

ADVISORY OPINION REQUEST

Number: AO 22-03-CD
Requested By: Unite America PAC, Inc.
Prepared By: Thomas R. Lucas, Campaign Disclosure Coordinator
Date Issued: September 15, 2022
Subject: Application of True Source Provisions under Ballot Measure 2 (BM2) to a Federally Registered Hybrid PAC.¹

Commission Decision:

I. BACKGROUND

Unite America PAC, Inc. (UAP) is a federally registered hybrid PAC that reports its contributors to the Federal Elections Commission.²

A Hybrid PAC is a political committee with non-contribution accounts that solicit and accept unlimited contributions from individuals, corporations, labor organizations, and other political committees to a segregated bank account for the purpose of making independent expenditures, other ads that refer to a federal candidate, and generic voter drives in federal elections, while maintaining a separate bank account, subject to all the statutory amount limitations and source prohibitions, that is permitted to make contributions to federal candidates.³

On June 28, 2022, UAP contributed \$30,000 to Putting Alaskans First Committee (PAFC)⁴, a registered Alaska group that makes independent expenditures⁵.

On its Statement of Contributions Report, UAP named two true sources of its contribution to PAFC – Marc Merrill and Ron Shaich as contributing \$15,000 each.⁶

UAP did not specifically solicit these two contributions for the purpose of making its contribution to PAFC.⁷ Instead, UAP chose two of its contributors whose contributions

¹ Exhibit 1, Request. Staff has included only an excerpt of the 752-page Exhibit A to UAP's request. This excerpt represents UAP's most recent itemized contributions reported to the FEC on its July Quarterly 2022 report found at pgs. 733-752 of their Exhibit A. A full copy of UAP's Exhibit A is available from the Commission's website at: <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=24128>

² *Id.*

³ <https://www.fec.gov/help-candidates-and-committees/filing-pac-reports/registering-hybrid-pac/>

⁴ Exhibit 2, Statement of Contributions Report.

⁵ Exhibit 3, Group Registration.

⁶ Ex. 2.

⁷ Ex. 1, p. 5.

to UAP were at least the equivalent of \$30,000.⁸ Incidentally, both contributors also happen to be board members of UAP.⁹

UAP does not explain how those two were chosen other than the fact that if you use those two, you can account for \$30,000. Indeed, UAP states that “in actuality, their combined contributions to Unite America PAC were significantly higher than \$30,000”.¹⁰ In fact, UAP could have just as easily chosen just Mr. Merrill to identify as the true source since he has contributed far more than \$30,000 to UAP.¹¹ UAP does not explain why it chose two instead of one, or, for that matter, why it did not choose three, or four.

UAP intends on using the same method as described above to identify contributors if future contributions require true source reporting.¹²

II. QUESTIONS PRESENTED

- A. Can the Commission confirm that Unite America PAC’s \$30,000 contribution triggered a reporting obligation under AS 15.13.040(r) that required it to disclose “true sources” *of the contribution* (i.e. the true sources of funds amounting to \$30,000) and not in excess of the contribution?
- B. Can the Commission confirm that Unite America PAC’s \$30,000 contribution did not trigger an obligation to report to APOC the true sources of all funds it has ever received, at any time?

III. SHORT ANSWERS

- A. No.
- B. Yes.

IV. LAW AND ANALYSIS

Provisions of BM2 became effective on February 28, 2021.¹³ Under the new law, once a person makes contributions in excess of \$2,000 in a year to an entity making independent expenditures in candidate elections, that entity must report the contribution and

⁸ *Id.*

⁹ *See*, <https://www.uniteamerica.org/team>

¹⁰ *Id.*

¹¹ Ex. 2.

¹² Ex. 1, p. 3.

¹³ AS 15.45.220 [act becomes effective 90 days after certification].

any subsequent contributions received from that contributor within 24 hours of receipt.¹⁴ The entity must report and certify the true sources of contributions, and any intermediaries.¹⁵

One of the findings and intent of BM2 was stated as:

The people of Alaska have the right to know in a timely manner the source, quantity, timing, and nature of *resources used to influence candidate elections* in Alaska. This right requires the prompt, accessible, comprehensible, and public disclosure of the true and original sources of funds used to influence these elections, and is essential to the rights of free speech, assembly, and petition guaranteed by the First Amendment to the United States Constitution and shall be construed broadly.¹⁶

The intent to identify the true sources of funds to be used in candidate elections is reflected, in part, by newly enacted AS 15.13.040(r) which requires any person who contributes more than \$2,000 to an entity that has made (in the previous election cycle), is making, or that the contributor believes will be making independent expenditures in candidate elections to file a report identifying the true sources of the funds it contributed.¹⁷

This intent is also expressed, in part, by newly enacted AS 15.13.110(k) which requires persons who have made (in the previous election cycle), are making, or that a contributor believes will be making independent expenditures in candidate elections; to file a report identifying true sources within 24 hours when it receives a contribution in excess of \$2,000 in a single year from another person.¹⁸

The intent of BM2 is further reflected in its definition of “Dark Money” which states, in essence, that dark money is a contribution whose true sources have not been identified.¹⁹

Finally, BM2 added a definition of the term “true source”:

“true source” means the person or legal entity whose contribution is funded from wages, investment income, inheritance, or revenue generated from selling goods or services; a person or legal entity who derived funds via contributions, donations, dues, or gifts is not the true source, but rather an intermediary for the true source; notwithstanding the foregoing, to the extent a membership

¹⁴ AS 15.13.110(k).

¹⁵ *Id*

¹⁶ Exhibit 4, Ballot Measure 2 Findings and Intent (emphasis added).

¹⁷ AS 15.13.040(k).

¹⁸ AS 15.13.110(k).

¹⁹ AS 15.13.400(5).

organization receives dues or contributions of less than \$2,000 per person per year, the organization itself shall be considered the true source.²⁰

A. UAP’s Method Of Identifying True Sources Is Not Compliant

UAP invites the Commission to adopt a standard whereby a contributing organization can pick and choose its contributors to be identified so long as the total contributed by those contributors is equal to or exceeds the amount the organization contributes to an independent expenditure group. Staff believes that such an approach is fundamentally at odds with AS 15.13 and the intent of ballot measure 2. What UAP fails to recognize is that while money is fungible, contributors are not. BM2 is a recognition, at least in part, that the public judges an organization by its contributors and the amount they contribute. So, although money may be interchangeable, contributors are not.

UAP attached a letter from Scott Kendall to its advisory opinion request.²¹ Mr. Kendall was the primary author of BM2.²² The letter is addressed to Alaska Public Offices Commission Executive Director, Heather Hebdon. In the letter, Mr. Kendall states that the purpose of the “dark money” provisions of BM2, “was to end the practice of obscuring true sources of contributions to independent expenditure groups by funneling them through intermediaries”.²³ Here, UAP is the intermediary. The true sources of the money it intends on contributing to Alaska independent expenditure groups are its contributors.

However, Mr. Kendall goes on to warn:

“In Short, the Dark Money provision in Ballot Measure 2 *did not* give APOC the authority to regulate contributions made for purposes *other than* impacting candidate elections in Alaska. To the extent an entity receives funds for non-campaign purposes and keeps those funds segregated from campaign funds, the non-campaign funds do not fall within Ballot Measure 2 or under APOC’s authority at all.”²⁴

Here, the funds contributed by UAP are not segregated from the funds UAP uses for other purposes. Instead, UAP simply tapped its general fund²⁵ to make its contribution to PAFC and intends on doing the same thing for future contributions to Alaska independent expenditure groups.²⁶

²⁰ As 15.13.400(19).

²¹ Exhibit 5, Kendall Letter at p.1.

²² *Ibid.*

²³ *Ibid.*

²⁴ *Id.* at p. 2; footnotes omitted; emphasis in original.

²⁵ UAP, as a Hybrid PAC has two general funds – one which can accept unlimited funds from any person (unrestricted), and one that follows federal amount and source limitations for organizations that contribute to federal candidates. Here, UAP is using its unrestricted general fund. *See*, Exhibit 6, Email to Tom Lucas.

²⁶ Ex. 1.

Mr. Kendall further points out that many entities, such as Planned Parenthood and the National Rifle Association provide services and education to their members and the public that have nothing to do with campaign activity; and APOC does not have the authority to inquire into donations made for those non-campaign purposes just because they have a separate account or affiliated entity that also engages in campaign activities regulated by APOC.²⁷ Staff agrees, as did the Commission in AO 21-11-CD – Revised, The Alaska Center.²⁸ But, unlike here, The Alaska Center had a segregated account for Alaska political activities – UAP does not – it proposes to use one of its general funds.²⁹

Furthermore, the Commission has adopted a regulation, effective September 25, 2022, that provides a path for organizations such as the National Rifle Association or Planned Parenthood that insulates them from providing contributor information for contributions not intended to influence Alaska candidate elections:

2 AAC 50.270 is amended by adding a new paragraph to read:

(e) A person required to report under AS 15.13.110(k) is not required to report donations that are not intended to influence the outcome of an election if the person

(1) establishes a political activities account as required by AS 15.13.052;

(2) makes no expenditures intended to influence the results of an election regulated under AS 15.13 from its general fund;

(3) establishes a written policy that all contributions to the person’s political activities account must be from a contributor who has expressly indicated a desire that the contribution be used for political activities or has been expressly solicited for the purpose of making a contribution to the person’s political activities account; and

(4) Establishes a written policy that the donator/contributor is the only person to decide whether a donation/contribution goes to the person’s general fund or the person’s political activities account.³⁰

Here, UAP proposes to choose for itself which of its contributors will be considered the true sources of its contributions using no uniform methodology. This, it cannot do because it violates the clear intent of BM2 and the letter of the statutes enacted.

²⁷ Ex. 5, p. 2.

²⁸ <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=23802>

²⁹ Ex. 1.

³⁰ Exhibit 7, Adopted Regulations effective September 25, 2022.

B. True Sources To Be Identified

Should UAP decide to use its general fund to source its contributions to Alaska independent expenditure groups it will be required to identify the true sources of those funds when it contributes in excess of \$2,000.³¹ On its first Statement of Contributions Report it should identify all contributors and the amount of their contributions to its unrestricted fund since February 28, 2021, the effective date of BM2. Subsequent reports would only require identifying contributors who had not been previously identified, or who have, since their previous identification, contributed additional funds.³²

In its request, UAP suggests that it would be unduly burdensome to require it to name every single contributor who ever contributed to its unrestricted fund. Staff agrees.

Nevertheless, staff does not agree that requiring identification of all contributors since BM2 went into effect is equally burdensome. Here UAP has all the information it needs to properly identify its post February 28, 2021, contributors (including those that may be intermediaries with their own true sources) – it has already provided them to the Federal Elections Commission (FEC).³³

Staff also disagrees with UAP’s assertion that a long list of contributors would be unduly confusing to Alaska voters or the fact that the contributors are already named to the FEC should relieve UAP of the requirements of BM2. Alaska voters are well versed in long lists of contributors and where to find them – on APOC’s website.³⁴ Staff does not believe it was the intent of BM2 to require Alaska voters to visit the FEC website to determine who is contributing to an organization contributing to Alaska independent expenditure groups.

V. CONCLUSION

UAP’s proposed method of identifying the true sources of the funds it contributes to Alaska independent expenditure groups does not comply with the intent or letter of BM2.

If UAP funds its contributions to Alaska independent expenditure groups through its general fund, it must name all true sources of the funds used for those contributions since February 28, 2021, on its first Statement of Contributions Report and only previously unreported contributions thereafter.

³¹ AS 15.13.040(r).

³² AS 15.13.400(5).

³³ Ex. 1.

³⁴ Staff notes that one candidate for governor had over 1,800 income entries on their 30 Day State Primary Report.

If UAP creates a segregated fund for making its contributions to Alaska independent expenditure groups, it is only required to identify the true source of such contributions.³⁵

VII. COMMISSION DECISION

Only the Commission has the authority to approve an advisory opinion.³⁶ The Commission will rule on staff's proposed advice at its next regular meeting on December 7, 2022. The Commission may approve, disapprove, or modify the proposed advice. An advisory opinion must be approved by an affirmative vote of at least four members or it will be considered disapproved. Both staff's proposed advice and the Commission's final advisory opinion apply only to the specific facts and activity for which advice was requested.

If you rely on staff's proposed advisory opinion in good faith and the Commission subsequently rejects the proposed advice, staff will take no enforcement action on your activities up to that point if you acted under the specific facts described. If you have any additional questions or would like to discuss this proposed advice, please contact me at (907) 276-4176.

CERTIFICATE OF SERVICE:

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

Jason Brandeis Certified
Birch, Horton, Bittner & Cherot Mail
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09/15/2022

Law Office Assistant Date
9171-9690-0935-0275-1614-65

³⁵ See, for example, AO 21-11-CD – Revised, The Alaska Center.

³⁶ 2 AAC 50.840.

APPLICABLE LAW

ALASKA STATUTES

Sec. 15.13.010. Applicability.

(a) This chapter applies

(1) in every election for governor, lieutenant governor, a member of the state legislature, a delegate to a constitutional convention, or judge seeking judicial retention;

(2) to every candidate for election to a municipal office in a municipality with a population of more than 1,000 inhabitants according to the latest United States census figures or estimates of population certified as correct for administrative purposes by the Department of Commerce, Community, and Economic Development unless the municipality has exempted itself from the provisions of this chapter; a municipality may exempt its elected municipal officers from the requirements of this chapter if a majority of the voters voting on the question at a regular election, as defined by [AS 29.71.800\(20\)](#), or a special municipality-wide election called for that purpose, votes to exempt its elected municipal officers from the requirements of this chapter; the question of exemption from the requirements of this chapter may be submitted by the governing body by ordinance or by initiative election.

(b) Except as otherwise provided, this chapter applies to contributions, expenditures, and communications made for the purpose of influencing the outcome of a ballot proposition or question as well as those made to influence the nomination or election of a candidate.

(c) This chapter does not prohibit a municipality from regulating by ordinance election campaign contributions and expenditures in municipal elections, or from regulating those campaign contributions and expenditures more strictly than provided in this chapter.

