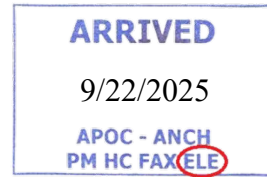


**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

David Long )  
 )  
 Complainant, )  
 )  
 v. )  
 )  
 Joel Borgquist and Keep it Alaska, )  
 )  
 Respondents. )  
 \_\_\_\_\_ )



APOC Case No. 25-03-CD

**ORDER RESOLVING COMPLAINT IN PART  
AND REMANDING ONE ISSUE TO STAFF**

On September 10, 2025 the Alaska Public Offices Commission considered Tom Oels’s complaint against Joel Borgquist and Keep it Alaska (collectively, “Keep it Alaska”), who participated in the 2024 election cycle. APOC Staff investigated the complaint and concluded that Keep it Alaska (1) did not include required information in its name or paid-for-by disclaimers, (2) failed to file independent expenditure reports, and (3) failed to include complete information about true sources in its reports. As explained below, the Commission agrees with staff’s recommendations about the first two issues. But the third issue was not adequately addressed by the parties. This narrow issue is remanded to staff for more briefing.

**I. Keep it Alaska participated in the 2024 election cycle.**

**A. May 2024 Anchorage Municipal Runoff Election**

On April 1, 2024 Joel Borgquist registered Keep It Alaska as an independent expenditure group. The group indicated plans to participate in the Anchorage Municipal election and the state primary and general elections. Borgquist also manages Red Dirt

Campaigns, LLC, which provides comprehensive campaign management services for candidates.

On April 11, the group updated its registration to indicate that it planned to use more than 1/3 of its total spending to support Anchorage mayoral candidate Dave Bronson in the May 2024 election:

**TYPE OF GROUP**

**INDEPENDENT EXPENDITURE GROUP**

More than 1/3 of total spending going to the following candidate(s).

**Dave Bronson**

While completing APOC forms, Borgquist got assistance from APOC staff by phone and email. He first called to explain that the group planned to host a fundraiser to support Bronson and asked whether Bronson could speak at the fundraiser. Staff responded that under Alaska law, independent expenditure groups generally cannot coordinate with candidates they support.<sup>1</sup> Staff also explained that if an expenditure group intends to spend more than 1/3 of its funds supporting a candidate, the candidate's name must be part of the group's name. Borgquist asked about the spending timeframe for this requirement because, in his view, there is "no way of guaranteeing future donations." He also questioned whether this statute was constitutional. The next day,

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<sup>1</sup> See AS 15.13.400(11) (saying "independent expenditure" means "an expenditure that is made without the direct or indirect consultation or cooperation with . . . a candidate").

Borgquist updated the group's registration to remove its intent to support candidate

**TYPE OF GROUP**

**INDEPENDENT EXPENDITURE GROUP**

More than 1/3 of total spending going to the following candidate(s):

Bronson: Dave Bronson

Later that month, Borgquist sent APOC staff a flyer supporting Bronson to get input about whether the disclaimer complied with the law. Staff responded and again told Borgquist that the group needed to include Bronson's name in its name if it intended to spend more than 1/3 of its funds supporting him.

On April 27, 2024, Keep It Alaska filed its first independent expenditure report, reflecting \$3,750 of debt to support "2024 – Dave Bronson Election."<sup>2</sup> This included a \$1,500 debt to Red Dirt Campaigns.

On April 30, 2024, Keep It Alaska filed a 24-hour true source report, disclosing \$9,925.48 in contributions it received from a similar group called Keep It Alaska Fed PAC from April 4 through April 24.<sup>3</sup> The report disclosed that Keep It Alaska Fed PAC was an intermediary for funds from 46 individual true source contributors.

On May 3, 2024, Keep It Alaska filed another true source report, disclosing an additional \$1,800 in contributions from Keep It Alaska Fed PAC from April 25 through

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<sup>2</sup> Independent Expenditure Report for Keep it Alaska (filed Apr. 27, 2024).

<sup>3</sup> 24-Hour True Sources Report for Keep it Alaska (filed Apr. 30, 2024).

April 26.<sup>4</sup> The report disclosed that Keep It Alaska Fed PAC was an intermediary for funds from 4 individual true source contributors.

