

[10]

Complaint 25-06-CD

***Recall Carrington v. No Recall for
Palmer Mayor Steve***

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Recall Steve Carrington,)	
)	
Complainant,)	
)	
vs.)	Case No. 25-06-CD
)	
No Recall for Palmer Mayor Steve,)	
)	
Respondent.)	
)	

AMENDED NOTICE OF HEARING AND PROCEDURAL ORDER¹

A hearing in this case will take place before the Alaska Public Offices Commission at approximately 1:15 p.m. on Wednesday, June 25, 2025.

The Commissioners will be present in-person, by telephone, or via Microsoft Teams and will receive evidence regarding this matter. You may be present at the hearing either by telephone (1-907-202-7104, Access Code: 233 147 607#), in-person (2221 E. Northern Lights Blvd, Ste 128, Anchorage, Alaska), or via [Microsoft Teams Meeting](#).² 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 June 18, 2025, so that a special accommodation can be made.

PREHEARING AND HEARING PROCEDURES

- 1) Parties.** The parties in this case are Commission Staff and Respondent.
- 2) Issues.** At the hearing, the Commission will consider whether Respondent's signs opposing the recall election of the city of Palmer's Mayor were "communications" that were required to be identified and if so, whether the signs' paid-for-by identifiers were accurate.
- 3) Procedural history.** On May 1, 2025, complainant Jacquelyn Goforth, chairperson of Recall Steve Carrington, a ballot proposition group formed to sponsor the recall of Steve Carrington, filed an expedited Complaint against No Recall for Palmer Mayor Steve, a group formed to

¹ The Procedural Order issued on June 10, 2025, noted an incorrect date of hearing - this notice corrects that mistake. Hearing for this matter will take place on June 25, 2025.

² Meeting ID: 217 752 983 222 7, Passcode: qD2Eb9rH

oppose the recall. The complaint was initially rejected by APOC staff due to insufficient service and was re-filed on May 16, 2025. The Commission held a hearing on May 20, 2025; denied expedited consideration of the merits; and remanded to staff for investigation. Staff's investigation report recommending the complaint be upheld was issued on June 11, 2025.

- 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 June 18, 2025, a party:
 - a) may file a list of witnesses expected to testify at the hearing;
 - b) may file copies of exhibits to be presented at the hearing that are marked and identified (for example, Resp.'s Ex. A);
 - c) may file a prehearing memorandum;
 - d) may file prehearing motions, including motions to dismiss, for summary judgment, or to exclude evidence, and
 - e) shall serve all parties and the Complainant with filings submitted.
- 7) Response to motions and requests for subpoenas.** No later than June 25, 2025, a party
 - a) may respond to a motion; and
 - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing, and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

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

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

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

Dated: June 12, 2025



Heather Hebdon, Executive Director
Alaska Public Offices Commission

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Recall Steve Carrington Attn: Jacquelyn Goforth PO Box 2768 Palmer, AK 99645 Jivie_58@hotmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
No Recall for Palmer Mayor Steve Attn: Steven J. Carrington PO Box 3333 Palmer, AK 99645 Steve.carrington47@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

Signature

Date



TO: APOC Commissioners
DATE: June 11_, 2025
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report, Complaint 25-06-CD, *Goforth/Recall Steve Carrington v. Carrington, No Recall for Palmer Mayor Steve.com*

SUMMARY OF COMPLAINT AND RESPONSE

Complainant Jacquelyn Goforth/Recall Steve Carrington (Goforth) alleges respondent Steven Carrington/No Recall for Palmer Mayor Steve.com (Carrington) failed to include proper “paid for by” identifiers on his group’s signs in the 2025 City of Palmer Special Election in violation of AS 15.13.090(a)(2)(C). Carrington did not file a written response to the complaint.

FACTS

Complainant Goforth is chairperson of Recall Steve Carrington, a ballot proposition group formed to support the recall of Palmer mayor Steve Carrington in the 2025 Palmer Special Election. Respondent Carrington is the chairperson of No Recall for Palmer Mayor Steve.com, formed to oppose the ballot proposition.

On May 1, 2025, Goforth filed an expedited complaint against Carrington alleging the group’s “Stop the Recall” signs did not contain the top three donors’ information as required by AS 15.13.090(a)(2)(C).¹ Goforth signed this complaint on April 28, 2025, and indicated she had served the respondent “(i)n person during city council meeting.” Because the complaint did not meet service requirements, APOC did not accept the complaint but informed both parties of its action.

¹ Exhibit 1, Rejected Expedited Complaint.

On May 16, 2025, APOC received Goforth’s second complaint, identical in form and substance to the first but properly served upon Carrington on May 13, 2025.² Goforth supported both complaints with a photo of a sign bearing a communication that stated: “Paid for by: NO Recall for Palmer MayorSteve.com Po box 3333, Palmer AK 99645.”

Earlier, on May 15, 2025, Carrington had contacted APOC staff concerning the lettering required for campaign signs. In an email, Carrington stated he had “received another expedited complaint” from Goforth and that he was “working to print stickers to add to signs now.”³ APOC staff explained to Carrington that AS 15.30.090 required communications to include the name and residence information of the top three contributors, separate from the text of the communication and of readable size.⁴

On May 21, 2025, the Commission held a hearing to consider Goforth’s request to expedite consideration of the complaint. At the hearing – which coincidentally fell on election day – Goforth testified that Carrington’s signs, including those being waved that day by Carrington supporters, still did not list the top three donors.

