

[TAB 17]

**Complaints 25-11-CD and 25-21-CD,
Jerad McClure v. David Wilson**

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Jerad McClure,)	
)	
Complainant,)	
)	
vs.)	Case No. 25-11-CD / 25-21-CD
)	
David S. Wilson)	
)	
Respondent.)	
_____)	

NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing in these cases will take place before the Alaska Public Offices Commission at approximately 11:15 a.m. on Wednesday June 3, 2026.

The Commissioners will be present in person, by telephone, or via Microsoft Teams and will receive evidence regarding this matter. You may be present at the hearing either by telephone (1-907-202-7104, Access Code: 269 275 710# in-person (2221 E. Northern Lights Blvd, Ste 128, Anchorage, Alaska), or via [Microsoft Teams Meeting](#).¹ You may be, but are not required to be, represented by an attorney or agent.

If you wish to participate by telephone and are an individual who requires a special accommodation to participate, you must advise the Commission office on or before May 26, 2026, so that a special accommodation can be made.

PREHEARING AND HEARING PROCEDURES

- 1) **Parties.** The parties in this case are Commission Staff and Respondent.
- 2) **Issues.** At the hearing, the Commission will consider whether Respondent failed to provide sufficient details of campaign expenditures during his 2020 and 2024 campaigns.
- 3) **Procedural history.** Complainant Jerad McClure filed a complaint against Respondent David Wilson on August 15, 2025 and a second complaint on October 13, 2025. Respondent Wilson filed a Response on September 23, 2025. Staff’s investigation report recommending the complaint be upheld in part and dismissed in part was issued May 8, 2026.

¹ Meeting ID: 226 535 332 612 23, Passcode: wZ9Uy9wz

- 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 May 22, 2026, a party:
 - a) may file a list of witnesses expected to testify at the hearing;
 - b) may file copies of exhibits to be presented at the hearing that are marked and identified (for example, Resp.'s Ex. A);
 - c) may file a prehearing memorandum;
 - d) may file prehearing motions, including motions to dismiss, for summary judgment, or to exclude evidence, and
 - e) shall serve all parties and the Complainant with filings submitted.
- 7) **Response to motions and requests for subpoenas.** No later than May 29, 2026, a party
 - a) may respond to a motion; and
 - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing, and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) **Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) **Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

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

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

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

Dated: May 15, 2026



Heather Hebdon, Executive Director
Alaska Public Offices Commission

CERTIFICATE OF SERVICE:	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
David S. Wilson 3001 E. Danny's Ave. Wasilla, AK 99654 Dw22@rocketmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Jerad McClure 2521 E. Mountain Village Dr. Ste B, PMB 600 Jeradmclure@outlook.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

Cari Rousselle

05/15/2026

Signature

Date

Rousselle, Cari J (DOA)

From: Microsoft Outlook
To: Dw22@rocketmail.com
Sent: Friday, May 15, 2026 1:23 PM
Subject: Relayed: Notice of Hearing and Procedural Order

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

[Dw22@rocketmail.com \(dw22@rocketmail.com\)](mailto:Dw22@rocketmail.com)

Subject: Notice of Hearing and Procedural Order



Notice of Hearing
and Procedur...

Rousselle, Cari J (DOA)

From: postmaster@outlook.com
To: Jeradmclure@outlook.com
Sent: Friday, May 15, 2026 1:23 PM
Subject: Delivered: Notice of Hearing and Procedural Order

Your message has been delivered to the following recipients:

[Jeradmclure@outlook.com \(jeradmclure@outlook.com\)](mailto:Jeradmclure@outlook.com)

Subject: Notice of Hearing and Procedural Order

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jerad McClure
2521 E Mountain Village Dr
Ste B, PMB 600
Wasilla AK 99654



9590 9402 9692 5199 6812 10

2. Article Number (Transfer from service label)

9589 0710 5270 1126 7215 31

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

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *8853*

Adult Address

B. Received by (Printed Name)

Stage 4 611.5

51826

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

3. Service Type

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

Domestic Return Receipt

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

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COMPLETE THIS SECTION ON DELIVERY

A. Signature

X *8853*

8853
 Address

B. Received by (Printed Name)

Stage 4 611.5

51826

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

3. Service Type

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

Restricted Delivery

Domestic Return Receipt



TO: APOC Commissioners
DATE: May 8, 2026
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report *Jerad McClure v. David Wilson*,
25-11-CD/25-21-CD (consolidated)

SUMMARY OF COMPLAINT AND RESPONSE

Complainant Jerad McClure filed complaints 25-11-CD,¹ 25-21-CD,² and “Additional Allegations”³ against Respondent David Wilson, alleging Wilson failed to provide sufficient details of his expenditures during his 2024 campaign (25-11-CD) and his 2020 campaign (25-21-CD and “Additional Allegations”).⁴ Respondent Wilson denies the allegations.⁵

SUMMARY OF STAFF RECOMMENDATIONS

Respondent’s description of the general expenditure identified in the complaint meets the requirements of 2 AAC 50.321(a)(5)(D), and a preponderance of the evidence does not support a finding of violation.

