during the period of August 26, 2025 through August 27, 2025 should have been disclosed by September 5, 2025. Instead, these expenditures were first disclosed on October 10, 2025 – 35 days late.

Expenditures during the period from September 1, 2025, through September 11, 2025 should have been disclosed by September 11, 2025. Instead, these expenditures were first disclosed on October 10, 2025 – 29 days late.

Expenditures occurring on September 17, 2025, should have been disclosed by September 29, 2025. Instead, these expenditures were first disclosed on October 10, 2025 – 11 days late.

Under Alaska law, a maximum penalty of \$50 accrues each day a report is late.⁴ In total, your group is 219 days late in disclosing campaign expenditures. **Accordingly, the assessed penalty owed is \$10,950.**⁵

You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)⁶ to make a payment by credit card; or by paying in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.

Alternatively, you have the right to appeal staff’s conclusion that a violation has occurred, or the penalty amount assessed.⁷ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

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

⁴ AS 15.13.390(a).

⁵ 2 AAC 50.855(a).

⁶ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

⁷ 2 AAC 50.831(a).

Failure to respond to this notice by either making arrangement for payment or submitting an appeal within will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General's Office.⁸

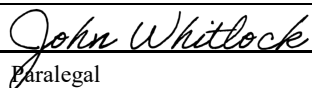
A copy of this letter will be placed in your APOC file and is considered a public document. If you have any questions about this matter, please contact APOC staff.

ALASKA PUBLIC OFFICES COMMISSION


John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: GROUP File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Natural Medicine AK ATTN: Regina Randall PO Box 90061 Anchorage, AK 99509 naturalmedicinealaska@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email
 Paralegal	11/6/25 Date

⁸ 2 AAC 50.895.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

December 29, 2025

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

Natural Medicine AK
Attn: Regina Randall
PO Box 90061
Anchorage, AK 99509
naturalmedicinealaska@gmail.com

RE: Notice of Violation – Independent Expenditure Report Due on July 7, 2025
AMENDED Notice of Penalty – Late filed Independent Expenditure Reports

Dear Ms. Randall:

According to Alaska Public Offices Commission (APOC) records, and based on the 15-6 Independent Expenditure report filed October 20, 2025, it appears Natural Medicine AK did not timely file Independent Expenditure Reports that must be filed within 10 days after an expenditure is made.

The group's first failure to report, for which you are receiving this Notice of Violation, is based upon the group's failure to timely file an Independent Expenditure Report that should have been filed no later than July 7, 2025, for expenditures incurred from June 27, 2025 through July 7, 2025. Instead, these expenditures were first disclosed on your Second Quarterly Report filed July 10, 2025 (three days late). Under Alaska law, a maximum penalty of \$50 accrues each day the report is late,¹ resulting in a maximum penalty APOC could have assessed of \$150.00.² **APOC is not assessing a penalty for the violation because this was the group's first independent expenditure reporting error.³**

However, multiple additional violations were found, as follows:

Expenditures during the period of July 8, 2025 through July 18, 2025 should have been disclosed by July 18, 2025. Instead, these expenditures were first disclosed on October 10, 2025 – 84 days late.

¹ AS 15.13.390(a).

² 2 AAC 50.855(a).

³ 2 AA 50.855(b)(2)(A)(v)

Expenditures occurring August 1, 2025 should have been disclosed by August 11, 2025. Instead, these expenditures were first disclosed October 10, 2025 – 60 days late.

Expenditures during the period of August 26, 2025 through August 27, 2025 should have been disclosed by September 5, 2025. Instead, these expenditures were first disclosed on October 10, 2025 – 35 days late.

Expenditures during the period from September 1, 2025, through September 11, 2025 should have been disclosed by September 11, 2025. Instead, these expenditures were first disclosed on October 10, 2025 – 29 days late.

Expenditures occurring on September 17, 2025, should have been disclosed by September 27, 2025. Instead, these expenditures were first disclosed on October 10, 2025 – 13 days late.

The maximum penalty the Alaska Public Offices Commission could assess you is \$11,050.⁴ Staff is reducing the penalty to 50% of the maximum civil penalty that could have been assessed because this is your first election cycle.⁵ **Accordingly, the assessed penalty owed is \$5,525.**

You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)⁶ to make a payment by credit card; or by paying in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.

Alternatively, you have the right to appeal staff’s conclusion that a violation has occurred, or the penalty amount assessed.⁷ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

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

⁴ 2 AAC 50.855(a).

⁵ 2 AAC 50.855(b)(2)(C)(i).

⁶ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

⁷ 2 AAC 50.831(a).

Failure to respond to this notice by either making arrangement for payment or submitting an appeal within will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General's Office.⁸

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

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: GROUP File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Natural Medicine AK ATTN: Regina Randall PO Box 90061 Anchorage, AK 99509 naturalmedicinealaska@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email
<i>John Whitlock</i> Paralegal	12/29/25 Date

⁸ 2 AAC 50.895.