

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Christopher Constant,)

Complainant,)

)

vs.)

)

Bernadette Wilson,)

Case No. 26-09 CD

Respondent)

)

FINAL ORDER

Complainant Christopher Constant alleges that Candidate Bernadette Wilson violated campaign disclosure law when she: (1) did not properly identify the source of a \$25,000 contribution from “IPOP, LLC”, (2) attributed an excessive amount of expenditures to credit card processing fees at the business WinRed (\$109,227.87), and (3) improperly reimbursed herself and others for campaign expenditures in violation of AS 39.50.030.

The Commission finds there is sufficient evidence to conclude Candidate Wilson’s receipt of \$25,000 from IPOP, LLC violated Alaska’s prohibition on corporate contributions under Alaska Statute 15.13.074. The Commission also finds that Candidate Wilson underreported WinRed expenditures and therefore orders Candidate Wilson to amend her 30-day primary and 7-day primary reports according to Staff’s recommendations to the extent not already completed. The Commission adopts Staff’s

recommendation that payments to Rival Strategy Group and 137 Initiative violated reimbursement rules.

The Commission adopts Staff's conclusion that Candidate Wilson failed to properly authorize individuals to make expenditures on behalf of the campaign. The facts show Candidate Wilson's campaign reimbursed five individuals for fuel, supplies, food, and beverage despite the fact those individuals had not been designated treasurers or deputy treasurers prior to making the expenditures. Had this been Ms. Wilson's only improper reimbursement violation, the Commission would have waived all penalties because a penalty of \$20,400 in this instance is significantly greater and out of proportion to the degree of harm to the public.¹ The campaign reimbursed campaign staff for minimal expenses related to the campaign and they were fully reported to the public. The Commission therefore slightly reduces Staff's recommendation for penalties related to improper reimbursements made by Candidate Wilson's campaign. Staff recommended 408 days of penalties related to improper reimbursements starting from June 14, 2025, which is the first day a non-treasurer made a campaign expenditure. The Commission adjusts the start date of improper reimbursement penalties to 393 days, adjusting to Candidate Wilson's first untimely flight reimbursement, which occurred on 6/30/2025.

The Commission adopts Staff's conclusion that Candidate Wilson untimely reimbursed herself for plane travel but does not adopt Staff's recommendation that she is precluded from reimbursement. Past Commission decisions have imposed penalties and

¹ 2 AAC 50.865(b)(4)-(6).

has allowed the Candidate to retain the benefit of any late reimbursements.² The Commission adopts that precedent here.

CONCLUSION

With the exception of the minor adjustment described above, the Commission adopts the Staff's penalty recommendations. As adjusted, the running of penalties to the day the complaint was filed results in a maximum penalty of \$26,225.00 as follows:

Report	Dates of Violation	Penalty Days	Max	2 AAC 50.855
Year Start	2/17/26-7/27/26	160 (\$50/day)	\$8,000	\$2,000.00
30-day primary	7/20/2026-7/26/26	007 (\$50/day)	\$350.00	\$175.00
\$25,000 contrib.	4/30/26-7/27/26	088 (\$50/day)	\$4,400	\$4,400.00
Improper Reimb.	6/30/26-7/27/26	393 (\$50/day)	\$19,650	\$19,650.00

The Commission adopts APOC Staff's mitigation analysis and lowers the fine for improper reimbursements to \$196.50 for the reasons stated above. The Commission orders Candidate Wilson to pay a civil penalty of \$2,473.50 and amend the 30-day primary and 7-day primary report in consonance with Staff's recommendations to the extent not already completed. Candidate Wilson may keep the reimbursements for air travel.

² See *DeLaiarro v. Pruitt*, APOC Case No. 20-08- CD Final Order pgs. 5; 11 (2021)(upheld penalties, did not require reimbursement);

This is a final Commission order. It may be appealed to the superior court within 30 days from the date of this order.³ A request for the Commission to reconsider this order must be filed within 15 days from the date this order is delivered or mailed.⁴

DATED: 10/8/2026

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION⁵

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 Robert Stone rob@stonelawalaska.com	☒ Certified Mail ☒ Email ☒ Email only
Christopher Constant 133 E. Harvard Ave Anchorage, AK 99501 aktransparency@gmail.com	☒ US Mail ☒ Email

Cari Rousselle

Signature

10/08/2026

Date

³ AS 15.13.380(g); AS 44.62.560; Alaska R. App. P. 602

⁴ 2 AAC 50.891(g).

⁵ Commissioners Richard Stillie, Dan LaSota, Eric Feige, and Lanette Blodgett participated in this decision. The Decision was made 4-0 with Commissioner Walter Monegan not participating.