(d) This chapter does not limit the authority of a person to make contributions to influence the outcome of a voter proposition submitted to the public for a vote at a municipal election. In this subsection, in addition to its meaning under [AS 15.13.065\(c\)](#), “proposition” means a municipal reclassification, proposal to adopt or amend a home rule charter, a unification proposal, a boundary change proposal, or the approval of an ordinance when approval by public vote is a requirement for the ordinance.

Sec. 15.13.052. Independent expenditures; political activities accounts.

(a) Before making an independent expenditure in support of or in opposition to a candidate or before making an independent expenditure in support of or in opposition to a ballot proposition or question, each person other than an individual, candidate, or nongroup entity with an annual operating budget of \$250 or less shall establish a political activities account. The political activities account may be a separate account in the person's general treasury. The political activities account must be administered using

generally accepted accounting principles. All funds used by the person to make independent expenditures must be drawn from the person's political activities account.

(b) Records necessary to substantiate that the requirements of (a) of this section have been met must be made available for inspection by the commission.

(c) Each person who has established a political activities account under this section shall preserve all records necessary to substantiate the person's compliance with the requirements of this section for each of the six preceding years.

Sec. 15.13.040. Contributions, expenditures, and supplying of services to be reported.

(a) Except as provided in (g) and (l) of this section, each candidate shall make a full report, upon a form prescribed by the commission,

(1) listing

(A) the date and amount of all expenditures made by the candidate;

(B) the total amount of all contributions, including all funds contributed by the candidate;

(C) the name, address, date, and amount contributed by each contributor; and

(D) for contributions in excess of \$50 in the aggregate during a calendar year, the principal occupation and employer of the contributor; and

(2) filed in accordance with [AS 15.13.110](#) and certified correct by the candidate or campaign treasurer.

(b) Each group shall make a full report upon a form prescribed by the commission, listing

(1) the name and address of each officer and director;

(2) the aggregate amount of all contributions made to it; and, for all contributions in excess of \$100 in the aggregate a year, the name, address, principal occupation, and employer of the contributor, and the date and amount contributed by each contributor; for purposes of this paragraph, "contributor" means the true source of the funds, property, or services being contributed; and

(3) the date and amount of all contributions made by it and all expenditures made, incurred, or authorized by it.

(c) The report required under (b) of this section shall be filed in accordance with [AS 15.13.110](#) and shall be certified as correct by the group's treasurer.

(d) Every person making an independent expenditure shall make a full report of

expenditures made and contributions received, upon a form prescribed by the commission, unless exempt from reporting.

(e) Each person required to report under (d) of this section shall file a full report in accordance with [AS 15.13.110\(h\)](#) on a form prescribed by the commission. The report must contain

(1) the name, address, principal occupation, and employer of the individual filing the report;

(2) an itemized list of all expenditures made, incurred, or authorized by the person;

(3) the name of the candidate or the title of the ballot proposition or question supported or opposed by each expenditure and whether the expenditure is made to support or oppose the candidate or ballot proposition or question;

(4) the name and address of each officer and director, when applicable;

(5) the aggregate amount of all contributions made to the person, if any, for the purpose of influencing the outcome of an election; for all contributions, the date of the contribution and amount contributed by each contributor; and, for a contributor

(A) who is an individual, the name and address of the contributor and, for contributions in excess of \$50 in the aggregate during a calendar year, the name, address, principal occupation, and employer of the contributor; or

(B) that is not an individual, the name and address of the contributor and the name and address of each officer and director of the contributor.

(f) During each year in which an election occurs, all businesses, persons, or groups that furnish any of the following services, facilities, or supplies to a candidate or group shall maintain a record of each transaction: newspapers, radio, television, advertising, advertising agency services, accounting, billboards, printing, secretarial, public opinion polls, or research and professional campaign consultation or management, media production or preparation, or computer services. Records of provision of services, facilities, or supplies shall be available for inspection by the commission.

(g) The provisions of (a) and (l) of this section do not apply to a delegate to a constitutional convention, a judge seeking judicial retention, or a candidate for election to a municipal office under [AS 15.13.010](#), if that delegate, judge, or candidate

(1) indicates, on a form prescribed by the commission, an intent not to raise and not to expend more than \$5,000 in seeking election to office, including both the primary and general elections;

(2) accepts contributions totaling not more than \$5,000 in seeking election to office,

including both the primary and general elections; and

(3) makes expenditures totaling not more than \$5,000 in seeking election to office, including both the primary and general elections.

(h) The provisions of (d) of this section do not apply to one or more expenditures made by an individual acting independently of any other person if the expenditures

(1) cumulatively do not exceed \$500 during a calendar year; and

(2) are made only for billboards, signs, or printed material concerning a ballot proposition as that term is defined by [AS 15.13.065\(c\)](#).

(i) The permission of the owner of real or personal property to post political signs, including bumper stickers, or to use space for an event or to store campaign-related materials is not considered to be a contribution to a candidate under this chapter unless the owner customarily charges a fee or receives payment for that activity. The fact that the owner customarily charges a fee or receives payment for posting signs that are not political signs is not determinative of whether the owner customarily does so for political signs.

(j) Except as provided in (1) of this section, each nongroup entity shall make a full report in accordance with [AS 15.13.110](#) upon a form prescribed by the commission and certified by the nongroup entity's treasurer, listing

(1) the name and address of each officer and director of the nongroup entity;

(2) the aggregate amount of all contributions made to the nongroup entity for the purpose of influencing the outcome of an election;

(3) for all contributions described in (2) of this subsection, the name, address, date, and amount contributed by each contributor, for all contributions described in (2) of this subsection in excess of \$250 in the aggregate during a calendar year, the principal occupation and employer of the contributor, and for all contributions described in (2) of this subsection in excess of \$2,000 in the aggregate during a calendar year, the true source of such contributions and all intermediaries, if any, who transferred such funds, and a certification from the treasurer that the report discloses all of the information required by this paragraph; and

(4) the date and amount of all contributions made by the nongroup entity, and, except as provided for certain independent expenditures in [AS 15.13.135\(a\)](#), all expenditures made, incurred, or authorized by the nongroup entity, for the purpose of influencing the outcome of an election; a nongroup entity shall report contributions made to a different nongroup entity for the purpose of influencing the outcome of an election and expenditures made on behalf of a different nongroup entity for the purpose of influencing

the outcome of an election as soon as the total contributions and expenditures to that nongroup entity for the purpose of influencing the outcome of an election reach \$500 in a year and for all subsequent contributions and expenditures to that nongroup entity in a year whenever the total contributions and expenditures to that nongroup entity for the purpose of influencing the outcome of an election that have not been reported under this paragraph reach \$500.

(k) Every individual, person, nongroup entity, or group contributing a total of \$500 or more to a group organized for the principal purpose of influencing the outcome of a proposition, and every individual, person, nongroup entity, or group contributing a total of \$500 or more to a group organized for the principal purpose of filing an initiative proposal application under [AS 15.45.020](#) or that has filed an initiative proposal application under [AS 15.45.020](#), shall report the contribution or contributions on a form prescribed by the commission not later than 30 days after the contribution that requires the contributor to report under this subsection is made. The report must include the name, address, principal occupation, and employer of the individual filing the report and the amount of the contribution, as well as the total amount of contributions made to that group by that individual, person, nongroup entity, or group during the calendar year.

(l) Notwithstanding (a), (b), and (j) of this section, for any fund-raising activity in which contributions are in amounts or values that do not exceed \$50 a person, the candidate, group, or nongroup entity shall report contributions and expenditures and supplying of services under this subsection as follows:

(1) a report under this subsection must

(A) describe the fund-raising activity;

(B) include the number of persons making contributions and the total proceeds from the activity;

(C) report all contributions made for the fund-raising activity that do not exceed \$50 a person in amount or value; if a contribution for the fund-raising activity exceeds \$50, the contribution shall be reported under (a), (b), and (j) of this section;

(2) for purposes of this subsection,

(A) “contribution” means a cash donation, a purchase such as the purchase of a ticket, the purchase of goods or services offered for sale at a fund-raising activity, or a donation of goods or services for the fund-raising activity;

(B) “fund-raising activity” means an activity, event, or sale of goods undertaken by a candidate, group, or nongroup entity in which contributions are \$50 a person or less in amount or value.

(m) Information required under this chapter shall be submitted to the commission

electronically, except that the following information may be submitted in clear and legible black typeface or hand-printed in dark ink on paper in a format approved by the commission or on forms provided by the commission:

(1) information submitted by

(A) a candidate for election to a borough or city office of mayor, membership on a borough assembly, city council, or school board, or any state office, who

(i) meets the requirements of (g)(1) — (3) of this section; or

(ii) does not have reasonable access to the technology necessary to file electronically; in this sub-subparagraph, a candidate is considered not to have reasonable access to the technology necessary to file electronically if the candidate does not own a personal computer or does not have broadband Internet access at the candidate's residence; in this sub-subparagraph, “broadband Internet access” means high-speed Internet access that is always on and that is faster than traditional dial-up access; or

(B) a candidate for municipal office for a municipality with a population of less than 15,000; in this subparagraph, “municipal office” means the office of an elected borough or city

(i) mayor; or

(ii) assembly, council, or school board member;

(2) any information if the commission determines that circumstances warrant an exception to the electronic submission requirement.

(n) The commission shall print the forms to be provided under this chapter so that the front and back of each page have the same orientation when the page is rotated on the vertical axis of the page.

(o) Information required by this chapter that is submitted to the commission on paper and not electronically shall be electronically scanned and published on the Internet by the commission, in a format accessible to the general public, within two working days after the commission receives the information.

(p) Notwithstanding the requirement in (a) of this section that a candidate shall make a full report upon a form prescribed by the commission, the commission shall accept information submitted electronically by a candidate if the information is

(1) entered onto a version of a form accessed on the Internet website of the commission; or

(2) in the form of an electronic spreadsheet or data file that contains field names and data types that conform to a standard defined by the commission.

(q) For purposes of (b), (e), and (j) of this section, “contributor” means the true source of the funds, property, or services being contributed.

(r) Every individual, person, nongroup entity, or group that contributes more than \$2,000 in the aggregate in a calendar year to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent expenditures in one or more candidate elections in the current election cycle shall report making the contribution or contributions on a form prescribed by the commission not later than 24 hours after the contribution that requires the contributor to report under this subsection is made. The report must include the name, address, principal occupation, and employer of the individual filing the report and the amount of the contribution, as well as the total amount of contributions made to that entity by that individual, person, nongroup entity, or group during the calendar year. For purposes of this subsection, the reporting contributor is required to report and certify the true sources of the contribution, and intermediaries, if any, as defined by AS 15.13.400(18). This contributor is also required to provide the identity of the true source to the recipient of the contribution simultaneously with providing the contribution itself.

(s) For purposes of (e) of this section,

(1) “director” means a member of the board of directors of a corporation or any person performing a similar function with respect to any organization;

(2) “officer” means a president, vice-president, secretary, treasurer, principal financial officer, or comptroller of a corporation, or any person routinely performing functions similar to those of a president, vice-president, secretary, treasurer, principal financial officer, or comptroller with respect to any organization.

Sec. 15.13.110. Filing of reports.

(a) Each candidate, group, and nongroup entity shall make a full report in accordance with AS 15.13.040 for the period ending three days before the due date of the report and beginning on the last day covered by the most recent previous report. If the report is a first report, it must cover the period from the beginning of the campaign to the date three days before the due date of the report. If the report is a report due February 15, it must cover the period beginning on the last day covered by the most recent previous report or on the day that the campaign started, whichever is later, and ending on February 1 of that year. The report shall be filed

(1) 30 days before the election; however, this report is not required if the deadline for filing a nominating petition or declaration of candidacy is within 30 days of the election;

(2) one week before the election;

(3) 105 days after a special election; and

(4) February 15 for expenditures made and contributions received that were not reported previously, including, if applicable, all amounts expended from a public office expense term account established under AS 15.13.116(a)(8) and all amounts expended from a municipal office account under AS 15.13.116(a)(9), or when expenditures were not made or contributions were not received during the previous year.

(b) Each contribution that exceeds \$250 and that is made within nine days of the election shall be reported to the commission by date, amount, and contributor within 24 hours of receipt by the candidate, group, campaign treasurer, or deputy campaign treasurer. Each contribution to a nongroup entity for the purpose of influencing the outcome of an election that exceeds \$250 and that is made within nine days of the election shall be reported to the commission by date, amount, and contributor within 24 hours of receipt by the nongroup entity.

(c) All reports required by this chapter shall be filed with the commission's central office and shall be kept open to public inspection. The commission shall keep a report filed on paper under AS 15.13.040(m) open to public inspection by scanning the report and posting a copy of the scanned image on the commission's Internet website within two working days after the report is filed. The commission shall prepare a summary of each report, which shall be made available to the public at cost upon request. Each summary must use uniform categories of reporting. Summaries for reports filed

(1) electronically shall be made available within 30 days after the report is filed; and

(2) on paper shall be made available within 30 days after each election.

(d) [Repealed, § 35 ch 126 SLA 1994.]

(e) A group formed to sponsor a referendum or a recall shall report 30 days after its first filing with the lieutenant governor. Thereafter, each group shall report within 10 days after the end of each calendar quarter on the contributions received and expenditures made during the preceding calendar quarter until reports are due under (a) of this section.

(f) During the year in which the election is scheduled, each of the following shall file the campaign disclosure reports in the manner and at the times required by this section:

(1) a person who, under the regulations adopted by the commission to implement AS 15.13.100, indicates an intention to become a candidate for elective state executive or legislative office;

(2) a person who campaigns as a write-in candidate for elective state executive or legislative office at the general election; and

(3) a group or nongroup entity that receives contributions or makes expenditures on

behalf of or in opposition to a person described in (1) or (2) of this subsection, except as provided for certain independent expenditures by nongroup entities in [AS 15.13.135\(a\)](#).

