



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

PREPARED BY: John Grover Whitlock **DATE:** August 13, 2024

RESPONDENT: Interior Republicans

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

REASON FOR FILING: 2024 Fairbanks North Star Borough Special Election

LATE REPORT(S): • Campaign Disclosure Reports
 Thirty Day Campaign Disclosure Report

DUE DATE OF LATE FILED REPORT: April 8, 2024
REPORT FILED ON: April 26, 2024
NUMBER OF DAYS LATE: 18
DATE PENALTY ASSESSMENT SENT: May 6, 2024
DATE PENALTY APPEAL RECEIVED: May 9, 2024
MAXIMUM STATUTORY PENALTY: \$900
PENALTY ASSESSED¹: \$900
RECOMMENDATION: \$450
(See “Staff’s Recommendation Based on Standard Mitigation Criteria”)

AFFIANT’S STATEMENT OF MITIGATING FACTS:

1. Affiant states that the Interior Republicans have a good filing history.
2. Affiant states that the late filing of this report did not cause a significant harm to the public.

STAFF’S ANALYSIS OF FACTS FOR COMMISSION REVIEW

¹ 2 AAC 50.855(b)(2)(C)(ii).

- 1) A civil penalty may be reduced by up to 50 percent if the person required to file has a good filing history (no late filings in the immediately preceding 5 years).² This late filed report is the Interior Republicans’ first late filing in the three years they have registered as a group.
- 2) A civil penalty may be reduced by a percentage greater than 50% or waived entirely if the civil penalty assessed is significantly out of proportion to the degree of harm to the public for not having the information³. For this criteria, a penalty is considered to be significantly out of proportion to the degree of harm when it exceeds the value of the late-filed transactions. Here the penalty is \$900 and the filer’s 30 day report disclosed more than \$9,000 in activity. Accordingly, staff is unable to consider this mitigator for reduction.
- 3) Based on the filer’s good filing history, staff recommends the penalty be reduced by 50 percent.

FILER’S REPORTING HISTORY:

2022

Group Registration filed on 7/1/22

Multiple Statewide Municipal Elections

30 Day Report..... timely

7 Day Report..... timely

105 Day Report timely

Year End Report..... timely

State Primary

30 Day Report..... timely

7 Day Report..... timely

State General

30 Day Report..... timely

7 Day Report..... timely

2023

Group Registration filed on 2/15/23

Multiple Statewide Municipal Elections

30 Day Report..... timely

7 Day Report..... timely

105 Day Report timely

Year End Report..... timely

2024

Group Registration filed on 2/20/24

Fairbanks North Star Borough Special Election

30 Day Report..... Late (subject to appeal)

7 Day Report..... timely

² 2 AAC 50.865(a)(1)(A)(i)

³ 2 AAC 50.865(b)(4)

ACTIVITY ON LATE REPORT:

Beginning Balance:	\$ 939.75
Income:	\$ 9,825.00
Expenses:	\$ 1,473.38
Debts:	\$ 0.00
Ending Balance:	\$ 9,291.37

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

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

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

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

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

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

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

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

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

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

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

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

Aggravating Factors [2 AAC 50.865(d)]:

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

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

- Waived**
- Reduced by 50% to \$450**
- Upheld at the assessed amount of \$**

⁷ Value greater than \$1000.

CAMPAIGN DISCLOSURE FORM

COMPLETED

Submission Date: **04/26/2024**
 Filer First Name: **YULIYA**
 Filer Middle Name:
 Filer Last Name: **Jordan**
 Filer's Title: **Treasurer**
 Report Type: **Thirty Day Report**

GROUP INFORMATION

Group Name: **2024 - Interior Republicans**
 Group Abbreviation:
 Group Address: **P.O.Box 70202**
 City, State Zip: **Fairbanks, Alaska 99707**

REPORT INFORMATION

Election Year: **2024**
 Election: **Fairbanks North Star Borough Special Election**
 Report Type: **Thirty Day Report**
 Reporting Period: From **02/02/2024** Through **04/05/2024**

FINANCIAL SUMMARY

THIS PERIOD		ENTIRE CAMPAIGN			
Beginning Cash On Hand:	\$939.75				
[+] ↓		Year To Date Income Total: <small>(From Box A of previous report)</small>		Total Income To Date: <small>(Box A)</small>	
Total Income Reported:	\$9,825.00	[+] ⇒	\$0.00	[=] ⇒	\$9,825.00
[-] ↓		Year to Date Expense Total: <small>(From Box B of previous report)</small>		Total Expense To Date: <small>(Box B)</small>	
Total Expenditures Reported:	\$1,473.38	[+] ⇒	\$0.00	[=] ⇒	\$1,473.38
[=] ↓					
Closing Cash On Hand:	\$9,291.37				
[-] ↓					
Total Debts:	\$0.00				
[=] ↓					
Surplus/Deficit:	\$9,291.37				

INCOME

Date Received	Payment Method	Contributor	Details	Amount
02/21/2024	Electronic Funds Transfer	Markwood, Cheryl 2964 Totem Drive Fairbanks, Alaska 99709	Occupation: Owner Employer: Markwood Realty Description:	\$25.00
02/21/2024	Electronic Funds Transfer	Markwood, Cheryl 2694 Totem Drive Fairbanks, Alaska 99709	Occupation: Owner Employer: Markwood Realty Description:	\$25.00

Date Received	Payment Method	Contributor	Details	Amount
02/21/2024	Electronic Funds Transfer	Wilson, Tammie 571 Old Canoro Road North Pole, Alaska 99705	Occupation: State of Alaska Employer: Family Advocate Description:	\$250.00
02/29/2024	Electronic Funds Transfer	Slane, Elizabeth PO Box 70922 Fairbanks, Alaska 99707	Occupation: Retired Employer: Retired Description:	\$100.00
03/06/2024	Electronic Funds Transfer	Perkins, Robert 1605 Moose Trail Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired Description:	\$2,000.00
03/08/2024	Electronic Funds Transfer	Rotermund, Brett 3010 Industrial Avenue Fairbanks, Alaska 99701	Occupation: Self Employed Employer: Bulltproof Trailers Description:	\$1,000.00
03/11/2024	Check 2449	Deer, Charles 322 Fairbanks Street Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired Description:	\$100.00
03/19/2024	Electronic Funds Transfer	Church, Josh PO Box 10155 Fairbanks, Alaska 99710	Occupation: Financial Advisor Employer: Arbor Capital Management Description:	\$250.00
03/20/2024	Check 9238	Kilbourn, Aldean 3217 Riverview Drive Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired Description:	\$100.00
03/21/2024	Electronic Funds Transfer	Gower, Jim 1198 S. Crown Road Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired Description:	\$500.00
03/26/2024	Electronic Funds Transfer	Vreeman, Fred 1554 Scenic Loop Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired Description:	\$1,000.00
03/28/2024	Electronic Funds Transfer	Duquette, Julie 458 Shannon Drive Fairbanks, Alaska 99701	Occupation: Retired Employer: Retired Description:	\$500.00
03/28/2024	Electronic Funds Transfer	Samson, Michael 2031 Van Horn Court Fairbanks, Alaska 99701	Occupation: Electrical Contractor Employer: Samson Electric Inc Description:	\$500.00
03/29/2024	Electronic Funds Transfer	Alling, Jeff 1376 Valley Drive North Pole, Alaska 99705	Occupation: Allcan Builders Employer: Owner Description:	\$500.00
03/29/2024	Electronic Funds Transfer	Myers, Robert 3021 Amanda Loop North Pole, Alaska 99705	Occupation: Black Gold Express Employer: Truck Driver Description:	\$100.00
04/01/2024	Check 1537	Coghill, JR, John PO Box 58003 FAirbanks, Alaska 99711	Occupation: Director Employer: Fairbanks Rescue Mission Description:	\$200.00

