



## **APOC ALLOWS DUNLEAVY-SUPPORTING PAC TO CONTINUE OPERATIONS FOR NOW - AKPIRG & 907 INITIATIVE FILE NEW COMPLAINT**

***APOC Finds insufficient evidence to shutter A Stronger Alaska - investigation to continue. AKPIRG & 907 Initiative file separate APOC complaint against the Republican Governors Association and A Stronger Alaska.***

**10/17/2022**

### **FOR IMMEDIATE RELEASE**

(Anchorage) - Today, the Alaska Public Offices Commission (APOC) ruled against expediting AKPIRG and the 907 Initiative complaint alleging coordination between Outside-funded super PAC A Stronger Alaska and the Dunleavy for Governor campaign. The complaint, however, remains active and will be moving forward on APOC's standard timeline.

“While we believe the timing of this complaint is critical to ensuring the fairness of Alaska’s gubernatorial election, we thank APOC and the commissions for continuing their investigation,” said Veri di Suvero, Executive Director of AKPIRG. “This matter could have been resolved already had the responding parties not intentionally withheld information. The actions taken by APOC today speak to the larger issue of the Commission’s limited resources when investigating.”

In addition to the ongoing investigation, today, AKPIRG and 907 Initiative filed a separate, expedited complaint against the Republican Governors Association (RGA) after public records revealed the entity reported false and/or conflicting accounts of their electoral activity in Alaska.

“Last week, we learned hundreds of thousands of dollars are being spent on communications claiming to be funded by A Stronger Alaska, but records indicate it might be the RGA directly and illegally spending the money,” said Aubrey Wieber, Executive Director of the 907 Initiative. “We were advised that this egregious issue was outside the scope of our original complaint, and therefore a new complaint was necessary.”

According to state campaign finance records, the RGA made a \$3 million donation to super PAC A Stronger Alaska in support of Gov. Mike Dunleavy’s re-election. The donation was purportedly made three days before new donor disclosure laws kicked in, which would have required the RGA to report its donors.

However, Internal Revenue Service records show a conflicting story. Those records show the RGA never contributed \$3 million to ASA, and that the RGA is directly spending the money that A Stronger Alaska is claiming to be spending in Alaska. Simply put, either the RGA's IRS reports are materially false, or the RGA is illegally operating as an unregistered independent expenditure group in Alaska, and actively working to cover their tracks by using A Stronger Alaska as a shell entity.

“This complaint seeks clarity on a substantial amount of money that is currently unaccounted for,” said Veri di Suvero, Executive Director AKPIRG. “If the Republican Governors Association and A Stronger Alaska have been operating legally, they should quickly be able to produce records to demonstrate full compliance with Alaska’s campaign finance laws.”

###

**Contact:**

Robin O’Donoghue Communications Manager, AKPIRG: [robin@akpirg.org](mailto:robin@akpirg.org) | 907-460-1445

Aubrey Wieber, Executive Director, 907 Initiative: [aubrey@907initiative.org](mailto:aubrey@907initiative.org) | 907-903-7017



# Alaska Public Offices Commission



## COMPLAINT

FILING A COMPLAINT <i>To be accepted, complaint must include</i>	APOC LAWS ALLEGEDLY VIOLATED <i>Specify section of law or regulation</i>		<i>APOC case name/number/date</i>
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 <i>and</i> all supporting documents were served on respondent	Campaign Disclosure Law	<input checked="" type="checkbox"/> AS 15.13 <input type="checkbox"/> 2 AAC 50.250-405	
	Public Official Financial Disclosure	<input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799	
	Legislative Financial Disclosure	<input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799	
	Lobbying Regulation	<input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590	

*If complaint meets requirements for acceptance, APOC will investigate the allegations and notify the respondent of the right to respond. APOC will notify Complainant and Respondent when APOC accepts or rejects a complaint.*

<input type="checkbox"/> APOC <input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	COMPLAINANTS	Alaska Public Interest Research Group & 907 Initiative	RESPONDENTS <i>Person or group allegedly violating law</i>	<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	Republican Governor's Association; A Stronger Alaska
	Address City / Zip	PO Box 201416 Anchorage, AK 99520	See attached Complaint, page 1		
Phone/Fax	907-350-2286				
E-mail	veri@akpirg.org; aubrey@907initiative.org				

COMPLAINANTS' REPRESENTATIVE	RESPONDENTS' REPRESENTATIVES	
<i>If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info</i>		
Name/Title	Scott M. Kendall for Complainants	RGA: Stacey Stone, Holmes Weddle & Barcott, PC 701 W. 8 <sup>th</sup> Ave., Ste. 700, Anchorage, AK 99501, <a href="mailto:ststone@hwb-law.com">ststone@hwb-law.com</a> , (907) 274-0666
Address	510 L Street, Ste. 601	
Phone/Fax	907-222-7932 / 907-222-7938	ASA: Richard Moses, Holmes Weddle & Barcott, PC 701 W. 8 <sup>th</sup> Ave., Ste. 700, Anchorage, AK 99501, <a href="mailto:rmoses@hwb-law.com">rmoses@hwb-law.com</a> , (907) 274-0666
E-mail	scott@cashiongilmore.com	

<b>DESCRIPTION or SUMMARY of ALLEGED VIOLATION</b> Please see attached supporting information and documentation.	Use extra pages if needed	<input checked="" type="checkbox"/> <b>SUPPORTING DOCUMENTS – DESCRIBE:</b> Please see attached complaint and associated exhibits and website links.

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 Title Scott M. Kendall Date October 17, 2022

Subscribed and sworn to or affirmed by me at Anchorage Ak on October 17, 2022

Signature Title Paralegal

**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: 2 AAC 50.470; ANSWERING COMPLAINTS: 2 AAC 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: <a href="http://doa.alaska.gov/apoc/">http://doa.alaska.gov/apoc/</a>	APOC FORMS: <a href="http://doa.alaska.gov/apoc/forms_all.html">http://doa.alaska.gov/apoc/forms_all.html</a>	APOC LAWS: <a href="http://doa.alaska.gov/apoc/apoclaws.html">http://doa.alaska.gov/apoc/apoclaws.html</a>

**From:** Jennifer Ditcharo jenn@cashiongilmore.com   
**Subject:** APOC Complaint and Request for Expedited Consideration  
**Date:** October 17, 2022 at 3:52 PM  
**To:** sstone@hwb-law.com  
**Cc:** Scott Kendall scott@cashiongilmore.com, Sam Gottstein sam@cashiongilmore.com

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To Whom It May Concern:

Please see the attached APOC Complaint and Request for Expedited Consideration.




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2022.10.17  
AKPIR...ion.pdf

Jenn Ditcharo  
Paralegal  
Cashion Gilmore & Lindemuth  
510 L Street, Ste. 601  
Anchorage, Alaska 99501  
(907) 339-4970  
[jenn@cashiongilmore.com](mailto:jenn@cashiongilmore.com)

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**Date:** October 17, 2022 at 3:52 PM  
**To:** rmoses@hwb-law.com  
**Cc:** Scott Kendall scott@cashiongilmore.com, Sam Gottstein sam@cashiongilmore.com

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To Whom It May Concern:

Please see the attached APOC Complaint and Request for Expedited Consideration.



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Jenn Ditcharo  
Paralegal  
Cashion Gilmore & Lindemuth  
510 L Street, Ste. 601  
Anchorage, Alaska 99501  
(907) 339-4970  
[jenn@cashiongilmore.com](mailto:jenn@cashiongilmore.com)

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***EMERGENCY/REQUEST TO EXPEDITE***

To: Alaska Public Offices Commission  
From: Alaska Public Interest Research Group and 907 Initiative

Re: Complaint Against the Republican Governors Association and A Stronger Alaska for Numerous Violations of Campaign Finance Law and Regulation.

**Respondents:<sup>1</sup>**

**Republican Governors Association**

1747 Pennsylvania Avenue NW, Suite 250  
Washington, DC 20006  
Telephone: 202-662-4140  
Erim Canligil, CFO  
Stacey Stone (counsel to RGA)  
[sstone@hwb-law.com](mailto:sstone@hwb-law.com)

**A Stronger Alaska**

1747 Pennsylvania Avenue, NW, Suite 250  
Washington, DC 20006  
Telephone: 202-662-4928  
Erim Canligil, Treasurer  
Richard Moses (counsel to ASA)  
[RMoses@hwb-law.com](mailto:RMoses@hwb-law.com)

**I. INTRODUCTION**

The Republican Governors Association (“RGA”) purportedly formed and registered A Stronger Alaska (“ASA”) as an independent expenditure group (“I.E. Group”) under Alaska law on February 24, 2021. The RGA also claims to have donated \$3 million to ASA the following day. These dates are critical because the new “Dark Money” disclosure requirements passed as part of Ballot Measure 2 in 2020 became effective on February 28, 2021.

As explained herein, a review of the RGA’s IRS tax filings, as well as other publicly-available records, indicate that ***the RGA never contributed the \$3 million to ASA.*** Those records also indicate that the RGA has been making independent expenditures directly, but has been reporting them to APOC in the name of ASA. Additionally, these records (or lack thereof) appear to indicate that ASA itself might not even have its own bank account or exist at all.

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<sup>1</sup> This information is intended to satisfy the required contact information for this APOC Complaint. It has also been relied upon for service of the complaint, with additional documentation to follow. Additional information about the Respondents is included below.

If these records reflect reality, the RGA — and, by extension ASA — are violating a litany of APOC’s reporting requirements. Specifically, the RGA may be guilty of: (1) operating as an unregistered I.E. Group; (2) filing false/deceptive reports with APOC; (3) issuing communications with false “paid for by” disclaimers and lacking necessary “three largest contributors” disclaimers; and (4) failing to disclose donors as required by the Dark Money provisions of Ballot Measure 2. Collectively, these violations could amount to fines totaling hundreds of thousands of dollars, or more.

