



TO: APOC Commissioners
DATE: May 5, 2026
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report 26-03-CD, *Vickie Clay v. George Martinez*

SUMMARY OF COMPLAINT AND RESPONSE

Complainant Vickie Clay alleges Respondent George Martinez violated campaign disclosure law by improperly describing expenditures to two vendors. She also alleges Respondent used campaign contributions for airline travel and a Sustainable Airline Fuel (SAF) contribution that did not reasonably relate to election campaign activities and provided a personal benefit to him.¹

Respondent explains that the airline expenditure related to campaign activities and the SAF contribution was consistent with his pledge to offset carbon emissions associated with campaign travel.²

SUMMARY OF STAFF RECOMMENDATIONS

Respondent's reporting adequately and accurately described the purpose of the expenditures. APOC staff recommends the Commission dismiss the complaint as it relates to these allegations.

Respondent's expenditure for airline travel and the SAF contribution in connection with the trip did not reasonably relate to election campaign activities. APOC staff recommends the Commission find Respondent violated AS 15.13.112(a).

¹ [Complaint](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27473), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27473>.

² [Complaint Response](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27475), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27475>.

BACKGROUND FACTS

Respondent was a candidate in the April 7, 2026 Anchorage Municipal Election.³ His year-start report disclosed a December 29, 2025 expenditure to Alaska Airlines for \$1,255.70 and a December 30, 2025 expenditure to Choose, Inc. for \$1,000. Respondent described the purpose of the Alaska Airlines expenditure as “travel” and the Choose, Inc. expenditure as “promotional/advertisement.”

The following timeline is gleaned from information and documentation provided in response to APOC staff requests:

- On December 27, 2025, Respondent purchased a \$1,255.70 ticket from Alaska Airlines for a nonrefundable flight to Ft. Lauderdale, Florida departing at 2:20 a.m. on December 30, 2025.
 - After transferring to a connecting flight in Seattle, Respondent was scheduled to arrive in Ft. Lauderdale on December 30th at 5:40 p.m.
 - Respondent’s return flight to Anchorage, connecting through Seattle, was scheduled to depart at 6:43 p.m., 63 minutes after arrival.⁴
- The day after booking the trip to Ft. Lauderdale, on December 28, 2025, Respondent contributed \$1,000 to Choose, Inc. and in return received “carbon offset/SAF attributes” and 1,500 “status points” that went to his personal Alaska Airlines Mileage Plan account.⁵
 - Choose, Inc. is a climate technology company through which Alaska Airlines passengers can contribute sustainable aviation fuel (SAF) credits based upon the estimated carbon emissions of their flight.⁶
 - A passenger can make an SAF contribution during the booking process in an amount based on 5%, 10%, or 20% of their flight’s estimated carbon emissions.⁷
 - During December 2025, Alaska Airlines rewards members had the option, through a promotion offered by the airline and its affiliated Atmos

³ [Registration](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7957&ViewType=CR), https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7957&ViewType=CR.

⁴ Exhibit 1, Responses to APOC request for information, pp. 19-21, 23.

⁵ Exhibit 1, Responses to APOC request for information, pp. 18, 22.

⁶ [Alaska Airlines Empowers Guests to Support SAF | Choose](#), accessed March 16, 2026; [Alaska Airlines partners with CHOOOSE to empower guests to reduce emissions and support growth of the sustainable aviation fuel market - Alaska Airlines, Hawaiian Airlines and Horizon Air](#), accessed March 16, 2026.

⁷ [Alaska Airlines Empowers Guests to Support SAF | Choose](#), accessed March 16, 2026.

- credit card, to contribute to the SAF program independent of any scheduled travel by contributing directly through Choose, Inc.⁸
- Alaska Airlines/Atmos rewards members using the option to donate outside of the booking process received reward program “status points” for every \$100 of contribution, up to a maximum of \$1,000.⁹
- Members become eligible for higher levels of airline benefits based upon accumulated status points.¹⁰
- Status points received during the SAF credits promotion counted toward members’ Atmos Rewards status qualification for the 2026 calendar year.¹¹

In response to APOC staff’s requests to describe how the expenditures related to Anchorage municipal election activities,¹² Respondent stated repeatedly but without detail or documentation that his trip to Ft. Lauderdale was campaign related, with his fullest response describing it as “campaign-related strategic planning, including development of campaign policy, messaging, and overall campaign strategy.”¹³ Relating to Choose, Inc., Respondent explained that the \$1,000 purchase “reflected the campaign’s broader commitment to offset emissions associated with all campaign related travel” that “was not intended to correspond directly to the cost of the airfare” but was a “promotional campaign expense consistent with those objectives.”¹⁴ Also in his March 13, 2026 response, Respondent emphasized: “The expenditure did not provide a personal benefit to me as a

⁸ [Skip the mileage run and earn status points by supporting sustainable aviation fuel - Alaska Airlines, Hawaiian Airlines and Horizon Air](#), accessed March 16, 2026.

⁹ *Id.*

¹⁰ [Earning Points - FAQ - Atmos™ Rewards](#), accessed March 16, 2026.

¹¹ [Join Our EverGreen Journey and Earn Status Points](#), accessed March 16, 2026.