Date Received	Payment Method	Contributor	Details	Amount
04/01/2024	Electronic Funds Transfer	Smith, April 3633 Anton Avenue North Pole, Alaska 99705	Occupation: Unemployed Employer: Homemakers Description:	\$100.00
04/02/2024	Electronic Funds Transfer	Wisel, Patty 877 Risse Road Fairbanks, Alaska 99712	Occupation: Retired Employer: Retired Description:	\$25.00
04/03/2024	Electronic Funds Transfer	Gray , Cordell 385 Forest Hills Court Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired Description:	\$250.00
04/03/2024	Electronic Funds Transfer	Vreeman, Fred 1554 Scenic Loop Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired Description:	\$1,000.00
04/05/2024	Check 108	Griffin, Randolph PO Box 73653 Fairbanks, Alaska 99707	Occupation: Hoseler Employer: Carlile Transporation Systems Inc Description:	\$300.00
04/05/2024	Electronic Funds Transfer	Perkins, Robert 1605 Moose Trail Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired Description:	\$1,000.00
Number of Contributions under \$100:				0
Sum of Contributions under \$100:				\$0.00
Income Total:				\$9,825.00

EXPENDITURES

Date	Payment Method	Vendor	Purpose	Amount
02/21/2024	Debit Card	Raise The Money 2964 Totem Drive Fairbanks, Alaska 99709	Bank Servie Charge	\$1.47
02/21/2024	Debit Card	Raise The Money 2964 Totem Drive Fairbanks, Alaska 99709	Bank Servie Charge	\$1.47
02/21/2024	Debit Card	Raise The Money 571 Old Canoro Road North Pole, Alaska 99705	Bank Servie Charge	\$12.50
02/27/2024	Debit Card	Date Line 3677 College Rd #2 Fairbanks, Alaska 99709	Dateline	\$96.65
02/29/2024	Debit Card	Raise The Money PO Box 70922 Fairbanks, Alaska 99707	Bank Servie Charge	\$5.15
03/04/2024	Debit Card	Date Line 3677 College Rd #2 Fairbanks, Alaska 99709	Tammie Wilson	\$417.23
03/06/2024	Debit Card	Raise The Money 1605 Moose Trail Fairbanks, Alaska 99709	Robert Perkin's CC Transaction	\$98.25
03/08/2024	Debit Card	Raise The Money 3010 Industrial Ave Fairbanks, Alaska 99701	Brett Robermund	\$49.25

Date	Payment Method	Vendor	Purpose	Amount
03/19/2024	Debit Card	Raise The Money PO Box 10155 Fairbanks, Alaska 99710	Bank Servie Charge	\$12.50
03/23/2024	Electronic Funds Transfer	Banners On The Cheap 11525 Stonehollow Dr B220 Austin, Texas 78758	Banners On the Cheap	\$303.14
03/23/2024	Debit Card	Raise The Money 1554 Scenic Loop Fairbanks, Alaska 99701	Bank Servie Charge	\$49.25
03/23/2024	Electronic Funds Transfer	Raise The Money 336 Forest Ave Fairbanks, Alaska 12010	Sticker Muel	\$226.50
03/27/2024	Electronic Funds Transfer	Mt. McKinley 500 4th Ave Fairbanks, Alaska 99701	Over the Counter Checks	\$3.00
03/28/2024	Debit Card	Raise The Money 458 Shannon Drive Fairbanks, Alaska 99701	Bank Servie Charge	\$24.75
03/28/2024	Debit Card	Raise The Money 2031 Van Horn Ct Fairbanks, Alaska 99701	Bank Servie Charge	\$24.75
03/29/2024	Debit Card	Raise The Money 3021 Amanda Loop North Pole, Alaska 99705	Bank Servie Charge	\$5.15
03/29/2024	Debit Card	Raise The Money 1376 Valley Drive North Pole, Alaska 99705	Bank Servie Charge	\$24.75
04/02/2024	Debit Card	Raise The Money PO Box 56151 North Pole, Alaska 99705	Bank Servie Charge	\$5.15
04/03/2024	Debit Card	Raise The Money 877 Risse Road Fairbanks, Alaska 99712	Bank Servie Charge	\$1.47
04/03/2024	Debit Card	Raise The Money 385 Forest Hills Ct Fairbanks, Alaska 99709	Bank Servie Charge	\$12.50
04/03/2024	Debit Card	Raise The Money 1554 Scenic Loop Fairbanks, Alaska 99709	Bank Servie Charge	\$49.25
04/05/2024	Debit Card	Raise The Money 1605 Moose Trail Fairbanks, Alaska 99709	Bank Servie Charge	\$49.25
			Expenditure Total:	\$1,473.38

DEBTS

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

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law



Name of Appellant: Cheryl Markwood

Office: _____

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

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

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): _____

Fairbanks North Star Borough Special Election 2024

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

Statement:

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

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

Please see attached below.

Certification:

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

Signed/Date: Cheryl Markwood 5/9/2024

RE: Notice of Penalty Assessment – 30-day Campaign Disclosure Report

To Whom it May Concern

Thank you for your recent letter notifying us of the penalty we have incurred for failing to file on time our 30-Day Campaign Disclosure Report. Firstly, we want to express my gratitude for the diligence of your office in bringing this matter to our attention.

We wish to appeal for your understanding and leniency in this matter. The penalty imposed poses a significant burden on our group members and their families, and we sincerely regret any inconvenience caused to your office. It is important for us to clarify that there was never any intention to conceal our campaign activities or expenditure.

Our oversight stemmed from a lack of awareness regarding the requirement to amend our group registration following the declaration of a special election on February 17, 2024. Prior to this declaration, we had registered as a group for participation in the Fairbanks North Star Borough Elections. The sudden need for an amendment caught us off guard, compounded by the fact that a special election in the Borough is a rare occurrence, with the last one happening over 20 years ago. Additionally, as this was a ballot initiative, it fell under different guidelines, further adding to our confusion.

Upon receiving notification from your office, we promptly took corrective action by amending our group registration with your assistance and filing the necessary reports within hours. We want to emphasize that our group has consistently maintained a positive track record regarding filing and has never previously breached any stipulated protocols or regulations. We have always been committed to transparency and compliance with all legal requirements.

Furthermore, we have not caused any harm to the public and have no prior history of aggravating factors. Accordingly, we humbly implore clemency to be extended to our group. We assure you of our unwavering commitment to comply with all future requisites and express our gratitude for your comprehension and collaboration.

Considering these circumstances, we respectfully request that you consider extending clemency to our group. We acknowledge our responsibility for the oversight and assure you of our commitment to full compliance moving forward. You're understanding and cooperation in this matter are greatly appreciated.

Thank you for your time and attention to this appeal. Please do not hesitate to contact me if further clarification is needed.

Sincerely,

Cheryl Markwood



May 6, 2024

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

Interior Republicans
Attn Cheryl Markwood
PO Box 70202
Fairbanks, AK 99709
Cherylmarkwood@gmail.com
Yuliya.temple@gmail.com

RE: Notice of Penalty Assessment – 30 Day Campaign Disclosure Report

Dear Ms. Markwood:

According to our records you did not timely file your 30 Day Campaign Disclosure Report for the Fairbanks North Star Borough Special Election that was due on April 8. Instead, the report was filed on April 26 (18 days late). By law a maximum penalty of \$50 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission has assessed you is \$900.²

Additionally, please be advised:

- 1) You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)³ to make a payment by credit card; or you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.
- 2) Alternatively, you have the right to appeal staff’s conclusion that a violation has occurred or the penalty amount assessed.⁴ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

¹ AS 15.13.390(a).

² 2 AAC 50.855(a).

³ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

⁴ 2 AAC 50.831(a).

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

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General’s Office.⁵

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

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: GROUP File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Interior Republicans Attn Cheryl Markwood PO Box 70202 Fairbanks, AK 99709 Cherylmarkwood@gmail.com Yuliya.temple@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

John Whitlock 5-6-24
Law Office Assistant Date

⁵ 2 AAC 50.895.



THE STATE
of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

August 13, 2024

Via Certified Mail and Email

Interior Republicans
Attn Cheryl Markwood
PO Box 70202
Fairbanks, AK 99709
Cherylmarkwood@gmail.com
Yuliya.temple@gmail.com

Re: Commission Meeting Notice

Dear Ms. Markwood:

At its upcoming June meeting, the Commission will consider the matter of your civil penalty appeals for your late 30 day report and multiple late Independent Expenditure Reports.