(g) An initiative committee, person, group, or nongroup entity receiving contributions exceeding \$500 or making expenditures exceeding \$500 in a calendar year in support of or in opposition to an initiative on the ballot in a statewide election or an initiative proposal application filed with the lieutenant governor under [AS 15.45.020](#) shall file a report within 10 days after the end of each calendar quarter on the contributions received and expenditures made during the preceding calendar quarter until reports are due under (a) and (b) of this section. If the report is a first report, it must cover the period beginning on the day an initiative proposal application is filed under [AS 15.45.020](#) and ending three days before the due date of the report.

(h) An independent expenditure report required under [AS 15.13.040\(e\)](#) shall be filed with the commission not later than 10 days after an independent expenditure has been made. However, an independent expenditure that exceeds \$250 and that is made within nine days of an election shall be reported to the commission not later than 24 hours after the expenditure is made.

(i) During a campaign period, the commission may not change the manner or format in which reports required of a candidate under this chapter must be filed. In this subsection, “campaign period” means the period beginning on the date that a candidate becomes eligible to receive campaign contributions under this chapter and ending on the date that a final report for that same campaign must be filed.

(j) Before the primary election, a candidate seeking nomination by petition under [AS 15.25.140](#) — 15.25.200 for the office of governor, lieutenant governor, state senator, or state representative shall file the reports under (a)(1) and (2) of this section.

(k) Once contributions from an individual, person, nongroup entity, or group to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent expenditures in one or more candidate elections in the current election cycle exceed \$2,000 in a single year, that entity shall report that contribution, and all subsequent contributions, not later than 24 hours after receipt. For purposes of this subsection, the entity is required to certify and report the true source, and all intermediaries, if any, of the contribution as defined by [AS 15.13.400\(18\)](#).

Sec. 15.13.400. Definitions.

In this chapter,

(1) “candidate”

(A) means an individual who files for election to the state legislature, for governor,

for lieutenant governor, for municipal office, for retention in judicial office, or for constitutional convention delegate, or who campaigns as a write-in candidate for any of these offices; and

(B) when used in a provision of this chapter that limits or prohibits the donation, solicitation, or acceptance of campaign contributions, or limits or prohibits an expenditure, includes

(i) a candidate's campaign treasurer and a deputy campaign treasurer;

(ii) a member of the candidate's immediate family;

(iii) a person acting as agent for the candidate;

(iv) the candidate's campaign committee; and

(v) a group that makes expenditures or receives contributions with the authorization or consent, express or implied, or under the control, direct or indirect, of the candidate;

(2) “commission” means the Alaska Public Offices Commission;

(3) “communication” means an announcement or advertisement disseminated through print or broadcast media, including radio, television, cable, and satellite, the Internet, or through a mass mailing, excluding those placed by an individual or nongroup entity and costing \$500 or less and those that do not directly or indirectly identify a candidate or proposition, as that term is defined in [AS 15.13.065\(c\)](#);

(4) “contribution”

(A) means a purchase, payment, promise or obligation to pay, loan or loan guarantee, deposit or gift of money, goods, or services for which charge is ordinarily made, and includes the payment by a person other than a candidate or political party, or compensation for the personal services of another person, that is rendered to the candidate or political party, and that is made for the purpose of

(i) influencing the nomination or election of a candidate;

(ii) influencing a ballot proposition or question; or

(iii) supporting or opposing an initiative proposal application filed with the lieutenant governor under [AS 15.45.020](#);

(B) does not include

(i) services provided without compensation by individuals volunteering a portion or all of their time on behalf of a political party, candidate, or ballot proposition or

question;

(ii) ordinary hospitality in a home;

(iii) two or fewer mass mailings before each election by each political party describing members of the party running as candidates for public office in that election, which may include photographs, biographies, and information about the candidates;

(iv) the results of a poll limited to issues and not mentioning any candidate, unless the poll was requested by or designed primarily to benefit the candidate;

(v) any communication in the form of a newsletter from a legislator to the legislator's constituents, except a communication expressly advocating the election or defeat of a candidate or a newsletter or material in a newsletter that is clearly only for the private benefit of a legislator or a legislative employee;

(vi) a fundraising list provided without compensation by one candidate or political party to a candidate or political party; or

(vii) an opportunity to participate in a candidate forum provided to a candidate without compensation to the candidate by another person and for which a candidate is not ordinarily charged;

(5) “dark money” means a contribution whose source or sources, whether from wages, investment income, inheritance, or revenue generated from selling goods or services, is not disclosed to the public; notwithstanding the foregoing, to the extent a membership organization receives dues or contributions of less than \$2,000 per person per year, the organization itself shall be considered the true source;

(6) “electioneering communication” means a communication that

(A) directly or indirectly identifies a candidate;

(B) addresses an issue of national, state, or local political importance and attributes a position on that issue to the candidate identified; and

(C) occurs within the 30 days preceding a general or municipal election;

(7) “expenditure”

(A) means a purchase or a transfer of money or anything of value, or promise or agreement to purchase or transfer money or anything of value, incurred or made for the purpose of

(i) influencing the nomination or election of a candidate or of any individual who files for nomination at a later date and becomes a candidate;

(ii) use by a political party;

(iii) the payment by a person other than a candidate or political party of compensation for the personal services of another person that are rendered to a candidate or political party;

(iv) influencing the outcome of a ballot proposition or question; or

(v) supporting or opposing an initiative proposal application filed with the lieutenant governor under [AS 15.45.020](#);

(B) does not include a candidate's filing fee or the cost of preparing reports and statements required by this chapter;

(C) includes an express communication and an electioneering communication, but does not include an issues communication;

(8) “express communication” means a communication that, when read as a whole and with limited reference to outside events, is susceptible of no other reasonable interpretation but as an exhortation to vote for or against a specific candidate;

(9) “group” means

(A) every state and regional executive committee of a political party;

(B) any combination of two or more individuals acting jointly who organize for the principal purpose of influencing the outcome of one or more elections and who take action the major purpose of which is to influence the outcome of an election; a group that makes expenditures or receives contributions with the authorization or consent, express or implied, or under the control, direct or indirect, of a candidate shall be considered to be controlled by that candidate; a group whose major purpose is to further the nomination, election, or candidacy of only one individual, or intends to expend more than 50 percent of its money on a single candidate, shall be considered to be controlled by that candidate and its actions done with the candidate's knowledge and consent unless, within 10 days from the date the candidate learns of the existence of the group the candidate files with the commission, on a form provided by the commission, an affidavit that the group is operating without the candidate's control; a group organized for more than one year preceding an election and endorsing candidates for more than one office or more than one political party is presumed not to be controlled by a candidate; however, a group that contributes more than 50 percent of its money to or on behalf of one candidate shall be considered to support only one candidate for purposes of [AS 15.13.070](#), whether or not control of the group has been disclaimed by the candidate; and

(C) any combination of two or more individuals acting jointly who organize for the principal purpose of filing an initiative proposal application under [AS 15.45.020](#) or who file an initiative proposal application under [AS 15.45.020](#);

(10) “immediate family” means the spouse, parent, child, including a stepchild and an adopted child, and sibling of an individual;

(11) “independent expenditure” means an expenditure that is made without the direct or indirect consultation or cooperation with, or at the suggestion or the request of, or with the prior consent of, a candidate, a candidate's campaign treasurer or deputy campaign treasurer, or another person acting as a principal or agent of the candidate;

(12) “individual” means a natural person;

(13) “issues communication” means a communication that
(A) directly or indirectly identifies a candidate; and

(B) addresses an issue of national, state, or local political importance and does not support or oppose a candidate for election to public office;

(14) “nongroup entity” means a person, other than an individual, that takes action the major purpose of which is to influence the outcome of an election, and that

(A) cannot participate in business activities;

(B) does not have shareholders who have a claim on corporate earnings; and

(C) is independent from the influence of business corporations.

(15) “outside-funded entity” means an entity that makes one or more independent expenditures in one or more candidate elections and that, during the previous 12-month period, received more than 50 percent of its aggregate contributions from true sources, or their equivalents, who, at the time of the contribution, resided or had their principal place of business outside Alaska;

(16) “person” has the meaning given in [AS 01.10.060](#), and includes a labor union, nongroup entity, and a group;

(17) “political party” means any group that is a political party under [AS 15.80.010](#) and any subordinate unit of that group if, consistent with the rules or bylaws of the political party, the unit conducts or supports campaign operations in a municipality, neighborhood, house district, or precinct;

(18) “publicly funded entity” means a person, other than an individual, that receives

half or more of the money on which it operates during a calendar year from government, including a public corporation;

(19) “true source” means the person or legal entity whose contribution is funded from wages, investment income, inheritance, or revenue generated from selling goods or services; a person or legal entity who derived funds via contributions, donations, dues, or gifts is not the true source, but rather an intermediary for the true source; notwithstanding the foregoing, to the extent a membership organization receives dues or contributions of less than \$2,000 per person per year, the organization itself shall be considered the true source.

Sec. 15.45.220. Adoption and effective date of proposed law.

If a majority of the votes cast on the initiative proposition favor its adoption, the proposed law is enacted, and the lieutenant governor shall so certify. The act becomes effective 90 days after certification.

ALASKA ADMINISTRATIVE CODE

2 AAC 50.840. Advisory opinion

(a) The commission staff shall review any request for an advisory opinion submitted under AS 15.13.374. If the staff determines that a request for an advisory opinion does not satisfy the requirements of AS 15.13.374(b), the staff shall reject the request and notify the person making the request of any deficiency. A rejected request may be corrected and refiled.

(b) If the staff determines that a request for an advisory opinion satisfies the requirements of AS 15.13.374(b), the executive director or the executive director's designee shall prepare a recommended advisory opinion for the commission's consideration as provided in AS 15.13.374(c). The commission will consider the recommended opinion as provided in 2 AAC 50.826.

(c) A commission member who voted with the majority approving an advisory opinion may, no later than 15 days after the vote, move for reconsideration of the opinion based on a showing of substantial procedural error, fraud, misrepresentation, material mistake of fact or law, or new evidence relevant to the advisory opinion. If at least four members vote to reconsider an advisory opinion, the opinion is vacated.

(d) A person that requested an advisory opinion may act in reliance on the advisory opinion unless that person receives notice that the commission has reconsidered the advisory opinion. A person's good faith reliance on an advisory opinion is a complete defense to any enforcement action based on the conduct that is the subject of the advisory opinion.

(e) Nothing in this section precludes the commission from revising a previous advisory opinion for good cause.

Jason Brandeis
Respond to Anchorage Office
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September 8, 2022

VIA ELECTRONIC DELIVERY
heather.hebdon@alaska.gov

Ms. Heather Hebdon, Executive Director
Alaska Public Offices Commission
2221 East Northern Lights Boulevard, Room 128
Anchorage, Alaska 99508-4149

RE: Unite America PAC, Inc.
Request for Advisory Opinion Re: Reporting "True Sources" in AS 15.13.040(r) Reports
Our File No.: 508,736.1

Dear Ms. Hebdon:

Pursuant to AS 15.13.374, Unite America PAC, Inc. ("Unite America PAC") respectfully requests an advisory opinion from the Alaska Public Offices Commission ("APOC") regarding its "true source" reporting obligations under AS 15.13.040(r).

FACTUAL BACKGROUND AND SCENARIO

Unite America PAC is a federally-registered "hybrid PAC."¹ Since 2018, Unite America PAC has filed with the Federal Election Commission ("FEC") reports disclosing its donors.²

In June 2022, Unite America PAC contributed \$30,000 to Putting Alaskans First Committee, a registered group that intends to make independent expenditures in candidate elections for state office.³

¹ See Registering as a Federal Hybrid Pac, available at: <https://www.fec.gov/help-candidates-and-committees/filing-pac-reports/registering-hybrid-pac/>

² Unite America PAC's reports are available online at: <https://www.fec.gov/data/committee/C00677773/?cycle=2018&tab=filings>; a sample are attached as Exhibit A.

³ See Putting Alaskans First Committee, Group Registration Form (Jan. 3, 2022), available at: <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=5455&ViewType=GR>

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Unite America PAC reported the contribution to the Alaska Public Offices Commission on a Statement of Contributions Form 15-5.⁴ As disclosed on the Statement of Contributions Form, Unite America PAC reported two “true sources” of the \$30,000 it contributed to Putting Alaskans First Committee: \$15,000 from each of two named individuals.⁵

Following the report of that \$30,000 contribution to Putting Alaskans First Committee, Unite America PAC requested an advisory opinion on the questions listed below in the “Request For Advisory Ruling” section. APOC Staff rejected that request on August 29, 2022 and suggested that Unite America PAC could re-file its request with (1) clarification as to whether Unite America PAC is presently engaged in or intends to undertake a specific transaction in the future; and (2) further description of all relevant facts related to the request, such as how Unite America PAC chose the individuals it identified as the true sources of the contribution at issue.

Unite America PAC now confirms that it intends to make another contribution and then file a Statement of Contributions in the same manner as it did in the subject of this Advisory Opinion Request and provides the following additional information in response to APOC Staff’s questions about how Unite America PAC identified the true sources of the contribution to report on the previously-filed Form 15-5, and how it would identify the true sources of the contribution on a future Form 15-5:

1. Are contributions to support a contribution to an Alaska independent expenditure group solicited for that purpose or does Unite America PAC simply write a check from its general funds and then choose who to name?

As explained in Footnote 5 of the original advisory opinion request, Unite America PAC did not, and does not intend to, solicit contributions for an Alaska independent expenditure group. Unite America PAC solicits funds in support of its mission, but generally does not solicit funds for particular purposes or for use in particular elections, and indeed has not done so in or in connection with Alaska elections. In the case of the previous contribution, and as would be the case of the intended future contribution, Unite America PAC used its general funds for the contribution and, as explained in more detail below, used a reasonable and rational method to link those general funds to individuals who had contributed to Unite America PAC.

⁴ See Unite America PAC, Inc., Statement of Contributions Form 15-5 (June 29, 2022), available at: <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4489&ViewType=SC>, and attached as Exhibit B.