¹² Exhibit 1, Responses to APOC request for information, pp. 1, 13, 16. In its March 5, 2026 Complaint Notification letter to Respondent, APOC staff requested: “Please provide further details concerning your 12.29.25 expenditure to Alaska Airlines and 12.30.25 expenditure to Choose, Inc., including a description of the goods or services received for the expenditure and how the expenditure relates to election campaign activities.” In a follow up request on March 13, 2026, APOC staff asked: “Are you able to provide any additional information that might assist APOC in determining the validity of the allegations that \$1,000 for carbon offsets relating to a \$1,255.70 trip is excessive or that the \$1,000 expenditure to Choose, Inc. was a personal benefit to the candidate rather than for the benefit of the campaign?” APOC staff on March 26, 2026 requested “a detailed description of the reason for the travel” along with receipts and campaign documents relating to the expenditures.

¹³ Exhibit 1, Responses to APOC request for information, p. 18.

¹⁴ Exhibit 1, Responses to APOC request for information, p. 14.

candidate.”¹⁵ Subsequently, in response to APOC staff’s request for documentation relating to the Choose, Inc. expenditures, Respondent disclosed:

“The purchase resulted in carbon offset/SAF attributes (2.16 tons CO₂e), as reflected in the receipt. No additional goods or services were received as part of the transaction. . . .

Subsequently, a status-related benefit described as “evergreen SAF status points” (1,500 points) was credited to my Alaska Airlines Mileage Plan account. This was an incidental benefit that was not disclosed on the receipt at the time of purchase and was not a factor in the decision to make the expenditure.”¹⁶

LAW AND ANALYSIS

- a) Respondent’s descriptions of expenditures to Alaska Airlines and Choose, Inc. adequately described their purpose

Under Alaska campaign disclosure law, candidates are required to disclose financial activity, including expenditures and debts incurred by their campaigns.¹⁷ An expenditure includes a purchase or a transfer of money or anything of value incurred or made for the purpose of influencing the election of a candidate.”¹⁸

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

- (A) the date of payment;
- (B) the check number or the identifying transaction number. . . ;
- (C) the name and address of the payee;
- (D) the purpose of the expenditure; and
- (E) the amount of the expenditure.¹⁹

¹⁵ Exhibit 1, Responses to APOC request for information, p. 14.

¹⁶ Exhibit 1, Responses to APOC request for information, p. 18.

¹⁷ AS 15.13.040(a), 2 AAC 50.321.

¹⁸ AS 15.13.400(7)(A)(i).

¹⁹ AS 15.13.040(a)(1)(A); 2 AAC 50.321(a)(5).

Where the expenditure is made to an advertising agency or business providing campaign consultation or management services, the candidate must provide a more robust description and “disclose in detail all services rendered.”²⁰

Here, Respondent’s year-start report²¹ listed an expenditure to Alaska Airlines, a campaign vendor for which 2 AAC 50.321(a)(5) required only “the purpose” of the expenditure. By describing the purpose as “travel,” Respondent met the regulation’s requirement.²² APOC staff does not find the lack of additional detail violates 2 AAC 50.321(a)(5); it described the reason the expenditure was done or made. The same analysis applies to the allegation that Respondent insufficiently or incorrectly described the expenditure to Choose, Inc. as “promotional/advertisement.”²³ Having clarified that the expenditure was a “promotional campaign expense consistent with” campaign objectives of sustainable travel, Respondent’s listed description of its purpose accurately describes the reason it was done or made.

The complaint further argues the listed address for campaign vendor Choose, Inc. is not its “principal” address, rendering the information inaccurate. Complainant points to Alaska Statute 15.13.040 and 2 AAC 50.321(a)(5)(C) which together require the name and address of an expenditure’s payee. But nothing in the law or regulation dictates which of a business’s addresses must be listed or requires that a vendor’s “principal” address take precedent over others. Nor does Complainant describe how listing one out-of-state business address over another affects campaign transparency. APOC staff finds Respondent did not

²⁰ 2 AAC 50.321(d).

²¹ [Year start report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49243&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49243&ViewType=CD>.

²² See, e.g. [Alexander v. Bjorkman 25-12-CD](#),

<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27395> (finding descriptions of “buttons” and “graphic design” sufficient description of expenditures under 2 AAC 50.321(a)(5)); [Alexander v. Costello 25-14-CD](#), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27391> (finding descriptions of “outreach,” “campaign help,” and “printing” sufficient description of expenditures under 2 AAC 50.321(a)(5)); [Gilliland v. Merrick, Order Approving Consent Agreement 25-10-CD](#), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27387> (finding descriptions of “sportswear” sufficient description of expenditures under 2 AAC 50.321(a)(5)).

²³ [Year start report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49243&ViewType=CD), <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=49243&ViewType=CD>.

violate campaign disclosure law by not using a campaign vendor’s “principal” business address.

APOC staff finds the descriptions of the expenditures satisfied 2 AAC 50.321(a)(5) and recommends dismissal of the complaint relating to these allegations.

- b) Respondent’s expenditures to Alaska Airlines and Choose, Inc. were not reasonably related to election campaign activities, violating AS 15.13.112

Complainant alleges Respondent’s \$1,255 expenditure to Alaska Airlines and the following day’s \$1,000 donation to Choose, Inc. were excessive, not reasonably related to election campaign activities, and gave Respondent a personal benefit.

With limited exceptions, campaign contributions held by a candidate may be used only to pay the expenses of the candidate and that reasonably relate to election campaign activities.²⁴ Campaign disclosure law specifically prohibits candidates from using contributions for their own personal benefit.²⁵ Generally, where a candidate uses campaign funds for a legitimate campaign expense but also receives a measurable personal benefit from the expenditure, it must be pro-rated such that the campaign pays for only the portion reasonably related to election campaign activities.²⁶

When APOC receives a properly filed complaint, Commission staff must undertake an investigation and present the investigation report.²⁷ The staff bears the burden of proving a violation by a preponderance of the evidence.²⁸

(1) Respondent’s trip to Ft. Lauderdale, Florida

As discussed in the previous section, campaign disclosure law only requires a candidate to describe the purpose of an expenditure, and describing an expenditure for an

²⁴ AS 15.13.112(a).