You have a right to participate at the meeting either in person or by telephone (1-907-202-7104, Access Code 868 986 512#), in-person (2221 Northern Lights Blvd, Ste 128, Anchorage, Alaska 99508), or via [Microsoft Teams](#).¹ Please notify our office if you intend to participate. The matter is currently scheduled to be heard at **[9:05 a.m. (for Candidates) / 9:20 a.m. (for Groups)] on Thursday, August 29, 2024.**

If you do not participate in the meeting, staff will send you a letter and a final order notifying you of the Commission’s decision.

Sincerely

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Interior Republicans PO Box 70202 Fairbanks, AK 99709 Cherylmarkwood@gmail.com Yuliya.temple@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

John Whitlock 8-13-24
Signature Date
9489 0178 9820 3021 0547 43

Encl: Staff Assessment

¹ Meeting ID: 262 010 339 336, Passcode: GwECLG

From: [Microsoft Outlook](#)
To: [Cheryl Markwood](#); [Yuliya Temple](#)
Subject: Relayed: Commission Meeting Notice and Staff Assessment
Date: Tuesday, August 13, 2024 8:10:32 PM
Attachments: [Commission Meeting Notice and Staff Assessment.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
Cheryl Markwood (cherylmarkwood@gmail.com) <mailto:cherylmarkwood@gmail.com>
Yuliya Temple (yuliya.temple@gmail.com) <mailto:yuliya.temple@gmail.com>
Subject: Commission Meeting Notice and Staff Assessment



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

PREPARED BY: John Grover Whitlock **DATE:** August 13, 2024

RESPONDENT: Interior Republicans

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

REASON FOR FILING: 2024 Fairbanks North Star Borough Special Election

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

DUE DATE OF LATE FILED REPORT: Various¹
REPORT FILED ON: Various²
NUMBER OF DAYS LATE: Various³
DATE PENALTY ASSESSMENT SENT: May 6, 2024
DATE PENALTY APPEAL RECEIVED: May 9, 2024
MAXIMUM STATUTORY PENALTY: \$4,700
PENALTY ASSESSED⁴: \$4,700
RECOMMENDATION: Reduction
(See “Staff’s Recommendation Based on Standard Mitigation Criteria”)

AFFIANT’S STATEMENT OF MITIGATING FACTS:

1. Affiant states that the Interior Republicans have a good filing history.
2. Affiant states that the late filing of this report did not cause a significant harm to the public.

¹ Exhibit 1. Comprehensive Chart of Late-Filed Independent Expenditure Reports.
² Id.
³ Id.
⁴ 2 AAC 50.855(b)(2)(C)(ii).

STAFF’S ANALYSIS OF FACTS FOR COMMISSION REVIEW

- 1) A civil penalty may be reduced by up to 50 percent if the person required to file has a good filing history (no late filings in the immediately preceding 5 years).⁵ This late filed report is the Interior Republicans’ first late filing in the three years they have registered as a group.
- 2) A civil penalty may be reduced by a percentage greater than 50% or waived entirely if the civil penalty assessed is significantly out of proportion to the degree of harm to the public for not having the information⁶. For this criteria, a penalty is considered to be significantly out of proportion to the degree of harm when it exceeds the value of the late-filed transactions. Because the filer’s four Independent Expenditure Reports subject to this appeal disclosed more than \$3,000, \$1,000, \$2,500, and \$6,000 in activity respectively, staff is unable to consider this mitigator for reduction.
- 3) Based on the filer’s good filing history, staff recommends the penalty be reduced by 50 percent.

FILER’S REPORTING HISTORY:

2022

Group Registration filed on 7/1/22

Multiple Statewide Municipal Elections

30 Day Report..... timely

7 Day Report..... timely

105 Day Report timely

Year End Report..... timely

State Primary

30 Day Report..... timely

7 Day Report..... timely

State General

30 Day Report..... timely

7 Day Report..... timely

2023

Group Registration filed on 2/15/23

Multiple Statewide Municipal Elections

30 Day Report..... timely

7 Day Report..... timely

105 Day Report timely

Year End Report..... timely

2024

Group Registration filed on 2/20/24

Fairbanks North Star Borough Special Election

⁵ 2 AAC 50.865(a)(1)(A)(i)

⁶ 2 AAC 50.865(b)(4)

IE Report due on 3/255 Days Late (Notice of Violation Issued)⁷
 IE Report due on 3/1443 Days Late (Subject of this Appeal)
 IE Report due on 3/2928 Days Late (Subject of this Appeal)
 30 Day Report (Due on 4/8).....18 Days Late
 IE Report due on 4/1214 Days Late (Subject of this Appeal)
 IE Report due on 4/209 Days Late (Subject of this Appeal)
 7 Day Report (Due on 4/30).....timely

ACTIVITY ON FIRST LATE REPORT DUE ON 3/2 (55 Days Late)⁸:

Beginning Balance:	N/A
Income:	\$ 400.00
Expenses:	\$ 117.24
Debts:	\$ 0.00
Ending Balance:	N/A

ACTIVITY ON SECOND LATE REPORT DUE ON 3/14 (43 Days Late):

Beginning Balance:	N/A
Income:	\$ 3,000.00
Expenses:	\$ 564.76
Debts:	\$ 0.00
Ending Balance:	N/A

ACTIVITY ON THIRD LATE REPORT DUE ON 3/29 (28 Days Late):

Beginning Balance:	N/A
Income:	\$ 850.00
Expenses:	\$ 673.79
Debts:	\$ 0.00
Ending Balance:	N/A

ACTIVITY ON FOURTH LATE REPORT DUE ON 4/12 (14 Days Late):

Beginning Balance:	N/A
Income:	\$ 2,575.00
Expenses:	\$ 117.62
Debts:	\$ 0.00
Ending Balance:	N/A

⁷ A Notice of Violation was issued. See 2 AAC 50.855(b)(2)(A)(v).

⁸ Id.

ACTIVITY ON FIFTH LATE REPORT DUE ON 4/20 (9 Days Late):

Beginning Balance:	N/A
Income:	\$ 1,000.00
Expenses:	\$ 5,424.72
Debts:	\$ 0.00
Ending Balance:	N/A

STAFF'S RECOMMENDATION BASED ON STANDARD MITIGATION CRITERIA

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

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

- Good filing history (no late filings in the previous 5 years). **2 AAC 50.865(a)(1)(A)**
- Inexperienced filer.⁹ **2 AAC 50.865(a)(1)(B)**
- Technical error at APOC. **2 AAC 50.865(a)(2)**
- Reported information had a value of \$100 or less. **2 AAC 50.865(a)(3)**
- Reported information had a value between \$100 and \$1000 AND any factor listed in 2 AAC 50.865(b) also applies. **2 AAC 50.865(a)(4)**

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

- Personal catastrophe/emergency or incapacitating illness. **2 AAC 50.865(b)(1)**
- APOC Staff error. **2 AAC 50.865(b)(2)**
- Report included only administrative costs. **2 AAC 50.865(b)(3)**
- No significant harm to the public and no aggravating factors.¹⁰ **2 AAC 50.865(b)(4)**
- The civil penalty is significantly greater and out of proportion to the degree of harm to the public for not having the information.¹¹ **2 AAC 50.865(b)(5)**
- A unique circumstance. **2 AAC 50.865(b)(6)**

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

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

⁹ Any entity or filer subject to a registration or reporting requirement for less than 365 days.

¹⁰ The amount missing is \$100 or less; the amount missing is more than \$100 but less than \$1,000 and the filer self-reported; or the missing information is readily available to the public through another forum.

¹¹ Penalty exceeds the value of late or unreported transactions or for 24-hour and 7-day reports, the penalty exceeds twice the value of the late or unreported transactions

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

Aggravating Factors [2 AAC 50.865(d)]:

- Failure to comply by omitting a significant source of income, interest in real property, loan, trust, business, or other substantial financial interest.¹² **2 AAC 50.865(d)(1)**
- More than one late filing in the preceding 5 years. **2 AAC 50.865(d)(2)(A)**
- Evidence suggesting deliberate non-reporting. **2 AAC 50.865(d)(2)(B)**
- Failure to cooperate with staff. **2 AAC 50.865(d)(2)(C)**
- A violation under AS 15.13, AS 24.45, AS 244.60.200-260, or AS 39.50 in the preceding 5 years. **2 AAC 50.865(d)(2)(D)**

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

- Waived**
- Reduced by 50% to \$2,350**
- Upheld at the assessed amount of \$**

¹² Value greater than \$1000.