Carrington testified that his signs were ordered in April when he was the only contributor, that he remained the primary contributor, and that he did have the top three contributors listed on his website. He also testified that the group’s total expenses included \$600 for 50 signs with less than \$1,000 spent for everything. Carrington testified that he’s unfamiliar with the specific APOC “paid for by” requirements relating to ballot propositions as he’s only run candidate campaigns.

Election day newspaper coverage included a May 20, 2025, photo that appeared to be the same one Goforth submitted in her earliest complaint in late April, showing a Stop the Recall campaign sign still lacking top three contributors.⁵ The recall effort lost by a

² Exhibit 2, Expedited Complaint.

³ Exhibit 3, Email between Carrington and APOC staff.

⁴ *Id.*

⁵ Exhibit 4, *Mat-Su Sentinel* coverage, May 21, 2025, last accessed May 28, 2025 at <https://www.matsusentinel.com/palmer-mayor-recall-too-close-to-call-as-final-ballots-await-count/>.

vote of 222 to 176, according to unofficial election results. On May 23, 2025, Carrington filed a Letter of Intent to run in the October 2025 mayoral race for the City of Palmer.⁶

After the hearing, the Commission denied expedited consideration and referred the complaint to staff for investigation under the normal timelines.⁷

LAW AND ANALYSIS

Alaska campaign disclosure law requires “all communications” to clearly identify the name and address of the person paying for the communication.⁸ Communications must also, for a person other than an individual or candidate, include the name and title of the person’s principal officer, a statement from the principal officer approving the communication, and identify its three largest contributors during the 12-month period before the date of the communication.⁹

Because Carrington’s signs did not have these identifiers, the dispositive question is whether they needed to. Or, more precisely, the key question is whether the signs are “communications.” The law defines “communication” broadly to include “an announcement or advertisement disseminated through print or broadcast media,” but excludes

those placed by an individual or nongroup entity and costing \$500 or less and those that do not directly or indirectly identify a candidate or proposition, as that term is defined in AS 15.13.065(c).¹⁰

Because Carrington’s signs were placed by a group and cost more than \$500 and the Commission has previously concluded that the subject of a recall election is not a “candidate,”¹¹ neither of the first two exclusions apply. That leaves the third—“those that

⁶ Exhibit 5, Letter of Intent, Steven Carrington.

⁷ Exhibit 6, Order Denying Expedited Consideration.

⁸ AS 15.13.090(a). Under AS 15.13, a “person” includes a group. *See* AS 15.13.400(16).

⁹ AS 15.30.090(a)(2)(C); 2 AAC 50.306(a).

¹⁰ AS 15.13.400(3).

¹¹ AS 15.13.400(1) (defining “candidate” as “an individual who files for election . . . for municipal office”); Memo to APOC members from the executive director re: “Is the subject of a recall election a candidate?” for *Barbara Lacher* Advisory Op. (Aug. 19, 1985) & *Lacher* Advisory Op. at 4 (Aug. 7, 1985), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=5584>.

do not directly or indirectly identify a . . . proposition, as that term is defined in AS 15.13.065(c).”

Alaska Statute 15.13.065(c) says that

[I]n addition to its meaning in AS 15.80.010, ‘proposition’ includes

(1) an issue placed on a ballot to determine whether

- (A) a constitutional convention shall be called;
- (B) a debt shall be contracted;
- (C) an advisory question shall be approved or rejected; or
- (D) a municipality shall be incorporated;

(2) an initiative proposal application filed with the lieutenant governor under AS 15.45.020.

Neither of the definitions in AS 15.13.065(c)(1) or (2) covers recall elections. So that leaves the definition of “proposition” in AS 15.80.010. That statute includes initiatives and referendums within its definition of a proposition: “In this title, unless the context otherwise requires, . . . “proposition” means an initiative, referendum, or constitutional amendment submitted at an election to the public for vote.”¹² As neither Alaska election or campaign finance disclosure law specifically defines “initiative” or “referendum,” the question then becomes whether a recall vote must fall outside either of those terms.¹³

Considering relevant legal sources and the legislative history of Alaska’s campaign disclosure law, staff believes the ambiguity should be resolved in favor of concluding that a recall vote is a “proposition” for purposes of AS 15.80.010. And because Carrington’s signs identified a proposition (i.e., the recall), his signs are “communications” required by AS 15.13.090(a) to have “paid for by” identifiers.

A recall election has long been considered a type of referendum. Black’s Law Dictionary defines a “recall election” as “[a]n election in which voters decide whether to remove an elected official from office before the term ends,” and notes that the phrase is

¹² AS 15.80.010(31).

¹³ See also, Palmer Municipal Code 18.05.010. [Ch. 18.05 General Provisions | Palmer Municipal Code](#).