As described herein, the evidence supporting these allegations is incredibly strong; the evidence is based primarily on the Respondents’ own sworn filings with the IRS and APOC. In short, the RGA has either falsified its filings with the IRS, or it has (through ASA) knowingly filed false reports with APOC.

Given the strength of the evidence and the gravity of the allegations, this case is uniquely suited to be expedited and resolved under APOC’s process for expediting complaints. APOC must act immediately to enjoin the unlawful activities of the RGA and ASA in the gubernatorial election, and to order immediate compliance with APOC’s reporting requirements. To do any less would allow this election to proceed while the RGA and ASA deliberately mislead the public and obscure required disclosures.

## **II. NEW EVIDENCE AROSE IN EXPEDITED PROCEEDING NO. 22-01-CD**

Last Friday, October 14, 2022, Complainants, Alaska Public Interest Research Group (“AKPIRG”) and 907 Initiative (collectively “Complainants”) participated in a narrowly-tailored expedited hearing regarding allegations of improper coordination between Dunleavy for Governor (“DFG”) and the I.E. Group supporting Dunleavy’s re-election, ASA.<sup>2</sup> In the course of that

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<sup>2</sup> See APOC Complaint No. 22-01-CD.

hearing, evidence came to light indicating that the RGA had not, in fact, donated \$3 million to ASA, and that the RGA appeared to be paying campaign expenditures directly. At the time, the evidence was offered for the limited purpose of impeaching the credibility of a witness,<sup>3</sup> and not for proof of whether additional violations had occurred.

Although the Commission admitted that evidence for the limited impeachment purpose, it was over the objections of counsel for several of the Respondents. In particular, counsel for the RGA stated that if Complainants wanted this new evidence considered, then they should file a new complaint. Likewise, APOC Commissioners indicated that they were unable to consider whether this evidence showed new violations within the scope of the expedited complaint, and encouraged Complainants to file a new complaint squarely raising the issues.

This is that complaint. The allegations are very serious, and the funds involved are of a magnitude larger than any other single entity or campaign involved in state elections. For these reasons, Complainants are simultaneously filing a Motion to Expedite this Complaint.<sup>4</sup>

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<sup>3</sup> Brett Huber, a Respondent in APOC Complaint No. 22-01-CD, testified that he sent all of his invoices to ASA and therefore believes that ASA paid his invoice. He did qualify his testimony to say that, because he received a wire transfer and not a check, that he was not certain ASA paid him but simply assumed so. Additionally, his contract with ASA indicates that he is to send invoices for his work to an employee with an RGA email address. *See* Exhibit F at 1.

<sup>4</sup> *See* AS 15.13.380(c) (“In deciding whether to expedite consideration, the commission shall consider such factors as [(1)] whether the alleged violation, if not immediately restrained, could materially affect the outcome of an election or other impending event; [(2)] whether the alleged violation could cause irreparable harm that penalties could not adequately remedy; and [(3)] whether there is reasonable cause to believe that a violation has occurred or will occur. . . . [T]he commission may independently expedite consideration of the complaint if the commission finds that the standards for expedited consideration set out in this subsection have been met.”).



### **III. THE PARTIES**

#### **A. The Republican Governors Association:**

The RGA is an IRS Section 527 tax-exempt entity whose purpose is to elect and re-elect Republican Governors. The RGA aggregates vast sums of money and then supports Republican gubernatorial candidates, typically through donations to I.E. Groups or “SuperPACs.” The RGA is a well-known “Dark Money” organization that compiles vast sums of money anonymously and then deploys those funds in elections without disclosing its true donors.<sup>5</sup> The RGA has raised hundreds of millions of dollars to support its preferred candidates and, as discussed below, intends to spend millions in the 2022 gubernatorial campaign to support Governor Dunleavy.

As a Section 527 entity, the RGA is required to report its activities to the IRS on a periodic basis. However, these reports are cumulative of their nationwide spending and not particularly timely, making them less than helpful for monitoring specific campaign activities. Nevertheless, a review of these reports after the fact can be a valuable resource to double check whether RGA’s other reporting is accurate. In this case, they are not.

#### **B. A Stronger Alaska:**

ASA claims to be an I.E. Group formed under state law (known as a “SuperPAC” in federal law). It was created for the sole purpose of supporting Governor Dunleavy’s re-election. Reports in APOC’s records indicate that it was formed on February 24, 2021, and that it received only a single donation — \$3 million — which was made from the RGA the day following ASA’s formation. ASA appears to be a mere instrumentality for the RGA acting in Alaska because — in addition to being solely funded by the RGA — its registered Treasurer is Erim Canligil, who is the

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<sup>5</sup> See, e.g., <https://www.cleveland.com/news/2022/04/dark-money-group-helping-gov-mike-dewine-was-funded-by-republican-governors-association-pac.html>.

Chief Financial Officer for the RGA,<sup>6</sup> and its registered Chair is Dave Rexrode, who is the Executive Director of the RGA.<sup>7</sup>

The evidence attached to this complaint indicates that ASA is a sham entity meant to obscure the activities of the RGA. It appears possible that ASA does not even exist at all beyond a cursory APOC registration, because it does not appear to have independent leadership, consultants, or even a bank account/funds of its own.

#### **IV. EVIDENCE AND APPLICATION OF THE LAW**

**A. The RGA's own IRS filings indicate that its report to APOC of a \$3 million contribution to ASA was false, and multiple violations have occurred and are ongoing.**

**1. The RGA's own filings contain clear evidence that ASA's and RGA's APOC filings are false.**

Between the Commission's October 12<sup>th</sup> decision to expedite a hearing on allegations of coordination in APOC Complaint No. 22-01-CD and the expedited hearing on October 14<sup>th</sup>, Complainants became aware of serious contradictions between the RGA's IRS tax filings and its activities as reported (or not reported) to APOC. That evidence is the basis of this complaint.

It is uncontested that the RGA claims to have donated \$3 million to ASA on February 25, 2021. This date is critical, because is also uncontested that the effective date of the Dark Money disclosure provisions in Ballot Measure 2 became effective on February 28, 2021.

According to the RGA's own IRS filings, the RGA did not donate \$3 million, or any other amount, to ASA on that date. Worse still, it does not appear that the RGA *ever* donated funds to ASA.

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<sup>6</sup> See <https://www.rga.org/rga-announces-senior-staff-2/>.

<sup>7</sup> See <https://www.linkedin.com/in/david-rexrode-1118594/>.

For this filing, Complainants have reviewed the RGA's Form 8872 filings, which are publicly available. Specifically, we reviewed the RGA's: Mid-Year 2021 Report (1/1/21 to 6/30/21); Year-End 2021 Report (7/1/21 to 12/31/21); Year-End *Amended* 2021 Report (same); First Quarter 2022 Report (1/1/2022 to 3/31/2022); and Second Quarter 2022 Report (4/1/2022 to 6/30/2022).<sup>8</sup> *None* of these reports show a contribution from the RGA to ASA in *any* amount. Accordingly, either the RGA's IRS filings are wildly inaccurate *or* their report to APOC of donating \$3 million to ASA is false.

The problem with this omission is made more clear by the fact that in the past the RGA *has* properly reported to the IRS its contributions to Alaska-based I.E. Groups. For example, in 2018 the RGA reported six contributions to another I.E. Group.<sup>9</sup> That the RGA reported these contributions properly in 2018 but failed to do so this cycle is additional evidence indicating that the omission is not accidental, and indicates that the contribution to ASA did not actually occur. It is unclear whether a bank account for ASA even exists.<sup>10</sup>

Additional corroboration of these irregularities, and support for the conclusion that the \$3 million contribution never occurred, is found in the fact that, curiously, the RGA received a

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<sup>8</sup> See Exhibit A at 1 (hyperlinks to RGA's Form 8872 filings from 1/1/2021 to 6/30/2022). The RGA's Third Quarter 2022 IRS Report (covering 7/1/2022 to 9/30/2021) was due on October 15, 2022 but, for unknown reasons, it has not been filed or posted before today.

<sup>9</sup> Exhibit A at 2 (data from RGA's Form 8872 filings covering 7/1/2018 to 12/31/2018 and link to database).

<sup>10</sup> Complainants did initial due diligence to determine whether ASA exists at all in terms of having, at a minimum, its own bank account. People who have experience forming political groups know that it is extremely difficult to open a bank account without obtaining an EIN (Employer Identification Number) from the IRS. A search of publicly-available information at the IRS did not turn up any entity called "A Stronger Alaska" or "Stronger Alaska." <https://apps.irs.gov/app/eos/allSearch>.

donation of \$225,000 from “Keep Dunleavy” on March 22, 2022.<sup>11</sup> “Keep Dunleavy” was a political group formed in 2020 to raise money in opposition of a potential recall election against Governor Dunleavy.<sup>12</sup> If the RGA had already donated its full \$3 million to ASA in support of Governor Dunleavy over a year prior, then why would a group — whose sole purpose is supporting Governor Dunleavy — be donating to the RGA? Logically, it would have made more sense for “Keep Dunleavy” to simply donate the funds to ASA directly.

## 2. Potential Violations

If the RGA’s own IRS filings are to be believed, then the RGA and ASA have committed a litany of potential APOC violations. Such violations include, but are not limited to:

- ASA filed a false year-end report containing the \$3 million donation from the RGA, and the RGA falsely reported making that donation.<sup>13</sup>
- If the RGA’s donation to ASA was not fully consummated before February 28, 2021, then all of ASA’s (and the RGA’s) activities are subject to Alaska’s relatively new Dark Money disclosure requirements, requirements that they have not been complying with.<sup>14</sup>
- All communications from ASA would contain both an incorrect identifier (because the RGA in fact would be making the communication) and would lack the necessary “three largest contributors” disclaimer.<sup>15</sup>

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<sup>11</sup> Exhibit B at 2 (excerpts from RGA’s First Quarter 2022 Form 8872 filing).

<sup>12</sup> See, e.g., <https://www.adn.com/politics/2020/02/28/dunleavy-supporters-announce-two-new-defense-groups-ahead-of-recall-campaigns-weekend-launch/>.

