



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)

**TO:** APOC Commissioners  
**DATE:** September 21, 2026  
**FROM:** Heather Hebdon, Executive Director  
**SUBJECT:** Staff Report, Complaint 26-13-POFD, *Joel Borgquist v. Bernadette Wilson*

---

### SUMMARY OF COMPLAINT AND RESPONSE

On September 8, 2026, Joel Borgquist filed a complaint against candidate for Governor, Bernadette Wilson, requesting expedited consideration.<sup>1</sup> The complaint alleges that Ms. Wilson's 2026 Candidate Public Official Financial Disclosure ("POFD") Statement failed to list her ownership interest in Denali Disposal, Inc. ("DDI") and failed to identify, as sources of income, clients that paid DDI more than \$1,000 during calendar year 2025.<sup>2</sup>

On September 10, 2026, Ms. Wilson filed an opposition to the request for expedited consideration relying largely on procedural and due process concerns.<sup>3</sup>

On September 10, 2026, the Commission held a special hearing to consider whether the complaint set forth sufficient grounds to merit consideration on an expedited basis. After consideration of the arguments presented by complainant and respondent, the Commission declined to grant expedited consideration.<sup>4</sup> The Commission ordered an

---

<sup>1</sup> [Complaint 26-13-POFD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28147), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28147>.

<sup>2</sup> *Id.*

<sup>3</sup> [Opp to Request for Expedited Consideration](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28166), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28166>.

<sup>4</sup> [Order Denying Expedited Consideration](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28167), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=28167>

abbreviated timeline for investigation and a hearing on the merits to occur on or before October 8, 2026.<sup>5</sup>

## **FACTS**

On May 29, 2026, Ms. Wilson filed a 2026 Candidate POFD Statement for her candidacy in the 2026 state election.<sup>6</sup>

Ms. Wilson’s POFD disclosed salaried income from DDI, Alaska Policy Forum, and Alaskans for Nick Begich, a real property interest, and a beneficial interest.<sup>7</sup> The POFD did not disclose any business interests.<sup>8</sup>

Mr. Borquist’s complaint provided a copy of DDI’s 2026 Biennial Report filed with the State of Alaska’s Division of Corporations, Business, and Professional Licensing demonstrating Ms. Wilson’s 75% ownership in DDI and alleges that Ms. Wilson failed to disclose DDI as a business interest and that she failed to disclose DDI’s clients as sources of income.<sup>9</sup>

## **LAW AND ANALYSIS**

Alaska’s POFD statutes require state candidates to file a statement disclosing personal business and financial interests at the time they declare for office.<sup>10</sup> The statement must be an accurate representation of the candidate’s financial affairs, covers the preceding year, and must disclose all sources of income over \$1,000, to the extent that is ascertainable.<sup>11</sup> Reportable income includes compensation from an employer as well as self-employment income.<sup>12</sup> When the person is “self-employed” by a corporation, such as

---

<sup>5</sup> *Id.*

<sup>6</sup> [2026 Candidate POFD](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=34142&ViewType=POFD),  
<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=34142&ViewType=POFD>.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> Complaint 26-13-POFD at Ex. B.

<sup>10</sup> AS 39.50.020(a).

<sup>11</sup> AS 39.50.030(b)(1). The statement must disclose the same information for the candidate’s spouse and dependent children; AS39.50.030(b)(2).

<sup>12</sup> 2 AAC 50.685.

DDI, and the filer holds a controlling interest in the corporation, the source of income is the client or customer of the business.<sup>13</sup>

Here, Ms. Wilson reported salaried income from DDI. Mr. Borgquist alleged that based on her 75% controlling interest in DDI, she was also required to identify each client or customer that paid DDI more than \$1,000. This is correct only if Ms. Wilson was “self-employed” by DDI.

The terms “self-employed” or “self-employment” are specifically defined and includes a two-part test to determine if a person is self-employed.<sup>14</sup> First, the person must have an ownership interest in the business entity from which that person derives income. The second part states that the person must be directly and actively involved with clients or customers of the business by soliciting the business of the client or customer or; by personally providing services to the patient or customer. Here, Ms. Wilson meets the first part of that test; she has ownership interest in DDI and also derives salaried income from DDI as the General Manager.<sup>15</sup> However, through her affidavit, she states that she does not engage in sales for DDI or solicit new or potential clients or customers and that she does not personally provide any services to clients or customers.<sup>16</sup> Rather, she explains that her role with DDI is strictly back office support and focuses on administrative and operations support.<sup>17</sup> Her duties and responsibilities include route management, scheduling equipment maintenance, maintaining schedules for ordering parts, monitoring accuracy for route data and driver paperwork, payroll, human resources, and other administrative functions for the business.<sup>18</sup> She states that sales, soliciting new customers, customer support and client services are all performed by other DDI employees.<sup>19</sup> Given this dynamic, and that Staff found no evidence to the contrary of the facts provided through her affidavit, Ms. Wilson

---

<sup>13</sup> AS 39.50.200(a)(10).