**Interior Republicans
Comprehensive Chart of Late-Filed Independent Expenditure (IE) Reports**

Report Filed	Date(s) of IE(s)	Due Date	Days Late	Maximum Civil Penalty
4/26/24	2/21/24 to 2/29/24	3/2/24	55	\$0 – NOV issued
4/26/24	3/4/24 to 3/8/24	3/14/24	43	\$2,150
4/26/24	3/19/24 to 3/29/24	3/29/24	28	\$1,400
4/26/24	4/2/24 to 4/5/24	4/12/24	14	\$700
4/29/24	4/10/24 to 4/18/24	4/20/24	9	\$450
TOTAL				\$4,700

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

INDEPENDENT EXPENDITURES FORM 15-6

AMENDMENT**Amendment Description: update address****COMPLETED**Submission Date: **04/26/2024**

FILER INFORMATION

Filer First Name: **YULIYA**
 Filer Middle Name:
 Filer Last Name: **Jordan**
 Filer Full Address: **2006 North Rush circle
 Palmer, Alaska 99645**
 Filer Occupation: **Treasurer**
 Filer Employer: **GCI**
 Filer's Title with Other Entity: **Enterprise Contract Administrator**

REPORT INFORMATION

Report Year: **2024**
 Election Year: **2024**
 Report Type: **Ten Day**
 Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Interior Republicans**
 Type of Business or Organization: **Registered Group**
 Address: **P.O.Box 70202**
 City: **Fairbanks**
 State: **Alaska**
99707
 Country: **United States**
 Business/Other Entity Contact Person: **Yuliya Jordan**
 Contact E-mail: **yuliya.temple@gmail.com**
 Contact Phone: **907-250-0524**

ELECTION INFORMATION

Election: **Fairbanks North Star Borough Special Election**

OFFICERS

Name	Full Address	Title
Cheryl Markwood	P.O.Box 70202 Fairbanks, Alaska 99709	Chair
Yuliya Jordan	2006 North Rush Circle Palmer, , Alaska 99645	Treasurer
Cynthia Henry	3216 Rlverview Drive Fairbanks, Alaska 99709	Deputy Treasurer
Fred Vreeman	1554 Scenic Loop Fairbanks, Alaska 99709	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
02/27/2024	Date Line 3677 College Rd #2 Fairbanks, Alaska 99709	Credit Card	OPPOSE: Propositio Election: Fairbanks North Star Borough Special Election Printing/Special Election Cards	\$96.65
03/04/2024	Date Line 3677 College Rd #2 Fairbanks, Alaska 99709	Credit Card	OPPOSE: Propositio Election: Fairbanks North Star Borough Special Election Printing/Special Election Cards	\$417.23
03/23/2024	Banners On The Cheap 11525 Stonehollow Dr B220 Austin, Texas 78758	Electronic Funds Transfer	OPPOSE: Propositio Election: Fairbanks North Star Borough Special Election Custome Signs	\$303.14
03/23/2024	Sticker Mule 336 Forest Ave. Amsterdam, New York 12010	Electronic Funds Transfer	OPPOSE: Propositio Election: Fairbanks North Star Borough Special Election Custom Magents/Pins/Stickers	\$226.50
04/18/2024	Graphic North LLC 157 Old Steese Hwy Fairbanks, Alaska 99701	Check Check Number: 9929	OPPOSE: Propositio Election: Fairbanks North Star Borough Special Election Printing/Mail Out Special Election	\$5,418.10
04/22/2024	Last Frontier Mediactive 529 5th Avenue Suite 200 Fairbanks, Alaska 99701	Check Check Number: 9930	OPPOSE: Propositio Election: Fairbanks North Star Borough Special Election Advertising	\$4,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
03/06/2024	Type: Individual Name: Robert , Rotermund 3010 Industrial Ave Fairbanks, Alaska 99701	Occupation: Retired Employer: Retired , Alaska	\$2,000.00
03/08/2024	Type: Individual Name: Brett, Deer 322 Fairbanks Street Fairbanks, Alaska 99709	Occupation: Self Employed Employer: Bulltproof Trailers , Alaska	\$1,000.00
03/21/2024	Type: Individual Name: Jim, Kilbourn 3217 Riverview Drive Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired , Alaska	\$500.00
03/26/2024	Type: Individual Name: Fred, Duquette 458 Shannon Drive Fairbanks, Alaska 99701	Occupation: Retired Employer: Retired , Alaska	\$1,000.00
03/28/2024	Type: Individual Name: Julie, Samson 458 Shannon Drive Fairbanks, Alaska 99701	Occupation: Retired Employer: Retired 458 Shannon Drive Fairbanks, Alaska 99701	\$500.00
03/28/2024	Type: Individual Name: Michael , Myers 2031 Van Horn Court Fairbanks, Alaska 99701	Occupation: Electrical Contractor Employer: Samson Electric Inc 550 W 7th Ave, Suite 1970 Anchorage, Alaska 99501	\$500.00
03/29/2024	Type: Individual Name: Jeff, Coghill, JR PO Box 58003 North Pole, Alaska 99711	Occupation: Owner Employer: Allcan Builders , Alaska	\$500.00

Contribution Date	Contributor	Details	Amount
04/03/2024	Type: Individual Name: Fred, Smith 3633 Anton Avenue Fairbanks, Alaska 99705	Occupation: Retired Employer: Retired , Alaska	\$1,000.00
04/05/2024	Type: Individual Name: Robert , Tyndall PO Box 82977 Fairbanks, Alaska 99707	Occupation: Retired Employer: Retired , Alaska	\$1,000.00
04/20/2024	Type: Individual Name: Seth , Hutchison 140 Falcon Drive Fairbanks, Alaska 99712	Occupation: Jewel Issac Employer: Contractor , Alaska	\$500.00

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	6
Total of paid Expenditures:	\$10,461.62
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report:	10
Total of Contributions Reported with this Report:	\$8,500.00
Cumulative Contribution Amounts:	\$8,500.00
Number of Officers:	4
Number of Debts Reported with this Report:	0
Total of Debts Incurred but not yet paid:	\$0.00

INDEPENDENT EXPENDITURES FORM 15-6

COMPLETEDSubmission Date: **04/29/2024**

FILER INFORMATION

Filer First Name: **Yuliya**
 Filer Middle Name:
 Filer Last Name: **Jordan**
 Filer Full Address: **2006 North Rush circle
 Palmer, Alaska 99645**
 Filer Occupation: **Treasurer**
 Filer Employer: **GCI**
 Filer's Title with Other Entity: **Enterprise Contract Administrator**

REPORT INFORMATION

Report Year: **2024**
 Election Year: **2024**
 Report Type: **Twenty-four Hour**
 Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Interior Republicans**
 Type of Business or Organization: **Registered Group**
 Address: **P.O.Box 70202**
 City: **Fairbanks**
 State: **Alaska**
99707
 Country: **United States**
 Business/Other Entity Contact Person: **Yuliya Jordan**
 Contact E-mail: **yuliya.temple@gmail.com**
 Contact Phone: **907-250-0524**

ELECTION INFORMATION

Election: **Fairbanks North Star Borough Special Election**

OFFICERS

Name	Full Address	Title
Cheryl Markwood	P.O.Box 70202 Fairbanks, Alaska 99709	Chair
Yuliya Jordan	2006 North Rush Circle Palmer, , Alaska 99645	Treasurer
Cynthia Henry	3216 Rlvview Drive Fairbanks, Alaska 99709	Deputy Treasurer
Fred Vreeman	1554 Scenic Loop Fairbanks, Alaska 99709	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
04/29/2024	Last Frontier Mediactive 529 5th Avenue Suite 200 Fairbanks, Alaska 99701	Check Check Number: 9931	OPPOSE: A Election: Fairbanks North Star Borough Special Election Advertising/Radio	\$1,250.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
04/29/2024	Type: Individual Name: Tamara Wilson 571 Old Canoro Road North Pole, Alaska 99705	Occupation: Parent Advocate Employer: State of Alaska , Alaska	\$1,200.00

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	1
Total of paid Expenditures:	\$1,250.00
<hr/>	
Previous Contributions:	\$8,500.00
Number of Contributions Reported with this Report:	1
Total of Contributions Reported with this Report:	\$1,200.00
Cumulative Contribution Amounts:	\$9,700.00
<hr/>	
Number of Officers:	4
<hr/>	
Number of Debts Reported with this Report:	0
Total of Debts Incurred but not yet paid:	\$0.00

Civil Penalty Appeal Affidavit
AS 15.13 Alaska Campaign Disclosure Law



Name of Appellant: Cheryl Markwood _____

Office: _____

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

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

Specify year & election, if late report (e.g., 04 Primary, 03 Muni, etc.): _____

Fairbanks North Star Borough Special Election 2024

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

Statement:

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

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

Please see attached below.

