Alaska Public Offices Commission

EXPEDITED COMPLAINT

EXPEDITED COMPLAINT REQUEST

PRIOR to requesting expedited review, ensure your filing meets the factors required for expedited approval in AS 15.13.380(c). Those factors are whether the alleged violation:

☑ if not immediately restrained (stopped), could materially affect the outcome of an election or other impending event;

☑ could cause irreparable harm that penalties could not adequately remedy; and

☑ whether there is reasonable cause to believe that a violation has occurred or will occur

Expedited review **requires the complainant to prove the violation by a preponderance of the evidence.**

ALL COMPLAINTS MUST INCLUDE:

1. Complainant's name + contact info
2. Respondent's name + contact info
3. Laws, regulations allegedly violated
4. Description of allegations
5. Basis of knowledge of alleged facts
6. Documentation to support allegations
7. Notarized signature of the complainant
8. Proof that complaint *and* all supporting documents were served on respondent

APOC case name/number/date

ARRIVED
SEP 04 2026
APOC - ANCH
PM HC FAX ELE

26-13-POFD

APOC LAWS ALLEGEDLY VIOLATED

Specify section of law or regulation

Campaign Disclosure Law ☑ AS 15.13 ☐ 2 AAC 50.250-405	**Public Official Financial Disclosure** ☑ AS 39.50 ☑ 2 AAC 50.680-799
Lobbying Regulation ☐ AS 24.45 ☐ 2 AAC 50.550-590	**Legislative Financial Disclosure** ☐ AS 24.60 ☐ 2 AAC 50.680-799

	COMPLAINANT	RESPONDENT *Person or group allegedly violating law*
☐ APOC ☑ Person ☐ Party ☐ Group	Joel C. Borgquist	☑ Person ☐ Party ☐ Group Bernadette Wilson
Address City / Zip	19730 Mills Bay Dr Eagle River, AK 99577	12301 Johns Road, Unit 21 Anchorage, AK 99577
Phone/Fax	308-892-9813	907-250-1672
E-mail	joel.g.jj@gmail.com	bmwsk8@yahoo.com
	COMPLAINANT'S REPRESENTATIVE	RESPONDENT'S REPRESENTATIVE

If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info

Name/Title		
Address		
Phone/Fax		
E-mail		

DESCRIPTION or SUMMARY of ALLEGED VIOLATION

See attached documents

Use extra pages if needed

☑ **SUPPORTING DOCUMENTS – DESCRIBE:**

See attached documents

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

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

Signature: [signature] Title: Date: 09-04-2026

Subscribed and sworn to or affirmed by me at Anchorage AK on 9-4-26

Signature: [signature] Title: Notary Public

BRODY REGER
My Commission Expires 4-24-27
NOTARY PUBLIC
STATE OF ALASKA

APOC COMPLAINTS, RESPONSES, INVESTIGATION REPORTS & COMMISSION ACTIONS ARE PUBLIC DOCUMENTS

APOC ANCHORAGE	APOC JUNEAU	APOC COMPLAINT PROCESS: 2 AAC 50.450 - 476	
2221 E. NORTHERN LIGHTS #128	240 MAIN STREET #500	FILING COMPLAINTS: 2AAC 50.870	ANSWERING COMPLAINTS: 2AAC 50.880
ANCHORAGE, AK 99508	P.O. BOX 110222	APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870	
907-276-4176 / FAX 907-276-7018	JUNEAU, AK 99811	INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891	
TOLL-FREE 800-478-4176	465-4864 / FAX 465-4832	RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c)	
WEB: http://doa.alaska.gov/apoc/	APOC FORMS: http://doa.alaska.gov/apoc/forms_all.html	APOC LAWS: http://doa.alaska.gov/apoc/apoclaws.html	

EXPEDITED COMPLAINT

Laws and regulations at issue

AS 39.50.030(a), (b)(1), and (b)(2); AS 39.50.200(a)(10); 2 AAC 50.700(b); 2 AAC 50.708(a) and (b); and 2 AAC 50.850.