<sup>14</sup> 2 AAC 50.799(a).

<sup>15</sup> Exhibit 1, Wilson Affidavit at ¶¶ 6 and 11.

<sup>16</sup> *Id.* at ¶¶ 8-9.

<sup>17</sup> *Id.* at ¶ 7.

<sup>18</sup> *Id.*

<sup>19</sup> *Id.* at ¶¶ 8-9.

does not meet the second part of the “self-employment” test. Accordingly, she was not required to disclose DDI’s clients and customers as sources of self-employment income.

In addition to income, a POFD statement must also identify by name and address, each business in which the filer held an interest or was an owner, director or partner and the nature of the interest held.<sup>20</sup> DDI’s 2026 Biennial Report identifies Ms. Wilson as 75% owner, President, Director, and Stockholder of DDI.<sup>21</sup> As such, Ms. Wilson was required to disclose her ownership interest in DDI. Both the statute and the instructions for Schedule B clearly indicate that both the income from a business interest and the business interest itself must be separately reported. Although Ms. Wilson disclosed income from DDI, that alone does not identify her ownership interest in DDI and because DDI was not separately disclosed as a business interest she violated AS 39.50.030(2).

FINANCIAL DISCLOSURE STATEMENT

State Candidate - 2026 - State Primary - State Senate District D - Report From: 1/1/2025 To: 12/31/2025

SCHEDULE B: BUSINESS INTERESTS

RemoveExportImport

BUSINESS INTERESTSNONE / Not Applicable → ☐

- Report business interests even if they were NOT a source of income, including businesses in which the filer or family member (spouse, domestic partner, dependent children and, for legislative branch filers ONLY, nondependent children living with the filer):
  - Served as stockholder, owner, officer, director, partner, proprietor, employee or held an interest.
  - Had ownership interests of more than \$1,000 in a publicly traded corporation.
  - Had any other ownership interest in a business, including shares in non-publicly traded corporations, sole proprietorships, limited liability companies. Include options to buy.
  - Include non-profit organizations, corporations, businesses, associations, trade groups.
- If the business was a source of income over \$1,000, it must also be reported in Schedule A.

No Interest Found.  
[Click here to add new source of Interest](#)

Save & Resume LaterPreviousNext

10 / 19

## CONCLUSION

APOC staff finds that Ms. Wilson is not, by definition, self-employed by DDI and was not required to identify DDI’s clients or customers as sources of income and recommends those allegations be dismissed. However, because DDI was not identified as a business interest, Ms. Wilson violated AS 39.50.030(b)(2).

<sup>20</sup> AS 39.50.030(b)(2); 2 AAC 50.708.

<sup>21</sup> Complaint 26-13-POFD at Ex. B.

## **MAXIMUM POTENTIAL CIVIL PENALTIES**

Ms. Wilson's POFD was filed on May 29, 2026.<sup>22</sup> Accordingly, the violation continued for 102 days until the Complaint was accepted on September 8, 2026. The civil penalty for such a violation is \$10 per day.<sup>23</sup> The maximum civil penalty in this matter is \$1,020.

## **PENALTY ASSESSMENT AND MITIGATION CRITERIA**

When APOC staff assesses a penalty, the starting point for calculation is 2 AAC 50.855. Here, where the issue is not timeliness of the filing but rather missing information, staff looks to 2 AAC 50.855(b)(3) which enables staff to document the violation and not assess a penalty when the missing information is readily available to the public through another forum. Staff finds no evidence of an intent to deceive or hide her ownership of DDI, only that she failed to report it as a business interest in addition to identifying it as a source of income. And as evidenced by the complaint, her ownership of DDI was publicly available through the state's corporations database.

APOC staff may also recommend mitigation criteria to reduce or waive a penalty under 2 AAC 50.865. The criteria provides for reductions when the filer is inexperienced and also in instances where the penalty is significantly out of proportion to the degree of harm to the public for not having the information required to be reported.<sup>24</sup> Here, this was Ms. Wilson's first time filing a POFD statement and there is no evidence of an intent to deceive or mislead the public; her statement did not fail to disclose or misreport the income she received from DDI, rather it failed to disclose her ownership of DDI.