On May 3, 2024, Keep It Alaska also filed an independent expenditure report disclosing \$11,147.11 in expenditures and a \$1,500 debt from April 24 to May 1.<sup>5</sup> All expenditures and debts on this report were to support “2024 – Dave Bronson Election.”

On May 7, 2024, Keep It Alaska filed a 7-day report for the Anchorage Municipal Runoff Election, disclosing \$17, 263.48 in total contributions and \$16,097.11 in expenditures.<sup>6</sup>

On May 8, 2024, Keep It Alaska filed a 24-hour true source report, disclosing \$1,040.48 in contributions from Keep It Alaska Fed PAC on May 8.<sup>7</sup> The report listed Keep It Alaska Fed PAC as an intermediary; three true sources of the funds were listed, but the report does not say how much each true source paid into the \$1,040.48 contribution.

On May 8, 2024, Keep it Alaska also filed an independent expenditure report showing \$1,631.32 in expenditures, all supporting “2024 – Dave Bronson Election.”<sup>8</sup>

The Anchorage Runoff Election happened on May 14, 2024.

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<sup>4</sup> 24-Hour True Sources Report for Keep it Alaska (filed May 3, 2024).

<sup>5</sup> Independent Expenditure Report for Keep it Alaska (filed May 3, 2024).

<sup>6</sup> 7-Day Report for Keep it Alaska (filed May 7, 2024).

<sup>7</sup> 24-Hour True Sources Report for Keep it Alaska (filed May 8, 2024).

<sup>8</sup> Independent Expenditure Report for Keep it Alaska (filed May 8, 2024).

**B. August 2024 State Primary Election**

On July 15, 2024, Keep It Alaska filed a 30-day report for the state primary election.<sup>9</sup> The report was later amended for accuracy. This report disclosed a \$729 expenditure for “voter data” related to the primary election, but it included no other expenditures for that election.

**C. November 2024 State General Election**

Keep It Alaska filed “No Activity” 30-Day and 7-Day reports for the state general election reflecting no change in its finances from the state primary election.<sup>10</sup> The group reported no contributions and no expenditures during the state general election cycle.

**D. Post-Election Reporting Activity**

On December 13, 2024, Keep It Alaska filed a 24-hour true source report, disclosing receipt of a \$3,000 contribution from Keep It Alaska Fed PAC made the prior day.<sup>11</sup> The report discloses that Keep It Alaska Fed PAC was an intermediary for the \$3,000 contribution, which came from three true sources. The report does not say how much of the \$3,000 overall contribution came from which of the three true sources.

Keep It Alaska then passed this contribution on to a group called the Alaska Voter Coalition, which used the money to pay a debt it owed to Red Dirt Campaigns, which is

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<sup>9</sup> 30-Day Report for Keep it Alaska (filed July 15, 2024).

<sup>10</sup> 7-Day Report for Keep it Alaska (filed Oct. 29, 2024); 30-Day Report for Keep it Alaska (filed October 7, 2024).

<sup>11</sup> 24-Hour True Sources Report for Keep it Alaska (filed Dec. 13, 2024).

run by Borgquist. Keep It Alaska did not file an independent expenditure report for making the \$3,000 contribution to Alaska Voter Coalition.

**II. Keep it Alaska committed two violations of Alaska’s campaign disclosure laws.**

**A. The respondents were adequately served.**

In materials submitted after staff’s report was issued, Keep It Alaska argues that the complaint should be dismissed for inadequate service.<sup>12</sup> The Commission rejects this argument. Staff received the initial complaint on January 10, 2025. The record includes a certified mail receipt indicating that on January 7, 2025 the complaint was delivered to the physical mailing address listed in the group’s registration form. And in the complaint paperwork, Long certified that he emailed the complaint to Borgquist at the email address he originally listed on Keep It Alaska’s registration form. That email had been updated by the time the complaint was filed, and the complaint was apparently not sent to the new email address. But there is no evidence in the record suggesting that the email used by the Long was out of service or that that the respondents did not receive the complaint. This combination of service by mail and email was adequate.

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<sup>12</sup> See 2 AAC 50.811; 2 AAC 50.870(b)(7) (saying complaint must include “proof that a copy of the complaint and documentation was mailed or delivered to the person alleged to be in violation”).