Respondent’s descriptions of several other expenditures identified in the complaint, to advertising agencies or for campaign consultation or management services under 2 AAC 50.321(d), do not disclose in detail all services rendered, as required for these vendors. For Respondent’s reports listing those services, APOC staff recommends a

¹ [Complaint 25-11-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27093), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27093>.

² [Complaint 25-21-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27287), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27287>.

³ Exhibit 1, McClure’s document entitled “Additional Findings.”

⁴ The Commission consolidated the matters on December 8, 2025, [Commission Order Consolidating](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27336), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27336>.

⁵ [Response to Complaint 25-11-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27265), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27265>.

finding of violation but recommends a reduced penalty based upon several mitigating factors.

APOC staff additionally finds Respondent was not required to break down by dollar amount the individual costs paid to subcontractors, either for general expenditures or for those expenditures for advertising agencies or campaign management and consulting services.

BACKGROUND FACTS

As a preliminary matter, this complaint utilizes the template of nine other complaints filed in 2025, most of them repeating allegations made by a third party during a previous Commission hearing.⁶

Respondent Wilson was a candidate for the State Senate during the 2020 and 2024 State Primary and General Elections. During his campaigns, Respondent made expenditures to campaign vendors, reporting them on his regularly scheduled campaign reports required under AS 15.13.040 and AS 15.13.110.

Complainant alleged in his first-filed complaint 25-11-CD that Respondent's reporting of expenditures to the following vendors during his 2024 campaigns violated Alaska Statute 15.13.040 and 2 AAC 50.321 because his descriptions provided insufficient detail:

- Wasilla Area Seniors, Inc.
- Dubai Business Services
- Hackney Communications

⁶ As with several other of the other template complaints filed in 2025 relating to campaign expenditure descriptions, the complaint document in 25-21-CD reflects editing by "Pat Martin." Exhibit 2, Pat Martin comments on complaint 24-21-CD. McClure also utilizes the identical format of the earlier complaints, and includes several pages of references to Internal Revenue Service, Occupational Safety and Health Administration, Federal Motor Carrier Safety Administration, Federal Aviation Administration, and Federal Election Commission provisions, along with citations to unnamed state traffic laws, the National Electrical Code, and State of Alaska statutes and Matanuska-Susitna Borough code provisions.

- AdXcelerant
- Ad Gorilla

Approximately two months later, Complainant filed a second complaint (25-21-CD), alleging additional violations based upon Respondent’s descriptions of expenditures to vendor Ad Gorilla made during his 2020 campaign. Finally, 10 days after filing 25-21-CD, Complainant submitted to APOC a list of “additional allegations,” pointing to other expenditures Respondent made to Ad Gorilla and Dubai Business Services during his 2020 campaigns and again alleging Respondent provided insufficient detail in his reporting.⁷

Complainant additionally argues that the law requires a breakdown of individual costs by vendor and that Respondent must provide invoices for every vendor and subcontractor associated with the expenditures identified in the complaint.

LAW

Alaska campaign disclosure law requires candidates to disclose expenditures and debts incurred by their campaigns. These disclosures are documented in reports. For each campaign, mandatory APOC reports include a year-start report, 30-day and 7-day reports for the primary and general elections, and a year-end report.⁸ An expenditure includes “a purchase or a transfer of money or anything of value, or promise or agreement to purchase or transfer money or anything of value, incurred or made for the purpose of . . . influencing the nomination or election of a candidate.”⁹

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

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

⁷ Complainant subsequently filed an additional complaint against Respondent (25-26-CD) alleging campaign disclosure violations on other bases.

⁸ AS 15.13.110.

⁹ AS 15.13.400(7)(A)(i).

(E) the amount of the expenditure . . .¹⁰

By comparison, for expenditures to advertising agencies or those who provide campaign consultation or management services, 2 AAC 50.321(d) requires a candidate to report “in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed, and the amount of the expenditure.”¹¹

APOC’s 2024 Candidate Campaign training materials reflect these regulations and outline the enhanced level of detail a candidate must provide under .321(d). As APOC instructs in its Candidate Training Presentation, “(w)hen 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).”¹²

Past guidance from APOC staff echoes these training materials and provides examples of proper reporting. In an email sent to all candidates and their treasurers in July 2020, 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.”