Clear and concise statement of facts

1. Wilson filed a 2026 candidate POFD on May 29, 2026, covering January 1 through December 31, 2025. The filing reports Denali Disposal Inc. only as a salaried employer, identifies Wilson as its full-time general manager, and places her compensation in the $100,000-$200,000 range. The Interests section does not report Denali Disposal or disclose any ownership or officer interest in the company. The filing also lists no Denali clients or customers. She did not amend or correct the document by the statutory deadline of July 1st. Exhibit A.
2. The State of Alaska corporations record identifies Wilson as President, Shareholder, and Director and states that she owns 75 percent of Denali Disposal. AS 39.50.030(b)(2) and 2 AAC 50.708 required her to report Denali as a business interest and identify the nature of those interests. Listing Denali only as her salaried employer did not disclose her ownership and officer roles. Exhibit B.
3. Because Wilson held a controlling interest while also serving as president, director, and full-time general manager, APOC should separately determine whether 2 AAC 50.700(b) required her to identify qualifying Denali clients or customers as sources of income.
4. Denali advertises front-load dumpster, roll-off dumpster, and commercial compactor services for businesses and other customers. Exhibit C. Denali's Front Office provided a written quote of $232.27 per month for weekly four-yard service and $328.32 per month for weekly six-yard service. Those amounts annualize to $2,787.24 and $3,939.84. Exhibit D. The quote is direct pricing evidence from Denali Disposal.
5. At either quoted rate, a recurring customer would exceed the $1,000 reporting threshold within five months. The direct quote therefore supports a reasonable belief that many, and likely most, year-round commercial dumpster customers paid more than $1,000. AS 39.50.030(b)(1) requires disclosure of **all sources of income over $1,000** during the preceding calendar year. The disclosure includes the source, recipient, amount/range, method by which the income was earned, approximate hours worked, and a description of the services. APOC's self-employment form instructions put it very plainly: **"Disclose each client, customer or business that paid you and/or your family members more than $1,000."**
6. This fits the same disclosure and certification pattern addressed in the Tregarrick Taylor matter. Taylor's POFD omitted required identifying information tied to a significant source of income. APOC found that his filing did not substantially comply to fix his POFD within 30 days after the due date of July 1 and recommended that his nomination not be certified. Wilson's omitted business interest is independently established by state records, and the same substantial-compliance standard should be applied consistently. Exhibit E.
7. A summary of all relevant case law and precedence related to Wilson being a non-certifiable candidate due to filing out an inaccurate POFD that was not remedied by July 1st are also included in this document. Exhibit F.
8. The allegations satisfy the requirements for expedited consideration under AS 15.13.380(c) and 2 AAC 50.888. The allegations and supporting exhibits satisfy the statutory and regulatory standards for expedited consideration. AS 15.13.380(c) directs the Commission to consider whether there is reasonable cause to believe that a violation has occurred or will occur; whether the alleged violation, if not immediately restrained, could materially affect the outcome of an election or other impending event; and whether the alleged violation could cause irreparable harm that penalties could not adequately remedy. 2 AAC 50.888 requires evidence showing reasonable cause to believe a violation has occurred or will occur and that, if not immediately restrained, the violation could materially affect an election or impending event or cause irreparable harm that penalties could not adequately remedy.
9. First, there is reasonable cause to believe that a violation occurred. Wilson's May 29, 2026 POFD is itself direct evidence of what she disclosed. The State of Alaska corporations record identified in Exhibit B provides

independent evidence that Wilson was President, Director, Shareholder, and 75% owner of Denali Disposal. Yet the POFD's Interests section does not identify Denali Disposal or disclose those ownership and officer interests. These records therefore provide an evidentiary basis for the allegation that information required by AS 39.50.030(b)(2) and 2 AAC 50.708 was omitted.