Certification:

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

Signed/Date: Cheryl Markwood 5/9/2024 _____

RE: Notice of Penalty: Late Filed Independent Expenditure Reports

To Whom it May Concern,

Thank you for your recent letter notifying me of the penalty we have incurred for failing to file on time the Independent Expenditure Reports. Firstly, we want to express our gratitude for the diligence of your office in bringing this matter to our attention.

We wish to appeal for your understanding and leniency in this matter. The penalty imposed poses a significant burden on our group members and their families, and we sincerely regret any inconvenience caused to your office. It is important for us to clarify that there was never any intention to conceal our campaign activities or expenditure.

Our oversight stemmed from a lack of awareness regarding the requirement to amend our group registration following the declaration of a special election on February 17, 2024. Prior to this declaration, we had registered as a group for participation in the Fairbanks North Star Borough Elections. The sudden need for an amendment to the Special Election caught us off guard, compounded by the fact that a special election in the Borough is a rare occurrence, with the last one happening over 20 years ago. Additionally, as this was a ballot initiative, it fell under different guidelines, further adding to our confusion.

Upon receiving notification from your office, we promptly took corrective action by amending our group registration with your assistance and filing the necessary reports within hours of notification. We want to emphasize that our group has consistently maintained a positive track record regarding filing and has never previously breached any stipulated protocols or regulations. We have always been committed to transparency and compliance with all legal requirements.

At no time were we aware that we were doing Independent Expenditure Activities or needed to change how our group has consistently worked within our community during elections. Given that this special election was based on a Ballot Initiative it fell under different rules. Our group has always taken a position on ballot initiatives and specifically in respect to the citizens' initiative to maintain a tax cap in the Fairbanks North Star Borough which has been taking place ever 2 years for over 30 years. This Special election was no different and it was the only issue we were taking a stand on as well as providing get out the vote information pertaining to the special election. While you are stating we were influencing an election, our group will always be considered influencing an election through its Republican values.

Accordingly, I humbly implore for clemency to be extended to our group. I assure you of our unwavering commitment to comply with all future requisites and express our gratitude for your comprehension and collaboration. We are a relatively new group and were unaware that these activities did not fall under our group registration. At no time did we try to hide our activities or deceive the public in our activities in this special election. Our group have consistently maintained a positive track record in regard to filing and have never previously breached any stipulated protocols or regulations. Furthermore, we have not caused any harm to the public and have no prior history of aggravating factors.

Considering these circumstances, we respectfully request that you consider extending clemency to our group. We acknowledge our responsibility for the oversight and assure you of our

commitment to full compliance moving forward. You're understanding and cooperation in this matter are greatly appreciated.

Thank you for your time and attention to this appeal. Please do not hesitate to contact me if further clarification is needed.

Sincerely,

Cheryl Markwood



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

May 6, 2024

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

Interior Republicans
Attn Cheryl Markwood
PO Box 70202
Fairbanks, AK 99709
Cherylmarkwood@gmail.com
Yuliya.temple@gmail.com

RE: Notice of Penalty¹
Late filed Independent Expenditure Reports

Dear Ms. Markwood:

Based on your group's 30 Day Campaign Disclosure Report, it appears that the Interior Republicans did not timely file their Independent Expenditure Reports that must be filed within 10 days after an expenditure has been made for the Fairbanks North Star Borough Special Election.

Expenditures during the period from February 21, 2024, through February 29, 2024 should have been disclosed by March 2, 2024. Instead, these expenditures were first disclosed on April 26, 2024 – 55 days late.

Expenditures during the period from March 4, 2024, through March 8, 2024, should have been disclosed by March 14, 2024. Instead, these expenditures were disclosed first disclosed on April 26, 2024 – 43 days late.

Expenditures during the period from March 19, 2024, and ending on March 29, 2024, should have been disclosed by March 29, 2024. Instead, these expenditures were first disclosed on April 26, 2024 – 28 days late.

Expenditures during the period from April 2, 2024, and ending on April 5, 2024, should have been disclosed by April 12, 2024. Instead, these expenditures were disclosed on April 26, 2024 – 14 days late.

¹ 2 AAC 50.855(a)

Based on your group’s 7 Day Campaign Disclosure Report, it also appears there were expenditures during the period from on April 10, 2024, and ending on April 18, 2024, that should have been disclosed by April 20, 2024, but were instead first disclosed on April 29, 2024, – 9 days late

By law a maximum penalty of \$50 accrues each day the report is late.² In total, your group is 149 days late in disclosing campaign expenditures. **Accordingly, the assessed penalty owed is \$7,450.**³

You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)⁴ to make a payment by credit card; or you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.

Alternatively, you have the right to appeal staff’s conclusion that a violation has occurred, or the penalty amount assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

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

Failure to respond to this notice by either making arrangement for payment or submitting an appeal within will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General’s Office.⁶

² AS 15.13.390(a).

³ 2 AAC 50.855(a).

⁴ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

⁵ 2 AAC 50.831(a).

⁶ 2 AAC 50.895.

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

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: GROUP File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Interior Republicans Attn Cheryl Markwood PO Box 70202 Fairbanks, AK 99709 Cherylmarkwood@gmail.com Yuliya.temple@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

John Whitlock 5-6-24
Law Office Assistant Date



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

August 13, 2024

Via Certified Mail and Email

Interior Republicans
Attn Cheryl Markwood
PO Box 70202
Fairbanks, AK 99709
Cherylmarkwood@gmail.com
Yuliya.temple@gmail.com

Re: Commission Meeting Notice

Dear Ms. Markwood:

At its upcoming June meeting, the Commission will consider the matter of your civil penalty appeals for your late 30 day report and multiple late Independent Expenditure Reports.

You have a right to participate at the meeting either in person or by telephone (1-907-202-7104, Access Code 868 986 512#), in-person (2221 Northern Lights Blvd, Ste 128, Anchorage, Alaska 99508), or via [Microsoft Teams](#).¹ Please notify our office if you intend to participate. The matter is currently scheduled to be heard at **[9:05 a.m. (for Candidates) / 9:20 a.m. (for Groups)] on Thursday, August 29, 2024.**

If you do not participate in the meeting, staff will send you a letter and a final order notifying you of the Commission's decision.

Sincerely

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

Encl: Staff Assessment

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Interior Republicans PO Box 70202 Fairbanks, AK 99709 Cherylmarkwood@gmail.com Yuliya.temple@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

John Whitlock 8-13-24
Signature Date
9489 0178 9820 3021 0547 43

¹ Meeting ID: 262 010 339 336, Passcode: GwECLG

From: [Microsoft Outlook](#)
To: [Cheryl Markwood](#); [Yuliya Temple](#)
Subject: Relayed: Commission Meeting Notice and Staff Assessment
Date: Tuesday, August 13, 2024 8:10:32 PM
Attachments: [Commission Meeting Notice and Staff Assessment.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
Cheryl Markwood (cherylmarkwood@gmail.com) <mailto:cherylmarkwood@gmail.com>
Yuliya Temple (yuliya.temple@gmail.com) <mailto:yuliya.temple@gmail.com>
Subject: Commission Meeting Notice and Staff Assessment



**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION
FINDINGS AND ORDER**

**In the matter of a civil penalty assessment
against Alaskan Conservatives for Integrity**

On August 29, 2024, the Alaska Public Offices Commission (Commission) reviewed the assessed civil penalty for Alaskan Conservatives for Integrity's late-filed 105 Report. The late-filed report's penalty is currently assessed at **\$25.00**. To facilitate collection proceedings by the Department of Law, the Commission issues the following Findings and Order.