<sup>13</sup> See AS 15.13.040; AS 15.13.110; see also AS 15.13.390(a)(1) (outlining the \$500 per day civil penalties).

<sup>14</sup> See AS 15.13.400(5); see also AS 15.13.040(r). There is a \$1,000 per day maximum civil penalty for this violation. AS 15.13.390(a)(2). There is also an additional civil penalty “of not more than the amount of the contribution,” unless “the violation was intentional,” at which point the amount of the civil penalty could be tripled. AS 15.13.390(a)(3).

<sup>15</sup> See AS 15.13.090(a).

All of these issues implicate numerous violations with long-standing and rapidly-accumulating daily fines. More urgently, the clear evidence of these violations requires APOC to order an immediate halt to the RGA's and ASA's illegal activities, along with the immediate correction of all false reporting and disclaimers.

**B. The RGA's own IRS filings indicate that it is paying ASA expenses directly, further corroborating that ASA does not exist as a separate entity.**

**1. The RGA's own IRS filings show it is paying ASA's campaign expenses directly and otherwise acting as an unregistered I.E. Group.**

Given that the RGA's own IRS filings fail to show that it funded ASA, it is unclear how ASA is paying for the independent expenditures that it has reported making to APOC. These filings therefore appear to be false. Further evidence of this problem is demonstrated by the fact that the RGA actually reported to the IRS that it had paid an expense that was reported to APOC as being paid by ASA. One of the two reports *must* be false.

The RGA reported to the IRS that on June 10, 2022, it directly paid Mr. Huber (through Strategic Synergies, LLC) for "political support services."<sup>16</sup> There are two problems with this filing. First, the RGA has not registered with or disclosed that it is an I.E. Group with APOC. Second, ASA filed a ten-day independent expenditure report with APOC that *also* claims to have paid this exact same expense: the payment is to the same person, on the same day, in the same amount, for the same listed reason.<sup>17</sup>

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<sup>16</sup> See Exhibit A at 3. See also, Exhibit C at 2 (excerpts from RGA's Second Quarter 2022 Form 8872 filing).

<sup>17</sup> See Exhibit A at 3. The entry shown comes from APOC's own records. Another piece of potentially relevant information is that ASA reports payment of \$1,404.50 in legal fees to the law firm Holmes, Weddle and Barcott on July 27, 2022 which by itself means little. However, ASA reported paying that expense with "check number 80016." See Exhibit D. Considering ASA is a newly-formed I.E. Group with virtually no reported expenditures to date, the fact that an expense

The simple truth is that both reports cannot be accurate. The fact that the RGA somehow reported paying Mr. Huber directly is additional evidence consistent with the apparent fact that the RGA *never* donated \$3 million to ASA, and perhaps indicates that ASA does not exist in any way shape or form. The cumulative weight of this evidence seems to indicate that ASA is nothing more than a false front, allowing the RGA to conduct independent expenditure activities directly while avoiding all disclosure and disclaimer requirements.

## **2. Potential Violations.**

If the RGA's own IRS filings are accurate, then the organization (and ASA) have committed (and are committing) additional APOC violations. Such violations include, but are not limited to:

- The RGA has directly paid for independent expenditures without registering with APOC prior to doing so.<sup>18</sup>
- In attempting to hide behind ASA as a false front, the RGA's communications contain false disclaimers, both as to who is making the communication and as to the lack of an accurate "three largest contributors" disclaimer.<sup>19</sup>
- If the RGA has been acting as I.E. Group it also should have disclosed all of its "true source" donors for its activities in the 2022 election.
- ASA, to the extent it exists, is filing false 10-day reports regarding independent expenditures that it is not paying for, but that the RGA is actually paying for directly.<sup>20</sup>

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was paid for with a check number that high seems to indicate that the RGA or some other entity in fact made the payment.

<sup>18</sup> See AS 15.13.050.

<sup>19</sup> See AS 15.13.090(a).

<sup>20</sup> See AS 15.13.040; AS 15.13.110.

- ASA (to the extent it exists) is causing communications to be produced that contain false disclaimers, both as to who is making the communication and as to the lack of an accurate “three largest contributors” disclaimer.<sup>21</sup>

Not only do these violations corroborate the primary allegation that RGA never donated \$3 million to ASA, they create a new, and just as serious, issue. The RGA appears to be brazenly undertaking activities as an I.E. Group without registering and disclosing with APOC as required. In short, they are acting in the shadows and presenting ASA as a false front both to distance themselves from the communications, but also to prevent required disclosure of donor information. These issues, like those above, must be immediately ceased and all impacted disclosures and reports must be immediately corrected.

**C. The RGA’s IRS filings indicate that it has made numerous expenditures in the gubernatorial election that have not been reported to APOC at all.**

- 1. The RGA’s own IRS filings, and evidence from the expedited hearing on APOC Complaint No. 22-01-CD, demonstrate that the RGA has made independent expenditures in support of Dunleavy’s re-election that have not been reported anywhere.**

In addition to the issues described above — that the RGA possibly never donated to ASA *and* that the RGA is paying directly for expenditures that ASA claims to have paid — there is a third major issue with the RGA’s participation in this election. There are a number of expenditures, and implied expenditures, that the RGA has undertaken to support its work in the gubernatorial election in Alaska that have not been reported to APOC as coming from either the RGA *or* from ASA.

Mr. Huber testified during the expedited hearing in APOC Complaint No. 22-01-CD on October 14. On the whole, his testimony attempted to minimize his role with DFG and ASA. Specifically, he indicated that he was not aware of many of ASA’s activities, and testified that he

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<sup>21</sup> See AS 15.13.090(a).

was not the “decision maker” for ASA. Under oath, he identified “Jake Eaton” with “The Political Company” as the person running ASA and making its decisions.<sup>22</sup>

Neither Jake Eaton nor the Political Company appear *anywhere* in *any* of ASA’s campaign disclosure reports. However, according to the RGA’s IRS filings the Political Company has been under contract to the RGA since January 18, 2022.<sup>23</sup> The description of these activities is “political support services” and their duration — monthly starting in January through the end of the reports to date — corroborates Mr. Huber’s testimony that Mr. Eaton of the Political Company is “running” ASA. The problem is, the RGA is paying Mr. Eaton, not ASA. Through June of this year,<sup>24</sup> Mr. Eaton has been paid \$62,792 to run ASA, and yet he has never appeared in ASA’s APOC reports.

Additional unreported subsidization of ASA activities appears to have come from RGA’s staff, who appear to be spending substantial unreported time supporting ASA’s activities. For example, all of the officers of ASA are also officers and employees of the RGA.<sup>25</sup> Mr. Huber’s contract with ASA was signed by Dave Rexrode, the Chair of the RGA, and the contract requires Mr. Huber to go to the RGA’s general counsel for any legal advice.<sup>26</sup>

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<sup>22</sup> See audio recording for the October 14, 2022 expedited hearing on APOC Complaint No. 22-01-CD, testimony of Brett Huber.

<sup>23</sup> See Exhibit E (compilation from RGA’s forms 8872 of all 2022 payments made to the Political Company); *see also* Exhibit B at 3-5; Exhibit C at 3-5.

<sup>24</sup> The available IRS reports only encompass activities through June 30, 2022. As stated above, the RGA’s Second Quarter 2022 Form 8872 filing was due on October 15, but has not yet been filed.

<sup>25</sup> See all of ASA’s APOC filings.

<sup>26</sup> See *generally* Exhibit F; *see also id.* at 3.



## 2. Potential Violations.

Once again, the RGA’s own IRS filings support a finding that the organization, and ASA, have committed, and are committing, additional APOC violations. Such violations include, but are not limited to:

- The RGA making unreported independent expenditures in support of Governor Dunleavy without reporting them, including paying the salary of the person “running” ASA according to the testimony of Mr. Huber.<sup>27</sup>
- The RGA utilizing significant professional staff time to run ASA without reporting the activity as an in-kind contribution or without ASA paying for the services.<sup>28</sup>
- ASA failing to report expenditures made in support of its activities by the RGA.
- In attempting to hide behind ASA as a false front, the RGA’s communications contain false disclaimers, both as to who is making the communication and as to the lack of an accurate “three largest contributors” disclaimer.
- If the RGA has been acting as an I.E. Group, it also should have disclosed all of its “true source” donors for its activities in the 2022 election.

Given the nature and scope of the initial allegations, this third category of allegation might seem more “minor” to the Commission at first blush. But the Commission and APOC Staff should keep in mind that these “off the books” expenditures are significant by any measure, amounting to many tens of thousands of dollars. Additionally, these allegations also corroborate the first two categories of violations by demonstrating the lengths to which the RGA disregarded ASA as a separate entity, blurring all lines of proper financial practices and subverting APOC’s statutes at every turn, by concealing who was actually paying for ASA’s activities and how.

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<sup>27</sup> See AS 15.13.040; AS 15.13.110.

<sup>28</sup> See AS 15.13.040; AS 15.13.110.

## V. CONCLUSION

This complaint outlines some of the largest campaign finance irregularities that APOC has ever been presented with. The evidence tends to show that the RGA has “created” ASA as nothing more than smoke and mirrors to prevent timely disclosure, to hide the RGA’s own role in the election, and to avoid the Dark Money disclosure regime that went into effect on February 28, 2021.

It is difficult to understand how the evidence in this case could be stronger. Nearly all of the allegations in this complaint are based upon examination of the RGA’s own IRS filings. Given the severity of penalties for filing false tax information — and given the RGA’s own past practice of reporting its donations to I.E Groups in Alaska — the reasonable conclusion is that the RGA *never* donated \$3 million to ASA, and that the RGA has been acting as a rogue, unregistered I.E. Group.

The potential implication from this allegation — and the many other allegations in this complaint — is that APOC, and by extension Alaska’s voters, are being lied to. And these are not small lies. These are the kind of lies that conceal hundreds of thousands in expenditures from the public’s view; the kind of lies that block operation of Alaska’s Dark Money disclosure requirements, keeping voters guessing as to who is attempting to influence the outcome of our elections.