10. There is also reasonable cause for APOC to investigate whether Wilson omitted reportable Denali Disposal customers as sources of income. A 75% ownership interest exceeds the 50% controlling-interest threshold in 2 AAC 50.700(b). Wilson's POFD identifies her as Denali's full-time General Manager. Denali's own written pricing quote, Exhibit D, establishes recurring commercial service rates of $232.27 and $328.32 per month, amounts that exceed $1,000 within five months. No Denali client or customer appears on Wilson's POFD. These facts provide a concrete evidentiary basis—not merely speculation—for APOC to determine whether Wilson satisfied the self-employment requirements and, if so, whether qualifying customer income sources required by AS 39.50.030(b)(1) and 2 AAC 50.700 were omitted.
11. Second, the alleged violations could materially affect the outcome of an election or other impending event. These allegations concern an active candidate for Governor and directly implicate whether the candidate timely substantially complied with Alaska's mandatory financial-disclosure law. Under AS 39.50.060(b), failure to comply within the time required can affect whether the Lieutenant Governor may certify a candidate's nomination or election. The alleged omissions were not corrected by the July 1, 2026 statutory deadline alleged in this complaint. Thus, the issue before APOC is not confined to assessing a monetary penalty for a historical reporting error; APOC's determination may bear directly upon the candidate-certification process and the November 3, 2026 general election.
12. The significance of prompt review is demonstrated by APOC's recent proceeding concerning gubernatorial candidate Tregarrick Taylor. APOC voted 4-1 that Taylor failed to substantially comply with AS 39.50 within the statutory period ending July 1, 2026 because required information concerning a significant source of income remained deficient. APOC recommended non-certification under 2 AAC 50.850(h), and the Lieutenant Governor subsequently declined to certify Taylor's nomination under AS 39.50.060(b). The Taylor matter therefore demonstrates that substantial POFD noncompliance by a gubernatorial candidate can have an immediate certification consequence rather than merely resulting in a later civil penalty.
13. Third, ordinary monetary penalties may not adequately remedy the alleged harm. If APOC ultimately determines that Wilson failed to substantially comply with AS 39.50 within the statutory period and that AS 39.50.060(b) and 2 AAC 50.850(h) apply, resolving that question only after the general election or certification process has substantially advanced could frustrate the operation of the statutory certification remedy. A civil penalty imposed later would not resolve the separate statutory question whether the candidate was eligible for certification based on timely compliance with the POFD requirements.
14. The alleged harm also concerns the electorate's access to financial information before voting. The purpose of a candidate POFD is to disclose financial interests and qualifying sources of income while that information can inform the public's evaluation of the candidate. If material ownership interests or required income sources remain undisclosed through the election, later amendment and monetary penalties cannot fully restore the opportunity for voters to consider that information before casting their ballots.
15. Accordingly, the supporting evidence establishes reasonable cause for investigation and presents a time-sensitive question that could materially affect an impending statewide election and candidate-certification process and that may not be adequately remedied through ordinary monetary penalties after the fact. The complainant therefore respectfully requests expedited consideration under AS 15.13.380(c) and 2 AAC 50.888.

Basis of knowledge

The ownership allegation is based directly on Wilson's POFD and the attached State of Alaska business record. The client allegation is made on information and belief based on the attached service and direct-price evidence. The complainant does not have access to Denali Disposal's private customer records, however a preponderance of evidence exists between the aforementioned exhibits that clearly demonstrate Wilson has clients paying her over $1000 annually, which are required to be disclosed.

Requested action

- Accept the complaint and grant expedited consideration.
- Apply the same substantial-compliance and certification standard used in the Taylor matter before voting and certification are completed.

EXHIBIT A

Wilson 2026 Candidate POFD

Submitted May 29, 2026; reporting period January 1 through December 31, 2025

POFD Form

COMPLETED

Submission Date: **05/29/2026**

Filer Information

First Name: **Bernadette**
Last Name: **Wilson**
Partner Type: **None / Not Applicable**
Spouse/Domestic Partner Name: Nothing to Report
Dependent Children: **1**
Non-Dependent Children: **1**

Purpose of Filing

Report Year: **2026**

Report Dates: From **01/01/2025** Through **12/31/2025**
Filing As: **State Candidate**
District: **Statewide**
Election: **2026 - State Primary**
Report Type: **Candidate**

Income

Owner	Type	Detail	Description	Amount
Filer	Salaried	Denali Disposal Inc. Full-time From: 01/01/2025 Through 12/31/2025	General Manager	**$100,000 - $200,000**

Income section: Denali Disposal is reported only as salaried employment; no Denali clients are listed.

Interests

Owner	Type	Detail	Description / Interest
Filer	Real Property	99515 Anchorage, Alaska 99515	Ownership Interest: Fee Simple
Filer	Beneficial	Managed By: Empower	Retirement Account Ownership: 100%

Interests section: no Denali Disposal ownership or officer interest is reported.

Source: https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=34142&ViewType=POFD

EXHIBIT B

State Corporate Record for Denali Disposal Inc.

State of Alaska Corporations, Business and Professional Licensing

AK Entity #: 10038378
Date Filed: 06/12/2026
State of Alaska, DCCED

FOR DIVISION USE ONLY

THE STATE of ALASKA

Department of Commerce, Community, and Economic Development
Division of Corporations, Business, and Professional Licensing
PO Box 110806, Juneau, AK 99811-0806
(907) 465-2550 • Email: corporations@alaska.gov
Website: corporations.alaska.gov

Domestic Business Corporation

2026 Biennial Report
For the period ending December 31, 2025

Web-6/12/2026 1:48:05 PM

Due Date: This report along with its fees are due by January 2, 2026

Fees: If postmarked before February 2, 2026, the fee is $100.00.
If postmarked on or after February 2, 2026 then this report is delinquent and the fee is $137.50.