⁵ See *id.* Of note, Unite America PAC solicits funds in support of its mission, but does not solicit funds for particular purposes, or for use in particular elections. Donations provided to Unite America PAC by the two disclosed individual donors were therefore not, themselves, “contributions” directed at specific races to influence the election of candidates, as the term is defined in AS 15.13.400(4).

2. How did Unite America PAC choose which of its contributors to name and how would Unite America PAC choose contributors to name if future contributions requiring true source reporting are made?

As shown in the FEC reports attached as Exhibit A, Unite America PAC has hundreds of donors who collectively donated well in excess of \$30,000 to Unite America PAC. As explained above, Unite America PAC did not, and does not, solicit contributions for an Alaska independent expenditure group or specifically to influence the nomination or election of a candidate in Alaska. Accordingly, Unite America PAC did not see clear direction as to how to identify the individual donors that provided Unite America PAC with the funds it contributed to Putting Alaskans First Committee.

To address this ambiguity, Unite America PAC reported to APOC the identity of two donors whose contributions to Unite America PAC were at least the equivalent of the \$30,000 Unite America PAC contributed to Putting Alaskans First Committee (in actuality, their combined contributions to Unite America PAC were significantly higher than \$30,000). Unite America PAC allocated \$30,000 of their total giving to the Putting Alaskans First contribution in order to identify some individuals as the source of the unrestricted general funds that Unite America PAC contributed to Putting Alaskans First Committee.

Unite America PAC believes that, under these circumstances, this was a reasonable and rational method for linking its previously-received general donations to the contribution that flowed to Putting Alaskans First Committee. The alternative would be to identify every donor Unite America PAC has ever had, which would require reporting contributions in excess of \$30,000, would capture funds not intended to be covered by Alaska's campaign disclosure laws, and would raise constitutional issues (as discussed below).

Unite America PAC intends to use the same method to identify contributors if future contributions require true source reporting, unless it receives guidance from APOC on an alternative method for reporting such contributions.

LEGAL BACKGROUND

Alaska Statute 15.13.040(r) now requires every person that contributes more than \$2,000 to an entity that makes independent expenditures in a candidate election to disclose to APOC the "true sources of the contribution":

- (r) Every individual, person, nongroup entity, or group that contributes more than \$2,000 in the aggregate in a calendar year to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent expenditures in one or more candidate elections in the current election cycle shall report making the

contribution or contributions on a form prescribed by the commission not later than 24 hours after the contribution that requires the contributor to report under this subsection is made. The report must include the name, address, principal occupation, and employer of the individual filing the report and the amount of the contribution, as well as the total amount of contributions made to that entity by that individual, person, nongroup entity, or group during the calendar year. For purposes of this subsection, the reporting contributor is required to report and certify the true sources of the contribution, and intermediaries, if any, as defined by AS 15.13.400(18) [sic⁶]. This contributor is also required to provide the identity of the true source to the recipient of the contribution simultaneously with providing the contribution itself.

“True source” is defined in AS 15.13.400(19) to mean a person whose contribution is funded from “wages, investment income, inheritance, or revenue generated from selling goods or services,” and not from “funds [derived] via contributions [or] donations.”⁷

This definition of “true source” was adopted by Ballot Measure 2, a voter-approved initiative in 2020. Among the express purposes of Ballot Measure 2 was the intent to “increas[e] transparency” by “prohibiting the use of dark money in candidate elections.”⁸ To that end, Ballot Measure 2 added to the uncodified law of Alaska a finding that “[t]he people of Alaska have the right to know in a timely manner the source, quantity, timing, and nature of resources used to influence candidate elections in Alaska,” which “requires . . . public disclosure of the true and original sources of funds used to influence these elections[.]”⁹

Ballot Measure 2 also codified a definition of “dark money,” now found at AS 15.13.400(5):

“dark money” means a contribution whose source or sources, whether from wages, investment income, inheritance, or revenue generated from selling goods or services, is not disclosed to the public; notwithstanding the foregoing, to the extent

⁶ The reference to AS 15.13.400(18) in the statute should be to AS 15.13.400(19).

⁷ The full text of AS 15.13.400(19) provides:

“true source” means the person or legal entity whose contribution is funded from wages, investment income, inheritance, or revenue generated from selling goods or services; a person or legal entity who derived funds via contributions, donations, dues, or gifts is not the true source, but rather an intermediary for the true source; notwithstanding the foregoing, to the extent a membership organization receives dues or contributions of less than \$2,000 per person per year, the organization itself shall be considered the true source.

⁸ See BALLOT MEASURE 2 at § 1(1), (2).

⁹ See *id.* at §1(3).

a membership organization receives dues or contributions of less than \$2,000 per person per year, the organization itself shall be considered the true source.

REQUEST FOR ADVISORY RULINGS

Unite America PAC seeks an advisory opinion to confirm that the “Statement of Contribution” Form 15-5 that it filed on June 29, 2022 complied with the “true source” reporting requirement of AS 15.13.040(r). Specially, Unite America PAC requests answers to the following questions:

1. Can the Commission confirm that Unite America PAC’s \$30,000 contribution triggered a reporting obligation under AS 15.13.040(r) that required it to disclose “true sources” *of the contribution* (i.e., the true sources of funds amounting to \$30,000), and not funds in excess of the contribution?
2. Can the Commission confirm that Unite America PAC’s \$30,000 contribution did not trigger an obligation to report to APOC the true sources of all funds it has ever received, at any time?

LEGAL DISCUSSION

Unite America PAC’s request for an advisory opinion is prompted by concern, raised in discussion with staff for the Commission, that AS 15.13.040(r) could be read to require Unite America PAC to disclose the true sources of not just the \$30,000 it contributed to an Alaska independent expenditure group, but the true source *of all funds Unite America PAC has ever received*.

As an initial matter, an “all sources of all funds ever received” interpretation would be impractical, needlessly burdensome, and unhelpful to Alaskan voters. In the present circumstance, for instance, requiring Unite America PAC, after making its \$30,000 contribution, to transcribe into the APOC online reporting system substantially all of its donor information (such as what is contained in the 752-pages of FEC reports attached as Exhibit A) would be exceedingly onerous and effectively transparency-defeating: loading several million dollars of transactions into a Form 15-5 report would likely *obscure* rather than illuminate the “true sources” of the particular \$30,000 contribution Unite America PAC made.

Moreover, an “all sources of all funds ever received” construction of AS 15.13.040(r) is: (a) not required by the language of the statute; (b) at odds with the intent of Ballot Measure 2; (c) not required by prior decisions of the Commission; and (d) inconsistent with the majority practice in other states. These points are discussed in more detail below.

A. AS 15.13.040(r) Requires Disclosure of the True Sources “Of the Contribution,” Not the True Sources of All Funds Ever Received by a Contributing Organization.

To begin, Alaska Statute 15.13.040(r) plainly requires a person making triggering contributions to disclose the true sources “of the contribution”—not the true sources of all funds ever received by the contributing person: “the reporting contributor is required to report and certify the true sources *of the contribution*, and intermediaries, if any.”¹⁰

B. Disclosing the True Sources “Of the Contribution” Fulfills the Intent of Ballot Measure 2 as It Eliminates All “Dark Money”; Ballot Measure 2 Was Not Intended to Require Contributing Organizations to Disclose the True Sources of Funds *Not Used* to Influence Alaska Candidate Elections.

As quoted above, Ballot Measure 2 was expressly intended to eliminate the use of dark money in Alaska candidate elections by requiring “public disclosure of the true and original sources of funds *used to influence these elections*.”¹¹

Requiring disclosure of the true source of every dollar used to influence an Alaska candidate election fulfills that purpose. Requiring disclosure of the “true sources” of funds that were never used to influence a candidate election in Alaska does not.

Further, as reflected in the attached letter by the primary author of Ballot Measure 2,¹² the law was not intended to require organizations, as a condition of contributing to an Alaska independent expenditure group, to report to APOC the true sources of all funds it had ever received. That requirement would not only be needlessly and incredibly burdensome, it would also likely be unconstitutional.

The United States Supreme Court has long recognized that states must have a “compelling interest” to require “the names of contributors to be disclosed” and “there must be a substantial relation between the governmental interest and the information required to be disclosed,” as the Alaska Supreme Court has summarized:

In *Buckley v. Valeo*, 424 U.S. 1, 60–84 & n. 76, (1976) (per curiam), the Court noted that “compelled disclosure, in itself, can seriously infringe on privacy of association and belief guaranteed by the First Amendment.” *See also NAACP v. Alabama ex rel. Patterson*, 357 U.S. 449, 460–66 (1958). Such disclosure requirements, if significant enough to burden First Amendment activity as a practical matter, must be justified by a compelling interest and there must be a substantial relation between the governmental interest and the information

¹⁰ AS 15.13.040(r), quoted in full above on page 2.

¹¹ Ballot Measure 2 §1(3).

¹² See Letter of August 22, 2022 from Scott Kendall, attached as Exhibit C.

required to be disclosed. Buckley, 424 U.S. at 64–65, 96 S.Ct. at 656–57; NAACP, 357 U.S. at 460–62, 78 S.Ct. at 1170–72. Such scrutiny is invoked where the disclosure requirements would entail divulging the names of contributors.¹³

Here, Alaska has no “compelling interest” to require entities to disclose the “true sources” of funds that will never be used to influence candidate elections in Alaska. There is no “relationship,” substantial or otherwise, between APOC’s interest in campaign disclosure and, for instance, the identity of persons who contributed funds to Unite America PAC in 2018, and whose funds were never used in Alaska.

C. AO 22-01-CD is Not to the Contrary.

The Commission does not appear to have yet squarely addressed the issue raised by this request for an advisory opinion. In AO 22-01-CD, the Commission provided guidance to an “Organization” required to file AS 15.13.040(r) reports. The Organization intended to contribute to an “Alaska Account” that, itself, would be used to contribute more than \$2,000 to “an Alaska IE group.” The funds that the Organization proposed to contribute to the Alaska Account would come from either of what the organization termed its “IRS” or “Contribution” accounts.

In that circumstance, the Commission advised the Organization that it would have to report the true sources of the funds that its Alaska Account received from the IRS or Contribution accounts, regardless of whether the IRS or Contribution accounts received the contributed funds before Ballot Measure 2’s effective date of February 27, 2021:

The Organization understands and is prepared to file the reports required under AS 15.13.040(r) when the Alaska Account contributes more than \$2,000 to an Alaska IE group, and those required under AS 15.13.110(k) when the Alaska Account receives a contribution in excess of \$2,000. Because the Alaska Account will receive the contribution after February 27, 2021, it must report the true sources

¹³ *Caucus Distributors, Inc. v. State, Dep’t of Com. & Econ. Dev., Div. of Banking, Sec. & Corps.*, 793 P.2d 1048, 1057 (Alaska 1990) (some citations omitted). To the extent that Ballot Measure 2 is ambiguous and *could* be read either: (a) as requiring certain contributing organizations to disclose the true sources of all funds they have received, ever, regardless of whether the funds are used to influence candidate elections, or (b) more narrowly, as targeting “dark money” and requiring fuller disclosure of the “true source” of money actually used to influence Alaska candidate elections— Alaska courts would apply the “doctrine of constitutional avoidance” and adopt the narrower interpretation of the law that “avoids constitutional problems.” *Cf. Est. of Kim ex rel. Alexander v. Coxe*, 295 P.3d 380, 388 (Alaska 2013) (“The doctrine of constitutional avoidance “is a tool for choosing between competing plausible interpretations of a statutory text.” Under this tool, “as between two possible interpretations of a statute, by one of which it would be unconstitutional and by the other valid, [this court’s] plain duty is to adopt that which will save the Act.”) (footnotes omitted and citing *Bigley v. Alaska Psychiatric Inst.*, 208 P.3d 168, 184 (Alaska 2009) (interpreting ambiguous statute to avoid constitutional problems)).

of all funds received from the IRS and Contribution accounts whether or not the IRS and Contribution accounts received the funds before or after February 27, 2021.¹⁴

In other words, the Commission advised that if the Organization made a 2022 contribution to its Alaska Account, using funds that its IRS account had received in, say, 2018, the Organization would have to disclose the “true sources” of the funds received by the IRS account in 2018. The requesting Organization had suggested that it would report true sources along the lines of a “last in, first out”-type model.¹⁵ There was no suggestion in the Commission’s opinion that it rejected that approach, or that it would require the Organization to disclose the true sources of *all funds* it had *ever* received in the IRS Account whenever it transferred *any particular* amount out of the IRS Account (and into the Alaska Account).

Indeed, the Commission confirmed that, so long as the true sources of “all funds received”¹⁶ were disclosed, “there would be no dark money,”¹⁷ and the requirements of Ballot Measure 2 are fulfilled.

D. The Practice of Other States is to Require “True Source” Disclosure of Funds in the Amount of the Contribution.

Last, it may bear mentioning that the practice of states outside of Alaska that have adopted something like “true source” reporting is to require disclosure of true sources *in the amount of the contribution*. By way of a few examples:

- Minnesota requires only disclosure of persons whose funds are “attributable” to a contribution¹⁸

¹⁴ AO 2022-01-CD at 2 (emphasis added).

¹⁵ See AO 2022-01-CD at Exhibit 2 (“The IRS Account and Contribution Account have each received over one million dollars in contributions since February 28, 2021 – more than enough to cover the amount either Account is ever likely to transfer to the Alaska Account. Under the Organization’s proposal in AO Request 22-01-CD, all of the true sources of the contributions received by either Account on or after February 28, 2021 would be reported to the recipient Alaska IE group and to APOC.”).

¹⁶ See *id.* at 2 (quoted in the text).

¹⁷ AO 2022-01-CD at 4.

¹⁸ See MINN. STAT. ANN. § 10A.27, subd. 15(b) (emphasis added):

an association that has contributed more than \$5,000 in aggregate to independent expenditure political committees or funds during the calendar year or has contributed more than \$5,000 in aggregate to ballot question political committees or funds during the calendar year must provide in writing to the recipient’s treasurer


- California has codified a “last in, first out” method.¹⁹

Indeed, we are not aware of any jurisdiction that requires organizations making campaign contributions to disclose the true source of all of the funds the organization has ever received.