²⁵ AS 15.13.112(b).

²⁶ [AO 10-03-CD Neal Foster](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4909), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4909> (while candidate’s use of personal airplane would be “95%” campaign related, cost to inspect the plane would lead to certification for a full year and provide a personal benefit to candidate beyond the campaign season; campaign funds therefore could only be used for costs reflecting the portion of the year plane was actively used in the campaign).

²⁷ 2 AAC 50.870; 2 AAC 50.891.

²⁸ 2 AAC 50.891(d).

airline ticket as “travel” meets this requirement. However, Respondent’s trip to Ft. Lauderdale raises the separate issue of whether the trip was campaign-related or provided a personal benefit to the candidate under AS 15.13.112.

Respondent was a candidate in the Anchorage Municipal Election with no obvious need for air travel for his campaign. Yet, with only three days of advance planning, and during the height of the holiday travel season, Respondent booked an 8,000-mile roundtrip journey to Ft. Lauderdale. The flights, as booked, allowed Respondent a total of 63 minutes on the ground, enough time to deplane from the arriving flight and begin the boarding process for the return flight. The schedule would not have allowed time to leave the secured area of the airport. But despite repeated opportunities to explain or provide details of how this trip, under these circumstances, could have related to an election for an East Anchorage Assembly seat, Respondent stated that the trip was for campaign-related strategic planning. Without details or documentation, staff does not find Respondent’s explanation credible. Staff finds it more likely than not that Respondent’s \$1,255 expenditure for his out-and-back trip to Ft. Lauderdale was not related to his Anchorage Municipal campaign. Staff recommends that the Commission find a violation.

(2) Respondent’s SAF contribution to Choose, Inc. relating to his Ft. Lauderdale trip and his receipt of personal status points

The day after booking his trip to Ft. Lauderdale, Respondent contributed \$1,000 of campaign funds to Choose, Inc. for the purpose of “support[ing] the campaign’s publicly stated environmental platform and related communications regarding the mitigation of emissions from campaign travel.”²⁹ Respondent emphasized in his March 13, 2026 response to APOC staff’s requests for information that “[t]he expenditure did not provide a personal benefit to me as a candidate.”³⁰

Subsequently, in response to APOC staff’s request for receipts and documentation, Respondent revised his response, stating that “a status-related benefit” of 1,500 status

²⁹ Exhibit 1, Responses to APOC request for information, p. 3.

³⁰ *Id.* at p. 14.

points “was credited to my Alaska Airlines mileage plan.³¹ He reiterated that the expenditure to Choose, Inc. “was to offset emissions associated with campaign-related travel.”³²

As APOC staff has found Respondent’s trip to Ft. Lauderdale did not reasonably relate to Anchorage Municipal election campaign activities, it must follow that the \$1,000 expenditure to offset emissions associated with the trip cannot be considered campaign related. Even if the trip had been campaign-related, the \$1,000 purchase would still not be reasonably related to the campaign because it was far more than what the emissions offset would have been for the Ft. Lauderdale trip alone. According to the emissions offset calculator provided by Alaska Airlines,³³ even contributing the maximum percentage of the flight’s estimated carbon emissions offered during the booking process (20%) for a trip from Anchorage to Ft. Lauderdale would result in an SAF contribution amount of \$150.83 each way, substantially less than the \$1,000 Respondent purchased. APOC staff recommends the Commission find Respondent violated AS 15.13.112(a) by spending campaign funds to support SAF under these circumstances.

Because neither the airline travel nor the SAF contribution were reasonably related to the Respondent’s campaign, the Respondent has violated AS 15.13.112(a). Staff does not believe the Commission needs to reach the issue of whether the plane tickets and SAF contributions also wrongly conferred a measurable personal benefit on the Respondent by providing him with airline mileage and status points. Staff recommends that the Commission leave that question, which may turn on whether airline mileage and status points are a measurable and more than *de minimis* personal benefit, for another case where the travel at issue is reasonably related to the campaign.

³¹ *Id.* at p. 18.

³² *Id.*

³³ [Join our EverGreen Journey and earn Status Points](#), accessed April 7, 2026.

CONCLUSION

APOC staff finds Respondent’s descriptions of his expenditures to Alaska Airlines and Choose, Inc. met the requirements of campaign disclosure law.

APOC staff finds Respondent’s expenditures to Alaska Airlines and Choose, Inc. were not reasonably related to campaign activities in violation of AS 15.13.112(a).

MAXIMUM POTENTIAL CIVIL PENALTIES

The maximum civil penalty for using campaign contributions for expenses that did not reasonably relate to election campaign activities and provided a personal benefit to the candidate is \$50 per day for each day the violation continues.³⁴ In calculating the penalty, staff has used the start date as when the campaign first made the unrelated expenditure with campaign funds, December 27, 2025, and the date of the complaint February 26, 2026 to toll the accrual, resulting in 61 days and a maximum penalty of \$3,050.

Staff also recommends that the candidate reimburse the campaign for the combined \$2,255.70 in expenditures.

MITIGATION CRITERIA

When APOC staff assesses a penalty, the starting point for calculation is 2 AAC 50.855. Here, the regulation does not offer an applicable provision to lower the assessed penalty.