Entity Name: DENALI DISPOSAL INC.
Entity Number: 10038378
Home Country: UNITED STATES
Home State/Prov.: ALASKA
Physical Address: 11831 S GAMBELL ST, ANCHORAGE, AK 99515
Mailing Address: BOX 112150, ANCHORAGE, AK 99511

Registered Agent information cannot be changed on this form. Per Alaska Statutes, to update or change the Registered Agent information this entity must submit the Statement of Change form for this entity type along with its filing fee.

Name: BERNADETTE WILSON
Physical Address: 12301 JOHNS ROAD #21, ANCHORAGE, AK 99515
Mailing Address: 12301 JOHNS ROAD #21, ANCHORAGE, AK 99515

Officials: The following is a complete list of officials who will be on record as a result of this filing.

- **Provide all officials and required information. Use only the titles provided.**
- **Mandatory Officers (3) and Directors (1), who must be individuals:** this entity must have a President, Secretary, and Treasurer. The President and Secretary cannot be the same person unless the President is 100% Shareholder. This entity must have at least one (1) Director. Provide all the individuals who are directors.
- **Shareholders:** the entity must provide all Shareholders who own 5% or more of the Issued Shares. Shareholders may be an individual or another entity.
- **Alien Affiliates:** the entity must provide all Alien Affiliates (non-U.S.), which may be an individual or another entity.

Full Legal Name	Complete Mailing Address	% Owned	Alien Affiliate	Assistant Secretary	Assistant Treasurer	Director	President	Secretary	Shareholder	Treasurer	Vice President
Bernadette Wilson	BOX 112150, ANCHORAGE, AK 99511	75.00				X	X		X		
Roberta Zipay	BOX 110349, ANCHORAGE, AK 99511	25.00				X		X	X	X	

If necessary, attach a list of additional officers on a separate 8.5 X 11 sheet of paper.

Purpose: ANY LAWFUL
NAICS Code: 562111 - SOLID WASTE COLLECTION
New NAICS Code (optional):

Entity #: 10038378 Page 1 of 2

Issued Shares: The entity must provide the number of Issued Shares

- Do not leave Issued Shares blank.
- If there are Shareholders then you must provide a number of Issued Shares. Do not exceed the number of Authorized Shares.
- If there are no Issued Shares (and no Shareholders) then provide "0" or "zero" or "none".
- To change Class, Series, Authorized Shares, or Par Value submit an amendment.

Class	Series	Authorized Shares	Par Value	Number of Issued Shares
Common		10000	0.000000	10000

Mandatory. Do not leave blank.

This form is for use by the named entity only. Only persons who are authorized by the above Official(s) of the named entity may make changes to it. If you proceed to make changes to this form or any information on it, you will be certifying under penalty of perjury that you are authorized to make those changes, and that everything on the form is true and correct. In addition, persons who file documents with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor. Continuation means you have read this and understand it.

Name: Bernadette Wilson

Entity #: 10038378

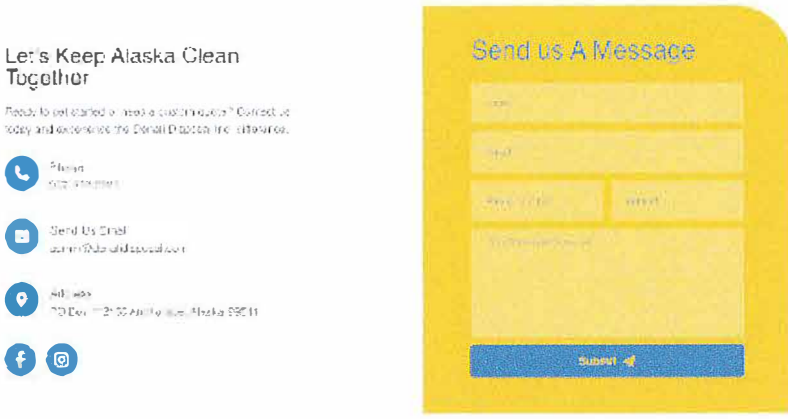
Page 2 of 2

The state record identifies Bernadette Wilson as President, Shareholder, and Director with 75.00 percent ownership.

EXHIBIT C

Denali Disposal Commercial Services

Archived company website capture



Denali DISPOSAL INC.