Thank you, in advance, for your review of this matter. Please do not hesitate to contact us if you need any additional information.

Sincerely,

BIRCH HORTON BITTNER & CHEROT



Jason Brandeis

JMB:ajl

a statement that includes the name, address, and amount attributable to each person that paid the association dues or fees, or made donations to the association that, in total, aggregate more than \$5,000 of the contribution from the association to the independent expenditure or ballot question political committee or fund. The statement must also include the total amount of the contribution attributable to persons not subject to itemization under this section. The statement must be certified as true by an officer of the donor association.

Compare Minnesota reporting form at:

https://cfb.mn.gov/pdf/forms/cf_reports/2020_IEPCF_underlying_disclosure.pdf

¹⁹ See CAL. GOV'T CODE § 84222(e)(1)(C) (“A multipurpose organization shall report . . . for the balance of its contributions or expenditures shall further report contributors based on a last in, first out accounting method.”).

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 6 OF 22
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Dick, John, , ,		Date of Receipt MM / DD / YYYY 01 / 01 / 2022
Mailing Address 2708 S Kittredge Park Rd		Transaction ID : AF3FA3638460B44B7B86
City Evergreen	State CO	Zip Code 80439-9201
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 500.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 500.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Baird, Robert, , ,		Date of Receipt MM / DD / YYYY 01 / 06 / 2022
Mailing Address 777 East Wisconsin Avenue		Transaction ID : A172B1FEA076A43F387D
City Milwaukee	State WI	Zip Code 53202-5300
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 5000.00
Name of Employer (for Individual) Robert W. Baird & Co.		<input type="checkbox"/> Memo Item
Occupation (for Individual) Owner		Political Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 5000.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Klein, John, , ,		Date of Receipt MM / DD / YYYY 01 / 06 / 2022
Mailing Address 1220 Summit Ct		Transaction ID : A393DA212E3744AFE8DF
City South Saint Paul	State MN	Zip Code 55075-1228
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 500.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		Political Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 500.00

SUBTOTAL of Receipts This Page (optional).....▶	6000.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: PAGE 7 OF 22

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Thomas, Vic, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 01 / 07 / 2022 Transaction ID : A6FCC1AFCC4C84FA897E	
Mailing Address 3425 Hopkins Street		Amount of Each Receipt this Period 250.00	
City Nashville	State TN	Zip Code 37215-1507	Amount of Each Receipt this Period 250.00 <input type="checkbox"/> Memo Item
FEC ID number of contributing federal political committee. C		Name of Employer (for Individual) Retired	
Name of Employer (for Individual) Retired		Occupation (for Individual) Retired	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 250.00	
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Thomas, Owen, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 01 / 10 / 2022 Transaction ID : A39AAA30F3B3B4307A44	
Mailing Address 15 Elm Rock Rd		Amount of Each Receipt this Period 5000.00	
City Bronxville	State NY	Zip Code 10708-4202	Amount of Each Receipt this Period 5000.00 <input type="checkbox"/> Memo Item Political Contribution
FEC ID number of contributing federal political committee. C		Name of Employer (for Individual) Boston Properties	
Name of Employer (for Individual) Boston Properties		Occupation (for Individual) CEO	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 5000.00	
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. hoenigman, vince, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 02 / 14 / 2022 Transaction ID : A25C0C77A2B524EAEB16	
Mailing Address 3053 Fillmore Street 247		Amount of Each Receipt this Period 5000.00	
City San Francisco	State CA	Zip Code 94123-4009	Amount of Each Receipt this Period 5000.00 <input type="checkbox"/> Memo Item
FEC ID number of contributing federal political committee. C		Name of Employer (for Individual) Retired	
Name of Employer (for Individual) Retired		Occupation (for Individual) Retired	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 5000.00	
SUBTOTAL of Receipts This Page (optional).....▶		10250.00	
TOTAL This Period (last page this line number only).....▶		(Empty field)	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 8 OF 22
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Scully, Charles, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 07 / 2022
Mailing Address 57 Thoroughbred Drive		Transaction ID : AD20F82EBB01D49F3B75
City Saratoga Springs	State NY	Zip Code 12866-5000
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) MetLife	Occupation (for Individual) Investments	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 300.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Cohn, Brian, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 07 / 2022
Mailing Address 467 Savoie Drive		Transaction ID : A9DFD30EE367840F4B8D
City Palm Beach Gardens	State FL	Zip Code 33410-1606
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Multi Parts	Occupation (for Individual) CEO	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 300.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Bangs, David, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 14 / 2022
Mailing Address 4314 193rd Avenue Southeast		Transaction ID : A778DBCA90EC74ABD928
City Issaquah	State WA	Zip Code 98027-9704
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Retired	Occupation (for Individual) Retired	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date ▼ 300.00	

SUBTOTAL of Receipts This Page (optional).....▶	300.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 9 OF 22
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Starkweather, David, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 15 / 2022
Mailing Address 2220 Sherwood Forest Court		Transaction ID : A166F244A6B0C4078A3C
City Fort Collins	State CO	Zip Code 80524-2295
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Innovative Discovery		<input type="checkbox"/> Memo Item
Occupation (for Individual) program manager		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 300.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. LaMotte, Lily, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 15 / 2022
Mailing Address 912 2nd Street		Transaction ID : A4B167274673C47DFA8D
City Kirkland	State WA	Zip Code 98033-5549
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 250.00
Name of Employer (for Individual) Self-Employed		<input type="checkbox"/> Memo Item
Occupation (for Individual) Writer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Cook, Rachel, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 16 / 2022
Mailing Address 535 Elm Road 535 Elm Rd		Transaction ID : AC8023CE8662642296D
City Barrington	State IL	Zip Code 60010-3125
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 300.00	

SUBTOTAL of Receipts This Page (optional).....▶	450.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: PAGE 10 OF 22

(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Miller, Sherry, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 17 / 2022
Mailing Address 506 Whitehaven Road, None		Transaction ID : AC01E23B744494AC9BBB
City Grand Island	State NY	Zip Code 14072-1935
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 250.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 250.00
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Early, Richard, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 21 / 2022
Mailing Address 4800 Sugar Grove Blvd Suite 100		Transaction ID : A4BE2A35C87804F719E1
City Stafford	State TX	Zip Code 77477-2627
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 83.33
Name of Employer (for Individual) Early McClintic McMillan, LLP		<input type="checkbox"/> Memo Item
Occupation (for Individual) Investment Consultant		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 249.99
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Stone, Elizabeth, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 21 / 2022
Mailing Address 114 Deer Lake Circle		Transaction ID : AE41BF15B28EB4046967
City Ormond Beach	State FL	Zip Code 32174-4266
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 250.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 250.00
SUBTOTAL of Receipts This Page (optional).....▶		583.33
TOTAL This Period (last page this line number only).....▶		

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 11 OF 22
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Albers, Charles, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 23 / 2022
Mailing Address 340 S Palm Ave., Unit 512		Transaction ID : AD53CAA89FD8E4CFBB4
City Sarasota	State FL	Zip Code 34236-6743
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 300.00
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Pfeiffer, Richard, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 25 / 2022
Mailing Address 51 Elizabeth St		Transaction ID : AE9B56CE83D3649AE9A0
City Guilford	State CT	Zip Code 06437-1734
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Cigna		<input type="checkbox"/> Memo Item
Occupation (for Individual) Project Manager		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 300.00
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Schnur, Max, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 27 / 2022
Mailing Address 6 Gleason St		Transaction ID : A0178F4FCFA61441EA2C
City Medford	State MA	Zip Code 02155-2223
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 84.00
Name of Employer (for Individual) Wistia, Inc.		<input type="checkbox"/> Memo Item
Occupation (for Individual) Software Engineer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date ▼ 252.00
SUBTOTAL of Receipts This Page (optional).....▶		284.00
TOTAL This Period (last page this line number only).....▶		

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 12 OF 22
<input checked="" type="checkbox"/> 11a 13	<input type="checkbox"/> 11b 14
<input type="checkbox"/> 11c 15	<input type="checkbox"/> 12 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Lumpkin, Benjamin, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 28 / 2022
Mailing Address 1117 Forest Ave		Transaction ID : A54307B2684C64121A8E
City Evanston	State IL	
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 83.33
Name of Employer (for Individual) Self Employed		<input type="checkbox"/> Memo Item
Occupation (for Individual) Writer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 249.99	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B.		Date of Receipt M M / D D / Y Y Y Y Y Y
Mailing Address		Amount of Each Receipt this Period
City	State	
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item
Name of Employer (for Individual)		
Occupation (for Individual)		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C.		Date of Receipt M M / D D / Y Y Y Y Y Y
Mailing Address		Amount of Each Receipt this Period
City	State	
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item
Name of Employer (for Individual)		
Occupation (for Individual)		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼	

SUBTOTAL of Receipts This Page (optional).....▶	83.33
TOTAL This Period (last page this line number only).....▶	17950.66

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 13 OF 22
<input type="checkbox"/> 11a <input type="checkbox"/> 13	<input type="checkbox"/> 11b <input type="checkbox"/> 14
<input type="checkbox"/> 11c <input type="checkbox"/> 15	<input type="checkbox"/> 12 <input type="checkbox"/> 16
<input checked="" type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full) UNITE AMERICA PAC INC.
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Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Shaich, Ron, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 01 / 06 / 2022
Mailing Address PO Box 962049		Transaction ID : AFAAD6E98419E4DD887E
City Boston	State MA	Zip Code 02196-2049
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 22500.00
Name of Employer (for Individual) Self-Employed	Occupation (for Individual) Restaurant Executive	<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 22500.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Murdoch, Kathryn, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 10 / 2022
Mailing Address 363 Lafayette St		Transaction ID : A9CBF40C189DF4217913
City New York	State NY	Zip Code 10012-2719
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 500000.00
Name of Employer (for Individual) Quadrivium	Occupation (for Individual) President	<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 500000.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Ellis, Lincoln, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 03 / 17 / 2022
Mailing Address 50 S La Salle St		Transaction ID : ADE45AA61318E4302A6E
City Chicago	State IL	Zip Code 60603-1008
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 5000.00
Name of Employer (for Individual) Northern Trust	Occupation (for Individual) Senior Investment Strategist	<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 5000.00	

SUBTOTAL of Receipts This Page (optional).....▶	527500.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 14 OF 22
<input type="checkbox"/> 11a <input type="checkbox"/> 13	<input type="checkbox"/> 11b <input type="checkbox"/> 14
<input type="checkbox"/> 11c <input type="checkbox"/> 15	<input type="checkbox"/> 12 <input type="checkbox"/> 16
<input checked="" type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Voters First Virginia		Date of Receipt
Mailing Address 1800 N Jefferson St		<input type="text" value="03"/> / <input type="text" value="31"/> / <input type="text" value="2022"/>
City Arlington	State VA	Zip Code 22205-3228
FEC ID number of contributing federal political committee. <input type="text" value="C"/>		Transaction ID : A08B4011EA45D437F92B
Name of Employer (for Individual)		Occupation (for Individual)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Amount of Each Receipt this Period <input type="text" value="9750.00"/>
Aggregate Year-to-Date ▼ <input type="text" value="9750.00"/>		<input type="checkbox"/> Memo Item Non Contribution Acct - UA Fund Donation Refund

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Voters First Colorado		Date of Receipt
Mailing Address 601 16th Street Suite C		<input type="text" value="03"/> / <input type="text" value="31"/> / <input type="text" value="2022"/>
City Golden	State CO	Zip Code 80401-1979
FEC ID number of contributing federal political committee. <input type="text" value="C"/>		Transaction ID : ADBFD05B33D634CC3985
Name of Employer (for Individual)		Occupation (for Individual)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Amount of Each Receipt this Period <input type="text" value="9750.00"/>
Aggregate Year-to-Date ▼ <input type="text" value="9750.00"/>		<input type="checkbox"/> Memo Item Non Contribution Acct - UA Fund Donation Refund

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Voters First Arizona		Date of Receipt
Mailing Address PO Box 67808		<input type="text" value="03"/> / <input type="text" value="31"/> / <input type="text" value="2022"/>
City Phoenix	State AZ	Zip Code 85082-7808
FEC ID number of contributing federal political committee. <input type="text" value="C"/>		Transaction ID : AD4554F972A6A400792F
Name of Employer (for Individual)		Occupation (for Individual)
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Amount of Each Receipt this Period <input type="text" value="9750.00"/>
Aggregate Year-to-Date ▼ <input type="text" value="9750.00"/>		<input type="checkbox"/> Memo Item Non Contribution Acct - UA Fund Donation Refund

SUBTOTAL of Receipts This Page (optional).....▶	<input type="text" value="29250.00"/>
TOTAL This Period (last page this line number only).....▶	<input type="text" value="556750.00"/>

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 6 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Dick, John, , ,		Date of Receipt MM / DD / YYYY 04 / 01 / 2022
Mailing Address 2708 S Kittredge Park Rd		Transaction ID : A49712E91770342C69B7
City Evergreen	State CO	Zip Code 80439-9201
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 500.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 1000.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Thomas, Vic, , ,		Date of Receipt MM / DD / YYYY 04 / 08 / 2022
Mailing Address 3425 Hopkins Street		Transaction ID : ACD56EFD0ABE4194B7B
City Nashville	State TN	Zip Code 37215-1507
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 250.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. LaMotte, Lily, , ,		Date of Receipt MM / DD / YYYY 04 / 15 / 2022
Mailing Address 912 2nd Street		Transaction ID : A33E53DB4126C40B68E7
City Kirkland	State WA	Zip Code 98033-5549
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 250.00
Name of Employer (for Individual) Self		<input type="checkbox"/> Memo Item
Occupation (for Individual) Writer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