Alaska campaign disclosure law also imposes separate recordkeeping requirements for expenditures made to advertising agencies and businesses providing campaign consultation or management services.¹³ Upon request of the Commission, a candidate must make the records available for inspection.¹⁴

¹⁰ AS 15.13.040(a)(1)(A); 2 AAC 50.321(a)(5) (emphasis added).

¹¹ 2 AAC 50.321(d).

¹² [Candidate Training Manual](#) at p. 13 (emphasis in original),

<https://apoc.doa.alaska.gov/media/edrdibcp/cdt-2024-candidate-training-manual.pdf>.

¹³ 2 AAC 50.320(a) and (b).

¹⁴ AS 15.13.040(f) (vendor recordkeeping requirements and inspection provision); AS 15.13.045 (relating to Commission’s ability to conduct investigations and examine records); 2 AAC 50.806 (inspection and preservation of records).

When APOC receives a properly filed complaint, Commission staff must undertake an investigation and present the investigation report.¹⁵ Staff bears the burden of proving a violation by a preponderance of the evidence.¹⁶

ANALYSIS

For the campaign vendors Complainant has identified, APOC staff reviewed the nature of the business along with the nature of Respondent’s expenditures to them. APOC staff also considered Complainant’s argument that 2 AAC 50.321 requires itemization of individual dollar amounts within a single vendor contract.

- a. Respondent’s reporting of his general expenditure to Wasilla Area Seniors, Inc. meets 2 AAC 50.321(a)(5) requirements

Relating to his expenditure to **Wasilla Area Seniors, Inc.** (\$1,800 for “sponsorships”), Respondent’s description of its purpose is limited, but so are the requirements of 2 AAC 50.321(a)(5). Respondent’s description – “sponsorships” – satisfied .321(a)(5) because it described the reason the expenditure was done or made. A fuller description would have better informed the public of what the vendor provided, but the lack of additional detail doesn’t render Respondent’s reporting incomplete under campaign disclosure law. APOC staff additionally finds no evidence (nor does Complainant present any) that Wasilla Area Seniors, Inc. was an advertising agency or provided campaign consultation or management services, which would have required greater detail under 2 AAC 50.321(d). Respondent therefore did not need to provide the more detailed level of reporting required by 2 AAC 50.321(d).

APOC staff recommends the Commission find no violation relating to this expenditure.

¹⁵ 2 AAC 50.870; 2 AAC 50.891.

¹⁶ 2 AAC 50.891(d).

- b. Respondent’s reporting of expenditures made to advertising agencies and businesses providing consulting or management services does not meet 2 AAC 50.321(d) requirements

The complaint alleges Respondent’s descriptions of expenditures to vendors Dubai Business Services, Art Hackney Communications, AdXcelerant, and AdGorilla failed to comply with campaign disclosure laws.

Dubay Business Services advertises itself as a “One Stop Shop for Campaigns”¹⁷ and offers services including branding design, apps, small business support, data management and wireless mesh networks, campaigns, and software development and operations.¹⁸ Office contact addresses include an Ohio address listed on an invoice and another on the website that appears to be a residential address in Anchorage.¹⁹ A search of the Alaska corporations database for Dubai Business Services, 2024 Biennial report lists its business purpose as providing technology and business services.²⁰ In response to APOC staff requests for information, Respondent provided that “Dubay Business Services provided consulting, data services, website development, graphic design, signage, and mailers.”

Respondent’s expenditures to Dubai Business Services included:

- August 26, 2024 \$8,668 for “yard signs, mailer, and rack cards” reported on a 2024 30-day general report
- December 4, 2024 \$8,767 for “printing rack cards and mailers” reported on a 2024 year-end report
- November 17, 2020 \$12,341.84 for “printing services and mailers” reported on a 2020 year-end report

¹⁷ [DUBAY Business, https://dubay.bz/](https://dubay.bz/), last accessed April 28, 2024.

¹⁸ *Id.*

¹⁹ A physical address for the business listed on the LLC 2024 Biennial report also appears to be a residential address.