Denali advertises front-load dumpster, roll-off dumpster, and commercial compactor services.

Source: https://denalidisposal.com/

EXHIBIT D

Direct Denali Disposal Commercial Quote

Written quote provided by Denali Disposal Front Office

Dumpster Quotes Inbox ×

Front Office <admin@denalidisposal.com>
to me

Good morning. Per our conversation here are the quotes for 1-6yd 1x/wk and 1-4yd 1x/wk

1-6yd 1x/wk = 328.32 per month
1-4yd 1x/wk = 232.27 per month

Thank you for reaching out to us!

-Sebastian

Front Office

Denali Disposal, Inc.
907-522-2220
www.denalidisposal.com

Denali quoted weekly four-yard service at $232.27 per month and weekly six-yard service at $328.32 per month.

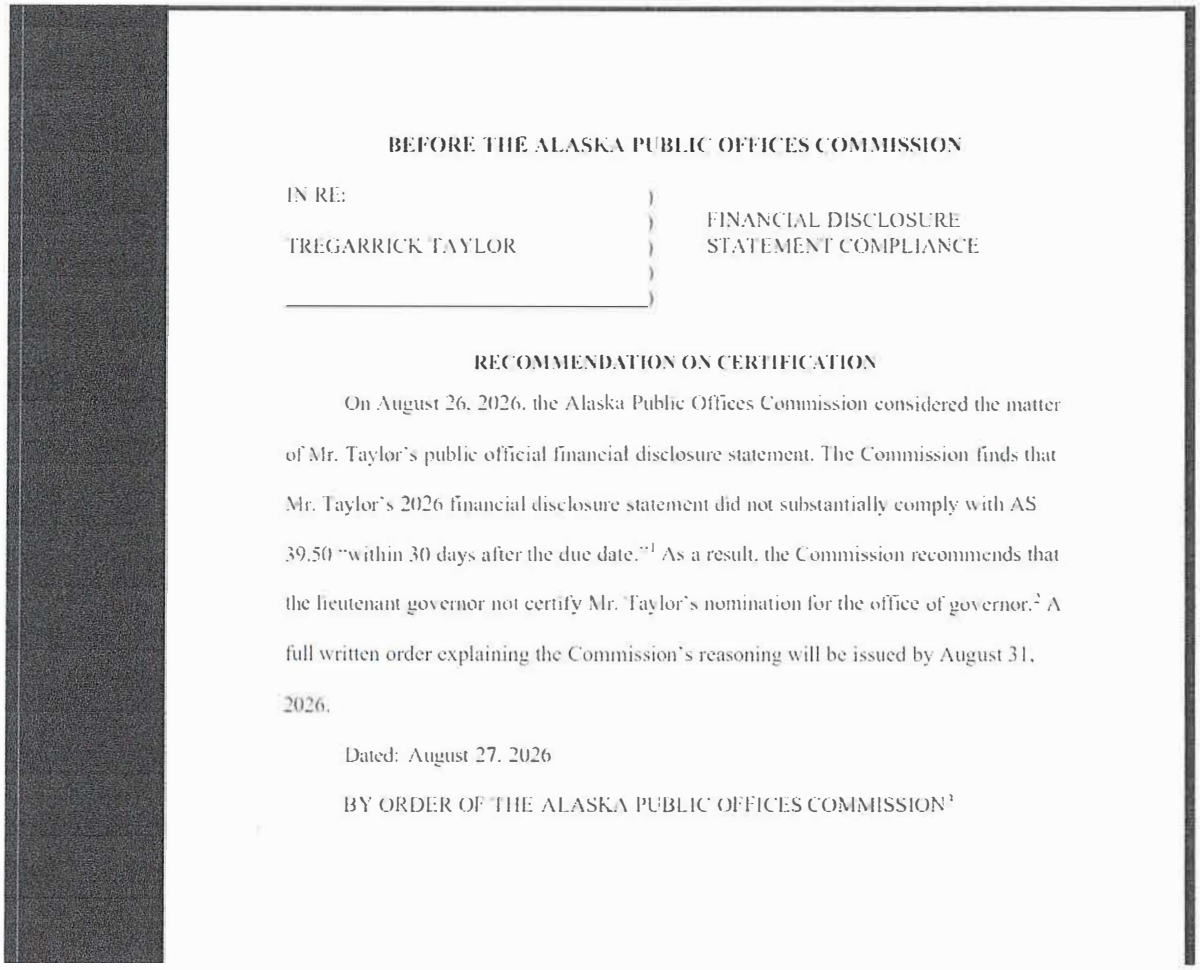
Annualized amounts: $2,787.24 for four-yard service and $3,939.84 for six-yard service.