“[a]lso termed *recall referendum*.”¹⁴ Indeed, a referendum is “[t]he process of referring . . . an important public issue to the people for final approval by popular vote.”¹⁵ That is precisely what a recall election is doing. Indeed, the Palmer Municipal Code itself equates initiatives, referendums, and recalls under the term “proposition”: “‘Proposition’ means an initiative, referendum, **recall**, or other issue submitted to the public at an election.”¹⁶

Plus, construing recall elections to be propositions squares with the legislative and regulatory framework of AS 15.13. As a matter of general application, AS 15.13.010 broadly applies to “communications made for the purpose of influencing the outcome of a ballot proposition or question.”¹⁷ Whether to recall the mayor may be considered a “question” under this section such that 15.13 applies generally. But by the Commission’s own regulations, it is certainly a ballot proposition. Campaign disclosures regulations specifically identify a recall as falling within the umbra of a “ballot proposition”:

(1) “**ballot proposition**” includes a bonding proposition, ballot initiative, ballot referendum, **recall**, advisory vote, ballot question proposed by the legislature, ballot measure to amend the Alaska Constitution, and any other question, as defined in AS **15.80.010**, on the ballot in an election.¹⁸

To include recalls in the regulatory definition of “ballot proposition” while excluding them from the statutory definition of “proposition” in AS 15.13.065(c) would be internally inconsistent.¹⁹

Finally, legislative history of AS 15.13.090 and its interplay with AS 15.13.400(3)’s definition of “communication” shed some light on the legislature’s

¹⁴ *Election*, Black’s Law Dictionary (12th ed. 2024).

¹⁵ *Referendum*, Black’s Law Dictionary (12th ed. 2024).

¹⁶ Palmer Mun. Code § 18.05.010 (emphasis added).

¹⁷ AS 15.13.010(b) (emphasis added). Campaign disclosure statutes do not define “question.” AS 15.80.010(33) defines “question” as “an issue placed on the ballot to determine whether a judge or justice shall be accepted or rejected, whether a constitutional convention shall be called, whether a state debt shall be contracted, or whether a state official shall be recalled.” The recall efforts at issue here involved a municipal election.

¹⁸ 2 AAC 50.405(1)

¹⁹ See *Rydwell v. Anchorage Sch. Dist.*, 864 P.2d 526, 528 (Alaska 1993) (stating that statutory construction should give “due consideration for the meaning that the language of the statute conveys to others,” and when possible, aim “to create a harmonious whole”).

intent in including the phrase “or proposition, as that term is defined in AS 15.13.065(c).”

Until 2002, AS 15.13.090 read:

“(a) All advertisements, billboards, handbills, paid-for television and radio announcements, and other communications intended to influence the election of a candidate or outcome of a ballot proposition or question shall be clearly identified by the words “paid for by” followed by the name and address of the candidate, group, or individual paying for the advertising.”

Two bills ([SB363](#) and HB531) in the 2002 legislative session would have revised .090 in an attempt to draw a line between issue advocacy (unregulated “soft money”)²⁰ and express advocacy (regulated). Ultimately, the legislature passed a version of .090 that removed the “advertisements, billboards, handbills, paid-for television and radio announcements, and other” language, keeping only the term “communications,” and also removed the “intended to influence the election of a candidate or outcome of ballot proposition or question” language. In the earlier versions of SB363 (and HB531) the definition of “communication” did not include the phrase “or proposition, as that term is defined in AS 15.13.065(c).” However, on May 8, 2002, an amendment was adopted on the Senate floor; the bill passed the Senate and went to the House on that same day, where the same amendment was proposed to HB531. The discussion on the change was brief:

JOE BALASH, Staff
to Senator Gene Therriault
Alaska State Legislature
Capitol Building, Room
Juneau, Alaska 99801
POSITION STATEMENT: Presented [HB 531](#)

BROOKE MILES, Executive Director
Alaska Public Offices Commission
2221 East Northern Lights, Room 128
Anchorage, Alaska 99508
POSITION STATEMENT: Testified on [HB 531](#)

²⁰ [Intro discussion of HB531.](#)

REPRESENTATIVE CRAWFORD made a motion to adopt Amendment 2, which read: Page 4, line 17, following “candidate”: Insert “or proposition, as that term is defined in AS 15.13.065(c)”

CHAIR COGHILL objected.

REPRESENTATIVE FATE asked what inserting “proposition” does to the intent of the bill.

MS. MILES answered that current law requires all political communication with respect to candidates or ballot propositions to be reported. With the change in language from “advertisement” to “communication”, the specification of ballot proposition being included was left off. **Amendment 2, as proposed, would make sure that communications intended to influence the outcome of a ballot question are included and subject to the law.**

MR. BALASH noted that there may be a similar amendment to this on the Senate floor [to SB 363, the bill similar to HB 531].

The objection was removed. There being no further objection, Amendment 2 was adopted.²¹

While the above history does not directly answer whether the legislature intended to exclude recall efforts from the requirements of “communications” under .400(3), APOC’s Executive Director testimony indicated a more inclusive rather than limiting intent of the term proposition, equating it to “a ballot question” with its purpose being to “to ensure communications intended to influence the outcome of a ballot question are included and subject to the law.” The Executive Director’s use of the term “ballot question” indicates the intention was for a more expansive, not limited, approach to the term “proposition.”

The expansive language of AS 15.13.090 requires “paid for by” disclaimers on “[a]ll communications.” While AS 15.13.400(3)’s definition of “communication” excludes those that do not identify a proposition, APOC finds the City of Palmer’s recall efforts to fall under a broad interpretation of “proposition,” supported by 2 AAC

²¹ [5/8/2002 HSTA minutes](#)

50.405(1), AS 15.13.065(c), AS 15.80.010(31), the City of Palmer Municipal Code, and the legislative history of the communications statute. An interpretation that 15.80.010(31)’s definition of proposition **must exclude any recall effort** – where “recall,” “initiative,” and “referendum” all are otherwise undefined in election and campaign disclosure law, and where Title 15 regulations specifically include recall within the definition of ballot proposition²² – would be inconsistent with the bedrock purpose of APOC’s statutory and regulatory framework: to provide information to the public for an informed electorate and to make campaign finance information *available to voters*. Any other reading would place recall elections outside the mandates of election disclosure statutes intended to make voters aware of the financing behind election communications.