Once the statutory assessment is calculated under 2 AAC 50.855, APOC staff may recommend mitigation criteria to reduce or waive the penalty under 2 AAC 50.865. While many mitigating factors of the regulation refer to filings, violations resulting in penalty assessments nevertheless are subject to appeal, and mitigation under 2 AAC 50.865 is appropriate.

Mitigation criteria would allow reduction of 50 percent up to a complete waiver when the penalty is significantly greater and out of proportion to the degree of harm to the

³⁴ AS 15.13.390(a)(1).

public.³⁵ However, the violations in this complaint strike at the heart of campaign disclosure law; among the purposes of our statutes are to ensure campaigns are open, transparent, and accountable. Staff is hesitant to rely on this factor due to the seriousness of the violations and Respondent's continued insistence that his expenditures related to his campaign while failing to provide details or documentation that could legitimize a last-minute, out-and-back trip to Ft. Lauderdale for an Anchorage municipal election. APOC staff also must consider that in his responses to APOC staff's specific requests for information, Respondent (1) first failed to acknowledge receiving goods or services for the expenditures, (2) next specifically denied receiving any personal benefit, and then (3) conceded, only after APOC staff's request for supporting receipts and documentation, that he did, in fact, receive Alaska Airlines/Atmos status points as a direct result of donating \$1,000 to Choose, Inc.³⁶

In light of the above factors, APOC staff does not recommend a full reduction in penalty. However, given that Respondent also should reimburse the campaign for the \$2,255.70 in expenditures, APOC staff finds the maximum assessed penalty of \$3,050 is significantly disproportional.³⁷ Therefore staff recommends imposing a penalty equivalent to the expenditures Respondent must reimburse, \$2,555.70, in addition to an order requiring reimbursement, resulting in a total of \$4,511.40 in reimbursed expenditures and civil penalties for the violations.

³⁵ 2 AAC 50.865(b)(6).

³⁶ Exhibit 1, Responses to APOC request for information, pp. 3-4, 14, 18.

³⁷ 2 AAC 50.865(b)(6).

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
George Martinez PO Box 212469 Anchorage, AK 99521 george@georgeforanchorage.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Vickie Clay 600 Donna Drive Anchorage, AK 99501 vsclay@aol.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email

Cari Rousselle
Signature

05/05/2026
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
Toll Free in Anchorage: 800.478.4176
Email: doa.apoc.reports@alaska.gov
www.doa.alaska.gov/apoc

March 5, 2026

Via Certified Mail and Email

George Martinez
PO Box 212469
Anchorage, AK 99521
george@georgeforanchorage.com

Re: Complaint 26-03-CD *Vickie Clay vs. George Martinez*

Dear Mr. Martinez:

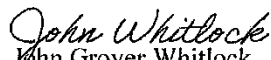
A complaint has been filed against you alleging violations of AS 15.13, Alaska's campaign disclosure law. This notification includes a copy of the complaint and its supporting documents. As the respondent, you have the right to file an answer within 15 days of this notification. Your answer may respond to the allegations, state any defenses to the allegations, object to the complaint, or include any relevant documentation, as provided under AS 15.13.380, 2 AAC 50.870, and 2 AAC 50.880. Your response is a public document. **Please provide further details concerning your 12.29.25 expenditure to Alaska Airlines and 12.30.25 expenditure to Choose, Inc., including a description of the goods or services received for the expenditure and how the expenditure relates to election campaign activities.**

APOC staff must conduct an investigation as provided in AS 15.13.380 and 2 AAC 50.875 to collect factual information, prepare a summary, and present recommendations to the Commission. Staff will provide you with a copy of the report. The Commission may (1) assess a civil penalty if the evidence supports a violation, (2) dismiss the complaint if the evidence does not support a violation, or (3) approve a consent agreement if the APOC staff and the respondent agree to a resolution. The Commission may also refer the case to the Attorney General. If the Commission schedules a hearing, you may participate in person or by phone. After the investigation concludes, the case file becomes a public document.

If you choose to respond to the complaint, please submit an answer to the Anchorage APOC office with any relevant supporting documents by no later than **March 20, 2026**.

If you have any questions, please contact us. Thank you for your cooperation.

Sincerely,


John Grover Whitlock
Paralegal III

Enclosures: Complaint 26-03-CD
cc: Heather Hebdon, Executive Director
Thomas Flynn, Assistant Attorney General
Vickie Clay, Complainant

CERTIFICATE OF SERVICE:		
I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:		
George Martinez PO Box 212469 Anchorage, AK 99521 george@georgeforanchorage.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email	and by e-mail to: Heather Hebdon Executive Director Alaska Public Offices Commission heather.hebdon@alaska.gov
Vickie Clay 600 Donna Dr. Anchorage, AK 99504 vsclay@aol.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email	and by e-mail to: Thomas Flynn Assistant Attorney General State of Alaska / Department of Law thomas.flynn@alaska.gov

Cari Rousselle 03/05/2026
Signature Date

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



Re: Complaint 26-03-CD – Response of George Martinez

March 9, 2026

Dear Mr. Whitlock,

I am writing in response to the notification dated March 5, 2026, regarding Complaint 26-03-CD. Thank you for the opportunity to clarify the expenditures referenced in the complaint.

Throughout my campaign, I have made every effort to comply with Alaska campaign disclosure laws and APOC reporting requirements. All expenditures reflected in my campaign reports were disclosed in good faith based on my understanding of applicable reporting requirements.

Alaska Airlines Expenditure – December 29, 2025 (\$1,255.70)

The Alaska Airlines expenditure reflects airfare for campaign-related travel for strategic planning purposes.

The expense was reported in good faith as a campaign expenditure because it was incurred in direct connection with campaign activity.

Choose, Inc. Expenditure – December 30, 2025 (\$1,000)

The payment to Choose, Inc. was made in connection with my campaign's publicly stated environmental platform and commitment to offset emissions associated with campaign-related travel.

Throughout the campaign, I have emphasized policies supporting responsible environmental stewardship in Alaska's transportation sector. Consistent with that commitment, my campaign publicly communicated that it would offset carbon emissions associated with campaign travel, including both air and ground travel, through sustainable aviation fuel and verified environmental initiatives.

This commitment was communicated through campaign materials and was publicly displayed on the campaign website as part of the campaign's "Certified Green Travel" commitment.

Choose provides carbon accounting, and the expenditure was incurred as part of the campaign's effort to align campaign travel and operations with the environmental commitments and policy priorities being communicated to voters.

Re: Complaint 26-03-CD – Response of George Martinez

Supporting campaign materials, including website communications and endorsement materials referencing these commitments, provide documentation that the expenditure was connected to campaign policy and communications. Accordingly, the expense was reported in good faith as a campaign-related promotional expenditure.

Thank you for the opportunity to provide this clarification. Please let me know if APOC staff require any additional information or documentation as part of the review process.

Sincerely,

George Martinez
Candidate – Anchorage Assembly District 5
PO Box 212469
Anchorage, Alaska 99521
george@georgeforanchorage.com

Attachments:

1. Exhibit index
2. Exhibit A
3. Exhibit B
4. Exhibit C
5. Exhibit D 4/4

Re: Complaint 26-03-CD – Response of George Martinez

EXHIBIT INDEX

The following materials are submitted in support of the respondent's clarification regarding the expenditures referenced in the complaint.

Exhibit A

Alaska Center endorsement graphic referencing campaign environmental commitments and mitigation of campaign-related travel emissions. <https://akcenter.org/endorsements/>

Exhibit B

Screenshot of the George Martinez campaign website www.georgeforanchorage.com displaying the "Certified Green Travel" commitment stating that the campaign offsets carbon emissions associated with campaign-related travel through sustainable aviation fuel (SAF) and verified environmental initiatives.

Exhibit C


Social media announcement from The Alaska Center listing endorsed candidates for the 2026 Anchorage Municipal Election, including George Martinez for Anchorage Assembly District 5.

Exhibit D 4/4

Relevant excerpts from the Alaska Center endorsement questionnaire reflecting the campaign's environmental policy commitments.

Exhibit A:


ENDORSED



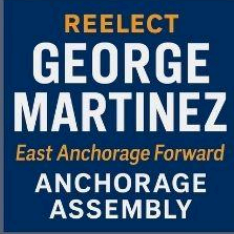
GEORGE MARTINEZ
Candidate for Anchorage Assembly, District 5 (East Anchorage)


Vision and Motivation for Public Service:

It's been the honor of my life to serve East Anchorage. I've delivered real results—free youth transit, expanded senior service, housing tax tools, and support for local food security through tax relief for growers. I've prioritized equitable climate action, including offsetting carbon emissions from all campaign-related travel — including air and ground — through SAF and verified environmental initiatives. A Connected, Safe, Thriving city means clean air, smart transit, resilient food systems, and a just transition that uplifts working families and protects our democracy.



“A Connected, Safe, Thriving city means clean air, smart transit, resilient food systems, and a just transition that uplifts working families and protects our democracy.”



Paid for by George for Anchorage, PO Box 212469, Anchorage, AK, 99521  **CERTIFIED GREEN TRAVEL**

Re: Complaint 26-03-CD – Response of George Martinez

Exhibit B:

Throughout this term, I've visited every part of my district. I've helped countless neighbors navigate city government, and although we haven't solved every problem, I've worked every day to represent our community with respect, accountability, and heart.

We're not done yet! There is still much work to be done! But we are moving forward, toward a city that's **Connected. Safe. Thriving.**



Marching with the Bridge Builders of Anchorage.

[HOME](#)

[RESULTS](#)

[DONATE](#)

Copyright 2025-2026

 Certified Green Travel

This campaign offsets carbon emissions from all campaign-related travel – including air and ground – through SAF and verified environmental initiatives.

Re: Complaint 26-03-CD – Response of George Martinez


Exhibit C:

alaskacenter The Alaska Center Board of Directors has voted to endorse candidates in the upcoming Anchorage Municipal Election.

We endorse leaders who share our vision of a thriving, just, and sustainable Alaska, and who are committed to building a stronger future for Anchorage.

Our endorsed candidates are:

- Sydney Scout, District 1 (Downtown Anchorage)
- Anna Brawley, District 3 (West Anchorage)
- Janice Park, District 4 (Midtown Anchorage)
- George Martinez, District 5 (East Anchorage)
- Rachel Blakeslee, School Board, Seat C
- Paul McDonogh, School Board, Seat D

 Election Day is April 7! Make your voice heard and vote for candidates who will champion healthy communities, clean air and water, and a strong democracy in Anchorage.

Check out our endorsements page to learn more about our candidates and the endorsement process. Link in bio!

43 minutes ago

Re: Complaint 26-03-CD – Response of George Martinez

Exhibit D 1/4:

Anchorage Assembly 2026

The Alaska Center board and staff **invites you to submit a questionnaire to be considered for endorsement by The Alaska Center.**

The following questionnaire contains short-answer and Yes/No questions, as well as a Candidate Code of Conduct for you to electronically sign. Please answer each written question fully, but keep your responses brief. **Responses must be submitted by 5pm on Friday, February 13.** The Alaska Center reserves the right to make the first question of your responses public to use for promotion. Lastly, please note that **candidates must submit a questionnaire by the deadline in order to be considered for endorsement by The Alaska Center.**

You will be notified of a decision regarding your endorsement as soon as possible after questionnaire submission. Thank you in advance for your thoughtful responses, and for your time.