Source: Email from admin@denalidisposal.com on 9/4/26, provided by the complainant

EXHIBIT E

APOC Recommendation on Tregarrick Taylor

Recommendation on Certification, August 27, 2026



BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

IN RE:
TREGARRICK TAYLOR

FINANCIAL DISCLOSURE STATEMENT COMPLIANCE

RECOMMENDATION ON CERTIFICATION

On August 26, 2026, the Alaska Public Offices Commission considered the matter of Mr. Taylor's public official financial disclosure statement. The Commission finds that Mr. Taylor's 2026 financial disclosure statement did not substantially comply with AS 39.50 "within 30 days after the due date."[1] As a result, the Commission recommends that the lieutenant governor not certify Mr. Taylor's nomination for the office of governor.[2] A full written order explaining the Commission's reasoning will be issued by August 31, 2026.

Dated: August 27, 2026

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION[3]

APOC found that Taylor's POFD did not substantially comply within 30 days after the due date and recommended that his nomination not be certified.

Source: https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28075

EXHIBIT F

Analysis of POFD Compliance and Certification Consequences

AS 39.50.030, AS 39.50.060(b), 2 AAC 50.850, Grimm v. Wagoner, and the 2026 Taylor determination

Purpose of Exhibit

This exhibit summarizes the controlling Alaska statute, regulation, Supreme Court precedent, and the directly analogous 2026 Tregarrick Taylor certification proceeding. It explains why, if APOC finds that Bernadette M. Wilson failed to disclose a significant Denali Disposal business interest or other required significant financial information and did not substantially comply by the statutory cure deadline, AS 39.50.060(b) leads to the same certification consequence applied to Taylor. The ultimate factual findings belong to APOC and the certifying authority; this exhibit does not assume disputed facts that APOC has not yet found. The complainant is not a lawyer and cannot give legal advice, but a plain reading of the statutes and legal precedent, appears to support the conclusion, as follows:

1. The governing statute makes timely compliance a condition of certification

AS 39.50.030(a) requires a candidate's disclosure statement to provide an accurate representation of the candidate's financial affairs. AS 39.50.030(b) then identifies information that must be disclosed, including sources of income and business interests.

AS 39.50.060(b) supplies the certification consequence. **A person who fails or refuses to comply with AS 39.50 forfeits nomination, and the lieutenant governor or other certifying authority may not certify the person's nomination or election if compliance was not made within the time required.** The statute further provides that a person is treated as timely only if the person complies within 30 days after the applicable due date. For the 2026 primary, the Division of Elections listed June 1, 2026 as the candidate filing deadline for the declaration of candidacy and required financial disclosure. Accordingly, the 30-day statutory cure period ran through July 1, 2026. This is the same deadline the State applied in the Taylor matter.

2. Alaska law uses substantial compliance, not technical perfection

The controlling Alaska Supreme Court case is Grimm v. Wagoner, 77 P.3d 423 (Alaska 2003). Grimm rejected strict or flawless compliance as the test for the forfeiture remedy. Instead, the Court held that substantial compliance is the appropriate standard under AS 39.50.060(b). The central question is whether the disclosure, taken as a whole, gave an accurate representation of the candidate's finances.

Grimm is important in both directions. It protects a candidate from forfeiture for trivial or inconsequential omissions, but it also recognizes that material omissions can defeat substantial compliance. In Grimm, the omissions were held trivial in large part because the underlying property and income-generating activity had already been disclosed elsewhere, so correcting the form would have added little meaningful information for voters.

That distinction is central here. The allegation in Exhibits A and B is not merely that Wilson used the wrong label for an interest already fully disclosed. Her POFD identified Denali Disposal as salaried employment, while the State corporate record identifies her as President, Shareholder, and Director with 75 percent ownership. If APOC confirms those facts, disclosure of salary alone does not communicate the separate ownership and governance interests that AS 39.50.030(b)(2) requires.

3. APOC regulation specifically identifies significant business interests and income sources

2 AAC 50.850(h) directs APOC staff to identify candidates who have not filed a complete disclosure statement. If the Commission determines that a candidate failed to supply required information on a significant source of income, interest in real property, business interest, loan, or trust, the regulation provides for a recommendation that the lieutenant governor remove the candidate from the ballot or, when removal is no longer possible, not certify the nomination or election.