²⁰ [Division of Corporations, Business and Professional Licensing, https://www.commerce.alaska.gov/cbp/main/search/entities.](https://www.commerce.alaska.gov/cbp/main/search/entities)

Art Hackney Communications describes itself as a “political media consultant[.]”²¹ On its State of Alaska business license, the company uses the NAICS code for “marketing consulting services.”²²

Respondent’s expenditures to Art Hackney Communications included:

- August 13, 2024 \$3,000 for “Ads” reported on a 2024 30-day report
- October 15, 2024 \$5,000 for “Ads” reported on a 2024 7-day report

AdXcelerant describes itself as “a technology-first advertising company” that offers “advertising insertion,” “advertising sales” and “ad tech stack” that “helps partners activate curated inventory with precision while using geo- and venue-based targeting, buyer-friendly packaging, and reporting built for transparency.”²³

Respondent’s expenditures to AdXcelerant included:

- July 15, 2024 \$3,300 for “Ads” reported on a 2024 30-day primary report
- August 8, 2024 \$2,300 for “Ads” reported on a 2024 7-day primary report
- October 14, 2024 \$4,000 for “Ads” reported on a 2024 7-day report
- October 30, 2024 \$1,500 for “Ads” reported on a 2024 year-end report

AdGorilla is affiliated with AdXcelerant, described on AdXcelerant’s webpage as the nation’s “top rated targeted mobile advertising product.”²⁴ Per its website, AdGorilla assists its clients in identifying the desired audience, assisting with word search strategy, providing analytics, pre-roll tv, geofencing, and assisting with ad creation.

Respondent’s expenditures to AdGorilla included:

- October 26, 2020 \$1,500 for “digital ads” reported on a 2020 7-day general report
- November 16, 2020 \$1,500 for “digital ads” reported on a 2020 year-end report
- November 16, 2020 \$1,000 for “digital ads” reported on a 2020 year-end report

²¹ [Bio | Art Hackney Communications](https://ajhackneycommunications.com/bio/), <https://ajhackneycommunications.com/bio/>, website last accessed December 3, 2025.

²² [Art Hackney Communications #2166017](https://www.commerce.alaska.gov/cbp/businesslicense/search/License), <https://www.commerce.alaska.gov/cbp/businesslicense/search/License>, State of Alaska business license database search, last accessed December 12, 2025.

²³ [AdXcelerant® homepage](https://www.adxcelerant.com/), <https://www.adxcelerant.com/>, last accessed April 28, 2026.

²⁴ [AdGorilla | The Future of Mobile Advertising](https://www.adxcelerant.com/adgorilla), <https://www.adxcelerant.com/adgorilla>, last accessed April 28, 2026.

Based upon the companies' self-descriptions, Respondent's purchases of "ads" and "digital ads" through them, and Respondent's descriptions of services provided by the businesses, APOC staff finds Dubai Business Services,²⁵ Art Hackney Communications, AdXcelerant, and AdGorilla to be advertising agencies or businesses providing campaign consultation services under 2 AA 50.321(d). Candidates making expenditures to such businesses "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."²⁶ Respondent's descriptions of expenditures to these campaign vendors, while disclosing the amount of the expenditures, did not provide sufficient detail. While minimal detail may be sufficient for *general* expenditures under 2 AAC 50.321(a)(5), the business purposes of Art Hackney Communications, AdXcelerant, and AdGorilla, combined with the services they provided Respondent, required him to describe "in detail all services rendered" pursuant to 2 AAC 50.321(d).

It is unclear from Respondent's reports what specific services each business provided. But, for example, for the combined \$8,000 expenditures to Art Hackney Communications, described only as "ads," the business must have paid or engaged a third-party business to place Respondent's campaign messaging. 2 AAC 50.321(d) requires a candidate to disclose the names of the companies or platforms subcontracted by the advertising agency or consulting business, including where the media advertising was placed. If the information concerning placement is unknown and can't be determined, .321(d) still requires some description of the services performed by the subcontractor, in keeping with .321(d)'s requirement to report advertising agency and consulting business expenditures with a heightened level of detail for all services rendered. For AdXcelerant

²⁵ Although Respondent's expenditures to Dubai Business Services described mostly printing services, Respondent explained that the business "provided consulting, data services, website development, graphic design, signage, and mailers." These services bring the business within the realm of 2 AAC 50.321(d). Additionally, given that the company does not advertise printing services, and the addresses used by it include an Ohio location and residential property in Anchorage, it appears probable that Dubai Business Services did not itself provide \$17,435 of printing services but rather subcontracted the printing work to a different business. 2 AAC 50.321(d) requires naming of subcontractors, which Respondent did not do.

²⁶ 2 AAC 50.321(d).

and AdGorilla, information could possibly have included whether the companies “created the ads, directly distributed them, arranged placement on another entity's website or app, or provided some combination of these services,”²⁷ and the name of any business it paid to do so. But Respondent’s description of these services – simply “ads” or “digital ads” – does not meet the regulatory requirement because it does not provide any level of detail of “all services rendered” by an advertising or consulting agency.²⁸

In his Response to the Complaint, Respondent argues that the issues raised in these complaints “were not previously identified as violations in my audits” and cites an April 15, 2016 APOC campaign disclosure audit letter.²⁹ But in that letter, APOC staff specifically pointed to an expenditure to Dubai Business Services as one that “lack[s] sufficient detail” because Respondent described the \$2,500 expenditure only as “campaign services.”³⁰ APOC staff further explained in the letter that while it is “not necessary to detail each single item” purchased, the description of purpose “should provide the public with an understanding of what the expense was for and how it relates to your campaign.”³¹

Respondent’s failure to report sufficient details of expenditures made to advertising agencies or businesses providing campaign consultation or management services rendered. Respondent’s 2024 30-day primary, 7-day primary, 30-day general, 7-day general, and year-end reports, and his 2020 7-day general and year-end reports incomplete. The combined total amount of 2 AAC 50.321(d) expenditures Respondent insufficiently reported in his 2024 and 2020 reports was \$52,876.84.

²⁷ [Order Denying Reconsideration](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27273), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27273>, *Widney v. McCabe*, 25-01-CD (September 22, 2025), pp. 3-4.

²⁸ *See id.*

²⁹ [Response to Complaint 25-11-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27265), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27265>.

³⁰ Exhibit 3, APOC 2016 audit letter.

³¹ *Id.*

- c. Alaska campaign disclosure law does not require identification of individual dollar amounts incurred by subcontractors for campaign goods and services under 2 AAC 50.321

As noted above, Respondent disclosed the total expenditure amount for each vendor in his reports. Complainant, however, alleges Respondent should also have provided – for “any consultant, campaign manager, or PR firm” retained by the campaign—“a breakdown of payments made to all subcontractors, sub-vendors, or affiliated service providers.”³² Complainant also requested that Respondent provide, among other items, “invoices” for every vendor and subcontractor associated with the expenditures identified in the complaint. But in several recent complaints presenting this identical issue, the Commission found that 2 AAC 50.321 “does not require the breakdown of amounts paid to an advertising agency’s or consulting firm’s subcontractors or ad placements.”³³ APOC staff recommends dismissal of this allegation.

MAXIMUM POTENTIAL CIVIL PENALTIES

The maximum civil penalty for failing to timely file complete and accurate 30-day and year-end reports is \$50 per day for each day the violation continues.³⁴ The maximum civil penalty for failing to timely file complete and accurate 7-day reports is \$500 per day for each day the violation continues through the date of the election and \$50 per day thereafter.³⁵ Tolling the running of the penalties for allegations contained in 25-11-25 as of the day that complaint was filed (August 15, 2025) and tolling the running of the penalties for allegations contained in 25-21-25 as of the day that complaint was filed (October 13, 2025) results in a maximum civil penalty of \$252,900.

³² Complaint 25-11-CD, pp. 7-8.

³³ See, e.g., [Final Order Alexander v. Hughes 25-19-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27394), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27394>, at pp. 1-2; see also [Alexander v. Bjorkman 25-12-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27395), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27395>; [Alexander v. Costello 25-14-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27391), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27391>; [Gilliland v. Merrick, Order Approving Consent Agreement 25-10-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27387), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27387>.

³⁴ AS 15.13.390(a)(1).

³⁵ AS 15.13.390(a)(1); 2 AAC 50.855(b)(5).

Report	Dates of Violation	Penalty Days	Max Penalty	2 AAC 50.855 Assessment
2024 30-day primary	7/22/24 – 8/15/25	389	\$19,450	\$9,725
2024 7-day primary	8/13/24 – 8/20/24	7	\$3,500	\$3,500
	8/21/24 – 8/15/25	359	\$17,950	\$17,950
2024 30-day general	10/7/24 – 8/15/25	312	\$15,600	\$15,600
2024 7-day general	10/29/24 – 11/5/24	7	\$3,500	\$3,500
	11/6/24 – 8/15/25	282	\$14,100	\$14,100
2024 Year-end report	02/18/25 – 8/15/25	178	\$8,900	\$8,900
2020 7-day general	10/27/20 – 11/03/20	7	\$3,500	\$3,500
	11/04/20 – 10/13/25	1805	\$90,250	\$90,250
2020 year-end	2/16/21 – 10/13/25	1701	\$85,050	\$85,050
		Total	\$252,900	\$243,175

MITIGATION CRITERIA

When staff assesses penalties, the starting point for calculating those penalties is found in AS 15.13.390, which outlines applicable penalties for violations of Alaska’s campaign disclosure laws, and 2 AAC 50.855, which outlines the penalty assessment procedure and available reductions.