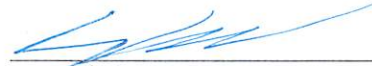
Enough is enough. Calculation of fines can wait for a later date. But APOC should act immediately to enjoin the RGA and ASA from further illegal action and also order them to immediately remedy all false reporting and under reporting. Complainants are concurrently filing

a motion to expedite this complaint,<sup>29</sup> because only APOC can prevent continued irreparable harm to our elections from Respondents' mis-reporting scheme.

CASHION GILMORE & LINDEMUTH  
Attorneys for Complainants

DATE: October 17, 2022

By:



\_\_\_\_\_  
Scott M. Kendall  
Alaska Bar No. 0405019  
Samuel G. Gottstein  
Alaska Bar No. 1511099

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<sup>29</sup> See AS 15.13.380(d)(1) (authorizing APOC to “enter an emergency order requiring the violation to be ceased” if “the respondent has engaged in or is about to engage in an act or practice that constitutes or will constitute a violation of this chapter or a regulation adopted under this chapter”).

Links to RGA's IRS Form 8872 Filings  
01/01/2021 to 6/30/2022

A Stronger Alaska's APOC Year End Report filed on 2/15/22 reported a \$3 million contribution by the Republican Governors Association on 2/25/21 which was nearly a year earlier.

The RGA is required to file IRS Form 8872. We would expect to see the \$3 million contribution to A Stronger Alaska on the Mid Year Report covering 1/1/21 to 6/30/21 (first link below) which was filed on 8/2/21. It was not. Nor was it reported on any subsequent RGA filing of IRS Form 8872.

The APOC report disclosing the contribution was filed by Erim Canligil who is Treasurer of the Independent Expenditure group, A Stronger Alaska. The IRS Form 8872 filings are signed by RGA's Chief Financial Officer who happens to be the same Erim Canligil.

- **Mid Year Report 2021** (1/1/21 through 6/30/21)  
[https://forms.irs.gov/app/pod/basicSearch/search?\\_eventId\\_displayForm=true&formId=125966&formtype=e8872&execution=e8s3](https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=125966&formtype=e8872&execution=e8s3)
- **Year End Report 2021** (7/1/21 through 12/31/21)  
[https://forms.irs.gov/app/pod/basicSearch/search?\\_eventId\\_displayForm=true&formId=129026&formtype=e8872&execution=e8s3](https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=129026&formtype=e8872&execution=e8s3)
- **Year End Report - Amended** (7/1/21 through 12/31/2021)  
[https://forms.irs.gov/app/pod/basicSearch/search?\\_eventId\\_displayForm=true&formId=130683&formtype=e8872&execution=e1s3](https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=130683&formtype=e8872&execution=e1s3)
- **First Quarter Report 2022** (1/1/2022 through 3/31/2022)  
[https://forms.irs.gov/app/pod/basicSearch/search?\\_eventId\\_displayForm=true&formId=130974&formtype=e8872&execution=e1s3](https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=130974&formtype=e8872&execution=e1s3)
- **Second Quarter Report 2022** (4/1/22 through 6/30/22)  
[https://forms.irs.gov/app/pod/basicSearch/search?\\_eventId\\_displayForm=true&formId=133399&formtype=e8872&execution=e2s3](https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=133399&formtype=e8872&execution=e2s3)

**Republican Governors Association 2018 Contributions to Families for Alaska's Future IE**

**6 contributions totaling \$2,710,000**

(dated from 8/21/18 through 10/3/18)

The data below is from the RGA's IRS Form 8872 filings:

- Post General Election Report 2018 covering 7/1/18 - 9/30/18 (first 5 entries below)
- Third Quarter Report 2018 covering 10/1/18 through 12/31/18 (last entry below)

The IRS database of Form 8872 Filings may be accessed at: <https://forms.irs.gov/>

<b>Recipient's name, mailing address and ZIP code</b> FAMILIES FOR ALASKAS FUTURE 645 G STREET STE #100, PMB 1061 ANCHORAGE, AK 99501	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 400000 <b>Date of expenditure</b> 08/21/2018
<b>Purpose of expenditure</b> CONTRIBUTION		
<b>Recipient's name, mailing address and ZIP code</b> FAMILIES FOR ALASKAS FUTURE 645 G STREET STE #100, PMB 1061 ANCHORAGE, AK 99501	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 08/29/2018
<b>Purpose of expenditure</b> CONTRIBUTION		
<b>Recipient's name, mailing address and ZIP code</b> FAMILIES FOR ALASKAS FUTURE 645 G STREET STE #100, PMB 1061 ANCHORAGE, AK 99501	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 300000 <b>Date of expenditure</b> 09/07/2018
<b>Purpose of expenditure</b> CONTRIBUTION		
<b>Recipient's name, mailing address and ZIP code</b> FAMILIES FOR ALASKAS FUTURE 645 G STREET STE #100, PMB 1061 ANCHORAGE, AK 99501	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 450000 <b>Date of expenditure</b> 09/20/2018
<b>Purpose of expenditure</b> CONTRIBUTION		
<b>Recipient's name, mailing address and ZIP code</b> FAMILIES FOR ALASKAS FUTURE 645 G STREET STE #100, PMB 1061 ANCHORAGE, AK 99501	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 100000 <b>Date of expenditure</b> 09/28/2018
<b>Purpose of expenditure</b> CONTRIBUTION		
<b>Recipient's name, mailing address and ZIP code</b> FAMILIES FOR ALASKAS FUTURE 645 G STREET SUITE #100, PMB 1061 ANCHORAGE, AK 99501	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 1450000 <b>Date of expenditure</b> 10/03/2018
<b>Purpose of expenditure</b> CONTRIBUTION		

**Payments to Strategic Synergies, LLC**  
 Reported by both the RGA and A Stronger Alaska  
 Same date, same amount, same purpose

From RGA's IRS Form 8872  
 Mid Year Report  
 (1/1/21 through 6/30/21)  
 Filed 7/15/22  
 Page 454

**Recipient's name, mailing address and ZIP code**  
 STRATEGIC SYNERGIES, LLC  
 200 W. 34TH ST. STE. 586  
 ANCHORAGE, AK 99503

**Name of recipient's employer**  
 N/A

**Recipient's occupation**  
 N/A

**Amount of Expenditure**  
 \$ 11500

**Date of expenditure**  
 06/10/2022

**Purpose of expenditure**  
 POLITICAL SUPPORT SERVICES

From A Stronger Alaska's APOC 10 Day IE Report  
 Filed 6/10/2022

Date	Recipient	Payment Type	Candidate / Proposition	Amount
06/10/2022	Strategic Synergies, LLC 200 E. 34th Ave., #586 Anchorage, Alaska 99503	Electronic Funds Transfer	SUPPORT: 2022 - Mike Dunleavy Election: State Primary CONSULTING/POLITICAL SUPPORT SERVICES	\$11,500.00

# Political Organization Report of Contributions and Expenditures

▶ See separate instructions.

**A** For the period beginning 01/01/2022 and ending 03/31/2022

**B** Check applicable box:  Initial report  Change of address  Amended report  Final report

**1** Name of organization: Republican Governors Association  
**Employer identification number:** 11 - 3655877

**2** Mailing address (P.O. box or number, street, and room or suite number)  
1747 Pennsylvania NW Suite 250

**City or town, state, and ZIP code**  
Washington, DC 20006

**3** E-mail address of organization: jjohnson@rga.org  
**4** Date organization was formed: 10/04/2002

**5a** Name of custodian of records: Jessica Johnson  
**5b** Custodian's address: 1747 Pennsylvania NW Suite 250  
Washington, DC 20006

**6a** Name of contact person: Jessica Johnson  
**6b** Contact person's address: 1747 Pennsylvania NW Suite 250  
Washington, DC 20006

**7** Business address of organization (if different from mailing address shown above). Number, street, and room or suite number  
1747 Pennsylvania NW Suite 250

**City or town, state, and ZIP code**  
Washington, DC 20006

**8** Type of report (check only one box)

- First quarterly report (due by April 15)
- Second quarterly report (due by July 15)
- Third quarterly report (due by October 15)
- Year-end report (due by January 31)
- Mid-year report (Non-election year only-due by July 31)
- Monthly report for the month of: (due by the 20th day following the month shown above, except the December report, which is due by January 31)
- Pre-election report (due by the 12th or 15th day before the election)
  - (1) Type of election:
  - (2) Date of election:
  - (3) For the state of:
- Post-general election report (due by the 30th day after general election)
  - (1) Date of election:
  - (2) For the state of:

**9** Total amount of reported contributions (total from all attached Schedules A) ..... **9.** \$ 28923183

**10** Total amount of reported expenditures (total from all attached Schedules B) ..... **10.** \$ 16663351

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Erim Canligil

04/18/2022

**Sign Here**

Signature of authorized official

Date

<b>Contributor's name, mailing address and ZIP code</b> SPANGLER, ROBIN 822 TRIPLE CROWN CT CLERMONT, FL 34711	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 784	<b>Amount of contribution</b> \$ 10 <b>Date of contribution</b> 01/23/2022
<b>Contributor's name, mailing address and ZIP code</b> CLAYBAUGH, WILLIAM J 56641 858TH RD CARROLL, NE 68723	<b>Name of contributor's employer</b> TWJ FARMS <b>Contributor's occupation</b> RANCHER <b>Aggregate contributions year-to-date</b> \$ 4465	<b>Amount of contribution</b> \$ 25 <b>Date of contribution</b> 03/31/2022
<b>Contributor's name, mailing address and ZIP code</b> FARQUHAR, MARK 52234 Highbury Court UTICA, MI 48315	<b>Name of contributor's employer</b> LEAR CORPORATION <b>Contributor's occupation</b> ENGINEERING <b>Aggregate contributions year-to-date</b> \$ 1680	<b>Amount of contribution</b> \$ 50 <b>Date of contribution</b> 03/04/2022
<b>Contributor's name, mailing address and ZIP code</b> ROOD, JOHN 1384 STONEHOLLOW DR. #1 KINGWOOD, TX 77345	<b>Name of contributor's employer</b> SELF-EMPLOYED <b>Contributor's occupation</b> CPA/CFP <b>Aggregate contributions year-to-date</b> \$ 3928	<b>Amount of contribution</b> \$ 4 <b>Date of contribution</b> 01/02/2022
<b>Contributor's name, mailing address and ZIP code</b> STANLEY, ROBERT 3636 MILLER HILL WAY BIRMINGHAM, AL 35243	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 284	<b>Amount of contribution</b> \$ 2 <b>Date of contribution</b> 01/14/2022
<b>Contributor's name, mailing address and ZIP code</b> CLEMONS, DIANNE 4532 HIGH VISTA LANE KNOXVILLE, TN 37931	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 574	<b>Amount of contribution</b> \$ 25 <b>Date of contribution</b> 01/28/2022
<b>Contributor's name, mailing address and ZIP code</b> CLAYBAUGH, WILLIAM J 56641 858TH RD CARROLL, NE 68723	<b>Name of contributor's employer</b> TWJ FARMS <b>Contributor's occupation</b> RANCHER <b>Aggregate contributions year-to-date</b> \$ 4465	<b>Amount of contribution</b> \$ 25 <b>Date of contribution</b> 03/18/2022
<b>Contributor's name, mailing address and ZIP code</b> KEEP DUNLEAVY PO BOX 240891 ANCHORAGE, AK 99524	<b>Name of contributor's employer</b> N/A <b>Contributor's occupation</b> N/A <b>Aggregate contributions year-to-date</b> \$ 225000	<b>Amount of contribution</b> \$ 225000 <b>Date of contribution</b> 03/22/2022
<b>Contributor's name, mailing address and ZIP code</b> REVETT, ELENA 1606 ABACO DR. C3 COCONUT CREEK, FL 33066	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 400	<b>Amount of contribution</b> \$ 100 <b>Date of contribution</b> 03/25/2022
<b>Contributor's name, mailing address and ZIP code</b> LANDES, SHARON 8174 VISTA DR LA MESA, CA 91941	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 225	<b>Amount of contribution</b> \$ 25 <b>Date of contribution</b> 02/24/2022
<b>Contributor's name, mailing address and ZIP code</b> BARTON, BONITA 2209 NORTH OWENS RD PLEASANT HILL, OH 45359	<b>Name of contributor's employer</b> RETIRED <b>Contributor's occupation</b> RETIRED <b>Aggregate contributions year-to-date</b> \$ 560	<b>Amount of contribution</b> \$ 25 <b>Date of contribution</b> 02/24/2022



<b>Recipient's name, mailing address and ZIP code</b> JETBLUE AIRWAYS 27-01 QUEENS PLAZA NORTH LONG ISLAND CITY, NY 11101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 310 <b>Date of expenditure</b> 02/16/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> LYFT 185 BERRY ST. #5000 SAN FRANCISCO, CA 94107	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 14 <b>Date of expenditure</b> 02/24/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> HMR DESIGNS 4200 W. BRYN MAWR AVE. CHICAGO, IL 60460	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 48779 <b>Date of expenditure</b> 01/14/2022
<b>Purpose of expenditure</b> EVENT STAGING		
<b>Recipient's name, mailing address and ZIP code</b> LYFT 185 BERRY ST. #5000 SAN FRANCISCO, CA 94107	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 35 <b>Date of expenditure</b> 01/19/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX 76155	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 50 <b>Date of expenditure</b> 03/21/2022
<b>Purpose of expenditure</b> TRAVEL-INTERNET		
<b>Recipient's name, mailing address and ZIP code</b> AMAZON.COM 1200 12TH AVE S STE 1200 SEATTLE, WA 98144	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 32 <b>Date of expenditure</b> 01/17/2022
<b>Purpose of expenditure</b> OFFICE SUPPLIES		
<b>Recipient's name, mailing address and ZIP code</b> UNITED AIR 1200 E ALGONQUIN RD ELK GROVE VILLAGE, IL 60007	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 35 <b>Date of expenditure</b> 01/14/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> ANEDOT, INC. 1340 POYDRAS ST. STE. 1770 NEW ORLEANS, LA 70112	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 160 <b>Date of expenditure</b> 03/02/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> WINRED TECHNICAL SERVICES, LLC 1776 WILSON BLVD. STE. 530 ARLINGTON, VA 22219	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 1 <b>Date of expenditure</b> 01/28/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 02/28/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		

<b>Recipient's name, mailing address and ZIP code</b> CHAIN BRIDGE BANK, N.A. 1445-A LAUGHLIN AVE MCLEAN, VA 22101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 5 <b>Date of expenditure</b> 03/31/2022
<b>Purpose of expenditure</b> BANK FEES		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 48 <b>Date of expenditure</b> 01/15/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> STAPLES 500 STAPLES DR. FARMINGHAM, MA 01702	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 248 <b>Date of expenditure</b> 02/01/2022
<b>Purpose of expenditure</b> OFFICE SUPPLIES		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 01/18/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> DROPBOX 185 BERRY ST STE 400 SAN FRANCISCO, CA 94107	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 159 <b>Date of expenditure</b> 01/21/2022
<b>Purpose of expenditure</b> SOFTWARE SUBSCRIPTION		
<b>Recipient's name, mailing address and ZIP code</b> AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX 76155	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 8 <b>Date of expenditure</b> 01/27/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 37 <b>Date of expenditure</b> 03/25/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> AMAZON.COM 1200 12TH AVE S STE 1200 SEATTLE, WA 98144	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 455 <b>Date of expenditure</b> 01/22/2022
<b>Purpose of expenditure</b> OFFICE SUPPLIES		
<b>Recipient's name, mailing address and ZIP code</b> GODADDY.COM 14455 N HAYDEN RD STE. 100 SCOTTSDALE, AZ 85260	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 152 <b>Date of expenditure</b> 03/24/2022
<b>Purpose of expenditure</b> WEB DEVELOPMENT		
<b>Recipient's name, mailing address and ZIP code</b> WINRED TECHNICAL SERVICES, LLC 1776 WILSON BLVD. STE. 530 ARLINGTON, VA 22219	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 2 <b>Date of expenditure</b> 02/07/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		

<b>Recipient's name, mailing address and ZIP code</b> DELTA AIR LINES 1030 DELTA BLVD. ATLANTA, GA 30354	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 237 <b>Date of expenditure</b> 02/09/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 03/07/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> FEDEX 942 SOUTH SHADY GROVE RD MEMPHIS, TN 38120	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 78 <b>Date of expenditure</b> 02/12/2022
<b>Purpose of expenditure</b> POSTAGE		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 14 <b>Date of expenditure</b> 03/10/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> HAMPTON INN 7930 JONES BRANCH DR. MCLEAN, VA 22102	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 445 <b>Date of expenditure</b> 01/22/2022
<b>Purpose of expenditure</b> TRAVEL-LODGING		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 69 <b>Date of expenditure</b> 03/22/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> TWIST, JONATHAN 1747 PENNSYLVANIA AVE. NW STE. 250 WASHINGTON, DC 20006	<b>Name of recipient's employer</b> REPUBLICAN GOVERNORS ASSN <b>Recipients's occupation</b> POLITICAL DIR.	<b>Amount of Expenditure</b> \$ 885 <b>Date of expenditure</b> 01/31/2022
<b>Purpose of expenditure</b> REIMB. PHONE/TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> ANEDOT, INC. 1340 POYDRAS ST. STE. 1770 NEW ORLEANS, LA 70112	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 1120 <b>Date of expenditure</b> 01/18/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> ACTIVE CAMPAIGN INC 1 N DEARBORN 5TH FLOOR CHICAGO, IL 60601	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 2440 <b>Date of expenditure</b> 01/01/2022
<b>Purpose of expenditure</b> SOFTWARE SUBSCRIPTION		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10 <b>Date of expenditure</b> 02/01/2022
<b>Purpose of expenditure</b> TRAVEL		

# Political Organization Report of Contributions and Expenditures

OMB No. 1545-1696

▶ See separate instructions.

**A** For the period beginning 04/01/2022 and ending 06/30/2022

**B** Check applicable box:  Initial report  Change of address  Amended report  Final report

**1** Name of organization: Republican Governors Association  
**Employer identification number:** 11 - 3655877

**2** Mailing address (P.O. box or number, street, and room or suite number):  
1747 Pennsylvania NW Suite 250

**City or town, state, and ZIP code:**  
Washington, DC 20006

**3** E-mail address of organization: jjohnson@rga.org  
**4** Date organization was formed: 10/04/2002

**5a** Name of custodian of records: Jessica Johnson  
**5b** Custodian's address: 1747 Pennsylvania NW Suite 250  
Washington, DC 20006

**6a** Name of contact person: Jessica Johnson  
**6b** Contact person's address: 1747 Pennsylvania NW Suite 250  
Washington, DC 20006

**7** Business address of organization (if different from mailing address shown above). Number, street, and room or suite number:  
1747 Pennsylvania NW Suite 250

**City or town, state, and ZIP code:**  
Washington, DC 20006

**8** Type of report (check only one box)

<input type="checkbox"/> First quarterly report (due by April 15)	<input type="checkbox"/> Monthly report for the month of: (due by the 20th day following the month shown above, except the December report, which is due by January 31)
<input checked="" type="checkbox"/> Second quarterly report (due by July 15)	<input type="checkbox"/> Pre-election report (due by the 12th or 15th day before the election)
<input type="checkbox"/> Third quarterly report (due by October 15)	(1) Type of election:
<input type="checkbox"/> Year-end report (due by January 31)	(2) Date of election:
<input type="checkbox"/> Mid-year report (Non-election year only-due by July 31)	(3) For the state of:
	<input type="checkbox"/> Post-general election report (due by the 30th day after general election)
	(1) Date of election:
	(2) For the state of:

**9** Total amount of reported contributions (total from all attached Schedules A) ..... **9.** \$ 29064384

**10** Total amount of reported expenditures (total from all attached Schedules B) ..... **10.** \$ 16833564

Under penalties of perjury, I declare that I have examined this report, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete.