2 AAC 50.850(i) separately requires staff investigation when information discovered after the withdrawal deadline indicates that a candidate failed to comply substantially with AS 39.50 or the implementing POFD regulations. Thus, the regulatory framework focuses on materiality: significant financial information and substantial compliance, not harmless clerical errors.

4. The 2026 Taylor matter establishes the current administrative application

The Taylor proceeding is the closest and most current administrative precedent. APOC staff framed the issue under Grimm as whether omission of required information concerning a significant source of income meant the candidate had not substantially complied within the statutory period. On August 27, 2026, APOC found that Taylor's 2026 POFD did not substantially comply with AS 39.50 within 30 days after the due date and, by a 4-1 vote, recommended that the lieutenant governor not certify his nomination.

On August 31, 2026, Lieutenant Governor Nancy Dahlstrom announced that Taylor's nomination would not be certified. The State explained that the 30-day statutory period ended July 1, 2026 and that, once APOC determined Taylor had failed to supply required information concerning a significant source of income by that deadline, AS 39.50.060(b) barred certification. The Lieutenant Governor also emphasized consistent application of the law.

5. Application to the Wilson allegations

The record attached to this complaint supports the following sequence for APOC to determine:

- Exhibit A shows Wilson's May 29, 2026 POFD reporting Denali Disposal as salaried employment but not listing a Denali ownership or officer interest in the Interests section.
- Exhibit B is a State of Alaska business record identifying Wilson as President, Shareholder, and Director and reporting 75.00 percent ownership of Denali Disposal.
- AS 39.50.030(b)(2) and 2 AAC 50.708 require disclosure of reportable business interests and the nature of those interests. If the State record reflects Wilson's interests during the reporting year, the ownership/officer information is independently reportable information, not merely a description of her salary.
- Exhibits C and D show that Denali provides recurring commercial services and quote monthly service prices that annualize well above $1,000. Those exhibits do not, standing alone, prove which customers Wilson personally solicited or served; they support APOC investigation of the separate customer-source issue under the controlling-interest/self-employment regulations.
- If APOC determines that the omitted ownership/business-interest information was significant, the omission falls squarely within the category identified by 2 AAC 50.850(h): required information concerning a significant business interest.
- If APOC further determines that Wilson had not supplied that required significant information by July 1, 2026, then she did not substantially comply within the time recognized by AS 39.50.060(b). A later amendment may correct the public record prospectively, but it cannot retroactively make July 1 compliance timely for purposes of the statutory certification rule.
- Under the same statutory and substantial-compliance framework applied to Taylor, the resulting certification consequence would be a recommendation that Wilson's nomination not be certified, followed by the certifying authority's application of AS 39.50.060(b).

6. Why Grimm does not foreclose non-certification on these alleged facts

Grimm cautions against using forfeiture for inconsequential omissions. But the Court's reasoning also explains why the alleged Denali Disposal omission is materially different if proven. Wagoner had already disclosed the underlying rental properties and income activity; the omitted business name added little incremental information. Here, the asserted missing fact is a 75 percent ownership stake plus president/director roles in the same company reported only as an employer. Ownership and control can tell voters something materially different from salary alone: the candidate's equity interest, governance authority, and potential exposure to the company's business relationships.

Accordingly, the strongest theory is not that every error automatically disqualifies a candidate. It is that this alleged omission concerns precisely the kind of significant business interest singled out by APOC's regulation, and therefore can support a finding of failure to substantially comply if APOC confirms the facts and materiality.

7. Certification logic

1. Wilson was required to file an accurate POFD identifying reportable business interests.

2. The attached State record identifies a 75 percent Denali ownership interest and president/director roles that are not identified as such on the attached POFD.

3. APOC determines whether that omitted information was required and significant, and whether the filing nevertheless substantially complied under Grimm.

4. If APOC finds a significant required business interest was omitted, the regulatory trigger in 2 AAC 50.850(h) is met.

5. If the required significant information was not supplied by July 1, 2026, the 30-day cure provision in AS 39.50.060(b) was not satisfied.

6. Under AS 39.50.060(b), the certifying authority may not certify a nomination when timely compliance was not made.

7. Taylor demonstrates the State's current application of that same rule: APOC found no substantial compliance by July 1, recommended non-certification, and the Lieutenant Governor declined to certify.