Based on these circumstances, APOC staff recommends that Ms. Wilson be directed to amend her statement to fully disclose her ownership interest in DDI and that penalties be waived.

---

<sup>22</sup>2026 Candidate POFD.

<sup>23</sup> AS 39.50.135.

<sup>24</sup> 2 AAC 50.865(a)(1)(B); 2 AAC 50.865(b)(4) [there is no significant harm to the public when the dollar amount missing is less than \$100].

**CERTIFICATE OF SERVICE:**

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:

Zachary Wallen  
Chalmers, Adams, Backer & Wallen, LLC  
301 South Hills Village Dr., Ste. LL200-420  
Pittsburgh, PA 15241  
[zwallen@chalmersadams.com](mailto:zwallen@chalmersadams.com)

☒ Certified Mail

☒ Email

Robert Stone  
[rob@stonelawalaska.com](mailto:rob@stonelawalaska.com)

☒ Email Only

Joel Borgquist  
18730 Mills Bay Road  
Eagle River, AK 99577  
[Joel.gjj@gmail.com](mailto:Joel.gjj@gmail.com)

☒ First Class Mail

☒ Email

*Cari Rousselle*

09/21/2026

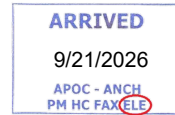
Signature

Date

**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

|                    |   |                     |
|--------------------|---|---------------------|
| Joel C. Borgquist, | : |                     |
|                    | : |                     |
| Complainant,       | : |                     |
|                    | : |                     |
| v.                 | : | CASE NO. 26-13-POFD |
|                    | : |                     |
| Bernadette Wilson, | : |                     |
|                    | : |                     |
| Respondent.        | : |                     |

---



**AFFIDAVIT OF BERNADETTE WILSON**

Bernadette Wilson, being duly sworn, deposes and says:

1. I am over 18 years of age, of sound mind and otherwise competent to make this Affidavit, which may be offered into evidence in the above captioned matter.
2. The facts set forth in this Affidavit are based on facts known to me personally.
3. I am one of the owners of Denali Disposal, Inc., a refuse company located in Anchorage, Alaska.
4. The focus of Denali Disposal's business is providing refuse services to businesses in the Anchorage area.
5. Denali Disposal's business is commercial refuse. This means that nearly all of its customers are businesses rather than individuals. By contrast, Denali Disposal does not engage in "roll cart" trash collection from individual homes.
6. I serve as Denali Disposal's General Manager, which is how I typically identify myself in connection with my relationship with the business.
7. My role at Denali Disposal is a back office one; focusing on prep and administrative work that occurs behind the scenes. I am responsible for route management, scheduling

maintenance of equipment, maintaining the schedule for ordering parts, entity payroll, HR, data entry from routes, checking for accuracy and consistency between routes and driver paperwork, monitoring solid waste services activity, and assisting with invoice prep and check processing.

8. I do not engage in sales for Denali Disposal, and I do not solicit any new or potential customers, and I do not answer phone calls or emails from potential customers.

9. Moreover, I do not personally provide services to customers. I do not drive or otherwise work on the garbage trucks that service Denali Disposal's customers. I also am not responsible for providing customer support to those client accounts in-office. Instead, that work is done by other employees that drive the garbage trucks that are out on the routes, or by other employees that are in the office.

10. Prior to becoming a candidate for Governor of Alaska, I reviewed the relevant statutory and code sections with legal counsel and compared that language with my roles and responsibilities at Denali Disposal. Upon that review, and based on my particular job responsibilities, I concluded that I was not "self-employed" as that term is defined in 2 AAC 50.799(a).

11. All of my income from Denali Disposal is compensation for my role as General Manager. I reported all of my income from Denali Disposal in the "Income" section of my POFD.

12. While I do have an ownership interest in Denali Disposal, the business has not paid any shareholder distributions (K-1 income) in many years.

13. The statements made in this affidavit are true and correct to the best of my personal knowledge or information and belief.

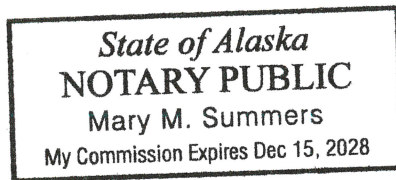
Affiant states nothing further.

  
BERNADETTE WILSON

State of Alaska )

Third Judicial District )

SUBSCRIBED AND SWORN to before me this 21<sup>st</sup> day of September, 2026, at  
Anchorage, Alaska.



\_\_\_\_\_  
Notary Public, State of Alaska

My Commission Expires: 12/15/2028