**B. Keep it Alaska was required to disclose its support for Dave Bronson in its name and paid-for-by disclaimers.**

**1. The Commission agrees with Staff's conclusion on this issue.**

When an independent expenditure group “intends to support only one candidate or to contribute or expend on behalf of one candidate 33 1/3 percent or more of its funds, the name of the candidate shall be part of the name of the group.”<sup>13</sup> In this context, “intent” means having the aim, purpose, goal, or plan to use more than 1/3 of funds supporting one candidate.<sup>14</sup>

A threshold issue is the time horizon that should be used to make the 1/3 determination. While the text of the statute does not address this directly, we conclude from the statute’s purpose and overall scheme that the statute addresses groups planning to spend 1/3 or more of its funds supporting one candidate during a yearly election cycle. First, The purpose of the statute is to ensure that the public knows when a group plans to support only one candidate—this may influence whether a person contributes to the group and how much weight the public gives to ads produced by the group.<sup>15</sup> This purpose can be evaded if a group has concrete plans to support one candidate during an election cycle but pretends to have plans to support other candidates in the future. Indeed, under the alternative approach, a group could plan to spend 100% of their funds on one

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<sup>13</sup> AS 15.13.050(b). The Commission interprets statutes based on their text and purpose, in light of reason, practicality, and common sense. *See McDonnell v. State Farm Mut. Auto. Ins. Co.*, 299 P.3d 715, 721 (Alaska 2013).

<sup>14</sup> *See Intent*, Merriam-Webster.com (accessed Sept. 18, 2025).

<sup>15</sup> The Commission is aware of no legislative history to the contrary.

candidate during an election but, due to a vague future intent, not put the candidate's name in the group's name. We doubt the Legislature wanted that result. Second, much of the APOC statutes were designed to operate on a yearly election-reporting cycle.<sup>16</sup> Our interpretation keeps this part of the statutory scheme aligned with those parts. And ultimately, if a group's intent changes, it may change the name on its APOC registration form. In sum, the statute applies if a group intends to spend more 1/3 or more of its funds on a supporting a single candidate in a yearly election cycle.

Keep It Alaska triggered the naming requirement. While it can be difficult to know a person's subjective intent, we agree with staff that the circumstantial evidence here is overwhelming.

- The group initially reported on its registration that it intended to use more than 1/3 of its funds to support candidate Bronson.
- The group change its registration only after learning about the naming obligation.
- In the following six weeks, the group spent 100% of its funds supporting candidate Bronson.
- During the entire 2024 election cycle, the group made only two expenditures to other candidates; one for \$729.90 to get "voter data" and another for \$3000, which went to a private company that Borgquist runs.
- Roughly \$16,000 of its roughly \$21,000 total expenditures supported Bronson.
- \$3,000 worth of contributions going to other candidates happened *after* all the elections for the year were finished.

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<sup>16</sup> See AS 15.13.070 (yearly contribution limits); AS 15.13.110 (yearly reporting cycle); AS 15.13.400(5) (defining "dark money" by amount contributed "per person per year"), (19) (defining "true source" and focusing on "per person per year" calculation).

In response to these facts, Keep It Alaska offered no concrete evidence that it planned to support other candidates during the yearly election cycle. For example, Keep it Alaska could have submitted organizational documents, a mission statement, minutes from group meetings, or emails among the group's staff discussing broader plans. And if Keep It Alaska had made more contributions to other candidates, that would be valid evidence of its prior intent. But on this record, the Commission concludes that the group should have put candidate Bronson's name in its name. Failing to do so violated AS 15.13.050(b). And because Alaska law requires groups to have accurate names in paid-for-by disclaimers on their ads, the group violated that statute as well.<sup>17</sup>

**2. Keep It Alaska's constitutional arguments do not change the Commission's analysis.**

Keep It Alaska raises various arguments about why AS 15.13.050(b) violates their constitutional rights, but those arguments do not change our analysis. First, APOC is an administrative agency, which "do not have jurisdiction to decide issues of constitutional law."<sup>18</sup> The Commission must enforce the statutes under its jurisdiction as they are written.<sup>19</sup> That said, the Commission of course gives due regard to the Federal and State Constitutions when interpreting and applying statutes. Here, the Commission notes that this is essentially an election disclosure requirement, which are subject to exacting

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<sup>17</sup> AS 15.13.090.

<sup>18</sup> *Alaska Pub. Int. Rsch. Grp. v. State*, 167 P.3d 27, 36 (Alaska 2007).

<sup>19</sup> Keep It Alaska may raise these issues if it pursues a superior court appeal.

scrutiny.<sup>20</sup> That standard is “somewhat less rigorous” than other forms of review under the First Amendment.<sup>21</sup> And the burden imposed by the law is quite minimal. Groups only need to disclose their relationship to candidates they have *already* chosen to give significant financial support to. Groups are also free to change their name immediately upon deciding to drop below the level of support in the statute. This gives groups significant flexibility to associate freely.

**C. Keep it Alaska was required to, but did not, file complete independent expenditure reports and contribution reports.**

Independent expenditure groups must fully report all of their expenditures on an independent expenditure report within 10 days of the expenditure.<sup>22</sup> The report must include, among other things, the date and amount of the expenditure.<sup>23</sup> Similarly, groups that contribute more than \$2,000 to an independent expenditure group must report the contribution within 24 hours.<sup>24</sup>

Keep It Alaska made expenditures that it should have, but did not, disclose on independent expenditure reports. On June 10, 2024, Keep It Alaska made a \$729.90 expenditure to i360. This was reported on the group’s 30-day primary report, but the law requires it to be reported on an additional independent expenditure report.

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<sup>20</sup> *Smith v. Helzer*, 95 F.4th 1207, 1214 (9th Cir. 2024).

<sup>21</sup> *Id.* (quoting *Nat’l Ass’n for Gun rts., Inc. v. Mangan*, 933 F.3d 1102, 1112 (9th Cir. 2019)).

<sup>22</sup> AS 15.13.040(b), (d), (e); AS 15.13.110(h) (ten-day requirement).

<sup>23</sup> *Id.*

<sup>24</sup> AS 15.13.040(r).

On December 12, 2024, Keep It Alaska contributed \$3,000 to Alaska Voter Coalition. This was reported on the group’s year-end report, but it also needed to be reported on a separate independent expenditure report, and because this was a contribution to an independent expenditure group, it also needed to be disclosed as such on a statement of contribution report.<sup>25</sup>

Also, based on Keep It Alaska’s 7-day report for the Anchorage Runoff election, its April 27, 2024 independent expenditure report failed to disclose \$5,038 in contributions, and its May 3, 2024 report failed to disclose an additional \$500 contribution.<sup>26</sup>

**D. Keep it Alaska is ordered to pay \$4,225 for these violations.**

**1. Maximum Penalty**

The maximum civil penalty for most reporting violations is \$50 per day;<sup>27</sup> the maximum penalty for failing to file a statement of contribution under AS 15.13.040(r) is \$1,000 per day the violation continues.<sup>28</sup>

The violation of AS 15.13.050(b), which required Keep It Alaska to refer to candidate Bronson in its name, began when the group registered and ran through the

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<sup>25</sup> *Id.*

<sup>26</sup> AS 15.13.040(e)(5).

<sup>27</sup> AS 15.13.390(a)(1).

<sup>28</sup> AS 15.13.390(a)(2).

election. The related violation for failing to include accurate paid-for-by disclaimers ran from the date of the communications through the day of the election.<sup>29</sup>

For *missing* independent expenditure reports, penalties run from 10 days after the date of the expenditure (when the reports were due) until the expenditures were first disclosed. For the *incomplete* independent expenditure reports, the penalties run from the date they were filed until the contributions were first disclosed. For an unfiled statement of contribution report, the penalty starts accruing the day after the contribution was made. All penalties were tolled beginning on January 10, 2025 when the complaint was filed. Based on these rules, staff calculated the following maximum penalty:<sup>30</sup>

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<sup>29</sup> Keep It Alaska’s expenditures for texting services began on April 18, 2024. Because the respondent’s presented no evidence to the contrary, the Commission concludes that this is the date that the communications began running.

<sup>30</sup> Staff’s penalty calculation includes alleged violations of AS 15.13.110(k) in the line item titled “Incomplete 24-hour true sources reports” referring to May 8 and December 13 reports, which have not been discussed in this order. As explained below, those penalties are remanded to staff—they are *not* being imposed by this order. They are included here only to provide a complete picture of staff’s initial penalty analysis.

| <b>Violation</b>                                  | <b>Dates of Violation</b> | <b>Total Days</b> | <b>Maximum Penalty</b> |
|---|---------------------------|-------------------|------------------------|
| Failure to name supported candidate in group name | 4/12/24 – 5/14/24         | 33                | \$1,650                |
| Inaccurate paid-for-by identifiers                | 4/18/24 – 5/14/24         | 27                | \$1,350                |
| Incomplete IE reports:                            |                           |                   |                        |
| April 27, 2024                                    | 4/27/24 – 5/7/24          | 10                | \$500                  |
| May 3, 2024                                       | 5/3/24 – 5/7/24           | 4                 | \$200                  |
| Incomplete 24-hour true sources reports:          |                           |                   |                        |
| May 8, 2024                                       | 5/8/24 – 7/15/2024        | 68                | \$3,400                |
| December 13, 2024                                 | 12/13/24 – 1/10/25        | 28                | \$1,400                |
| Failure to file IE reports:                       |                           |                   |                        |
| June 21, 2024                                     | 6/21/24 – 7/15/2024       | 24                | \$1,200                |
| December 23, 2024                                 | 12/23/24 – 1/10/25        | 18                | \$900                  |
| Failure to file 24-hour SoC report:               |                           |                   |                        |
| December 13, 2024                                 | 12/13/24 – 1/10/25        | 28                | \$28,000               |
|   |                           | <b>TOTAL</b>      | <b>\$42,500</b>        |

## 2. Mitigated Penalty

The Commission’s regulations allow staff to reduce penalties for groups that are new to APOC’s reporting requirements.<sup>31</sup> Here staff found that Keep It Alaska was a first-time filer during the 2024 Anchorage Runoff election, so the violations related to their incomplete independent expenditure reports during that period could be waived.<sup>32</sup> Staff recommended reducing the rest of the reporting-related penalties by 50% because this was the group’s first election cycle.<sup>33</sup> Staff found no reduction criteria applied to the penalties for using an incorrect group name.

The Commission’s regulations allow staff to recommend further mitigation based on mitigation specific mitigation factors.<sup>34</sup> A penalty may be reduced by up to 50% if

<sup>31</sup> 2 AAC 50.855.

<sup>32</sup> 2 AAC 50.855(b)(1)(A)(i).

<sup>33</sup> See 2 AAC 50.855(b)(2)(C)(i).

<sup>34</sup> 2 AAC 50.865.

someone is an inexperienced filer; Keep It Alaska meets that standard because 2024 was its first time participating in Alaska elections and the group had been subject to filing requirements for less than a year. Accordingly, staff recommended reducing all the *reporting* violations by 50%.

A penalty may be further mitigated, up to waiver, where it is “significantly out of proportion to the degree of harm to the public for not having the information.”<sup>35</sup> This typically happens when the amount of the penalty exceeds the amount of the undisclosed transaction; for 24-hour reports, the penalty must be twice the amount of the undisclosed transaction to qualify for a reduction.<sup>36</sup> Based on these factors, staff recommended reducing the penalty for the missing statement of contributions report by 95%.

Staff recommended no further mitigation of the penalties related to Keep It Alaska’s name and paid-for-by disclaimers. Staff noted that under 2 AAC 50.865(d) a maximum civil penalty may be disclosed if there is “evidence suggesting deliberate non-reporting.” It relied on the fact that the group changed its registration after learning about the naming requirement (presumably to avoid needing to refer to candidate Bronson in its name) but went on to spend much more than 1/3 of its funds on candidate Bronson. Staff recommended the following mitigated penalties for the violations at issue here:

| <b>Violation</b>                                  | <b>Total Days</b> | <b>Maximum Penalty</b> | <b>.855 Assessment</b> | <b>.865 Mitigation</b> |
|---|-------------------|------------------------|------------------------|------------------------|
| Failure to name supported candidate in group name | 33                | \$1,650                | \$1,650                | \$1,650                |

<sup>35</sup> 2 AAC 50.865(b)(5).