Having found that the City of Palmer recall efforts fall under Alaska campaign disclosure laws requiring communications to bear a “paid for by” message, APOC staff finds Respondent Carrington / No Recall for Palmer Mayor Steve.com violated AS 15.13.090. All evidence supports – and Carrington did not deny – that the group’s signs did not include the required “paid for by” statements listing the three largest contributors.

MAXIMUM CIVIL PENALTIES

The maximum civil penalty for a violation of AS 15.13.090 is \$50 per day for each day the violation continued.²³ The precise date of the initial communication on the non-conforming sign is not known, but it’s fair to go back at least to the date of Goforth’s original complaint with its supporting evidence of the non-conforming sign – April 22, 2025. No evidence suggests Carrington ever abated the violation, despite his clear and continued awareness of it and his knowledge (provided directly to him by APOC) of what campaign disclosure laws required in the “paid for by” message. The time elapsed from the first documented communication through the May 20, 2025, election was 29 days, resulting in a maximum civil penalty of **\$1,450**.

²² 2 AAC 50.405(1).

²³ AS 15.13.090(a)(1); 2 AAC 50.855(b)(5).

MITIGATION AND RECOMMENDATION

When staff assesses a penalty, the starting point for calculating it is 2 AAC 50.855. Here, staff reduces the penalty by 50% pursuant to subsection .855(b)(2)(C)(i) as the election cycle was the first election cycle for the group No Recall for Palmer MayorSteve.com.²⁴

A civil penalty also may be reduced by a percentage greater than 50% or waived entirely where “the civil penalty assessment is significantly out of proportion to the degree of harm to the public for not having the information.”²⁵ APOC staff does not reach this public harm analysis, however, as the mitigator cannot be applied where an aggravating factor exists under 2 AAC 50.865(d), including where a person required to file a statement has a poor reporting history, as indicated by “evidence suggesting deliberate non-reporting.”²⁶ Here, Carrington was put on notice that his signage did not comply with Alaska campaign disclosure laws when he was presented with Goforth’s original complaint detailing the violation at the Palmer City Council meeting on April 22, 2025.²⁷ Next, APOC copied Carrington with its letter to Goforth (rejecting the original complaint on service grounds) on May 2, which would have again alerted Carrington that his signs lacked a complete “paid for by” message. Once again on May 13, 2025, when Goforth’s complaint was officially served upon him, Carrington was reminded his signage did not bear required “paid for by” communications. On May 15, 2025, Carrington told APOC he intended to purchase stickers with the required communication to put on his signs – yet apparently still took no action. Also on May 15, 2025, the chairperson of No Recall called APOC and received further instruction on placing the top three contributors on the signs.²⁸ Yet on election day, according to testimony, Carrington supporters were waving signs still lacking proper “paid for by” messages in violation of Alaska campaign disclosure law.

²⁴ 2 AAC 50.855(b)(2)(C)(i) requiring reduction to 50% where “the election cycle is the person’s first election. “Person” under AS 15.13.400(16) includes a group.

²⁵ 2 AAC 50.865(b)(5).

²⁶ 2 AAC 50.865(d), 2 AAC 50.865(d)(2)(B).

²⁷ Goforth’s rejected complaint, noting she had provided Carrington with the complaint during a city council meeting, was signed April 28, 2025. The regularly scheduled, fourth Tuesday of the month meeting immediately prior to April 28, 2025 was April 22, 2025.

²⁸ Exhibit 7, Best phone note of May 15, 2025.

Nothing in the record indicates Carrington took any actual effort, ever, to correct the violation through election day despite being aware of the violation for over a month and having received several reminders of the problem. The evidence does not “suggest[] deliberate non-reporting” as much as it shouts deliberate non-reporting. Under these circumstances, APOC finds no further reduction in penalty to be warranted.

CONCLUSION

Staff finds that Carrington’s signs failed to identify the group’s top three contributors in violation of AS 15.13.090(a)(2)(C), staff recommends the maximum penalty of \$1,450 be reduced by 50% to **\$725** because it was the group’s first election cycle. Staff recommends no further reduction because the group failed to take any corrective action once aware that the signs were not in compliance.