Conclusion

The conclusion is conditional but direct: if APOC confirms that Wilson's POFD omitted a required significant Denali Disposal business interest and that the omission remained uncured through July 1, 2026, the filing would not satisfy the substantial-compliance standard within the time required. Under AS 39.50.060(b), 2 AAC 50.850(h), Grimm, and the State's 2026 Taylor application, the consequence is that her nomination should not be certified. The attached evidence provides a concrete basis for APOC to make the required factual and materiality findings promptly.

Authorities and Sources

AS 39.50.060(b): https://law.justia.com/codes/alaska/title-39/chapter-50/section-39-50-060/

Grimm v. Wagoner, 77 P.3d 423 (Alaska 2003): https://law.justia.com/cases/alaska/supreme-court/2003/s-10953-1.html

2 AAC 50.850: https://www.law.cornell.edu/regulations/alaska/2-AAC-50.850

APOC Taylor Staff Recommendation, Aug. 12, 2026:
https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28074

APOC Recommendation on Certification, Taylor, Aug. 27, 2026:
https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28075

Division of Elections - 2026 Important Dates: https://www.elections.alaska.gov/doc/forms/Updated/B05P-F.pdf

Division of Elections - Taylor non-certification announcement, Aug. 31, 2026:
https://www.elections.alaska.gov/lieutenant-governor-nancy-dahlstrom-will-not-certify-treg-taylors-nomination-for-governor/

APOC Expedited Hearing Complaint: 9.4.26 - Notice and request for response.

MO

Microsoft Outlook

To: bmwsk8@yahoo.com

Forward

Fri 9/4/2026 3:36 PM

APOC Expedited Hearing Co...
Outlook Item

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

bmwsk8@yahoo.com (bmwsk8@yahoo.com)

Subject: APOC Expedited Hearing Complaint: 9.4.26 - Notice and request for response.

JB

Joel Borgquist

Reply Reply all Forward

To: bmwsk8@yahoo.com

Cc: joel.gjj@gmail.com

Fri 9/4/2026 3:36 PM

NOTARIZED COMPLAINT_Ber...
1 MB

Hi Bernadette,

Please see a copy of the complaint I am filing with APOC against you attached.

Respectfully,

- Joel

Complainant
Joel Borgquist
808-892-9813

ARRIVED
9/8/2026
APOC - ANCH
PM HC FAX ELE

RETURN OF PERSONAL SERVICE
ALASKA PUBLIC OFFICES COMMISSION
Complaint Against Bernadette M. Wilson

APOC Case No. (if assigned):	
Respondent:	Bernadette M. Wilson
Person personally served:	Bernadette M. Wilson
Date of service:	September 4, 2026
Exact time of service:	10:15 p.m.
Place/address of service:	Alaska State Fairgrounds, Palmer, Alaska

DOCUMENTS PERSONALLY SERVED

I personally delivered a true and correct copy of the following 13-page packet to Bernadette M. Wilson:

- APOC Expedited Complaint Request and Expedited Complaint against Bernadette M. Wilson;
- Exhibits A through F and all supporting documentation contained in the 13-page complaint packet; and
- The attached email/delivery-notification documentation contained as the final page of the packet.

METHOD OF SERVICE

I personally delivered the documents identified above directly to Bernadette M. Wilson at the Alaska State Fairgrounds in Palmer, Alaska, on September 4, 2026, at 10:15 p.m.

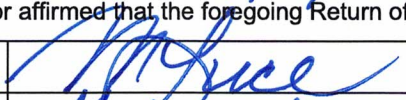
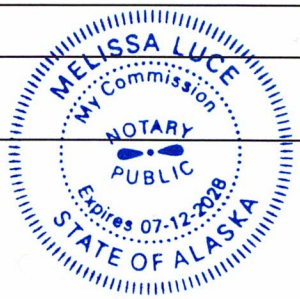
SERVER'S DECLARATION

I certify that the foregoing accurately states the service I personally performed and that the documents identified above were personally delivered to Bernadette M. Wilson.

Process server / person making service:	John Denny
Company:	Devil's Advocate Consulting and Investigations
Telephone:	907-360-8378
Mailing address:	P.O. Box 877036, Wasilla, AK 99687
Email:	907JDenny@gmail.com
Signature:	
Date signed:	6 sept 2026

NOTARY ACKNOWLEDGMENT / JURAT

Subscribed and sworn to (or affirmed) before me on 9/6/2026, 2026, by John Denny, who personally appeared before me and swore or affirmed that the foregoing Return of Personal Service is true and correct.

Notary Public signature:	
Printed name:	Melissa Luce
My commission expires:	07/12/2028
Notary seal: