



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](http://www.doa.alaska.gov/apoc)

December 29, 2025

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

Natural Medicine AK  
Attn: Regina Randall  
PO Box 90061  
Anchorage, AK 99509  
[naturalmedicinealaska@gmail.com](mailto:naturalmedicinealaska@gmail.com)

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

Dear Ms. Randall:

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

The group's first failure to report, for which you are receiving this Notice of Violation, is based upon the group's failure to timely file an Independent Expenditure Report that should have been filed no later than July 7, 2025, for expenditures incurred from June 27, 2025 through July 7, 2025. Instead, these expenditures were first disclosed on your Second Quarterly Report filed July 10, 2025 (three days late). Under Alaska law, a maximum penalty of \$50 accrues each day the report is late,<sup>1</sup> resulting in a maximum penalty APOC could have assessed of \$150.00.<sup>2</sup> **APOC is not assessing a penalty for the violation because this was the group's first independent expenditure reporting error.**<sup>3</sup>

However, multiple additional violations were found, as follows:

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

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

<sup>2</sup> 2 AAC 50.855(a).

<sup>3</sup> 2 AA 50.855(b)(2)(A)(v)

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

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

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

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

The maximum penalty the Alaska Public Offices Commission could assess you is \$11,050.<sup>4</sup> Staff is reducing the penalty to 50% of the maximum civil penalty that could have been assessed because this is your first election cycle.<sup>5</sup> **Accordingly, the assessed penalty owed is \$5,525.**

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

Alternatively, you have the right to appeal staff’s conclusion that a violation has occurred, or the penalty amount assessed.<sup>7</sup> **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.

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<sup>4</sup> 2 AAC 50.855(a).

<sup>5</sup> 2 AAC 50.855(b)(2)(C)(i).

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

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

<sup>7</sup> 2 AAC 50.831(a).

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

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)

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

*John Whitlock* 12/29/25  
Paralegal Date

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<sup>8</sup> 2 AAC 50.895.

## Civil Penalty Appeal Affidavit

AS 15.13 Alaska Campaign Disclosure Law

**Name of Appellant:** \_\_\_\_\_

**Office Sought:** \_\_\_\_\_

**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 type="checkbox"/> Independent Expenditure (15-6)    |
| <input type="checkbox"/> 24 Hour Report | <input type="checkbox"/> Registration    | <input type="checkbox"/> Paid for By Identifier            |
| <input type="checkbox"/> Other: _____   |  |  |

**Year & Election**, if late report (e.g., 2020 Primary, 2020 Muni, etc.): \_\_\_\_\_

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

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

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

**Signed/Date:** \_\_\_\_\_

## **2 AAC 50.865. Mitigating factors; aggravating factors**

(a) A civil penalty determined under 2 AAC 50.855 may be reduced by up to 50 percent if

(1) a person required to file a statement or other filing

(A) has a good filing history; in this subparagraph, "good filing history" means

(i) no late filings in the immediately preceding five years; and

(ii) for groups, no more than \$500 in non-administrative activity shown on the group's overdue report; or

(B) is an inexperienced filer; in this subparagraph, "inexperienced filer" means a person required to file reports under this chapter if that person has been subject to a registration or reporting requirement for less than 365 days, or a person engaged in the person's first election cycle;

(2) a technical error at the commission, including a communication, facsimile machine, computer program, electronic filing system, or other equipment problem may have contributed to the late or incomplete filing;

(3) any unreported or mistakenly reported information had a value of \$100 or less; or

(4) any unreported or mistakenly reported information had a value higher than \$100 but no more than \$1,000, and a factor listed in (b) of this section also applies.

(b) A civil penalty determined under 2 AAC 50.855 may be reduced by a percentage greater than 50 percent, or waived entirely based on the following factors:

(1) the person required to file, or a family member of the person required to file, experienced a personal emergency, including a call for military service, a natural disaster, a civil disturbance, or an incapacitating illness that prevented the person from filing on or before the due date; this mitigating factor is only available to a natural person;

(2) a significant cause of the late filing is commission staff error, including

(A) furnishing reporting materials too late for filing on or before the due date;

(B) giving incorrect oral or written information to a person required to submit a statement or other filing; or

(C) failing to deliver required notices when due;

(3) a late or erroneous report included only administrative costs;

(4) a late or incomplete report did not cause significant harm to the public, and aggravating factors under (d) of this section do not exist; for purposes of this paragraph, a late or incomplete report did not cause significant harm to the public if

(A) the dollar amount missing from a form or disclosure is \$100 or less;

(B) the dollar amount for the information missing from a form or disclosure is more than \$100 but no more than \$1,000, and the person required to file self-reported the error; for purposes of

this subparagraph, the error is self-reported if the person notified the staff of the error, but filing the late or missing information without notifying the staff does not constitute self-reporting; or

(C) except for a disclosure that must be submitted within 24 hours under AS 15.13.110 or 15.13.040, the missing or incomplete information is readily available to the public through another forum;

(5) the civil penalty assessment is significantly out of proportion to the degree of harm to the public for not having the information; for purposes of this paragraph, absent the presence of aggravating factors in (d) of this section, an assessed penalty is significantly out of proportion if it exceeds the value of the transactions that were not reported or were reported late, or, in the case of seven-day or 24-hour reports, exceeds twice the value of the transactions that were not reported or were reported late; or

(6) a unique circumstance justifies reducing or waiving the penalty.

(c) The commission will not accept any of the following as mitigating factors to reduce the amount of a penalty:

(1) relying on another person or mailroom to mail, postmark, or submit the statement on or before a due date;

(2) forgetting to file;

(3) being a volunteer;

(4) having no change in reportable information from previous filed statements;

(5) relying on the responsible person's staff to remind the person of the filing deadline or to complete or file the report;

(6) being too busy to file;

(7) absence caused by travel, unless the travel was unplanned or unavoidable, including travel for a personal emergency, or weather-related travel problems.

(d) A civil penalty determined under 2 AAC 50.855 may be increased to the maximum amount allowed under the applicable statute if a person required to file a statement or other filing has

(1) failed to substantially comply with financial disclosure requirements by omitting a significant source of income, interest in real property, business interest, loan, trust, or other substantial financial interest; in this paragraph, "substantial financial interest" means an interest with a value greater than \$1,000; or

(2) a poor reporting history; indicators of a poor reporting history include any of the following:

(A) more than one late filing in the immediately preceding five years;

(B) evidence suggesting deliberate non-reporting;

(C) failure to cooperate with the staff;

(D) a violation of any provision of AS 15.13, AS 24.45, AS 24.60.200 - 24.60.260, AS 39.50, or this chapter in the preceding five years.

**From:** [Microsoft Outlook](#)  
**To:** [happyplaceak@gmail.com](mailto:happyplaceak@gmail.com); [naturalmedicinalaska@gmail.com](mailto:naturalmedicinalaska@gmail.com)  
**Subject:** Relayed: AMENDED Notice of Penalty - Natural Medicine AK  
**Date:** Monday, December 29, 2025 7:36:03 PM  
**Attachments:** [AMENDED Notice of Penalty - Natural Medicine AK.msg](#)

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Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:  
[happyplaceak@gmail.com](mailto:happyplaceak@gmail.com) ([happyplaceak@gmail.com](mailto:happyplaceak@gmail.com)) <<mailto:happyplaceak@gmail.com>>  
[naturalmedicinalaska@gmail.com](mailto:naturalmedicinalaska@gmail.com) ([naturalmedicinalaska@gmail.com](mailto:naturalmedicinalaska@gmail.com)) <<mailto:naturalmedicinalaska@gmail.com>>  
Subject: AMENDED Notice of Penalty - Natural Medicine AK