Please contact Political Director Alex Petkanas at alex@akcenter.org with any questions.

Candidate Name *

George Martinez

Candidate Phone *

9074068907

Candidate Email *

george@georgeforanchorage.com

Re: Complaint 26-03-CD – Response of George Martinez

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Exhibit D 2/4:

NAME

PUBLIC CANDIDATE INFORMATION

Responses in this section will be used on our website in the event of your endorsement.

What is your vision for Anchorage, and what has motivated you to step up and serve in public office? How do your goals reflect a commitment to clean air and water, confronting climate change, and protecting a strong, inclusive democracy? If elected, how would you use this position to help lead a just transition—one that treats people equitably as we move toward environmental sustainability and a post-carbon future? (600 character limit) *

It's been the honor of my life to serve East Anchorage. I've delivered real results—free youth transit, expanded senior service, housing tax tools, and support for local food security through tax relief for growers. I've prioritized equitable climate action, including offsetting carbon emissions from all campaign-related travel — including air and ground — through SAF and verified environmental initiatives. A Connected, Safe, Thriving city means clean air, smart transit, resilient food systems, and a just transition that uplifts working families and protects our democracy.

Please upload a current headshot to be used in the event of your endorsement. *

 IMG_7061 - Geor...

 Add file

POLICY QUESTIONS (CONFIDENTIAL)

Transitioning to a 100 percent clean energy economy is necessary to avert the worst impacts of climate change while creating good jobs, boosting our economy, saving consumers money, and protecting our health. Clean energy has grown rapidly as technology prices have plummeted. However, Alaska's economy and government services are heavily dependent on oil extraction, the emissions of which are a major contributor to climate change.

Do you support transitioning to 100 percent clean energy no later than 2050 to help build pollution-free communities?

Yes

No

Exhibit D 3/4:

Do you support [Anchorage's Climate Action Plan](#), including recommendations like improving transportation with electric bus fleets and investing in energy efficiency upgrades? With solutions in mind, what specific policies at the city level do you support to reduce our state's carbon emissions and slow the harm of climate change? *

Yes. I support Anchorage's Climate Action Plan and have championed practical, community-focused solutions to reduce emissions. My work on public and multimodal transportation reflects that commitment. I authored legislation to provide free public transit for youth 18 and under and expanded free ride days for seniors—making clean, reliable transportation more accessible. I also led efforts to legalize and regulate e-bikes and scooters, integrating them into our non-motorized pathway network.

In addition, I've advanced local food security by securing targeted tax relief for growers and supporting policy that strengthens our local food systems—reducing dependence on imported goods and cutting transport-related emissions. These policies support a lower-carbon future while improving access, equity, and resilience in our city.

Environmental protection is closely tied to racial equity and social justice. Low-income communities and Black, Indigenous, and other communities of color often bear the greatest impacts of climate change. How would you work in partnership with these frontline communities—respecting their lived experience and long stewardship of this land—to reduce climate harms and ensure lasting protection and equity? *

I've worked to center low-income, Black, Indigenous, and other frontline communities in climate and environmental policy. I've expanded food access, invested in trails and parks in underserved areas, and secured free public transit for youth and seniors. As author of the Anchorage Economic Development Framework, I've embedded equity and sustainability into city planning. I will continue partnering with impacted communities to reduce emissions, build resilience, and ensure inclusive climate solutions.

We believe Anchorage has potential to lead Alaska in becoming the most engaged electorate in the country. What efforts will you make as a candidate and as an elected official to reduce barriers for systematically excluded residents to engage in our local democratic process and increase accessibility for Anchorage voters? *

I show up, stay engaged, and work directly to build community capacity. I authored the Access for Youth Initiative to remove barriers for young people to engage in local government and championed the creation of the Anchorage Youth Commission. I've supported language access, neighborhood meetings, and policies that increase access to the ballot. As a non-partisan leader, I'm committed to ensuring all voices—especially those historically excluded—are heard, represented, and empowered in our local democracy.

Are there any circumstances under which you would vote to roll back Anchorage's environmental protections, weaken climate-resilience efforts, or restrict democratic participation at the municipal level? If so, what are they? If not, how would you hold that line under political pressure? *

No. I would not vote to roll back environmental protections, weaken climate resilience, or restrict democratic participation—because these are foundations of responsible economic development. Anchorage's future depends on sustainable infrastructure, long-term cost savings, and inclusive public trust. I believe we can grow our economy and strengthen our communities without sacrificing clean air, safe neighborhoods, or public voice.

Exhibit D 4/4:

Expected Behavior

- The Alaska Center expects everyone in the workplace and all participants in Alaska Center activities, events or meetings to conform to the following code of conduct:
- Respect others and their views
- Recognize and value individual differences
- Be sure you do not engage in aggressive, bullying or intimidating behavior
- Do not engage in discriminatory or harassing behavior

I acknowledge that I have read The Alaska Center Code of Conduct and will adhere to these expectations.

Full Name *

George Martinez

Elected position being pursued *

Assembly, district 5, seat 1.

Date *

MM DD YYYY

02 / 05 / 2026

This form was created inside of The Alaska Center.