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered as indicated to the following:	
Recall Steve Carrington Attn: Jacquelyn Goforth PO Box 2768 Palmer, AK 99645 Recallstevecarrington.com Jivie_58@hotmail.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
Certified tracking	
No Recall for PalmerMayorSteve.com PO Box 3333 Palmer, AK 99645 Steve.carrington47@gmail.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
certified tracking	

Signature

Date



Alaska Public Offices Commission

EXPEDITED COMPLAINT



EXPEDITED COMPLAINT REQUEST		ALL COMPLAINTS MUST INCLUDE:		APOC case name/number/date
<p>PRIOR to requesting expedited review, ensure your filing meets the factors required for expedited approval in AS 15.13.380(c). Those factors are whether the alleged violation:</p> <p><input checked="" type="checkbox"/> if not immediately restrained (stopped), could materially affect the outcome of an election or other impending event;</p> <p><input checked="" type="checkbox"/> could cause irreparable harm that penalties could not adequately remedy; and</p> <p><input checked="" type="checkbox"/> whether there is reasonable cause to believe that a violation has occurred or will occur</p> <p>Expedited review requires the <u>complainant</u> to prove the violation by a preponderance of the evidence.</p>		<ol style="list-style-type: none"> 1. Complainant's name + contact info 2. Respondent's name + contact info 3. Laws, regulations allegedly violated 4. Description of allegations 5. Basis of knowledge of alleged facts 6. Documentation to support allegations 7. Notarized signature of the complainant 8. Proof that complaint and all supporting documents were served on respondent 		<div style="border: 2px solid black; padding: 5px; margin: 10px;"> <p style="font-size: 1.2em; font-weight: bold;">ARRIVED</p> <p style="color: red; font-weight: bold;">MAY 01 2025</p> <p style="font-weight: bold;">APOC - ANCH PM HC FAX ELE</p> </div>
<p>APOC LAWS ALLEGEDLY VIOLATED Specify section of law or regulation</p>				
		<p>Campaign Disclosure Law <input checked="" type="checkbox"/> AS 15.13 <input type="checkbox"/> 2 AAC 50.250-405</p>	<p>Public Official Financial Disclosure <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799</p>	
		<p>Lobbying Regulation <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590</p>	<p>Legislative Financial Disclosure <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799</p>	
<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	<p>COMPLAINANT</p>	<p>RESPONDENT <small>Person or group allegedly violating law</small></p>		
	Recall Steve Carrington	<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group No Recall for PalmerMayorSteve.com		
Address City / Zip	PO Box 2768 Palmer AK 99645	PO Box 3333 Palmer AK 99645		
Phone/Fax	907-720-9254	Not listed		
E-mail	recallstevecarrington.com	info@mayorsteve.com		
COMPLAINANT'S REPRESENTATIVE		RESPONDENT'S REPRESENTATIVE		
<small>If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info</small>				
Name/Title	Jacquelyn I. Goforth	Steven J. Carrington		
Address	PO Box 90226 Anchorage AK 99509	PO Box 3333 Palmer AK 99645		
Phone/Fax	907-720-9254	907-841-7329		
E-mail	jivie_58@hotmail.com	steve.carrington47@gmail.com		
<p>DESCRIPTION or SUMMARY of ALLEGED VIOLATION</p> <p>Campaign signs are missing required information of top three donor listings per Alaska Statutes, Title 15, Elections § 15.13.090 (a)(2)(C) Identification of communication</p>		<p>Use extra pages if needed</p>	<p><input type="checkbox"/> SUPPORTING DOCUMENTS – DESCRIBE:</p> <p>Pictures of posted campaign signs with missing information.</p>	
<p>PROOF of SERVICE ATTACHED: <input type="checkbox"/> Fax – receipt confirmation <input checked="" type="checkbox"/> Certified mail – signed receipt <input type="checkbox"/> Process server – return of service <input type="checkbox"/> E-mail – delivery/read receipt <input checked="" type="checkbox"/> Other: In person during city council meeting</p>				
<p>COMPLAINANT'S SWORN STATEMENT: To the best of my knowledge and belief, these statements are true</p>				
Signature			Title	CHAIRPERSON
Subscribed and sworn to or affirmed by me at		on		
Signature			Title	Notary Public
<p>APOC COMPLAINTS, RESPONSES, INVESTIGATION REPORTS & COMMISSION ACTIONS ARE PUBLIC DOCUMENTS</p> <p style="font-size: 0.8em;">My Commission Expires May 29, 2025</p>				
APOC ANCHORAGE		APOC JUNEAU		APOC COMPLAINT PROCESS: 2 AAC 50.450 -476
2221 E. NORTHERN LIGHTS #128	240 MAIN STREET #500	FILING COMPLAINTS: 2AAC 50.870		ANSWERING COMPLAINTS: 2AAC 50.880
ANCHORAGE, AK 99508	P.O. BOX 110222	APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870		
907-276-4176 / FAX 907-276-7018	JUNEAU, AK 99811	INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891		





Alaska Public Offices Commission

EXPEDITED COMPLAINT



EXPEDITED COMPLAINT REQUEST PRIOR to requesting expedited review, ensure your filing meets the factors required for expedited approval in AS 15.13.380(c). Those factors are whether the alleged violation: <input checked="" type="checkbox"/> if not immediately restrained (stopped), could materially affect the outcome of an election or other impending event; <input checked="" type="checkbox"/> could cause irreparable harm that penalties could not adequately remedy; and <input checked="" type="checkbox"/> whether there is reasonable cause to believe that a violation has occurred or will occur Expedited review requires the complainant to prove the violation by a preponderance of the evidence.		ALL COMPLAINTS MUST INCLUDE: 1. Complainant's name + contact info 2. Respondent's name + contact info 3. Laws, regulations allegedly violated 4. Description of allegations 5. Basis of knowledge of alleged facts 6. Documentation to support allegations 7. Notarized signature of the complainant 8. Proof that complaint and all supporting documents were served on respondent APOC LAWS ALLEGEDLY VIOLATED <i>Specify section of law or regulation</i> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> Campaign Disclosure Law <input checked="" type="checkbox"/> AS 15.13 <input type="checkbox"/> 2 AAC 50.250-405 </td> <td style="width: 50%; vertical-align: top;"> Public Official Financial Disclosure <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799 </td> </tr> <tr> <td style="vertical-align: top;"> Lobbying Regulation <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590 </td> <td style="vertical-align: top;"> Legislative Financial Disclosure <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799 </td> </tr> </table>		Campaign Disclosure Law <input checked="" type="checkbox"/> AS 15.13 <input type="checkbox"/> 2 AAC 50.250-405	Public Official Financial Disclosure <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799	Lobbying Regulation <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590	Legislative Financial Disclosure <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799
Campaign Disclosure Law <input checked="" type="checkbox"/> AS 15.13 <input type="checkbox"/> 2 AAC 50.250-405	Public Official Financial Disclosure <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799						
Lobbying Regulation <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590	Legislative Financial Disclosure <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799						