Findings of Fact

1. Alaskan Conservatives for Integrity registered as a group on November 1, 2023, and became subject to AS 15.13, Campaign Disclosure Law.
2. Pursuant to AS 15.13.110(a)(3), Alaskan Conservatives for Integrity's 105 Day Report was due on February 20, 2024, but was not filed until February 21, 2024, one day late.
3. On March 21, 2024, staff issued a Notice of Penalty informing Alaskan Conservatives for Integrity of the assessed penalty for their late filed 105 Day Report. The notice included an appeal affidavit and was sent via E-Mail and Certified Mail. The email server provided delivery confirmation. The Certified Mail was delivered on April 22, 2024.
4. On July 30, 2024, staff issued a Notice of Referral regarding Alaskan Conservatives for Integrity's outstanding civil penalty. This notice informed Alaskan Conservatives for Integrity that their right to appeal had expired. Additionally, it requested that Alaskan Conservatives for Integrity remit payment for the assessed civil penalty or the matter would be presented to the Commission for a Final Order. The notice was sent via E-Mail and Certified Mail. The email server provided delivery confirmation. The Certified Mail is still in transit and has yet to be delivered as of August 13, 2024.

Conclusions of Law

Due to Alaskan Conservatives for Integrity's failure to timely file their 105 Day Report, and their failure to pay or appeal the assessed penalty in a timely manner, the Commission upholds a penalty assessment of **\$25.⁰⁰** under the provisions of AS 15.13.390 and 2 AAC 50.855.

Commission staff has exhausted efforts to collect the penalty assessed against the Alaskans for Honest Elections now due and owing to the State of Alaska under 2 AAC 50.895.

The Commission approves the referral of this case to the Office of the Attorney General to begin the formal collection process.

Decision and Order of the Commission

In accordance with the above findings of fact and conclusions of law, the Commission orders Alaskan Conservatives for Integrity to pay a civil penalty of **25.⁰⁰** for failing to timely file their 105 Day Report and refers this matter for collection to the Office of the Attorney General.

BY ORDER OF THE COMMISSION ON August 29, 2024

NOTICE TO RESPONDENT

You must pay the penalty of \$25.⁰⁰ to the State of Alaska within thirty days from the date this order is mailed or otherwise distributed to you. To obtain judicial review of this order consistent with AS 44.62.560-570, you must file an appeal with the Superior Court within thirty days from the date this order is mailed or otherwise distributed to you.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

21 March 2024

VIA CERTIFIED MAIL, U.S. MAIL, & EMAIL

ALASKA CONSERVATIVES FOR INTEGRITY
Attn: LUCAS CONNOR
297 TURNPIKE RD. #108
WESTBOROUGH, MASSACHUSETTS 01581
lqconnor@alaska.edu

RE: Notice of Penalty Assessment – 105 Day Campaign Disclosure Report

Dear Mr. Connor:

According to our records you did not timely file your 105 Day Campaign Disclosure Report that was due on 02/20/2024. Instead, the report was filed on 02/21/2024 (1 day late). By law a maximum penalty of \$50.00 accrues each day the report is late.¹ The maximum penalty the Alaska Public Offices Commission could assess you is \$50.00.²

Staff is reducing the penalty to 50% of the maximum civil penalty that could have been assessed because the missing information had a value under \$100.³ **Accordingly, the assessed penalty owed is \$25.00.**

Additionally, please be advised:

- 1) You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the “State of Alaska” to our office at the address above; visiting our [website](#)⁴ to make a payment by credit card; or you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.

¹ AS 15.13.390(a).

² 2 AAC 50.855(a).

³ 2 AAC 50.855(b)(2)(C)(ii).

⁴ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

2) Alternatively, you have the right to appeal staff’s conclusion that a violation has occurred or the penalty amount assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

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

Failure to respond to this notice by either making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General’s Office.⁶

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

ALASKA PUBLIC OFFICES COMMISSION

Michael Sargent

MICHAEL SARGENT
PARALEGAL SPECIALIST I

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Group File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Alaska Conservatives for Integrity Attn: Lucas Connor 297 Turnpike Rd. #108 Westborough, Massachusetts 01581 lqconnor@alaska.edu	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

<i>Michael Sargent</i>	03.21.2024
Paralegal Specialist I	Date

9171 9690 0935 0310 8338 90

⁵ 2 AAC 50.831(a).

⁶ 2 AAC 50.895.



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

July 30, 2024

VIA CERTIFIED MAIL and EMAIL

ALASKA CONSERVATIVES FOR INTEGRITY
Attn: LUCAS CONNOR
297 TURNPIKE RD. #108
WESTBOROUGH, MASSACHUSETTS 01581
lqconnor@alaska.edu

Re: NOTICE OF REFERRAL TO COMMISSION
105 Day Campaign Disclosure Report

Dear Mr. Connor:

On March 21, 2024, the Alaska Public Offices Commission notified you that you were subject to a civil penalty of \$25 for your failure to timely file a 2023 105 Day Campaign Disclosure Report which was due on February 20, 2024. As of the date of this letter, you have not paid the penalty. In that same letter, this office also informed you of your right to appeal the penalty assessment within thirty (30) days and supplied you with an appeal affidavit form. You did not file an appeal within the thirty (30) days; therefore, your right to appeal has expired.

Pursuant to 2AAC 50.895, staff will refer this matter to the Commission for entry of a final order of assessment of the penalty due. The Commission will consider this matter at its August 29, 2024 public meeting.

If you would like to avoid further Commission action, please remit your payment of **\$25** to our office.

Finally, should you have any questions, please contact this office at 907-276-4176. If you are calling long distance to Anchorage from within the state, you may call toll-free at 800-478-4176.

ALASKA PUBLIC OFFICES COMMISSION

Michael Sargent

Michael Sargent
Paralegal Specialist I

Enclosure: Civil Penalty Assessment

cc: Group File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
ALASKA CONSERVATIVES FOR INTEGRITY Attn: LUCAS CONNOR 297 TURNPIKE RD. #108 WESTBOROUGH, MASSACHUSETTS 01581 lqconnor@alaska.edu	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

Michael Sargent 07.30.2024

Signature

Date

9489 0178 9820 3021 0538 76

From: [Sargent, Mike David \(DOA\)](#)
To: [Whitlock, John G \(DOA\)](#)
Subject: FW: Notice of Referral - Alaska Conservatives for Integrity
Date: Tuesday, August 6, 2024 8:36:59 AM

Michael Sargent

Paralegal Specialist I / Campaign Disclosure Coordinator

Alaska Public Offices Commission

2221 E. Northern Lights Blvd., Room 128

Anchorage, Alaska 99508

Phone: (907) 276-4176

Fax: (907) 276-7018

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From: Microsoft Outlook

<MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@stateofalaska.onmicrosoft.com>

Sent: Tuesday, July 30, 2024 4:53 PM

To: Sargent, Mike David (DOA)

Subject: Relayed: Notice of Referral - Alaska Conservatives for Integrity

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

lqconnor@alaska.edu (lqconnor@alaska.edu)

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Tracking Number:

9489017898203021053876

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Latest Update

Your package will arrive later than expected, but is still on its way. It is currently in transit to the next facility.

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In Transit to Next Facility, Arriving Late

August 13, 2024

Arrived at USPS Regional Facility

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August 12, 2024, 12:08 pm

[See All Tracking History](#)

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

[Text & Email Updates](#)



[Return Receipt Electronic](#)



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THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018

www.doa.alaska.gov/apoc

August 13, 2024

Via Certified Mail and Email

ALASKA CONSERVATIVES FOR INTEGRITY
Attn: LUCAS CONNOR
297 TURNPIKE RD. #108
WESTBOROUGH, MASSACHUSETTS 01581
lqconnor@alaska.edu

Re: Commission Meeting Notice

Dear Mr. Connor:

At its upcoming June meeting, the Commission will consider the matter of the referral of your delinquent penalty.