Google Forms

Re: Complaint 26-03-CD – Response of George Martinez

From: [Stone, Kim S \(DOA\)](#)
To: george@georgeforanchorage.com
Cc: [Hebdon, Heather R \(DOA\)](#)
Subject: APOC follow up
Date: Friday, March 13, 2026 3:21:34 PM
Attachments: [260309-Response-to-complaint.pdf](#)

Hello Mr. Martinez –

Thank you for submitting your response in APOC complaint 26-03-CD, *Clay v. Martinez* .

You explained that your campaign’s expenditure to Choose, Inc. was made in an effort to offset emissions associated with campaign-related travel, consistent with your campaign’s stated policy. Your explanation and supporting documents on this issue are helpful and informative.

Are you able to provide any additional information that might assist APOC in determining the validity of the allegations that \$1,000 for carbon offsets relating to a \$1,255.70 trip is excessive or that the \$1,000 expenditure to Choose, Inc. was a personal benefit to the candidate rather than for the benefit of the campaign?

Respectfully -

Kim Stone
Campaign Disclosure Coordinator
Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, Alaska 99508
Phone: (907) 276-4176
Fax: (907) 276-7018

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From: [George Martinez](#)
To: [Stone, Kim S \(DOA\)](#)
Cc: [Hebdon, Heather R \(DOA\)](#)
Subject: Re: APOC follow up
Date: Friday, March 13, 2026 3:55:30 PM

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

Hello Ms. Stone,

Thank you for your message and for reviewing my response and supporting materials.

The expenditure to Choose, Inc. was not intended to correspond directly to the cost of the airfare. Rather, it reflected the campaign's broader commitment to offset emissions associated with all campaign-related travel and to demonstrate that commitment through the campaign's operations and messaging.

The expenditure did not provide a personal benefit to me as a candidate. It supported the campaign's publicly stated environmental platform and related communications regarding the mitigation of emissions from campaign travel. The campaign reported the expenditure in good faith as a promotional campaign expense consistent with those objectives.

Please let me know if any additional information would be helpful.

Sincerely,

George Martinez

On Fri, Mar 13, 2026 at 3:21 PM Stone, Kim S (DOA) <kim.stone@alaska.gov> wrote:

Hello Mr. Martinez –

Thank you for submitting your response in APOC complaint 26-03-CD, *Clay v. Martinez* .

You explained that your campaign's expenditure to Choose, Inc. was made in an effort to offset emissions associated with campaign-related travel, consistent with your campaign's stated policy. Your explanation and supporting documents on this issue are helpful and informative.

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Respectfully -

Kim Stone

Campaign Disclosure Coordinator

Alaska Public Offices Commission

2221 E. Northern Lights Blvd., Rm. 128

Anchorage, Alaska 99508

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--

George Martinez

Paid for by George for Anchorage, PO Box 212469, Anchorage, 99521.

From: [Stone, Kim S \(DOA\)](#)
To: george@georgeforanchorage.com
Cc: [Hebdon, Heather R \(DOA\)](#); [Whitlock, John G \(DOA\)](#)
Subject: APOC complaint 26-03-CD
Date: Thursday, March 26, 2026 4:08:39 PM

Good afternoon, Mr. Martinez:

I am making the following requests related to matter 26-03-CD and pursuant to the authority granted under AS 15.13.045, AS 15.13.111, and 2 AAC 50.806. Please respond to the following questions and requests at your earliest convenience, but not later than 5 days from today, March 26, 2026.

The complaint alleges your December 29, 2025 expenditure to Alaska Airlines and December 30, 2025 expenditure to Choose, Inc. were excessive and provided a personal benefit to you. You have responded that the expenditures did not provide a personal benefit to you. In the interest of resolving these discrepancies:

1. Please provide details concerning the campaign's December 29, 2025 expenditure to Alaska Airlines, including the identity of the traveler, the destination and dates of the travel, and a detailed description of the reason for travel.
2. Please describe fully any goods, services, or benefits received after or as a result of the campaign's \$1,000 expenditure to Choose, Inc, and specifically describing whether Alaska Airlines / Atmos Rewards status points were awarded as part of the purchase, and if so, the identity of the person receiving the status points.
3. Please produce any and all campaign records or documents relating to the expenditures, including but not limited to receipts and invoices.

If you have any questions, please don't hesitate to contact me at Kim.Stone@alaska.gov. Thank you in advance for your assistance.

Respectfully,

Kim Stone
Campaign Disclosure Coordinator
Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, Alaska 99508
Phone: (907) 276-4176
Fax: (907) 276-7018

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contact the sender and destroy all copies of the communication.

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



Re: Complaint 26-03-CD – Response to Request for Information

Ms. Stone

In response to your March 26, 2026, request for additional information regarding the expenditures identified in Complaint 26-03-CD.

1. Alaska Airlines Expenditure – (\$1,255.70)

The traveler was George Martinez. The travel consisted of a round-trip coach itinerary from Anchorage, Alaska, to Fort Lauderdale, Florida, departing December 30, 2025, and returning December 31, 2025.

The purpose of the travel was campaign-related strategic planning, including development of campaign policy, messaging, and overall campaign strategy.

2. Choose, Inc. Expenditure – December 28, 2025 (\$1,000)

The expenditure to Choose, Inc. was to offset emissions associated with campaign-related travel consistent with the campaign’s publicly stated environmental platform and “Certified Green Travel” commitment.

The purchase resulted in carbon offset/SAF attributes (2.16 tons CO₂e), as reflected in the receipt. No additional goods or services were received as part of the transaction.

Subsequently, a status-related benefit described as “Evergreen SAF status points” (1,500 points) was credited to my Alaska Airlines Mileage Plan account. This was an incidental benefit that was not disclosed on the receipt at the time of purchase and was not a factor in the decision to make the expenditure.