ARRIVED
 MAY 16 2025
 W APOC - ANCH
 PM HC FAX ELE
 25-06-CD

<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	COMPLAINANT Recall Steve Carrington	<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	RESPONDENT <i>Person or group allegedly violating law</i> No Recall for PalmerMayorSteve.com
Address	PO Box 2768	Address	PO Box 3333
City / Zip	Palmer AK 99645	City / Zip	Palmer AK 99645
Phone/Fax	907-720-9254	Phone/Fax	Not listed
E-mail	recallstevecarrington.com	E-mail	info@mayorsteve.com

COMPLAINANT'S REPRESENTATIVE <i>If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info</i>	RESPONDENT'S REPRESENTATIVE <i>If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info</i>
Name/Title	Jacquelyn I. Goforth
Address	PO Box 90226 Anchorage AK 99509
Phone/Fax	907-720-9254
E-mail	jivie_58@hotmail.com

DESCRIPTION or SUMMARY of ALLEGED VIOLATION Campaign website and signs are missing required wording/ information of top three donor listings per Alaska Statute Title 15, Elections § 15.13.090 (a)(2)(C) Identification of communication <div style="border: 1px solid black; padding: 2px; margin-top: 5px;"> Use extra pages if needed </div>	<input type="checkbox"/> SUPPORTING DOCUMENTS – DESCRIBE: Pictures of posted campaign signs with missing information. <div style="border: 1px solid black; height: 100px; margin-top: 5px;"></div>
--	---

PROOF of SERVICE ATTACHED: ☐ Fax – receipt confirmation ☐ Certified mail – signed receipt
☒ Process server – return of service ☐ E-mail – delivery/read receipt Other:

COMPLAINANT'S SWORN STATEMENT: To the best of my knowledge and belief, these statements are true

Signature <i>[Signature]</i>	Title CHAIRPERSON	Date 5/7/2025
Subscribed and sworn to/affirmed by me at Palmer, Alaska on May 7, 2025		

Signature <i>[Signature]</i>	KIMBERLY N. ELLER Notary Public	Title Notary
------------------------------	------------------------------------	---------------------

APOC COMPLAINTS, RESPONSES, INVESTIGATION REPORTS & COMMISSION ACTIONS ARE PUBLIC DOCUMENTS
 My Commission Expires Apr 25, 2027

APOC ANCHORAGE
 2221 E. NORTHERN LIGHTS #128
 ANCHORAGE, AK 99508
 907-276-4176 / FAX 907-276-7018

APOC JUNEAU
 240 MAIN STREET #500
 P.O. BOX 110222
 JUNEAU, AK 99811

APOC COMPLAINT PROCESS: 2 AAC 50.450 -476
 FILING COMPLAINTS: 2AAC 50.870 ANSWERING COMPLAINTS: 2AAC 50.880
 APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870
 INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891



IN THE DISTRICT COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT PALMER

Recall Steve Carrington

-vs-

Steven J Carrington

RETURN OF SERVICE

Case No: APOC #

Alaska Court Services
821 N Street #104
Anchorage, Ak 99501
907-258-3211

269217

I certify that on Tuesday, May 13, 2025 at 5:50 pm I served the following documents:

APOC Expedited Complaint with Exhibit

for service upon Steven J Carrington

at 231 W Evergreen Ave in Palmer, Alaska.

By leaving a true and correct copy with Steven J Carrington

SUBSCRIBED AND SWORN to me on May 14, 2025

Client: Jacquelyn Goforth
PO Box 90226
Anchorage, AK 99509

Attention:

File No:

Service Fee: \$65.00 Per Rule 11 (A1ii)

Mileage: \$20.00 Per Rule 11 (A7)

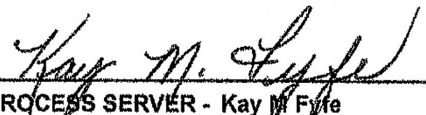
Endeavor:

Endeavor:

Endeavor:

Endeavor:

Total: \$85.00


PROCESS SERVER - Kay M Fyfe

Notary Public in and for the State of Alaska
My commission Expires: 7-5-2028





Whitlock, John G (DOA)

To: Steve Carrington

Cc: Hebdon, Heather R (DOA); Stone, Kim S (DOA)



Thu 5/15/2025 10:15 AM

Hello Mr. Carrington,

The express language in AS 15.13.090 provides that a printed communication is clearly identified by placing the words "paid for by" followed by the name and address of the person paying for the communication and the top three contributors (person's name and name of city and state of residence or principal place of business) in a manner that is easily discernible. The statute is silent in respect to specific size and placement of the identifier. The regulation requires that the statement be visible, separate from the text of the communication and of sufficient size to be read.