Erim Canligil

07/15/2022

**Sign Here** ▶ Signature of authorized official ▶ Date

<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 37 <b>Date of expenditure</b> 05/23/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> INTUIT 2700 COAST AVE. MOUNTAIN VIEW, CA 94043	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 85 <b>Date of expenditure</b> 05/22/2022
<b>Purpose of expenditure</b> SOFTWARE SUBSCRIPTION		
<b>Recipient's name, mailing address and ZIP code</b> STRATEGIC SYNERGIES, LLC 200 W. 34TH ST. STE. 586 ANCHORAGE, AK 99503	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 11500 <b>Date of expenditure</b> 06/10/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 11 <b>Date of expenditure</b> 04/11/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> FEDEX 942 SOUTH SHADY GROVE RD MEMPHIS, TN 38120	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 80 <b>Date of expenditure</b> 04/05/2022
<b>Purpose of expenditure</b> POSTAGE		
<b>Recipient's name, mailing address and ZIP code</b> DELTA AIR LINES 1030 DELTA BLVD. ATLANTA, GA 30354	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 629 <b>Date of expenditure</b> 04/28/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> ANEDOT, INC. 1340 POYDRAS ST. STE. 1770 NEW ORLEANS, LA 70112	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 1236 <b>Date of expenditure</b> 05/27/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> ARIZONA DEPARTMENT OF PUBLIC SAFETY 1700 W. WASHINGTON ST. STE. 500 PHOENIX, AZ 85007	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 4717 <b>Date of expenditure</b> 05/31/2022
<b>Purpose of expenditure</b> REIMB. TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> LYFT 185 BERRY ST #5000 SAN FRANCISCO, CA 94107	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 53 <b>Date of expenditure</b> 05/01/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX 76155	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 67 <b>Date of expenditure</b> 05/23/2022
<b>Purpose of expenditure</b> TRAVEL		

<b>Recipient's name, mailing address and ZIP code</b> AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX 76155	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 326 <b>Date of expenditure</b> 05/03/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> WINRED TECHNICAL SERVICES, LLC 1776 WILSON BLVD. STE. 530 ARLINGTON, VA 22219	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 98 <b>Date of expenditure</b> 06/30/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> CAREY INTERNATIONAL, INC. 7445 NEW TECHNOLOGY WAY FREDERICK, MD 21703	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 1793 <b>Date of expenditure</b> 05/26/2022
<b>Purpose of expenditure</b> EVENT TRANSPORTATION SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 41 <b>Date of expenditure</b> 05/27/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> GODADDY.COM 2299 W OBISPO AVE GILBERT, AZ 85233	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 22 <b>Date of expenditure</b> 04/12/2022
<b>Purpose of expenditure</b> WEB DEVELOPMENT		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 12792 <b>Date of expenditure</b> 06/06/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> MACNAIR TRAVEL 1101 KING ST. STE. 190 ALEXANDRIA, VA 22314	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 15 <b>Date of expenditure</b> 06/22/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> WINRED TECHNICAL SERVICES, LLC 1776 WILSON BLVD. STE. 530 ARLINGTON, VA 22219	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 3 <b>Date of expenditure</b> 05/13/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX 76155	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 556 <b>Date of expenditure</b> 04/06/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> MACNAIR TRAVEL 1101 KING ST. STE. 190 ALEXANDRIA, VA 22314	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 15 <b>Date of expenditure</b> 04/06/2022
<b>Purpose of expenditure</b> TRAVEL		

<b>Recipient's name, mailing address and ZIP code</b> DELTA AIR LINES 1030 DELTA BLVD. ATLANTA, GA 30354	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 1182 <b>Date of expenditure</b> 04/19/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> CHAIN BRIDGE BANK, N.A. 1445-A LAUGHLIN AVE MCLEAN, VA 22101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10 <b>Date of expenditure</b> 04/27/2022
<b>Purpose of expenditure</b> BANK FEES		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 05/31/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> UNITED AIR 1200 E ALGONQUIN RD ARLINGTON HTS, IL 60007	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 363 <b>Date of expenditure</b> 05/31/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> ANEDOT, INC. 1340 POYDRAS ST. STE. 1770 NEW ORLEANS, LA 70112	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 673 <b>Date of expenditure</b> 06/06/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 9 <b>Date of expenditure</b> 05/07/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> LYFT 185 BERRY ST #5000 SAN FRANCISCO, CA 94107	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 35 <b>Date of expenditure</b> 06/16/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> BANDH FOTO AND ELECTRONICS CORP. 420 9TH AVE. NEW YORK, NY 10001	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 409 <b>Date of expenditure</b> 05/16/2022
<b>Purpose of expenditure</b> EQUIPMENT PURCHASE		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 31 <b>Date of expenditure</b> 05/26/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> WINRED TECHNICAL SERVICES, LLC 1776 WILSON BLVD. STE. 530 ARLINGTON, VA 22219	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 39 <b>Date of expenditure</b> 04/07/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		

<b>Recipient's name, mailing address and ZIP code</b> CHAIN BRIDGE BANK, N.A. 1445-A LAUGHLIN AVE MCLEAN, VA 22101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10 <b>Date of expenditure</b> 05/04/2022
<b>Purpose of expenditure</b> BANK FEES		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 9 <b>Date of expenditure</b> 04/21/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> ANEDOT, INC. 1340 POYDRAS ST. STE. 1770 NEW ORLEANS, LA 70112	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 295 <b>Date of expenditure</b> 04/21/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 04/11/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> UBER 1455 MARKET ST. SAN FRANCISCO, CA 94103	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 93 <b>Date of expenditure</b> 04/18/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> ANEDOT, INC. 1340 POYDRAS ST. STE. 1770 NEW ORLEANS, LA 70112	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 601 <b>Date of expenditure</b> 06/02/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> AMERICAN AIRLINES 4333 AMON CARTER BLVD FORT WORTH, TX 76155	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 487 <b>Date of expenditure</b> 04/06/2022
<b>Purpose of expenditure</b> TRAVEL		
<b>Recipient's name, mailing address and ZIP code</b> GODADDY.COM 2299 W OBISPO AVE GILBERT, AZ 85233	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 30 <b>Date of expenditure</b> 05/10/2022
<b>Purpose of expenditure</b> WEB DEVELOPMENT		
<b>Recipient's name, mailing address and ZIP code</b> ANEDOT, INC. 1340 POYDRAS ST. STE. 1770 NEW ORLEANS, LA 70112	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 45 <b>Date of expenditure</b> 04/15/2022
<b>Purpose of expenditure</b> CREDIT CARD MERCHANT FEES		
<b>Recipient's name, mailing address and ZIP code</b> LIMELIGHT HOTEL 355 S. MONARCH ST. ASPEN, CO 81611	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 04/28/2022
<b>Purpose of expenditure</b> EVENT DEPOSIT		



## INDEPENDENT EXPENDITURES FORM 15-6

COMPLETED
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Submission Date: **07/27/2022**

## FILER INFORMATION

Filer First Name: **Erim**

Filer Middle Name:

Filer Last Name: **Canligil**

Filer Full Address: **1747 Pennsylvania Ave. NW, Ste. 250  
Washington, District of Columbia 20006**

Filer Occupation: **Treasurer**

Filer Employer: **A Stronger Alaska**

Filer's Title with Other Entity: **Treasurer**

## REPORT INFORMATION

Report Year: **2022**

Election Year: **2022**

Report Type: **Twenty-four Hour**

Filer Type: **Registered Group**

## BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **A Stronger Alaska**

Type of Business or Organization: **Registered Group**

Address: **1747 Pennsylvania Avenue, NW, Ste. 250**

City: **Washington**

State: **District of Columbia**

**20006**

Country: **United States**

Business/Other Entity Contact Person: **Erim Canligil**

Contact E-mail: **ecanligil@rga.org**

Contact Phone: **202-662-4928**

## ELECTION INFORMATION

Election: **State Primary**

OFFICERS

Name	Full Address	Title
Dave Rexrode	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Chair
Erim Canligil	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Treasurer
Eric Powell	1747 Pennsylvania Avenue, NW, Ste. 250 Washington, District of Columbia 20006	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
07/27/2022	Holmes Weddle & Barcott 701 West 8th Avenue, Suite 700 Anchorage, Alaska 99501	Check Check Number: 80016	SUPPORT: 2022 - Mike Dunleavy Election: State Primary A Stronger Alaska Legal Fees	\$1,404.50

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
No Contributions / Nothing to Report			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 1	
Total of paid Expenditures:	<b>\$1,404.50</b>
Previous Contributions:	<b>\$0.00</b>
Number of Contributions Reported with this Report: 0	

Total of Contributions Reported with this Report:	<b>\$0.00</b>
Cumulative Contribution Amounts:	<b>\$0.00</b>
Number of Officers: <b>3</b>	
Number of Debts Reported with this Report:	<b>0</b>
Total of Debts Incurred but not yet paid:	<b>\$0.00</b>

**Payments from RGA to The Political Company from 1/18/22 thru 5/31/22**

**Total: \$62,792**

**From RGA's Form 8872 Filings**

<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 01/18/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 02/28/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 03/07/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 04/11/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 10000 <b>Date of expenditure</b> 05/31/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		
<b>Recipient's name, mailing address and ZIP code</b> THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	<b>Name of recipient's employer</b> N/A <b>Recipients's occupation</b> N/A	<b>Amount of Expenditure</b> \$ 12792 <b>Date of expenditure</b> 08/06/2022
<b>Purpose of expenditure</b> POLITICAL SUPPORT SERVICES		

# A STRONGER ALASKA

May 1, 2022

Brett Huber Sr.  
Strategic Synergies, LLC  
200 E 34th Ave, #586  
Anchorage, AK 99503

Dear Mr. Huber:

Upon proper signatures by all parties hereto, this letter will serve as the AGREEMENT between Strategic Synergies, LLC (hereinafter referred to as "INDEPENDENT CONTRACTOR") and the A Stronger Alaska, its affiliates and subsidiaries (collectively referred to hereinafter as "A STRONGER ALASKA").