<sup>36</sup> *Id.*

|                                    |              |                 |                 |                |
|------------------------------------|--------------|-----------------|-----------------|----------------|
| Inaccurate paid-for-by identifiers | 27           | \$1,350         | \$1,350         | \$1,350        |
| Incomplete IE reports:             |              |                 |                 |                |
| April 27, 2024                     | 10           | \$500           | \$0             | \$0            |
| May 3, 2024                        | 4            | \$200           | \$0             | \$0            |
| Failure to file IE reports:        |              |                 |                 |                |
| June 21, 2024                      | 24           | \$1,200         | \$600           | \$300          |
| December 23, 2024                  | 18           | \$900           | \$450           | \$225          |
| Failure to file 24 hour SoC:       |              |                 |                 |                |
| December 13, 2024                  | 28           | \$28,000        | \$14,000        | \$700          |
|                                    | <b>Total</b> | <b>\$33,800</b> | <b>\$18,050</b> | <b>\$4,225</b> |

The Commission agrees with staff's recommended penalties for these violations and orders the respondents to pay a \$4,225 penalty.<sup>37</sup> Keep it Alaska is also ordered to amend its reports, if it has not yet done so, to include all the required information within the next 30 days. No penalty will accrue during that time.

The preceding sections (I and II) of this order and their subparts are final for the purpose of superior court appeal rights. Any findings or conclusions above this paragraph may be appealed to superior court within 30 days from the date of this order.<sup>38</sup> A request for the Commission to reconsider this part of its order must be filed within 15 days from the date this order is delivered or mailed.<sup>39</sup>

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<sup>37</sup> Staff's ultimate recommended penalty is slightly greater than what is calculated here because it includes penalties for two violations that the Commission has decided to remand. Other than that minor adjustment, we agree with staff's analysis.

<sup>38</sup> AS 15.13.380(g), AS 44.62.560, Alaska R. App. P. 602.

<sup>39</sup> AS 44.62.540; 2 AAC 50.891(g).

**III. Whether Keep It Alaska violated AS 15.13.110(k) is remanded for further briefing.**

Alaska Statute 15.13.110(k) requires independent expenditure groups to file a report when they received more than \$2000, in the aggregate, from a single source. That report must “certify and report the true source, and all intermediaries, if any, of the contribution.”<sup>40</sup> Staff reads this to mean that the expenditure group must report both the name of the true source *and* the amount each true source put toward the ultimate total that the intermediary contributed to the expenditure group; and it concluded that Keep It Alaska violated the statute under staff’s interpretation. But another interpretation of the statute is that “report[ing] the true source” only requires disclosure of the true source’s name.

This issue was not thoroughly briefed by the parties. The Commission appreciates staff’s citation to relevant law. But it is not clear from the record (1) how staff arrived at its interpretation of those laws or (2) whether and to what extent staff provided advice to the public and the respondent about this issue. The Commission finds that this information is required to resolve these issues and decide whether to further mitigate the assessed penalty.<sup>41</sup>

Therefore, the narrow issue of how to interpret AS 15.13.110(k) is remanded to staff. Staff is ordered to issue a single supplemental report addressing (1) how it

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<sup>40</sup> AS 15.13.110(k).

<sup>41</sup> See *Alaska Pub. Off. Comm’n v. Stevens*, 205 P.3d 321, 325-26 (Alaska 2009) (discussing relationship between penalties and ambiguous regulatory requirements).

interprets the statute and why, in light of the common tools for interpreting statutes used by Alaska Courts, (2) if prior Commission decisions implicate this issue, and (3) the advice it has provided to the public and respondents about this issue. The respondent and complainant are welcome to file written materials addressing these issues as well, but no other issues may be addressed. The Commission will consider any filings at its next meeting.<sup>42</sup>

Section III of this order is not final for the purpose of a superior court appeal. The Commission retains jurisdiction to determine whether a violation occurred and if one occurred, whether to impose a penalty.<sup>43</sup>

Dated: September 22, 2024

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION<sup>44</sup>

**Certificate of Service:**

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

David Long  
1830 E. Parks Hwy A107  
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Dblong52@gmail.com

Joel Borgquist  
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PO Box 772081  
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chair@keepitalaska.org

and by **email** to:  
Heather Hebdon  
Executive Director  
Public Offices Commission  
heather.hebdon@alaska.gov

  
Paralegal

9/22/25  
Date

<sup>42</sup> The Commission is remanding the exact same issue in the consolidated matter with APOC Case Nos. 25-01-CD/25-02-CD. Staff may draft and file a single report as long as it adequately addresses the issues.

<sup>43</sup> See AS 44.62.560 (providing for judicial review by the superior court of “a *final* administrative order”).

<sup>44</sup> Commissioners Dan LaSota, Richard Stillie, Eric Feige, Lanette Blodgett, and Walt Monegan participated in this matter. The decision was made on a 5-0 vote.