I consulted the staff report in [14-13-CD](#) for this response.

We have yet to receive this complaint from Ms. Goforth. Once received, we will keep you posted on if this complaint is accepted by the Alaska Public Offices Commission.

Cordially,

John Grover Whitlock
Paralegal
Alaska Public Offices Commission

From: Steve Carrington <steve.carrington47@gmail.com>

Sent: Thursday, May 15, 2025 6:30 AM

To: Whitlock, John G (DOA) <john.whitlock@alaska.gov>

Cc: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>; Stone, Kim S (DOA) <kim.stone@alaska.gov>

Subject: Re: APOC Group 2025 City of Palmer Special Election - Seven Day Campaign Disclosure Report - Due Tuesday, May 13, 2025.

CAUTION: This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thank you for the clear notice and description (including location) for reporting 9_day reports. I am not anticipating any issues as I have not received \$250 or more from anyone thus far.

Question: I received another expedited complaint request copy from Jackie GoForth. I am working to print **stickers** to add to signs now. Are there any requirements or recommendations for letting size for an 18-inch by 24-inch sign?


Respectfully,

Steve Carrington


Mat-Su Sentinel, May 21, 2025



Campaign signs posted in Palmer on May 20, 2025, ask residents to vote "no" in a recall election for Palmer Mayor Steve Carrington. The signs are also the subject of an Alaska Public Offices Commission complaint because they do not list the top three contributors of the ballot group that purchased them. (Amy Bushatz/Mat-Su Sentinel)

 State of Alaska

myAlaskaMy GovernmentResidentBusiness in AlaskaVisiting AlaskaState Employees

 APOC Forms Admin

Welcome ksstone! [[Log Off](#)]

HOMEGENERALELECTIONSCANDIDATESGROUPSENTITIESPOFDFILINGSLOBBYINGPAPERHELP LINKS

State of Alaska > Department of Administration > APOC > Admin Home > Candidate View

PrintPrint

LETTER OF INTENT

COMPLETED

Submission Date: 05/23/2025
Filer First Name: STEVEN
Filer Middle Name: J
Filer Last Name: CARRINGTON
Election: 2025 - Palmer, City of
Office Type: Mayor

CANDIDATE INFORMATION

Report Year: 2025
Election Year: 2025
Candidate Display Name: Steve Carrington
Candidate Legal First Name: Steven
Candidate Legal Last Name: Carrington

Campaign Mailing Address: PO Box 3333
City, State Zip: Palmer, Alaska 99645
Phone: 9078417329
Email: info@mayorsteve.com
Fax (Optional): Did Not Report

PrintPrint

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Recall Steve Carrington,)
)
Complainant,)
)
v.)
)
No Recall for Palmer Mayor Steve,)
)
Respondent.)
_____)

APOC Case No. **25-06-CD**



ORDER DENYING EXPEDITED CONSIDERATION

On May 16, 2025, Recall Steve Carrington filed a complaint against the group opposed to the recall of the Palmer mayor alleging that the group had incomplete paid-for-by disclaimers on its campaign website and yard signs.¹ The recall campaign asked the Alaska Public Offices Commission to expedite the complaint.² On May 20, which was within the two-day window required by statute and the same day as the election, the Commission held a hearing.³ The Commission denied the request on the record and referred the complaint to staff for consideration on a regular basis.⁴ To explain the denial and referral, we issue this written order.

When deciding whether to expedite a complaint, the Commission considers “whether the alleged violation, if not immediately restrained, could materially affect the outcome of an election or other impending event; whether the alleged violation could

¹ AS 15.13.090(a).

² AS 15.13.380(c); 2 AAC 50.888(a).

³ AS 15.13.380(c); 2 AAC 50.888(b)–(c).

⁴ AS 15.13.380(c), (e); 2 AAC 50.888(d).

cause irreparable harm that penalties could not adequately remedy; and whether there is reasonable cause to believe that a violation has occurred or will occur.”⁵ The party requesting expedited consideration has the burden to prove the necessity for quick action.⁶ The complaint at issue does not meet the standards.

At the hearing, Jacquelyn Goforth, the chairperson for the recall campaign, acknowledged that with the polls closing hours after the hearing, expediting the complaint “would probably make zero difference” to the election. Ms. Goforth testified that she had noticed the inaccurate signs in late April but that she had difficulty serving the mayor with the complaint, which resulted in delays getting it properly filed. Nevertheless, she urged the Commission to hold the opposition campaign accountable. She described that the noncompliant signs were posted in various locations around Palmer and provided a photograph of one. The sign read in part “Paid for by: NO Recall for Palmer MayorSteve.com [P.O.] box 3333, Palmer AK 99645,” and included no identification of the opposition campaign’s top three donors.⁷

Palmer Mayor Steve Carrington, the subject of the recall, testified about the service attempts and the yard signs. He explained that he had not understood that Ms. Goforth was trying to serve an APOC complaint when she described it during public comment at a Palmer council meeting and that he did not receive the complaint via

⁵ AS 15.13.380(c).

⁶ 2 AAC 50.888(c).