SUBTOTAL of Receipts This Page (optional).....▶	1000.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 7 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Cook, Rachel, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 04 / 16 / 2022 Transaction ID : AB4FE37AD2DBF47AFA16	
Mailing Address 535 Elm Road 535 Elm Rd City Barrington State IL Zip Code 60010-3125		Amount of Each Receipt this Period 100.00 <input type="checkbox"/> Memo Item	
FEC ID number of contributing federal political committee. C			
Name of Employer (for Individual) Retired Occupation (for Individual) Retired			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 400.00	
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Early, Richard, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 04 / 21 / 2022 Transaction ID : A018382ED91DA405AAF2	
Mailing Address 4800 Sugar Grove Blvd Suite 100 City Stafford State TX Zip Code 77477-2627		Amount of Each Receipt this Period 83.33 <input type="checkbox"/> Memo Item	
FEC ID number of contributing federal political committee. C			
Name of Employer (for Individual) Early McClintic McMillan, LLP Occupation (for Individual) Investment Consultant			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 333.32	
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Merrill, Marc, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 04 / 22 / 2022 Transaction ID : A7E2284ABFF164D7F845	
Mailing Address 30 Latimer Rd City Santa Monica State CA Zip Code 90402-1012		Amount of Each Receipt this Period 5000.00 <input type="checkbox"/> Memo Item	
FEC ID number of contributing federal political committee. C			
Name of Employer (for Individual) Riot Games Occupation (for Individual) Co-founder			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 5000.00	
SUBTOTAL of Receipts This Page (optional)..... ▶		5183.33	
TOTAL This Period (last page this line number only)..... ▶			

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 8 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Pfeiffer, Richard, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 04 / 25 / 2022
Mailing Address 51 Elizabeth St		Transaction ID : AA5014F8E39CA4C719F4
City Guilford	State CT	Zip Code 06437-1734
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Cigna	Occupation (for Individual) Project Manager	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 400.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Schnur, Max, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 04 / 27 / 2022
Mailing Address 6 Gleason St		Transaction ID : AA9F003AC8FC049BBEE
City Medford	State MA	Zip Code 02155-2223
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 84.00
Name of Employer (for Individual) Wistia, Inc.	Occupation (for Individual) Software Engineer	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 336.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Lumpkin, Benjamin, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 04 / 28 / 2022
Mailing Address 1117 Forest Ave		Transaction ID : A3348B48EC45F4C88A53
City Evanston	State IL	Zip Code 60202-1407
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 83.33
Name of Employer (for Individual) Self Employed	Occupation (for Individual) Writer	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date ▼ 333.32	

SUBTOTAL of Receipts This Page (optional).....▶	267.33
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 9 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Baker, James, , ,		Date of Receipt MM / DD / YYYY 05 / 05 / 2022
Mailing Address 8 Waterford Rd		Transaction ID : A22826759C8904992A72
City Dalton	State PA	Zip Code 18414-7747
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Strickland, Steve, , ,		Date of Receipt MM / DD / YYYY 05 / 08 / 2022
Mailing Address 804 Nixon Ave		Transaction ID : A7FDDF8EC02764B838EC
City Reno	State NV	Zip Code 89509-1432
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) Wood Rodgers, Inc.		<input type="checkbox"/> Memo Item
Occupation (for Individual) Civil Engineer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Shappee, Mark, , ,		Date of Receipt MM / DD / YYYY 05 / 09 / 2022
Mailing Address 1157 Westridge Dr		Transaction ID : A10C4F231AF0345B1AC3
City Ventura	State CA	Zip Code 93003-1439
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

SUBTOTAL of Receipts This Page (optional).....▶	150.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 10 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full) UNITE AMERICA PAC INC.
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Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Bell, Michael, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 11 / 2022
Mailing Address 8814 Live Oak Rd		Transaction ID : A91B6CBD9E2FE4CFD9A/
City Wilton	State CA	Zip Code 95693-9666
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) n/a	Occupation (for Individual) Retired	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. walker, leslie, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 12 / 2022
Mailing Address 201 Island View Rd		Transaction ID : AECA06B02D6B048D6888
City Eastsound	State WA	Zip Code 98245-5574
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 1000.00
Name of Employer (for Individual) Retired	Occupation (for Individual) Retired	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 1000.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Welch, Teresa, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 12 / 2022
Mailing Address 6513 Southwest Janet Way		Transaction ID : A6E34DD21453647D5918
City Corvallis	State OR	Zip Code 97333-9323
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 5000.00
Name of Employer (for Individual) Self	Occupation (for Individual) Editor	<input type="checkbox"/> Memo Item
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 5000.00	

SUBTOTAL of Receipts This Page (optional).....▶	6050.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 11 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Welch, Pat, , ,		Date of Receipt MM / DD / YYYY 05 / 12 / 2022
Mailing Address 6513 SW Janet Way		Transaction ID : ABF8BC815767449FBA6
City Corvallis	State OR	Zip Code 97333-9323
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 5000.00
Name of Employer (for Individual) Self		<input type="checkbox"/> Memo Item
Occupation (for Individual) scientist		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 5000.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. LaMotte, Lily, , ,		Date of Receipt MM / DD / YYYY 05 / 15 / 2022
Mailing Address 912 2nd Street		Transaction ID : AF2576D2BF2444AE8BC0
City Kirkland	State WA	Zip Code 98033-5549
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 250.00
Name of Employer (for Individual) Self		<input type="checkbox"/> Memo Item
Occupation (for Individual) Writer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 500.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Wardlow, Connie, , ,		Date of Receipt MM / DD / YYYY 05 / 16 / 2022
Mailing Address 1724 Oak St		Transaction ID : A8BAA22F196A34E9DA5A
City South Pasadena	State CA	Zip Code 91030-4717
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date ▼ 250.00	

SUBTOTAL of Receipts This Page (optional).....▶	5300.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)		PAGE 12 OF 35	
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16 <input type="checkbox"/> 17

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Cook, Rachel, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 16 / 2022	
Mailing Address 535 Elm Road 535 Elm Rd		Transaction ID : A14E680E25E5349F8BEA	
City Barrington	State IL	Zip Code 60010-3125	Amount of Each Receipt this Period 100.00
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Retired		Occupation (for Individual) Retired	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 500.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Carter, Charles, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 17 / 2022	
Mailing Address 1557 Vance Avenue		Transaction ID : AF79C5CA35AA4464C90A	
City Memphis	State TN	Zip Code 38104-3842	Amount of Each Receipt this Period 500.00
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Self		Occupation (for Individual) Physician	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 500.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Pepin, Sophie, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 20 / 2022	
Mailing Address 4190 Manuela Ave		Transaction ID : AE5D15D107D524B1A973	
City Palo Alto	State CA	Zip Code 94306-3702	Amount of Each Receipt this Period 50.00
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Leapfrog Power, Inc.		Occupation (for Individual) Partner Success Analyst	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 250.00	

SUBTOTAL of Receipts This Page (optional).....▶	650.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 13 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Early, Richard, , ,		Date of Receipt MM / DD / YYYY 05 / 21 / 2022
Mailing Address 4800 Sugar Grove Blvd Suite 100		Transaction ID : A7604B38A30C44C2583E
City Stafford	State TX	Zip Code 77477-2627
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 83.33
Name of Employer (for Individual) Early McClintic McMillan, LLP		<input type="checkbox"/> Memo Item
Occupation (for Individual) Investment Consultant		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
Aggregate Year-to-Date ▼ 416.65		

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Pfeiffer, Richard, , ,		Date of Receipt MM / DD / YYYY 05 / 25 / 2022
Mailing Address 51 Elizabeth St		Transaction ID : ADDB7A3FC49504CFEA97
City Guilford	State CT	Zip Code 06437-1734
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Cigna		<input type="checkbox"/> Memo Item
Occupation (for Individual) Project Manager		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		
Aggregate Year-to-Date ▼ 500.00		

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Schnur, Max, , ,		Date of Receipt MM / DD / YYYY 05 / 27 / 2022
Mailing Address 6 Gleason St		Transaction ID : AEECBC7B307AA4013A9B
City Medford	State MA	Zip Code 02155-2223
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 84.00
Name of Employer (for Individual) Wistia, Inc.		<input type="checkbox"/> Memo Item
Occupation (for Individual) Software Engineer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Aggregate Year-to-Date ▼ 420.00		

SUBTOTAL of Receipts This Page (optional).....▶	267.33
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 14 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Callicott, Joe, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 27 / 2022 Transaction ID : AFC0389B14F1C4725B91	
Mailing Address 501 VES Rd. B212		Amount of Each Receipt this Period 250.00	
City Lynchburg	State VA	Zip Code 24503-4638	
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Retired		Occupation (for Individual) Retired	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 250.00	
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Kagan, Tom, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 28 / 2022 Transaction ID : A3375AD5FCF8848F4A16	
Mailing Address 136 Bement Ave		Amount of Each Receipt this Period 50.00	
City Staten Island	State NY	Zip Code 10310-1500	
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Retired		Occupation (for Individual) Retired	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 250.00	
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Lumpkin, Benjamin, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 28 / 2022 Transaction ID : A67232E80D13B45DEAB2	
Mailing Address 1117 Forest Ave		Amount of Each Receipt this Period 83.33	
City Evanston	State IL	Zip Code 60202-1407	
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Self Employed		Occupation (for Individual) Writer	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date ▼ 416.65	
SUBTOTAL of Receipts This Page (optional)..... ▶		383.33	
TOTAL This Period (last page this line number only)..... ▶		(Empty field)	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 15 OF 35
<input checked="" type="checkbox"/> 11a 13	<input type="checkbox"/> 11b 14
<input type="checkbox"/> 11c 15	<input type="checkbox"/> 12 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Balson, Andrew, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 31 / 2022
Mailing Address 276 Highland St		Transaction ID : A028DF78388494D42B2A
City West Newton	State MA	Zip Code 02465-2715
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 5000.00
Name of Employer (for Individual) Cove Hill Partners		<input type="checkbox"/> Memo Item
Occupation (for Individual) President, Managing Director		<input type="checkbox"/> Political Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 5000.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Clark, John, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 06 / 04 / 2022
Mailing Address 15 Groveland Commons Way		Transaction ID : AD99B2B4EE3194FD8AAC
City Groveland	State MA	Zip Code 01834-1319
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 250.00
Name of Employer (for Individual) Imprivata		<input type="checkbox"/> Memo Item
Occupation (for Individual) Product Management		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 250.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Baker, James, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 06 / 05 / 2022
Mailing Address 8 Waterford Rd		Transaction ID : A2EB80C64B3B649F39DD
City Dalton	State PA	Zip Code 18414-7747
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Aggregate Year-to-Date ▼ 300.00	

SUBTOTAL of Receipts This Page (optional).....▶	5300.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 16 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Cohn, Brian, , ,		Date of Receipt MM / DD / YYYY 06 / 07 / 2022
Mailing Address 467 Savoie Drive		Transaction ID : A5C63190801AC490FA96
City Palm Beach Gardens	State FL	Zip Code 33410-1606
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Multi Parts		<input type="checkbox"/> Memo Item
Occupation (for Individual) CEO		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 300.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Scully, Charles, , ,		Date of Receipt MM / DD / YYYY 06 / 07 / 2022
Mailing Address 57 Thoroughbred Drive		Transaction ID : AD9B0C61817F043D4977
City Saratoga Springs	State NY	Zip Code 12866-5000
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) MetLife		<input type="checkbox"/> Memo Item
Occupation (for Individual) Investments		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 300.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Strickland, Steve, , ,		Date of Receipt MM / DD / YYYY 06 / 08 / 2022
Mailing Address 804 Nixon Ave		Transaction ID : A9430795B81784525B0E
City Reno	State NV	Zip Code 89509-1432
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) Wood Rodgers, Inc.		<input type="checkbox"/> Memo Item
Occupation (for Individual) Civil Engineer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date ▼ 300.00

SUBTOTAL of Receipts This Page (optional).....▶	250.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 17 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Shappee, Mark, , ,		Date of Receipt MM / DD / YYYY 06 / 09 / 2022
Mailing Address 1157 Westridge Dr		Transaction ID : A9535EB48A790416BABE
City Ventura	State CA	Zip Code 93003-1439
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 300.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Bell, Michael, , ,		Date of Receipt MM / DD / YYYY 06 / 11 / 2022
Mailing Address 8814 Live Oak Rd		Transaction ID : A8DD4DCFE5ECC40BB884
City Wilton	State CA	Zip Code 95693-9666
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) n/a		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 300.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Clapp, William, , ,		Date of Receipt MM / DD / YYYY 06 / 12 / 2022
Mailing Address 5845 W Ohio Street		Transaction ID : AF696A0B021584500B12
City Chicago	State IL	Zip Code 60644-1410
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 500.00
Name of Employer (for Individual) Cook County Hospital		<input type="checkbox"/> Memo Item
Occupation (for Individual) Physician		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 500.00

SUBTOTAL of Receipts This Page (optional).....▶	600.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 18 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Bangs, David, , ,		Date of Receipt MM / DD / YYYY 06 / 14 / 2022
Mailing Address 4314 193rd Avenue Southeast		Transaction ID : AFC7C855910884F3C9B1
City Issaquah	State WA	Zip Code 98027-9704
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 300.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Edsell, Patrick, , ,		Date of Receipt MM / DD / YYYY 06 / 15 / 2022
Mailing Address 33781 Glocamora Lane		Transaction ID : AD8B8F591C27E4E958A7
City San Juan Capistrano	State CA	Zip Code 92675-4957
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 300.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Tonetti, Caroline, , ,		Date of Receipt MM / DD / YYYY 06 / 15 / 2022
Mailing Address 1256 Laguna Avenue		Transaction ID : A623447D8B5C84DF180C
City Burlingame	State CA	Zip Code 94010-3432
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 83.33
Name of Employer (for Individual) Self		<input type="checkbox"/> Memo Item
Occupation (for Individual) Clinical Psychologist		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 249.99	