3. Campaign Records and Documents

Attached are copies of records responsive to your request, including:

- A • Alaska Airlines itinerary and receipt for the December 29–31, 2025 travel (Exhibit 1)
- B • Choose, Inc. receipt and transaction confirmation (Exhibit 2)

Re: Complaint 26-03-CD – Response of George Martinez 3.26.26

C • Alaska Airlines Mileage Plan account record reflecting “Evergreen SAF status points” credit (Exhibit 3)

D • Campaign bank transaction records confirming Alaska Airlines and Choose expenditures (Exhibit 4)

A- Alaska Airlines itinerary and receipt for the December 29–31, 2025 travel (Exhibit 1)

3/26/26, 9:42 PM

Gmail - Your confirmation receipt: OHPVFR for your flight to Seattle on 2025-12-30

Alaska Airlines

Flight 98
Boeing 737MAX 9
Passenger

Traveler(s)

George Martinez
Seat: 9B★ Class: L (COACH)

Tue, Dec 30
02:20 AM

ANC

Anchorage



Tue, Dec 30
07:00 AM

SEA

Seattle

Alaska Airlines

Flight 516
Boeing 737-900 (Winglets)
Passenger

Traveler(s)

George Martinez
Seat: 10D★ Class: L (COACH)

Tue, Dec 30
08:40 AM

SEA

Seattle



Tue, Dec 30
05:40 PM

FLL

Fort Lauderdale

<https://mail.google.com/mail/u/0/?ik=53f0bc3e6d&view=pt&search=all&permmsgid=msg-f:1852684043143359734&simpl=msg-f:1852684043143359734>

2/10

Re: Complaint 26-03-CD – Response of George Martinez 3.26.26

3/26/26, 9:42 PM

Gmail - Your confirmation receipt: OHPVFR for your flight to Seattle on 2025-12-30

Alaska Airlines

Flight 517
Boeing 737-900 (Winglets)
Passenger

Traveler(s)

George Martinez
Seat: 10F ★ Class: L (COACH)



Alaska Airlines

Flight 218
Boeing 737-800 (Winglets)
Passenger

Traveler(s)

George Martinez
Seat: 7E ★ Class: L (COACH)



★ Premium Class seat has been selected for this flight.

<https://mail.google.com/mail/u/0/?ik=53f0bc3e6d&view=pt&search=all&permmsgid=msg-f:1852684043143359734&simpl=msg-f:1852684043143359734>

3/10

Re: Complaint 26-03-CD – Response of George Martinez 3.26.26

3/26/26, 9:42 PM

Gmail - Your confirmation receipt: OHPVFR for your flight to Seattle on 2025-12-30

Summary of airfare charges

George Martinez

[REDACTED]

Ticket 0272127386782

Base fare and surcharges	\$1,144.56
Taxes and other fees	\$111.14
Per-person total	\$1,255.70

Total charges for air travel **\$1,255.70**

[View all taxes, fees and charges.](#)

Nonrefundable fare of \$1,255.70 to be charged to the VISA card with number VI9639 held by George Martinez on Dec 27, 2025.

Trip insurance by Allianz Global Assistance

Purchase travel insurance benefits and travel assistance services for your trip from [Allianz Global Assistance](#). [Learn more.](#)

<https://mail.google.com/mail/u/0/?ik=53f0bc3e6d&view=pt&search=all&permmsgid=msg-f:1852684043143359734&simple=msg-f:1852684043143359734>

4/10

Re: Complaint 26-03-CD – Response of George Martinez 3.26.26

B- Choose, Inc. receipt and transaction confirmation (Exhibit 2)

Receipt from Choose AS

Bill number: 254-2992-277
Billing date: 2025.12.28 UTC
Paid date: 2025.12.28 UTC
Paid with: ****9639 2/2029
Total amount: 1000.00 USD
SAF attributes: 2.16 tn CO₂e
Order count: 1
Customer: George Martinez
████████████████████
████████████████████
████████████████████
AK
United States
Country of residence :United States

Orders

Date	Id	Category	Subtotal	Total
2025.12.28 UTC	254-3095-278		1000.00 USD	1000.00 USD
		SAF attributes	2.16 tn CO ₂ e	


Business name: Choose AS
Address: Kristian Augusts gate 13, 0164 Oslo, Norway
VAT number: 979501765 MVA (Foretaksregisteret). **Business No.** 73839 6407, **G.S.T./H.S.T. No.** 73839 6407 RT0001, **Q.S.T. No.** 12 2991 4568 TQ 0001
support@choose.today

C- Alaska Airlines Mileage Plan account record reflecting "Evergreen SAF status points" credit (Exhibit 3)

12/28/2025	SPECIAL SERVICES EVERGREEN SAF STATUS POINTS	Credited	0	0	0	1500
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D- Campaign bank transaction records confirming Alaska Airlines and Choose expenditures (Exhibit 4)


Alaska Air >

\$1,255.70 

S70 Business Checking -S70

WITHDRAWAL DEBIT CARD PURCHASEALASKA AIR
0272127386782 SEATTLE WA Date 12/27/25 PURCH
2443106536153622835152 Card 25 #9639 MCC 3256

Recurring Choose Alaska Oslo No >

\$1,000.00 

S70 Business Checking -S70

Recurring WITHDRAWAL DEBIT CARD PURCHASECHOOSE*
ALASKA OSLO NO Date 12/28/25 PURCH
2460905536253627910001 Card 25 #9639 MCC 8999