You have a right to participate at the meeting either in person or by telephone (1-907-202-7104, Access Code 868 986 512#), in-person (2221 Northern Lights Blvd, Ste 128, Anchorage, Alaska 99508), or via [Microsoft Teams](#).¹ Please notify our office if you intend to participate. The matter is currently scheduled to be heard at **[9:05 a.m. (for Candidates) / 9:20 a.m. (for Groups)] on Thursday, August 29, 2024.**

If you do not participate in the meeting, staff will send you a letter and a final order notifying you of the Commission's decision.

Sincerely

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

Encl: Proposed Findings and Order

CERTIFICATE OF SERVICE:	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
ALASKA CONSERVATIVES FOR INTEGRITY Attn: LUCAS CONNOR 297 TURNPIKE RD. #108 WESTBOROUGH, MASSACHUSETTS 01581 lqconnor@alaska.edu	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

John Whitlock
Signature
9489 0178 9820 3021 0547 36

8-13-24
Date

¹ Meeting ID: 262 010 339 336, Passcode: GwECLG

From: [Microsoft Outlook](#)
To: lqconnor@alaska.edu
Subject: Relayed: Notice of Commission Meeting and Proposed Findings and Order for Referral
Date: Tuesday, August 13, 2024 8:13:03 PM
Attachments: [Notice of Commission Meeting and Proposed Findings and Order for Referral.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
lqconnor@alaska.edu (lqconnor@alaska.edu) <mailto:lqconnor@alaska.edu>
Subject: Notice of Commission Meeting and Proposed Findings and Order for Referral



**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION
FINDINGS AND ORDER**

**In the matter of a civil penalty assessment
against Alaskans for Honest Elections**

On August 29, 2024, the Alaska Public Offices Commission (Commission) reviewed the assessed civil penalty for Alaskans for Honest Elections' late-filed First Quarterly Report. The late-filed report's penalty is currently assessed at **\$250.00**. To facilitate collection proceedings by the Department of Law, the Commission issues the following Findings and Order.

Findings of Fact

1. Alaskans for Honest Elections registered as an Initiative Proposal Application Group on March 20, 2023, and is subject to AS 15.13, Campaign Disclosure Law.
2. Pursuant to AS 15.13.110(g), Alaskans for Honest Elections' First Quarter Report was due on April 10, 2024.
3. On April 11, 2024, staff issued a Notice of Deficiency to Alaskans for Honest Elections informing the group, that as of the date of the notice, their First Quarter report was one day late. The notice also informed the group that a daily penalty would continue to accrue until the report was filed and that the group had a right to appeal the assessment of a penalty. The notice was sent via E-mail and Certified Mail. The email server provided delivery confirmation. The Certified Mail was refused on April 13, 2024.¹
4. On April 11, 2024, Alaskans for Honest Elections filed their First Quarter Report, five days late.
5. On April 17, 2024, staff issued a Notice of Penalty informing Alaskans for Honest Elections of the assessed penalty for their late filed First Quarterly Report. The notice included an appeal affidavit and sent via E-Mail and Certified Mail. The

¹ See, AS 44.62.380(c) [service effective by certified mail when mailed to address of record if filer is required to file address with agency and to notify any change in address]. See also, 2 AAC 50.811(b) [requiring filer to keep accurate address on file and to promptly notify any change in address].

email server provided delivery confirmation. The Certified Mail was refused on April 19, 2024.

On July 30, 2024, staff issued a Notice of Referral regarding Alaskans for Honest Elections' outstanding civil penalty. This notice informed Alaskans for Honest Elections that their right to appeal had expired. Additionally, it requested that Alaskans for Honest Elections remit payment for the assessed civil penalty or the matter would be presented to the Commission for a Final Order. The notice was sent via E-Mail and Certified Mail. The email server provided delivery confirmation. The Certified Mail has been available for pick up since August 10.

Conclusions of Law

Due to Alaskans for Honest Elections' failure to timely file their First Quarterly Report, and their failure to pay or appeal the assessed penalty in a timely manner, the Commission upholds the penalty assessment of **\$250.00** under the provisions of AS 15.13.390 and 2 AAC 50.855.

Commission staff has exhausted efforts to collect the penalty assessed against the Alaskans for Honest Elections now due and owing to the State of Alaska under 2 AAC 50.895.

The Commission approves the referral of this case to the Office of the Attorney General to begin the formal collection process.

Decision and Order of the Commission

In accordance with the above findings of fact and conclusions of law, the Commission orders Alaskans for Honest Elections to pay a civil penalty of **250.00** for failing to timely file their First Quarterly Report and refers this matter for collection to the Office of the Attorney General.

BY ORDER OF THE COMMISSION ON August 29, 2024

NOTICE TO RESPONDENT

You must pay the penalty of \$250.00 to the State of Alaska within thirty days from the date this order is mailed or otherwise distributed to you. To obtain judicial review of this order consistent with AS 44.62.560-570, you must file an appeal with the Superior Court within thirty days from the date this order is mailed or otherwise distributed to you.

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



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

April 11, 2024

VIA CERTIFIED MAIL, U.S. MAIL, & EMAIL

Alaskans for Honest Elections

Attn: Philip Izon

4201 E. Dimond Way Unit B

Wasilla, Alaska 99654

admin@alaskansforhonestelections.com

Re: Notice of Deficiency¹
First Quarterly Report – Due April 10, 2024

Mr. Izon,

According to our records, you have not filed your First Quarterly Report that was due on April 10, 2024. Failure to timely file a report results in the assessment of civil penalties for failure to comply with the provisions of the Campaign Disclosure Law under Alaska Statute 15.13.

As of the date of this letter, your First Quarterly Report is **1 day** late, and the accrued maximum penalty is **\$50**. This penalty continues to accrue by law at a rate of \$50 per-day until your First Quarterly Report is filed.²

To stop the accrual of penalties, you must file your First Quarterly Report. You have a right to appeal the assessment of a penalty. To do so, **you must submit your delinquent report and submit the enclosed appeal affidavit to the Commission within 30 days.** APOC staff will review your affidavit and prepare a recommendation for the Commission. You will receive a copy of that recommendation and notice of when the Commission will meet to consider the matter. You will have the opportunity to participate in the meeting either in-person or telephonically.

¹ 2 AAC 50.850(b).

² AS 15.13.390(a).

Failure to respond to this notice by filing the report, making arrangement for payment within thirty days or submitting an appeal within thirty days will result in staff presenting this matter to the Commission for a final order in the amount of the total accrued penalty as of the date of the order; and referral to the Attorney General’s Office for appropriate action.³

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

Thank you,

ALASKA PUBLIC OFFICES COMMISSION




Dyane Chung
Campaign Disclosure Associate

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Candidate File

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Alaskans for Honest Elections Attn: Philip Izon 4201 E. Dimond Way Unit B Wasilla, Alaska 99654 admin@alaskansforhonestelections.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

	4-11-24
Campaign Disclosure Associate	Date
9489 0178 9820 3021 0504 79	

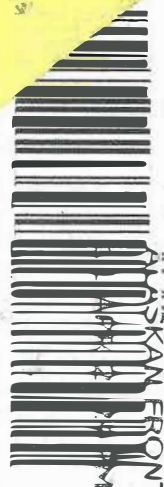
³ 2 AAC 50.895.

ALASKA PUBLIC OFFICES COMMISSION
2221 E. Northern Lights, Room 128
Anchorage, Alaska 99508-4149



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NO POSTAGE
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IF MAILED
IN THE
UNITED STATES



995 DE 2
BBB4/15/24
JL78 9820 3021 0504 79

995 995 9820 4149

*Refused
4-13*

*Alaskans for Honest Elections
Attn: Philip Izen
4201 E. Diamond Way, Unit B
Wasilla, AK 99654*

Label 890-QDT, March 2024

995
the post
04/11/2024
US POSTAGE \$007.36
FIRST-CLASS MAIL
ZIP 99508
041L10243475



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

April 17, 2024

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

Alaskans for Honest Elections
Attn: Phillip Izon
4201 E Dimond Way #B
Wasilla, AK 99654
admin@alaskansforhonestelections.com

RE: Notice of Penalty¹
First Quarterly Campaign Disclosure Report

Dear Mr. Izon:

According to our records you did not timely file your 2024 First Quarterly Campaign Disclosure Report that was due on April 10, 2024. Instead, the report was filed on April 15, 2024 (5 days late). By law a maximum penalty of \$50 accrues each day the report is late.² **Accordingly the assessed penalty owed is \$250.**³

You may pay the assessed penalty and avoid formal Commission action by sending payment by check or money order payable to the "State of Alaska" to our office at the address above; visiting our [website](#)⁴ to make a payment by credit card; or you may pay in cash at our offices. **Payment must be made within thirty days of the date of this letter.** If you are unable to pay the entire assessed penalty in a single payment and wish to discuss a payment plan, or have any other question concerning this matter, please contact the APOC staff.