In this matter, 2 AAC 50.855 enables staff to reduce the maximum statutory assessment for Respondent’s incomplete 2024 30-day primary report to 50% of the maximum penalty because at the time the complaint was filed the incomplete report was the first alleged violation against Respondent.³⁶

Once the statutory assessment is calculated under 2 AAC 50.855, APOC staff looks to 2 AAC 50.865 to recommend to the Commission potential mitigation criteria that may apply for further reductions of the assessed penalty. A penalty reduction of more than 50% and up to a complete waiver is appropriate when the penalty is significantly greater or out

³⁶ 2 AAC 50.855(b)(3)(B).

of proportion to the degree of harm suffered by the public for not having the information.³⁷ A civil penalty is considered significantly out of proportion if it exceeds the value of the reported transactions or, in the case of a 7-day report, exceeds twice the value of the reported transactions.³⁸ Here, all but two of the assessed penalties exceed the values of transactions insufficiently reported, and the majority by great margin:

- The \$9,725 penalty for Respondent’s 2024 30-day primary report exceeds the value of the \$3,300 transaction
- The \$21,450 penalty for Respondent’s 2024 7-day primary report exceeds twice the value of the \$2,300 transaction
- The \$15,600 penalty for Respondent’s 2024 30-day general report exceeds the value of the \$11,668 in transactions
- The \$17,600 penalty for Respondent’s 2024 7-day general report *does not* exceed twice the value of the \$9,000 in transactions
- The \$8,900 penalty for Respondent’s 2024 year-end report *does not* exceed the value of the \$10,267 in transactions
- The \$93,750 penalty for Respondent’s 2020 7-day general report exceeds twice the value of the \$1,500 transaction
- The \$85,050 penalty for Respondent’s 2020 year-end report exceeds the value of the \$14,841.84 in transactions.

Unique circumstances may also justify reducing or waiving the penalty.³⁹ Here, APOC staff recommends waiving the \$178,800 in penalties associated with Respondent’s 2020 reports (for which the allegations barely made the 5-year statute of limitations⁴⁰), based upon Respondent’s generally good filing history, disproportionality, and unique

³⁷ 2 AAC 50.865(b)(5).

³⁸ 2 AAC 50.865(b)(5).

³⁹ 2 AAC 50.865(c).

⁴⁰ 15.13.380(b), Complaint 25-21-CD filed October 13, 2025 and Exhibit 1, “Additional Allegations” submitted October 24, 2025.

circumstances, consistent with its Order in *Alexander v. Hughes*, 25-19-CD.⁴¹ As in *Hughes*, “[t]he informational interest in reports filed five years ago is low, and the mistakes were incompleteness, not a failure to report the correct amount or to report an expense all together.”⁴²

Considering all of the above noted factors, for the penalties associated with Respondent’s 2024 reporting APOC staff recommends a 98% reduction of the \$73,275 total penalty resulting from Respondent’s incomplete 30-day primary, 7-day primary, 30-day general, 7-day general, and year-end reports to \$1,465.50.⁴³ The total penalty is appropriate and commensurate with penalties assessed in similar matters heard by the Commission.⁴⁴

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
David S. Wilson 3001 E. Danny’s Ave. Wasilla, AK 99654 Dw22@rocketmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Jerad McClure 2521 E. Mountain Village Dr. Ste B, PMB 600 Jeradmclure@outlook.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

Cari Rousselle

05/08/2026

Signature

Date

⁴¹ [Alexander v. Hughes, 25-19-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27394),

<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27394>, pp. 2-3.

⁴² *Id.*

⁴³ 2 AAC 50.865(b)(5) and (6).

⁴⁴ *See, e.g.*, [Alexander v. Costello 25-14-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27391),

<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27391>; [Alexander v. Giessel, 25-15-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27397),

<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27397>.

ARRIVED

10/24/2025

APOC - ANCH
PM HC FAX **ELE**

TO: Alaska Public Offices Commission
DATE: Friday, October 24, 2025
FROM: Jerad McClure, Wasilla Alaska
SUBJECT: Complaint, 25-21, *McClure v. David Wilson – Additional Findings*

ADDITIONAL FINDINGS

Upon review of Mr. Wilson's 2020 Year End Disclosure, I see that he has several more expenditures that appear to violate AS 15.13.040 and 2 AAC 50.321 in similar ways that the expenditure identified in 25-21-CD has.