SUBTOTAL of Receipts This Page (optional).....▶	283.33
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 19 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Starkweather, David, , ,		Date of Receipt MM / DD / YYYY 06 / 15 / 2022
Mailing Address 2220 Sherwood Forest Court		Transaction ID : A3E2887C11C554DE590D
City Fort Collins	State CO	Zip Code 80524-2295
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Innovative Discovery		<input type="checkbox"/> Memo Item
Occupation (for Individual) program manager		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 300.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. LaMotte, Lily, , ,		Date of Receipt MM / DD / YYYY 06 / 15 / 2022
Mailing Address 912 2nd Street		Transaction ID : AC2A55E953B8C4ABE830
City Kirkland	State WA	Zip Code 98033-5549
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 250.00
Name of Employer (for Individual) Self		<input type="checkbox"/> Memo Item
Occupation (for Individual) Writer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 750.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Wardlow, Connie, , ,		Date of Receipt MM / DD / YYYY 06 / 16 / 2022
Mailing Address 1724 Oak St		Transaction ID : A32B16579CAED45DCB90
City South Pasadena	State CA	Zip Code 91030-4717
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 300.00	

SUBTOTAL of Receipts This Page (optional).....▶	400.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 20 OF 35
<input checked="" type="checkbox"/> 11a 13	<input type="checkbox"/> 11b 14
<input type="checkbox"/> 11c 15	<input type="checkbox"/> 12 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Cook, Rachel, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 06 / 16 / 2022
Mailing Address 535 Elm Road 535 Elm Rd		Transaction ID : A2C154B3638814F969F3
City Barrington	State IL	Zip Code 60010-3125
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 600.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Pepin, Sophie, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 06 / 17 / 2022
Mailing Address 4190 Manuela Ave		Transaction ID : A411BF34C1E554841B50
City Palo Alto	State CA	Zip Code 94306-3702
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50.00
Name of Employer (for Individual) Leapfrog Power, Inc.		<input type="checkbox"/> Memo Item
Occupation (for Individual) Partner Success Analyst		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 300.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Early, Richard, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 06 / 21 / 2022
Mailing Address 4800 Sugar Grove Blvd Suite 100		Transaction ID : A2BC87AAD35EA4E81AD2
City Stafford	State TX	Zip Code 77477-2627
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 83.33
Name of Employer (for Individual) Early McClintic McMillan, LLP		<input type="checkbox"/> Memo Item
Occupation (for Individual) Investment Consultant		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 499.98

SUBTOTAL of Receipts This Page (optional).....▶	233.33
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 21 OF 35
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b
<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14
<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Albers, Charles, , ,		Date of Receipt MM / DD / YYYY 06 / 23 / 2022
Mailing Address 340 S Palm Ave., Unit 512		Transaction ID : AA77636FC00F049AAAFF
City Sarasota	State FL	Zip Code 34236-6743
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Retired		<input type="checkbox"/> Memo Item
Occupation (for Individual) Retired		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 300.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Pfeiffer, Richard, , ,		Date of Receipt MM / DD / YYYY 06 / 25 / 2022
Mailing Address 51 Elizabeth St		Transaction ID : A84F231297679453B8FB
City Guilford	State CT	Zip Code 06437-1734
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 100.00
Name of Employer (for Individual) Cigna		<input type="checkbox"/> Memo Item
Occupation (for Individual) Project Manager		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 600.00

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Schnur, Max, , ,		Date of Receipt MM / DD / YYYY 06 / 27 / 2022
Mailing Address 6 Gleason St		Transaction ID : AAF5EDEA98FC4138B2E
City Medford	State MA	Zip Code 02155-2223
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 84.00
Name of Employer (for Individual) Wistia, Inc.		<input type="checkbox"/> Memo Item
Occupation (for Individual) Software Engineer		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date ▼ 504.00

SUBTOTAL of Receipts This Page (optional).....▶	284.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: PAGE 22 OF 35
(check only one)

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12	<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16	<input type="checkbox"/> 17
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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Lumpkin, Benjamin, , ,		Date of Receipt MM / DD / YYYY 06 / 28 / 2022	
Mailing Address 1117 Forest Ave		Transaction ID : A95D2C614BD37400D95F	
City Evanston	State IL	Zip Code 60202-1407	Amount of Each Receipt this Period 83.33
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Self Employed		Occupation (for Individual) Writer	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 499.98	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Hill, Tim, , ,		Date of Receipt MM / DD / YYYY 06 / 28 / 2022	
Mailing Address 1524 W Vista Ave		Transaction ID : ADECA40FDC93F4572A18	
City Phoenix	State AZ	Zip Code 85021-7900	Amount of Each Receipt this Period 500.00
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Krueger Financial		Occupation (for Individual) Financial Planner	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 500.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Kagan, Tom, , ,		Date of Receipt MM / DD / YYYY 06 / 28 / 2022	
Mailing Address 136 Bement Ave		Transaction ID : AB244BAB514C2436C866	
City Staten Island	State NY	Zip Code 10310-1500	Amount of Each Receipt this Period 50.00
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Retired		Occupation (for Individual) Retired	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date ▼ 300.00	

SUBTOTAL of Receipts This Page (optional).....▶	633.33
TOTAL This Period (last page this line number only).....▶	27235.31

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 23 OF 35
<input type="checkbox"/> 11a <input type="checkbox"/> 13	<input type="checkbox"/> 11b <input type="checkbox"/> 14
<input type="checkbox"/> 11c <input type="checkbox"/> 15	<input type="checkbox"/> 12 <input type="checkbox"/> 16
<input checked="" type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Rehtin, Jim, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 06 / 06 / 2022
Mailing Address 2155 S Fillmore St		Transaction ID : A91A793A18A9B4D71B65
City Denver	State CO	Zip Code 80210-4828
FEC ID number of contributing federal political committee. C	Amount of Each Receipt this Period 10000.00	
Name of Employer (for Individual) Envision Healthcare	Occupation (for Individual) Chief Executive Officer	<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 10000.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Ellis, Lincoln, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 04 / 04 / 2022
Mailing Address 50 S La Salle St		Transaction ID : A9CF8ACE6C3984634B16
City Chicago	State IL	Zip Code 60603-1008
FEC ID number of contributing federal political committee. C	Amount of Each Receipt this Period 2500.00	
Name of Employer (for Individual) Northern Trust	Occupation (for Individual) Senior Investment Strategist	<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 7500.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Foreman, Steve, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 14 / 2022
Mailing Address 5320 sombrero		Transaction ID : A8B07C503F249404BAA5
City Bow Mar	State CO	Zip Code 80123-1416
FEC ID number of contributing federal political committee. C	Amount of Each Receipt this Period 2000.00	
Name of Employer (for Individual) LK Capital	Occupation (for Individual) Owner	<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 2000.00	

SUBTOTAL of Receipts This Page (optional).....▶	14500.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s) for each category of the Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 24 OF 35
<input type="checkbox"/> 11a <input type="checkbox"/> 13	<input type="checkbox"/> 11b <input type="checkbox"/> 14
<input type="checkbox"/> 11c <input type="checkbox"/> 15	<input type="checkbox"/> 12 <input type="checkbox"/> 16
<input checked="" type="checkbox"/> 17	

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NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Thiry, Kent, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 17 / 2022
Mailing Address 2 Cantitoe Ln		Transaction ID : A516237E2AC0A43FFB05
City Englewood	State CO	Zip Code 80113-6111
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 50000.00
Name of Employer (for Individual) DaVita	Occupation (for Individual) Executive Chairman	<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 50000.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Merrill, Marc, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 04 / 22 / 2022
Mailing Address 30 Latimer Rd		Transaction ID : A974F18E0D6394033A0A
City Santa Monica	State CA	Zip Code 90402-1012
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 995000.00
Name of Employer (for Individual) Riot Games	Occupation (for Individual) Co-founder	<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 995000.00	

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C. Balson, Andrew, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 31 / 2022
Mailing Address 276 Highland St		Transaction ID : A9C8726D9A9E24EEE96C
City West Newton	State MA	Zip Code 02465-2715
FEC ID number of contributing federal political committee. C		Amount of Each Receipt this Period 145000.00
Name of Employer (for Individual) Cove Hill Partners	Occupation (for Individual) President, Managing Director	<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼	Aggregate Year-to-Date ▼ 145000.00	

SUBTOTAL of Receipts This Page (optional).....▶	1190000.00
TOTAL This Period (last page this line number only).....▶	

**SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER: (check only one)	PAGE 25 OF 35
<input type="checkbox"/> 11a <input type="checkbox"/> 13	<input type="checkbox"/> 11b <input type="checkbox"/> 14
<input type="checkbox"/> 11c <input type="checkbox"/> 15	<input type="checkbox"/> 12 <input type="checkbox"/> 16
<input checked="" type="checkbox"/> 17	

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)
UNITE AMERICA PAC INC.

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name A. Klivan, Josh, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 05 / 18 / 2022 Transaction ID : A85D405352547430EA18	
Mailing Address 101 Warren St Apt 3060 City New York State NY Zip Code 10007-1375		Amount of Each Receipt this Period 2550.00	
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution	
Name of Employer (for Individual) Self Employed Occupation (for Individual) Investor			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 2550.00	
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name B. Davis, Anthony, , ,		Date of Receipt M M / D D / Y Y Y Y Y Y 06 / 17 / 2022 Transaction ID : AD687A141E72245BC831	
Mailing Address 510 Laguardia Pl Fl 5 City New York State NY Zip Code 10012-4648		Amount of Each Receipt this Period 37500.00	
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item Non Contribution Acct - Contribution	
Name of Employer (for Individual) Inherent Group Occupation (for Individual) CEO & CIO			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify) ▼		Aggregate Year-to-Date ▼ 37500.00	
Full Name of Individual (Last, First, Middle Initial) or Full Organization Name C.		Date of Receipt M M / D D / Y Y Y Y Y Y	
Mailing Address City State Zip Code		Amount of Each Receipt this Period	
FEC ID number of contributing federal political committee. C		<input type="checkbox"/> Memo Item	
Name of Employer (for Individual) Occupation (for Individual)			
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		Aggregate Year-to-Date ▼	
SUBTOTAL of Receipts This Page (optional).....▶		40050.00	
TOTAL This Period (last page this line number only).....▶		1244550.00	

STATEMENT OF CONTRIBUTIONS FORM 15-5

COMPLETEDSubmission Date: **06/29/2022**

REPORT TYPE

Filing Reason: **Contributions in excess of \$2,000**Report Year: **2022**Filed As: **Other**

FILING

Filer First Name: **Jeffrey**

Filer Middle Name:

Filer Last Name: **Carson**Filer Phone: **7205920843**Filer Email: **ops@uniteamerica.org**Occupation: **Interim VP, Ops & People**Employer: **Polestar, Inc.**Filer's Title with Other Entity: **Treasurer**

BUSINESS INFORMATION

Business Entity Name: **Unite America PAC Inc.**Business Type: **Federal Hybrid PAC**Address: **1580 Lincoln St. Suite 520**City: **Denver**State: **Colorado****80203**Country: **United States**

CONTACT PERSON INFORMATION

First Name: **Jeffrey**Last Name: **Carson**Phone: **7205920843**Email: **ops@uniteamerica.org**Occupation: **Interim VP, Ops & People**Employer: **Polestar, Inc.**

CONTRIBUTIONS

Contribution Date	Recipient	Form of Contribution	Amount	Total Annual Contribution
06/28/2022	2022 - Putting Alaskans First Committee	Electronic Funds Transfer	\$30,000.00	\$30,000.00

TRUE SOURCES

EX. B

Page 1 of 2

Date	Name	Address	Employment	Amount	Total Annual
04/22/2022	Name: Marc Merrill	Address: 30 Latimer Rd, Santa Monica, California 90402 Phone: 7205920843 Email: ops@uniteamerica.org	Co-Founder Riot Games	\$15,000.00	\$1,000,000.00
Received Directly from True Source No Intermediaries					
07/09/2021	Name: Ron Shaich	Address: 23 Prescott St, Brookline, Massachusetts 02446 Phone: 7205920843 Email: ops@uniteamerica.org	Founder Panera	\$15,000.00	\$0.00
Received Directly from True Source No Intermediaries					

REPORT SUMMARY

Number of Contributions Reported with this Report: 1
Total of Contributions Reported with this Report: \$30,000.00



August 22, 2022

Heather Hebdon, Executive Director
Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Room #128
Anchorage, Alaska 99508

Re: Ballot Measure 2's "Dark Money" prohibition cannot be applied to campaign funds raised and spent in federal elections or the elections of another state

Dear Ms. Hebdon:

My name is Scott Kendall, and I am an attorney with over 16 years' experience practicing before the Alaska Public Offices Commission ("APOC" or "Commission"). In addition, I was the primary author of Ballot Measure 2 (also known as "19AKBE" or the "Better Elections Initiative"), an initiative that appeared on the 2020 general election ballot.

Ballot Measure 2 proposed three principal reforms to Alaska's elections: 1) the replacement of closed party primary elections with non-partisan "Top 4" primaries; 2) the replacement of "first past the post" general elections with Ranked-Choice Voting requiring general election winners to obtain majority support; and 3) a prohibition on "Dark Money" in candidate campaigns. The last point's intent was to end the practice of obscuring the true sources of contributions to Independent Expenditure groups by funneling them through intermediaries. In November 2020, the voters of Alaska passed Ballot Measure 2 and on approximately February 28th, 2021 the measure became effective. The only element relevant to this letter is Ballot Measure 2's prohibition on "Dark Money" in candidate elections.

I have learned of concerns that Ballot Measure 2's ban on "Dark Money" will be applied in an overly broad and potentially unconstitutional manner to sweep in *all* of an entities' donor information, regardless of whether those donors' contributions are actually used in an Alaska election. Such an interpretation would be illogical and contrary to the purposes of Ballot Measure 2, and actual application of such an interpretation could be vulnerable to constitutional challenge.

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Ballot Measure 2 added a new subsection “r” to AS 15.13.040 which requires that—for contributions of \$2,000 or more to an entity making independent expenditures in candidate elections—the “true source” of such funds must be disclosed. Such contributions can no longer be diverted through intermediaries and have those intermediaries be reported as the actual donor, which in the past has been done in order to obscure the true source. *However*, Ballot Measure 2 *did not* impact or change the actual definition of “contribution” codified at AS 15.13.400(4).