This AGREEMENT is made and entered into by and between INDEPENDENT CONTRACTOR and A STRONGER ALASKA. In light of the mutual promises set forth herein and for good and valuable consideration, the receipt and sufficiency of which are hereby acknowledged by the parties, A STRONGER ALASKA and INDEPENDENT CONTRACTOR hereby agree as follows:

1. The WORK AND SERVICES to be performed by INDEPENDENT CONTRACTOR under this AGREEMENT will be to provide political consulting services in Alaska (hereinafter, "Target State") to A STRONGER ALASKA. INDEPENDENT CONTRACTOR agrees to work with the foregoing in provision of services as directed. For purposes of this performance of the services outlined in this AGREEMENT, INDEPENDENT CONTRACTOR agrees that its sole representative will be J.P. Twist, or his designee.
2. This AGREEMENT will be effective from May 1, 2022 through November 30, 2022, unless terminated earlier or extended in a writing signed by both parties. INDEPENDENT CONTRACTOR may terminate the AGREEMENT with or without cause upon 30-days written notice to A STRONGER ALASKA. A STRONGER ALASKA may terminate this AGREEMENT with or without cause immediately upon written notice to INDEPENDENT CONTRACTOR.
3. In return for, and upon satisfactory completion of, the WORK AND SERVICES performed by INDEPENDENT CONTRACTOR in compliance with this Agreement, A STRONGER ALASKA agrees to pay INDEPENDENT CONTRACTOR eleven thousand, five hundred dollars (\$11,500) per month for the term of this AGREEMENT. Any period during the term less than one (1) month shall be prorated. INDEPENDENT CONTRACTOR will submit an invoice for any fees and/or expenses for the WORK AND SERVICES completed under this AGREEMENT in order to receive payment. All invoices and requests for payment or reimbursement must be submitted promptly by email to Morgan Johnston at [mjohnston@rga.org](mailto:mjohnston@rga.org).

All invoices shall be paid within thirty (30) days of A STRONGER ALASKA's receipt of the invoice.

4. A STRONGER ALASKA will reimburse INDEPENDENT CONTRACTOR for any out-of-pocket, ordinary incidental expenses, such as copies, postage, and reasonable travel and related expenses, etc., in connection with INDEPENDENT CONTRACTOR's performance of the WORK AND SERVICES. Expenses will be paid within thirty (30) days of A STRONGER ALASKA's receipt of INDEPENDENT CONTRACTOR's invoice, which shall be accompanied by all original receipts and documentation of costs/expenses incurred. Invoices for expenses must be submitted by INDEPENDENT CONTRACTOR to A STRONGER ALASKA no later than sixty (60) days after the expense is incurred to be reimbursable. Expenses in amounts of two hundred and fifty dollars (\$250) or more require advance written approval by A STRONGER ALASKA's General Counsel for such expenses to be incurred. First-class travel in any form is not reimbursable and will be reimbursed only at a coach class or other discounted rate. INDEPENDENT CONTRACTOR's expenses under this AGREEMENT must be invoiced without mark-up. Any expenses, payments, or amounts due under this AGREEMENT that do not meet the above criteria may not be paid in whole or in part and may be treated as an in-kind contribution to A STRONGER ALASKA, or deducted from the compensation otherwise due INDEPENDENT CONTRACTOR, at the sole discretion of A STRONGER ALASKA.

5. During the course of performance of this AGREEMENT, INDEPENDENT CONTRACTOR may come into the possession of confidential material and/or information that pertains to A STRONGER ALASKA's business. INDEPENDENT CONTRACTOR acknowledges that any and all of the foregoing, along with any and all other information provided to, generated by, or otherwise becoming known to INDEPENDENT CONTRACTOR, its directors, officers, employees, consultants, or agents in connection with or incidental to this AGREEMENT, is privileged and confidential material and/or information in any form, and INDEPENDENT CONTRACTOR will not retain, duplicate, distribute, or otherwise use any such material and/or information, in any manner, or for any purpose not necessary to the furtherance of the terms of this AGREEMENT. Confidential material and/or information will not be willfully or negligently divulged or made accessible to any third party. Confidential material and/or information as described above is the exclusive property of A STRONGER ALASKA and will be immediately returned to A STRONGER ALASKA upon request or upon completion of this AGREEMENT. CONTRACTOR agrees not to communicate, directly or indirectly, with any member of the news media on behalf of, for, or about A STRONGER ALASKA, or any candidate for Governor, without the express advance consent of A STRONGER ALASKA.

6. INDEPENDENT CONTRACTOR acknowledges and agrees that fees paid by A STRONGER ALASKA to INDEPENDENT CONTRACTOR are based on an independent contractor relationship and in no way shall be construed to create any manner of agency or employment relationship. INDEPENDENT CONTRACTOR shall enter into no contract or agreement on behalf of A STRONGER ALASKA without the prior approval of an employee of A STRONGER ALASKA authorized to grant such approval. INDEPENDENT CONTRACTOR acknowledges sole responsibility for the payment of any taxes that might be applicable with respect to compensation earned for the services provided pursuant to this AGREEMENT and agrees that INDEPENDENT CONTRACTOR will make timely payment of such taxes.

INDEPENDENT CONTRACTOR further agrees to fully indemnify A STRONGER ALASKA from any and all liability, including penalties, interest, attorneys' fees, costs, or unpaid taxes, that might be assessed against A STRONGER ALASKA for not withholding or paying taxes on such compensation provided to INDEPENDENT CONTRACTOR.

7. INDEPENDENT CONTRACTOR acknowledges and agrees that INDEPENDENT CONTRACTOR is subject to, throughout the duration of this AGREEMENT, a continuing duty to disclose to A STRONGER ALASKA any actual or potential conflicts of interest. Conduct that interferes with operations, promotes self-dealing, brings discredit to A STRONGER ALASKA, or is offensive to A STRONGER ALASKA members or employees will result in the termination of this AGREEMENT. INDEPENDENT CONTRACTOR may not obtain any improper personal benefit by virtue of its relationship with A STRONGER ALASKA, and agrees to avoid even the appearance of impropriety. If any questions arise as to whether certain conduct is appropriate, A STRONGER ALASKA's General Counsel should be consulted.

8. INDEPENDENT CONTRACTOR acknowledges and agrees that A STRONGER ALASKA's insurance policies do not extend coverage or benefits to INDEPENDENT CONTRACTOR, and that INDEPENDENT CONTRACTOR is solely responsible for acquiring and/or maintaining any insurance coverage desired by INDEPENDENT CONTRACTOR. INDEPENDENT CONTRACTOR agrees to indemnify, defend, reimburse and hold harmless A STRONGER ALASKA and its members, officers, employees, agents and volunteers against any and all claims, demands, liabilities, actions, damages, costs, and expenses related thereto, including attorneys' fees, court costs, and other litigation expenses, and against all damages and liabilities of any kind or nature whatsoever, arising from, or attributable to, any negligent or unauthorized performance by INDEPENDENT CONTRACTOR in connection with this AGREEMENT, or arising from, or attributable to, the failure of INDEPENDENT CONTRACTOR to disclose any actual or potential conflicts of interest.

9. INDEPENDENT CONTRACTOR shall not hold the members, officers, employees and agents of A STRONGER ALASKA personally liable for any debt, liability or obligation of A STRONGER ALASKA. INDEPENDENT CONTRACTOR may look only to the funds and property of A STRONGER ALASKA for payment of any contract or claim, or for the payment of any debt, damages, judgment, decree or any money that may otherwise become due or payable to it from A STRONGER ALASKA.

10. INDEPENDENT CONTRACTOR will not have any contact with any candidate for governor of any state, or any gubernatorial campaign committee, or any committee participating directly or indirectly in a gubernatorial race, or any agent of any of the foregoing, which in any way relates to advertisements or expenditures, absent specific written approval from A STRONGER ALASKA's general counsel Jessica Furst Johnson at [jjohnson@rga.org](mailto:jjohnson@rga.org).

11. INDEPENDENT CONTRACTOR will not utilize or employ the services of any subcontractor or individual for work of a strategic or substantive nature under this Agreement without first confirming with such subcontractor that the subcontractor agrees to and can meet all conditions set forth in Paragraph 10. In the event of any question or uncertainty regarding the capacity of a subcontractor to adhere to this provision, INDEPENDENT CONTRACTOR shall

notify A STRONGER ALASKA General Counsel Jessica Furst Johnson at [jjohnson@rga.org](mailto:jjohnson@rga.org) and obtain approval before utilizing or employing such subcontractor.

12. INDEPENDENT CONTRACTOR acknowledges and agrees that INDEPENDENT CONTRACTOR will not hold itself out or otherwise represent itself as an agent or as having any other affiliation with A STRONGER ALASKA except when engaging in the business of providing the Services set forth in this Agreement. While performing services for any other political committees, entities, or individuals, INDEPENDENT CONTRACTOR will have no authority, actual or apparent, to act on behalf of A STRONGER ALASKA and will not be an agent of A STRONGER ALASKA, hold itself out as an agent of A STRONGER ALASKA, or otherwise represent itself as an agent of A STRONGER ALASKA.

13. INDEPENDENT CONTRACTOR agrees that all copyrightable works created by INDEPENDENT CONTRACTOR for A STRONGER ALASKA or under A STRONGER ALASKA's direction are "works made for hire" and shall be the sole and complete property of A STRONGER ALASKA and that any and all copyright to such works shall belong to A STRONGER ALASKA. To the extent such works are not deemed to be "works made for hire," INDEPENDENT CONTRACTOR hereby assigns all proprietary rights, including copyright, in these works to A STRONGER ALASKA without further compensation, and further agrees that the nature and contents of these works shall not be disclosed to others without the prior written permission of A STRONGER ALASKA.