Please add these findings to 25-21-CD or respond so that I can file a new complaint with these items.

Respectfully submitted Friday, October 24, 2025

Jerad McClure
Wasilla Alaska

ATTACHMENTS

1. David Wilson 2020 APOC Report
 - a. 2020 Year End Disclosure Report

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **02/16/2021**
 Filer First Name: **DAVID**
 Filer Middle Name: **S**
 Filer Last Name: **WILSON**
 Filer's Title: **David Wilson**
 Report Type: **Year End Report**

CANDIDATE INFORMATION

Candidate Name: **David S. Wilson**
 Candidate Address: **3001 E. Danny's Ave**
 City, State Zip: **Wasilla, Alaska 99654**

REPORT INFORMATION

Election Year: **2020**
 Election: **State General Election**
 Report Type: **Year End Report**
 Reporting Period: From **10/25/2020** Through **02/01/2021**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$16,911.98				
[+] ↓		Previous Campaign Income: (From Box A of previous report)		Campaign Income Total: (Box A)	
Total Income Reported:	\$2,750.00	[+] ⇒	\$46,283.82	[=] ⇒	\$49,033.82
[-] ↓		Previous Campaign Expenses: (From Box B of previous report)		Campaign Expense Total: (Box B)	
Total Expenditures Reported:	\$19,661.98	[+] ⇒	\$34,380.49	[=] ⇒	\$54,042.47
[=] ↓					
Closing Cash On Hand:	\$0.00				
[-] ↓					
Total Debts:	\$0.00				
[=] ↓					
Surplus/Deficit:	\$0.00				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
10/27/2020	Check 1730	Alaska Realtors PAC 4206 Minnesota Dr Anchorage, Alaska 99503	Occupation: N/A Employer: N/A	\$1,000.00
10/27/2020	Credit Card	Cohen, Carlee 1605 Boscobel Street Nashville, Tennessee 37206	Occupation: Owner Employer: Breathe, Release, Repeat, Inc	\$500.00
10/29/2020	Check 14653	Alaska Republican Party Inc PO Box 201049 Anchoarge, Alaska 99520	Occupation: N/A Employer: N/A	\$300.00
10/30/2020	Check 5919	Alstrom, Ragnar PO Box 112 Alakanuk, Alaska 99554	Occupation: CEO Employer: Kwipak Fisheries	\$50.00
10/31/2020	Credit Card	Holmes, Doyle PO BOX 9 Willow, Alaska 99688	Occupation: Business Owner Employer: Self	\$500.00
11/27/2020	Check 2057	Committee for the Advancement of Rural Energy 703 W. Tudor Rd Anchoarge, Alaska 99503	Occupation: N/A Employer: N/A	\$200.00
01/08/2021	Check 6700	Murphy, Richard 1108 Chalk Bluff Rd Uvalde, Texas 78801	Occupation: Captain Employer: Alaska Marine Pilots, LLC	\$200.00
			Income Total:	\$2,750.00

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
10/26/2020	Check 125	Ad Gorilla PO Box 271010 Littleton, Colorado 80127	Digital Advertising	\$1,500.00
10/27/2020	Bank Fee	PayPal, Inc. 2211 N. First St. San Jose, California 95131	Transaction Fee	\$14.80
10/31/2020	Debit Card	Lowe's 2561 East Sun Mountain Ave Wasilla, Alaska 99654	Heater for Trunk or Treat events	\$183.48

Date	Payment Method	Vendor	Purpose	Amount
10/31/2020	Bank Fee	PayPal, Inc. 2211 N. First St. San Jose, California 95131	Transaction Fee	\$14.80
10/31/2020	Debit Card	Three Bears Shell 14468 W. Hollywood Rd. Big Lake, Alaska 99652	Fuel for Campaign	\$66.20
11/02/2020	Credit Card	Best Buy 1200 N. Muldoon Rd Anchorage, Alaska 99504	Campaign computer, protection plan, and screen protector	\$2,659.93
11/02/2020	Credit Card	Computer Renaissance 1830 E. Park Hwy Suite A-113 Wasilla, Alaska 99654	Computer cables for display	\$97.34
11/02/2020	Credit Card	Facebook 1 Facebook Way Menlo Park, Alaska 94025	Facebook Ad	\$233.61
11/13/2020	Credit Card	Best Buy 1200 N. Muldoon Rd Anchorage, Alaska 99504	Software-Office home and business	\$262.00
11/13/2020	Credit Card	Holiday Stationstore 225 N. Boundary St. Wasilla, Alaska 99654	Fuel for Campaign	\$40.80
11/16/2020	Check 126	Ad Gorilla PO Box 271010 Littleton, Colorado 80127	Digital Advertising	\$1,000.00
11/17/2020	Electronic Funds Transfer	Dubay Business Services 7490 Coon Club Rd Medina, Ohio 44256	Printing Services & Mailers	\$12,341.84
11/17/2020	Bank Fee	Wells Fargo 1701 E. Parks Hwy Wasilla, Alaska 99654	WIRE TRANS SVC CHARGE	\$30.00