⁷ AS 15.13.090(a).

certified mail because the post office was closed when he tried to pick it up. Mayor Carrington testified that he was eventually served before another council meeting. On the merits, he admitted that the recall opposition signs did not include identification of the top three donors. Mayor Carrington explained that when he bought the signs in April, he was the only donor and that he was still among the top three donors. He stated that the opposition campaign's website had an accurate and complete disclaimer.

Upon consideration of this testimony and argument, we deny expedited consideration due to insufficient grounds. First, even if there was a violation, we conclude that an emergency order would not have come in time to remedy any impact the incomplete disclaimers may have had on the election.⁸ As Ms. Goforth candidly acknowledged, we lacked sufficient time to conduct a hearing on the merits and if a violation was found, issue an order requiring changes to the signs before the polls closed.

Second, this decision not to expedite does not shield the recall opposition campaign from a civil penalty if any violation occurred. A civil penalty commensurate to the circumstances, including the length of any violation, will provide a remedy.⁹

Third, we lack "reasonable cause to believe that a violation has occurred."¹⁰

⁸ AS 15.13.380(c) (stating relevant factors for granting expedited consideration, including "whether the alleged violation, if not immediately restrained, could materially affect the outcome of an election or other impending event").

⁹ AS 15.13.390(a)(4) (providing that a civil penalty accrues each day a violation continues); *see* AS 15.13.380(c) (stating that "irreparable harm that penalties could not adequately remedy" is another basis for granting expedited consideration).

¹⁰ AS 15.13.380(c).

Alaska Statute 15.13.090(a) may not require disclaimers because advocacy related to a recall election appears to fall outside the definition of “communication.” A “communication” is “an announcement or advertisement disseminated through print or broadcast media . . . excluding . . . those that do not directly or indirectly identify a candidate or proposition, as that term is defined in AS 15.13.065(c).”¹¹ Here, the mayor is the subject of a recall election, not a candidate, so the signs do not identify a candidate.¹² And whether the recall is a “proposition,” as defined in AS 15.13.065(c), is unclear. Recall elections do not appear to fit within the types of ballot questions in AS 15.13.065(c) or in the definition of “proposition” in the Alaska Election Code,¹³ which .065(c) incorporates by reference. Thus, based on what we understand at this point, we lack reasonable cause to believe a violation occurred.¹⁴

We refer the complaint to staff for investigation under the regular process.¹⁵ The issues raised by this complaint will benefit from that full process. Staff may want to

¹¹ AS 15.13.400(3).

¹² AS 15.13.400(1) (defining “candidate” as “an individual who files for election . . . for municipal office”); *Hickel/Coghill Recall Committee* Advisory Op. at 4 (adopted Mar. 17, 1992), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=5523>; Memo to APOC members from the executive director re: “Is the subject of a recall election a candidate?” for *Barbara Lacher* Advisory Op. (Aug. 19, 1985) & *Lacher* Advisory Op. at 4 (Aug. 7, 1985), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=5584>.

¹³ AS 15.80.010. *See* AS 15.45 (prescribing the procedures for initiatives, referendums, and recalls in separate articles, rather than considering recalls a type of initiative or referendum); AS 15.80.010(33) (defining “question” as distinct from “proposition” and as including whether to recall a state official).

¹⁴ AS 15.13.380(c).

¹⁵ AS 15.13.380(c), (e); 2 AAC 50.888(d).

consider whether a prior advisory opinion, relevant legislative history, or a deeper look at the types of questions that fit the definition of “proposition” helps resolve whether AS 15.13.090(a) applies to recall election advocacy. We will consider the complaint and staff’s investigation report at a later date.

This is not a final order for the purposes of an appeal to superior court because the Commission has not yet decided the merits of the complaint.

Dated: May 21, 2025.

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION¹⁶

Certificate of Service: I hereby certify that on this date, I served, by certified mail, US mail, and email a true and correct copy of the foregoing in this proceeding on the following:	
Recall Steve Carrington Attn: Jacquelyn Goforth PO Box 2768 Palmer, AK 99645 Recallstevecarrington.com Jivie_58@hotmail.com No Recall for Palmer Mayor Steve Attn: Steven J. Carrington PO Box 3333 Palmer, AK 99645 Norecallforpalmermayorsteve.com Steve.carrington47@gmail.com	and by email to: Heather Hebdon Executive Director Alaska Public Offices Commission heather.hebdon@alaska.gov

Paralegal

Date

¹⁶ Commissioners Richard Stillie, Dan LaSota, Lanette Blodgett, and Eric Feige participated in this decision. The decision was made on a 4-0 vote.

Call from Richard Best



Whitlock, John G (DOA)

To Stone, Kim S (DOA)

Cc Hebdon, Heather R (DOA)

Reply

Reply All

Forward



Thu 5/15/2025 3:50 PM



20-06-CD.pdf
477 KB



Hello,

I received a call from Richard Best, chair of NO Recall for Palmer MayorSteve.com. He stated that the campaign was looking to get stickers made to update the paid for by identifier on the signs that were purchased to oppose the recall. This is being done in response to Ms. Goforth's complaint. We got into a discussion regarding whose name should be on the paid for by identifiers as the top three contributors. I advised that if the stickers are being purchased today, that the top three need to be based on the top three contributors today (not back with the signs are purchased). I used 20-06-CD as my framework to provide this guidance.

Thanks,

John Grover Whitlock
Paralegal

Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, Alaska 99508