14. INDEPENDENT CONTRACTOR agrees that, in the performance of the WORK AND SERVICES, it will comply with all applicable laws and regulations, including, but not limited to the Federal Election Campaign Act of 1971, as amended ("FECA"), and Federal Election Commission ("FEC") regulations, as well as applicable state-level election, campaign finance, and lobbying laws and regulations in the Target State, as applicable.

15. Neither party will be liable to the other party for any delay or failure in the performance of its obligations under this AGREEMENT or otherwise if such delay or failure arises from any cause(s) beyond the control of such party including, without limitation, labor shortages or disputes, strikes, other labor or industrial disturbances, delays in transportation, acts of God, floods, lightning, fire, epidemic, shortages of materials, rationing, utility or communication failures, earthquakes, casualty, war, acts of the public enemy, explosives, riots, regulations or orders by the government, or subdivision thereof.

16. This AGREEMENT constitutes the entire AGREEMENT between A STRONGER ALASKA and INDEPENDENT CONTRACTOR. There are no other promises, agreements or warranties affecting it.



IN WITNESS WHEREOF, the parties have caused this AGREEMENT to be executed on their behalf by their respective, duly authorized, proper signatories.

A STRONGER ALASKA

BY: DocuSigned by:  
Dave Rexrode  
286912638CDD48A...

NAME: Dave Rexrode

TITLE: Chair

DATE: 4/28/2022

Strategic Synergies, LLC  
("INDEPENDENT CONTRACTOR")

BY: DocuSigned by:  
Brett Huber  
68541F7C9A4D486...

NAME: Brett Huber Sr.

TITLE: Authorized Signatory

DATE: 4/29/2022

***EMERGENCY/EXPEDITED***

October 17, 2022

To: Alaska Public Offices Commission  
From: Alaska Public Interest Research Group and 907 Initiative  
Re: Complainants' Request to Expedite Consideration of APOC Complaint Against the Republican Governors Association and A Stronger Alaska.

**I. INTRODUCTION**

Pursuant to AS 15.13.380(c), Complainants Alaska Public Interest Research Group and 907 Initiative (“Complainants”) request that APOC expedite consideration of the attached APOC Complaint filed today for the purpose of enjoining Respondents A Stronger Alaska (“ASA”) and the Republican Governors Association (“RGA”) from continuing to make expenditures out of compliance with Alaska law. Complainants also seek an order that the Respondents immediately correct and remedy their prior reporting violations and disclaimers on communications.

The nature and sheer volume of potential violations is covered at length in the accompanying complaint. Given the Respondents’ stated intent to spend \$3 million in the gubernatorial election, the risk that these violations, uncorrected, will completely mislead the public and impact the outcome of the election, is very high.

Additionally, in a prior still-pending proceeding (22-01-CD) the Respondents have refused to cooperate with the APOC Staff’s requests for information, seemingly out of a desire to “run out the clock” on any enforcement action until after the election.

Given Respondents’ record, the risk that they have already spent hundreds of thousands of dollars unlawfully, and that the factual exhibits accompanying this complaint are extremely strong, this case is uniquely suited to be expedited. Additionally, because the factual record is complete from the Complainants’ perspective — and because Respondents’ have had several days’ notice to compile any exculpatory evidence of their own — Complainants request that, if expedited

consideration is granted, the hearing on the merits commence immediately after that determination is made.

## **II. FACTS**

Because this Request to Expedite is filed concurrently with the complaint, and to avoid repetition, Complainants hereby incorporate the facts and evidence from that filing as if fully laid out herein.

To summarize: *RGA's own IRS filings* indicate that ASA was never actually formed, and that the RGA did not donate \$3 million to ASA on February 25, 2021 (or at any later time). Rather, these filings tell a story where ASA is a total sham that exists nowhere except in APOC filing materials, and it only exists there for the purpose of unlawfully shielding the RGA and its donors from public view. It is likely that this scheme was undertaken to falsely evade the operation of Alaska's prohibition on Dark Money, but regardless, it is evident from their own filings that the RGA must either be filing false reports with APOC or with the IRS.

There is also evidence that the RGA is paying expenditures directly that ASA is attempting to pass off as paid by them, resulting in the IRS reports showing that the RGA paid certain expenditures, while APOC reports show that ASA paid for the same expenditure. Finally, it is also clear from the evidence that the RGA is paying expenditures in support of ASA's purported activities that have gone completely unreported to APOC, such as directly paying the contract for "Jake Eaton" of "The Political Company," who Brett Huber has testified is "running" all independent expenditure activities for ASA.

### III. ARGUMENT

Alaska Statute 15.13.380(c) outlines three factors that APOC must consider when determining whether to expedite a complaint.<sup>1</sup> All three of those factors cry out for expedited consideration based on the allegations and strength of the evidence here.

First, the allegations in the complaint and supporting exhibits are strong. The RGA's own IRS filings show that they never contributed the \$3 million in funds to ASA, and that the RGA is paying for independent expenditures directly, without having registered as an independent expenditure group. This is resulting in rampant misreporting to APOC, as well as false disclaimers being used on all communications. If, in fact, the \$3 million was not contributed prior to February 28, 2021, then that also means that Alaska's new prohibition on Dark Money is being utterly disregarded by Respondents. Given that all of the exhibits that support Complainants' allegations are Respondents' own filings<sup>2</sup> — and given that those exhibits show a disturbing level of non-reporting, mis-reporting, and outright deception — there is reasonable cause to believe that violations have occurred and will continue to occur.<sup>3</sup>

Respondents have already committed over half a million dollars to influence the gubernatorial election. Most of that money was spent during the pendency of a prior complaint (No. 22-01-CD), and Respondents have also already refused to willingly cooperate with APOC Staff in that proceeding. Respondents have also stated that they intend to spend an additional

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<sup>1</sup> AS 15.13.380(c) (“In deciding whether to expedite consideration, the commission shall consider such factors as [(1)] whether the alleged violation, if not immediately restrained, could materially affect the outcome of an election or other impending event; [(2)] whether the alleged violation could cause irreparable harm that penalties could not adequately remedy; and [(3)] whether there is reasonable cause to believe that a violation has occurred or will occur.”).

<sup>2</sup> The exhibits to this Complaint are comprised of excerpts from the RGA's own IRS filings; ASA's own APOC filings; and a contract submitted by ASA itself in the prior proceeding.

<sup>3</sup> AS 15.13.380(c)

\$2.4+ million, which is more cash on hand than all of the four candidates for governor have on hand, *combined*. Accordingly, there can be no question that these violations could materially affect the outcome of the election.<sup>4</sup>

Given the breadth of these violations and considering that they began over a year and half ago, the potential fines could be enormous. However, even heavy civil penalties will not serve as an adequate remedy in this case. Respondents have shown a proclivity to delay and withhold even routine documents from APOC Staff. And even with cooperation, a Staff Report would not be complete until after the election has passed. Furthermore, even a record-breaking fine would not serve as an adequate remedy considering the RGA routinely raises tens of millions of dollars for its activities. The RGA's sole goal in Alaska is to see the Republican incumbent prevail, and if this case is not expedited, they can do so before there is any reckoning or remedy for their misdeeds. With millions in the bank, and *serious* discrepancies in their own financial reports, the RGA and ASA must be brought to heel before the election occurs, and preferably this week.

Complainants support APOC Staff doing a full investigation, utilizing their full discovery powers, because there are certain to be additional violations uncovered during their ordinary investigation timeline. But, in the meantime, the Commission must act before the RGA's and ASA's misdeeds materially impact this election.

There are several possible remedies that the Commission should consider. First, APOC could enjoin ASA and the RGA from making any campaign expenditures for the remainder of the election cycle, which will give APOC Staff enough time to complete a full investigation.<sup>5</sup> This remedy is extreme but appears appropriate given that the Respondents appear to have engaged in

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<sup>4</sup> AS 15.13.380(c).

<sup>5</sup> See AS 15.13.380(d)(1).

a nearly two-year long scheme to conceal their activities. Alternatively, APOC could immediately order the RGA and ASA to correct all faulty reports, include accurate disclaimers on all future communications, as well as comply with the Dark Money disclosures that must now apply. However, given that the Respondents have already committed roughly half a million dollars of communications with false and misleading disclaimers, APOC would also need to order that Respondents send communications to all of the same recipients that explain their misdeeds and properly reports the sources of their funding. It is the only remedy that is remotely proportional to the scale of Respondents' misdeeds.

#### **IV. CONCLUSION**


The RGA's own sworn IRS filings show that ASA is nothing more than smoke and mirrors. If anything, ASA is merely an imaginary construct that lives nowhere but in the minds of RGA's operatives and in the false reports they sent to APOC. ASA never received \$3 million. RGA is not at arm's length to ASA's activities; rather, the RGA is directly making independent expenditures and simply reporting them fictitiously as the product of an entity that, in truth, does not even exist. RGA's primary motivations for this scheme appear to be keeping itself out of the limelight and falsely evading Alaska's Dark Money rules.

There cannot be a fair election if one side is allowed break the rules without having any real consequences. The RGA and ASA are breaking the rules by making an utter sham of APOC's reporting requirements; not only are they failing to report required information to APOC, but they are also actively reporting false information. APOC must act swiftly to enjoin these violations and prevent the material impact these unlawful campaign tactics will have on the outcome of the election. Complainants' request to expedite consideration of the APOC Complaint filed today should be granted, and because the Complainants' exhibits prove up the allegations on their face,

they respectfully request that any hearing on the merits follow immediately after the decision to expedite.

CASHION GILMORE & LINDEMUTH  
Attorneys for Complainants

DATE: October 17, 2022

By:   
\_\_\_\_\_  
Scott M. Kendall  
Alaska Bar No. 0405019  
Samuel G. Gottstein  
Alaska Bar No. 1511099