Date	Payment Method	Vendor	Purpose	Amount
11/20/2020	Credit Card	Best Buy 1200 N. Muldoon Rd Anchorage, Alaska 99504	Docking station and keyboard	\$319.77
12/01/2020	Credit Card	Facebook 1 Facebook Way Menlo Park, California 94025	Facebook Ads	\$55.47
02/16/2021	Future Campaign Account	Friends of David Wilson 3001 E. Danny's Ave Wasilla, Alaska 99654	Future Campaign Account	\$841.94
			Expenditure Total:	\$19,661.98

DEBTS

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

Date	Payment Method	Vendor	Purpose	Amount
10/12/2020	Credit Card	Costco 4125 DeBarr Rd Anchorage, Alaska 99508	Candy for Trunk or Treat events	\$1,000
10/13/2020	Debit Card	Three Bears Shell 14468 W. Hollywood Rd. Big Lake, Alaska 99652	Fuel for Campaign	\$1,000
10/15/2020	Check 125	Ad Gorilla, LLC 10789 Bradford Rd, Ste 250 Littleton, Colorado 80127	Digital Ads	\$1,500
10/20/2020	Credit Card	Frontiersman 5751 E. Mayflower Ct. Wasilla, Alaska 99654	Ad for the Frontiersman newspaper	\$600
10/21/2020	Credit Card	Three Bears Shell 445 N Pittman Road Wasilla, Alaska 99623	Fuel for Campaign	\$1,000
10/21/2020	Credit Card	Wasilla Area Seniors, Inc, David 1301 S. Century Cir Wasilla, Alaska 99654	Sponsorship for meals	\$700
10/23/2020	Debit Card	Lowe's 2561 East Sun Mountain ave Wasilla, Alaska 99654	Supplies for social distancing candy delivery system for trunk or treats events	\$1,000
10/24/2020	Credit Card	Alaska Industrial Hardware, Inc 751 W. Commercial Drive Wasilla, Alaska 99654	Heater for trunk or treat events	\$1,000
Expenditure Total:				\$5,000

Comments 2

Add a suggestion

Page 20 2

Pat Martin
Oct 11
Highlighted Text
Reply

Pat Martin
Oct 11
Rectangle
Reply



THE STATE
of ALASKA
GOVERNOR BILL WALKER

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

April 15, 2016

Via U.S. Mail and Email

David Wilson
3001 E Danny's Avenue
Wasilla, AK 99654
dw22@rocketmail.com

Re: Year Start Campaign Disclosure Report Audit

Dear Mr. Wilson,

Thank you for timely filing your Year Start Campaign Disclosure Report for the 2016 State Primary Election. The Alaska Public Offices Commission's mission is to encourage the public's confidence in their elected and appointed officials by administering Alaska's disclosure statutes and publishing financial information regarding the activities of election campaigns, public officials, lobbyists, and lobbyist employers. To comply with this statutory mandate, APOC performs periodic audits to ensure compliance with our laws.


Your Year Start Report has been audited for compliance with AS 15.13, Alaska's Campaign Disclosure law. Based on the information you provided, staff noted a few issues that you may wish to address.

First, your report discloses a contribution from what appears to be a husband and wife.¹ Due to statutory limits and prohibitions that apply to contributions, the contribution must be attributed to an individual.² If they have both signed the check, or otherwise authorized the contribution in writing, then it is appropriate to assign and disclose an amount from each individual.³

Additionally, you have reported several expenditures which lack sufficient detail.⁴ Although it is not necessary to detail each single item that was purchased, the purpose should provide the public with an understanding of what the expense was for and how it relates to your campaign.

We appreciate your assistance in providing this information to the public. If you have any questions, please do not hesitate to contact us.

ALASKA PUBLIC OFFICES COMMISSION


Heather R. Hebdon
Campaign Disclosure Coordinator

cc: Candidate File

¹ See 1/21/16 Lahey contribution.

² AS 15.13.070(b).

³ 2 AAC 50.258(a)(6).

⁴ See Milne and Dubay Business Services expenditures noting "campaign services" as the purpose.