Alternatively, you have the right to appeal staff's conclusion that a violation has occurred, or the penalty amount assessed.⁵ **If you wish to appeal you must submit the enclosed appeal affidavit to APOC within thirty days of the date of this letter.**

¹ 2 AAC 50.855(a)

² AS 15.13.390(a).

³ 2 AAC 50.855(a).

⁴ <https://aws.state.ak.us/ApocReports/Paper/CommissionCivilPenalties.aspx>

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

⁵ 2 AAC 50.831(a).

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

Failure to respond to this notice by either making arrangement for payment or submitting an appeal within will result in staff presenting this matter to the Commission for a final order in the amount of the assessed penalty and referral to the Attorney General’s Office.⁶

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

ALASKA PUBLIC OFFICES COMMISSION

Dyane Chung

Dyane Chung
Campaign Disclosure Associate

Encl: Civil Penalty Appeal Affidavit
2 AAC 50.865

cc: Group File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Alaskans for Honest Elections Attn: Phillip Izon 4201 E Dimond Way #B Wasilla, AK 99654 admin@alaskansforhonestelections.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email

Dyane Chung

4-17-24

Campaign Disclosure Associate
9489 0178 9820 3021 0507 07

Date

⁶ 2 AAC 50.895.

Tracking Number:

Remove X

9489017898203021050707

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was forwarded to a different address at 9:54 am on April 23, 2024 in ANCHORAGE, AK. This was because of forwarding instructions or because the address or ZIP Code on the label was incorrect.

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Forwarded

ANCHORAGE, AK
April 23, 2024, 9:54 am

Refused

WASILLA, AK 99654
April 19, 2024, 9:50 am

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ALASKA PUBLIC OFFICES COMMISSION
2221 E. Northern Lights, Room 128
Anchorage, Alaska 99508-4149

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ALASKAN FRONTIER 905
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Label 890-QDT, March 2023

First-Class Mail
Redpost™
04/17/2024
US POSTAGE \$007.36
FIRST CLASS MAIL
ZIP 99508
041L10243475

Fusee
Alaskans for Forest Elected
Attn: Phillip Izon

REF
508950824149

NIXIE 995 DE 1 0804/22/22
RETURN TO SENDER
UNABLE TO FORWARD
BC: 99508414999 *1623-11695-17-42



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

July 30, 2024

VIA CERTIFIED MAIL and EMAIL

Alaskans for Honest Elections
Attn: Phillip Izon
4201 E Dimond Way #B
Wasilla, AK 99654
admin@alaskansforhonestelections.com

Re: NOTICE OF REFERRAL TO COMMISSION
First Quarterly Campaign Disclosure Report

Dear Mr. Izon:

On April 17, 2024, the Alaska Public Offices Commission notified you that you were subject to a civil penalty of \$250 for your failure to timely file a 2024 First Quarterly Campaign Disclosure Report which was due on April 10, 2024. As of the date of this letter, you have not paid the penalty. In that same letter, this office also informed you of your right to appeal the penalty assessment within thirty (30) days and supplied you with an appeal affidavit form. You did not file an appeal within the thirty (30) days; therefore, your right to appeal has expired.

Pursuant to 2AAC 50.895, staff will refer this matter to the Commission for entry of a final order of assessment of the penalty due. The Commission will consider this matter at its August 29, 2024 public meeting.

If you would like to avoid further Commission action, please remit your payment of **\$250** to our office.

Finally, should you have any questions, please contact this office at 907-276-4176. If you are calling long distance to Anchorage from within the state, you may call toll-free at 800-478-4176.

ALASKA PUBLIC OFFICES COMMISSION

Michael Sargent

Michael Sargent
Paralegal Specialist I

Enclosure: Civil Penalty Assessment

cc: Group File (w/o enclosures)

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Alaskans for Honest Elections Attn: Phillip Izon 4201 E Dimond Way #B Wasilla, AK 99654 admin@alaskansforhonestelections.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

Michael Sargent

07.30.2024

Signature

Date

9489 0178 9820 3021 0538 83

From: [Sargent, Mike David \(DOA\)](#)
To: [Whitlock, John G \(DOA\)](#)
Subject: FW: Notice of Referral - Alaskans for Honest Elections
Date: Tuesday, August 6, 2024 11:40:59 AM

Michael Sargent

Paralegal Specialist I / Campaign Disclosure Coordinator

Alaska Public Offices Commission

2221 E. Northern Lights Blvd., Room 128

Anchorage, Alaska 99508

Phone: (907) 276-4176

Fax: (907) 276-7018

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From: Microsoft Outlook

<MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@stateofalaska.onmicrosoft.com>

Sent: Tuesday, July 30, 2024 4:53 PM

To: Sargent, Mike David (DOA)

Subject: Relayed: Notice of Referral - Alaskans for Honest Elections

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

admin@alaskansforhonestelections.com (admin@alaskansforhonestelections.com)

Remove X

Tracking Number:

9489017898203021053883

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Schedule a Redelivery (<https://tools.usps.com/redelivery.htm>)

Latest Update

Your item arrived at the WASILLA, AK 99654 post office at 4:02 pm on August 10, 2024 and is ready for pickup. Your item may be picked up at WASILLA ANNEX, 626 N BOBBY DAY CIR, WASILLA, AK 996547369, M-F 1000-1730; SAT 1000-1500.

Feedback

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Available for Pickup

Available for Pickup

WASILLA ANNEX
626 N BOBBY DAY CIR
WASILLA AK 99654-7369
M-F 1000-1730; SAT 1000-1500
August 10, 2024, 4:02 pm

Notice Left (No Secure Location Available)

WASILLA, AK 99654
August 10, 2024, 10:32 am

See All Tracking History

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

Text & Email Updates





THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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

August 13, 2024

Via Certified Mail and Email

Alaskans for Honest Elections
Attn: Phillip Izon
4201 E Dimond Way #B
Wasilla, AK 99654
admin@alaskansforhonestelections.com

Re: Commission Meeting Notice

Dear Mr. Izon:

At its upcoming June meeting, the Commission will consider the matter of the referral of your delinquent penalty.

You have a right to participate at the meeting either in person or by telephone (1-907-202-7104, Access Code 868 986 512#), in-person (2221 Northern Lights Blvd, Ste 128, Anchorage, Alaska 99508), or via [Microsoft Teams](#).¹ Please notify our office if you intend to participate. The matter is currently scheduled to be heard at **[9:05 a.m. (for Candidates) / 9:20 a.m. (for Groups)] on Thursday, August 29, 2024.**

If you do not participate in the meeting, staff will send you a letter and a final order notifying you of the Commission's decision.

Sincerely

ALASKA PUBLIC OFFICES COMMISSION

John Whitlock
John Grover Whitlock
Paralegal

Encl: Proposed Findings and Order

CERTIFICATE OF SERVICE:	
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
Alaskans for Honest Elections Attn: Phillip Izon 4201 E Dimond Way #B Wasilla, AK 99654 admin@alaskansforhonestelections.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

John Whitlock
Signature

8-13-24
Date

9489 0178 9820 3021 0547 29

¹ Meeting ID: 262 010 339 336, Passcode: GwECLG

From: [Microsoft Outlook](#)
To: admin@alaskansforhonestelections.com
Subject: Relayed: Meeting Notice and Proposed Findings and Order
Date: Tuesday, August 13, 2024 8:08:23 PM
Attachments: [Meeting Notice and Proposed Findings and Order.msg](#)

Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:
admin@alaskansforhonestelections.com (admin@alaskansforhonestelections.com) <mailto:admin@alaskansforhonestelections.com>
Subject: Meeting Notice and Proposed Findings and Order