As applied within APOC’s statutes, a “contribution” applies only to funds donated for specific purposes: 1) influencing the nomination or election of a candidate *in Alaska*; 2) influencing a ballot proposition or question *in Alaska*; or 3) supporting or opposing an initiative proposal application filed with the *Alaska* lieutenant governor under AS 15.45.020.¹ With respect to Ballot Measure 2’s Dark Money restriction, only this first purpose is relevant because AS 15.13.040(r) applies *only* to candidate spending, not ballot propositions or questions.² Accordingly, APOC has no statutory authority to regulate contributions *unless* they are \$2,000 or more *and* are made to influence a candidate election for office *in Alaska*.

In short, the Dark Money provision in Ballot Measure 2 *did not* give APOC the authority to regulate contributions made for purposes *other than* impacting candidate elections in Alaska. To the extent an entity receives funds for non-campaign purposes³ and keeps those funds segregated from campaign funds, the non-campaign funds do not fall within Ballot Measure 2 or under APOC’s authority at all. And, to the extent an entity receives funds that it expends on federal elections or elections outside the state of Alaska, APOC has no jurisdiction to regulate or force disclosure of those funds.⁴

Indeed, even if APOC had a statute authorizing it to force disclosure of contributions bound for elections in other states (and it doesn’t) such a statute would likely be held unconstitutional. The United State Supreme Court has made clear that donor disclosure requirements implicate and burden the First Amendment.⁵ Accordingly, such requirements must be substantially related to a compelling governmental interest.⁶ In the case of campaign-related contributions,

¹ See AS 15.13.400(4).

² See *id.* repeatedly stating that the Dark Money restriction applies *only* to contributions to entities making independent expenditures in “candidate elections”.

³ Many entities such as Planned Parenthood, the National Rifle Association and the like have significant non-campaign activities. They provide services and education to their members and the public that are unrelated to any candidate campaign. The APOC does not have the authority to disclose or inquire into donations made to them for these non-campaign purposes just because they have a separate account or affiliated entity that also engages in campaign activities. If those funds are segregated, APOC *only* has the authority to regulate and disclose those “contributions” made towards campaign activities.

⁴ See *e.g.* AS 15.13.010 “Applicability”. Nothing in this statute, or any of APOC’s governing statutes indicate that the Commission has the authority to regulate campaign spending in federal elections or elections for office in states other than Alaska. Indeed, as a matter of federal law (and under the basic tenets of federalism) APOC could not be given the authority to do so.

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Ballot Measure 2 was never intended to sweep in all funds raised by an entity—whether spent in an Alaska election or not—because there is no policy purpose to do so. Voters in Alaska will not be better informed by knowing the identity of funders for spending that occurs in other states' elections. In fact, “dumping” a giant volume of irrelevant financial data onto voters could actually obscure the very information voters need—*attribution of the funds that will be spent in Alaska*. Such “over-reporting” could only serve to confuse voters and could be a tool to bury the real “true sources” of funding.

Additionally, a contrary position from APOC would seem to conflict with prior AOs in which the Commission allowed for the segregating of funds by purpose (campaign vs. non-campaign). A more logical extension would be to allow the same segregation here (Alaska bound vs. non-Alaska bound funds).

Finally, I have reviewed compilations and digests of the campaign finance laws in other jurisdictions. In that research I have been unable to find a single state in which an organization's spending in that state's elections requires the disclosure of campaign spending in all other states. Indeed, as discussed above, if the burden on the reporting entity is balanced against the voters' interest in such information, it could lead a court to find such a regime to be unconstitutional.

In summary, Ballot Measure 2's Dark Money restriction applies *only* to contributions of \$2,000 or more made for the purpose of impacting a candidate election through independent expenditures *in Alaska*. To the extent donations are made to entities for use in other states' elections, such donations are not intended to be swept up in the reports. Requiring such reporting could not only obscure useful information under the sheer volume of this financial “bycatch” but it also would likely violate the First Amendment. For this reason, if the Commission does decide to require disclosure of donations raising in connection with elections outside of Alaska, it must do so in a manner that minimizes the burden on the disclosing entity—and minimizes confusion for the public—by limiting the “bycatch”. For this reason, the position advanced by Unite America PAC's advisory opinion request (to disclose donors whose donations aggregate to at least the amount of the Alaska “contribution” being reported) is a much more rational and legally-sound approach than a requirement to disclose every donation to such an entity since its formation.

If you have any questions, or if I can assist the Commission or your staff in any way, please do not hesitate to contact me.

Best regards,



Scott Kendall, Attorney
Scott@cashiongilmore.com
(907) 222-7932 (Main)
(907) 339-4967 (Direct)
(907) 222-7938 (Fax)

STATEMENT OF CONTRIBUTIONS FORM 15-5

COMPLETEDSubmission Date: **06/29/2022**

REPORT TYPE

Filing Reason: **Contributions in excess of \$2,000**Report Year: **2022**Filed As: **Other**

FILING

Filer First Name: **Jeffrey**

Filer Middle Name:

Filer Last Name: **Carson**Filer Phone: **7205920843**Filer Email: **ops@uniteamerica.org**Occupation: **Interim VP, Ops & People**Employer: **Polestar, Inc.**Filer's Title with Other Entity: **Treasurer**

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CONTRIBUTIONS

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06/28/2022	2022 - Putting Alaskans First Committee	Electronic Funds Transfer	\$30,000.00	\$30,000.00

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Scott Kendall, Attorney

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STATEMENT OF CONTRIBUTIONS FORM 15-5

COMPLETEDSubmission Date: **06/29/2022**

REPORT TYPE

Filing Reason: **Contributions in excess of \$2,000**Report Year: **2022**Filed As: **Other**

FILING

Filer First Name: **Jeffrey**

Filer Middle Name:

Filer Last Name: **Carson**Filer Phone: **7205920843**Filer Email: **ops@uniteamerica.org**Occupation: **Interim VP, Ops & People**Employer: **Polestar, Inc.**Filer's Title with Other Entity: **Treasurer**

BUSINESS INFORMATION

Business Entity Name: **Unite America PAC Inc.**Business Type: **Federal Hybrid PAC**Address: **1580 Lincoln St. Suite 520**City: **Denver**State: **Colorado****80203**Country: **United States**

CONTACT PERSON INFORMATION

First Name: **Jeffrey**Last Name: **Carson**Phone: **7205920843**Email: **ops@uniteamerica.org**Occupation: **Interim VP, Ops & People**Employer: **Polestar, Inc.**

CONTRIBUTIONS

Contribution Date	Recipient	Form of Contribution	Amount	Total Annual Contribution
06/28/2022	2022 - Putting Alaskans First Committee	Electronic Funds Transfer	\$30,000.00	\$30,000.00

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		Phone: 7205920843			
		Email: ops@uniteamerica.org			

Received Directly from True Source
No Intermediaries

Date	Name	Address	Employment	Amount	Total Annual
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Received Directly from True Source No Intermediaries					

REPORT SUMMARY

Number of Contributions Reported with this Report:	1
Total of Contributions Reported with this Report:	\$30,000.00

GROUP REGISTRATION FORM

COMPLETED

Submission Date: **01/03/2022**
 Filer First Name: **Joelle**
 Filer Middle Name (Optional):
 Filer Last Name: **Hall**
 Filer's Title with Group: **Treasurer**

GROUP INFORMATION

Previously Registered: **Yes**
 Election Year: **2022**
 Group Name: **Putting Alaskans First Committee**
 Abbreviation: **Putting Alaskans First Committee**
 Purpose: **To support candidates who support working families**
 Group Type: **Independent Expenditure**
 Group Mailing Address: **3333 Denali Street, Suite 125**
 City, State Zip: **Anchorage, Alaska 99503**
 Additional Email Addresses to Notify: **kim@akaficio.org,rem@alaska.net,joelle@akaficio.org**

CHAIR

Name: **Joelle Hall**
 Address: **3333 Denali Street, Suite 125**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **907-258-6284**
 E-mail: **joelle@akaficio.org**
 Fax (Optional): **Did Not Report**

TREASURER

Name: **Kimberly Hays**
 Address: **3333 Denali Street, Suite 125**
 City, State Zip: **Anchorage, Alaska 99503**
 Phone: **907-258-6284**
 E-mail: **kim@akaficio.org**
 Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
No Deputy Treasurers / Co-chairs / Nothing to Report		

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

CAMPAIGN PLANS

Election Type	Election	Municipality
Anchorage Municipal	2022 - Anchorage Municipal Election	Anchorage, City and Borough
Statewide Municipal	2022 - Fairbanks Northstar Borough	Fairbanks Northstar Borough
Statewide Municipal	2022 - Fairbanks, City of	Fairbanks, City of
Statewide Municipal	2022 - Juneau, City and Borough	Juneau, City and Borough
Matanuska-Susitna Borough	2022 - Matanuska-Susitna Borough	Matanuska-Susitna Borough
Statewide Municipal	2022 - North Pole, City of	North Pole, City of

Election Type	Election	Municipality
Statewide Municipal	2022 - Palmer, City of	Palmer, City of
State General	2022 - State General	
State Primary	2022 - State Primary	
Statewide Municipal	2022 - Wasilla, City of	Wasilla, City of

BANK ACCOUNT / CAMPAIGN DEPOSITORYName of Bank: **Northrim Bank**Bank Address: **PO Box 241489**City, State Zip: **Anchorage, Alaska 99524**

ALASKA'S BETTER ELECTIONS INITIATIVE

AN INITIATIVE TO:

PROHIBIT THE USE OF DARK MONEY BY INDEPENDENT EXPENDITURE GROUPS WORKING TO INFLUENCE CANDIDATE ELECTIONS IN ALASKA AND REQUIRE ADDITIONAL DISCLOSURES BY THESE GROUPS; ESTABLISH A NONPARTISAN AND OPEN TOP FOUR PRIMARY ELECTION SYSTEM; CHANGE APPOINTMENT PROCEDURES FOR CERTAIN ELECTION BOARDS AND WATCHERS AND THE ALASKA PUBLIC OFFICES COMMISSION; ESTABLISH A RANKED-CHOICE GENERAL ELECTION SYSTEM; SUPPORT AN AMENDMENT TO THE UNITED STATES CONSTITUTION TO ALLOW CITIZENS TO REGULATE MONEY IN ELECTIONS; REPEAL SPECIAL RUNOFF ELECTIONS; REQUIRE CERTAIN NOTICES IN ELECTION PAMPHLETS AND POLLING PLACES; AND AMEND THE DEFINITION OF POLITICAL PARTY.

A BILL BY INITIATIVE For an Act Entitled

"An Act prohibiting the use of dark money by independent expenditure groups working to influence candidate elections in Alaska and requiring additional disclosures by these groups; establishing a nonpartisan and open top four primary election system for election to state executive and state and national legislative offices; changing appointment procedures relating to precinct watchers and members of precinct election boards, election district absentee and questioned ballot counting boards, and the Alaska Public Offices Commission; establishing a ranked-choice general election system; supporting an amendment to the United States Constitution to allow citizens to regulate money in Alaska elections; repealing the special runoff election for the office of United States Senator and United States Representative; requiring certain written notices to appear in election pamphlets and polling places; and amending the definition of 'political party'."

BE IT ENACTED BY THE PEOPLE OF THE STATE OF ALASKA:

***Section 1.** The uncodified law of the State of Alaska is amended by adding a section to read: **FINDINGS AND INTENT.** The People of the State of Alaska find:

- (1) It is in the public interest of Alaska to improve the electoral process by increasing transparency, participation, access, and choice.**
- (2) The people of Alaska hold that political power and influence should not be allocated based on wealth. Instead, reasonable limits on the role of money in elections are necessary to secure the equal rights of Alaskans and to protect the integrity of Alaska elections. Several rulings of the United States Supreme Court have erroneously changed the meaning of the First Amendment to the United States Constitution so as to empower unlimited spending as "free speech" without proper consideration of factors such as the danger of corruption and the undermining of self-governance in Alaska by the undue influence of wealth, including from outside the state. These mistaken Supreme Court decisions have invalidated longstanding anti-corruption laws in Alaska. Alaska shall now affirm the rights and powers of its citizens by prohibiting the use of**

ALASKA'S BETTER ELECTIONS INITIATIVE

dark money in its candidate elections and by supporting an amendment to the United States Constitution allowing citizens to regulate the raising and spending of money in elections.

- (3) The people of Alaska have the right to know in a timely manner the source, quantity, timing, and nature of resources used to influence candidate elections in Alaska. This right requires the prompt, accessible, comprehensible, and public disclosure of the true and original sources of funds used to influence these elections, and is essential to the rights of free speech, assembly, and petition guaranteed by the First Amendment to the United States Constitution and shall be construed broadly.
- (4) It is in the public interest of Alaska to adopt a primary election system that is open and nonpartisan, which will generate more qualified and competitive candidates for elected office, boost voter turnout, better reflect the will of the electorate, reward cooperation, and reduce partisanship among elected officials.
- (5) It is in the public interest of Alaska to adopt a general election system that reflects the core democratic principle of majority rule. A ranked-choice voting system will help ensure that the values of elected officials more broadly reflect the values of the electorate, mitigate the likelihood that a candidate who is disapproved by a majority of voters will get elected, encourage candidates to appeal to a broader section of the electorate, allow Alaskans to vote for the candidates that most accurately reflect their values without risking the election of those candidates that least accurately reflect their values, encourage greater third-party and independent participation in elections, and provide a stronger mandate for winning candidates.

***Sec. 2.** AS 15.10.120(c) is amended to read:

(c) An election supervisor shall appoint one nominee of the political party or political group with the largest number of registered voters at the time of the preceding gubernatorial election [OF WHICH THE GOVERNOR IS A MEMBER] and one nominee of the political party or political group with [THAT RECEIVED] the second largest number of registered voters at the time of [VOTES STATEWIDE IN] the preceding gubernatorial election. **However, the election supervisor may appoint a qualified person registered as a member of a third political party or political group or as a nonpartisan or undeclared voter if** [IF] a party district committee or state party central committee of the party or group with the largest number of registered voters [OF WHICH THE GOVERNOR IS A MEMBER] or the party or group with [THAT RECEIVED] the second largest number of registered voters at the time of [VOTES STATEWIDE IN] the preceding gubernatorial election fails to present the names prescribed by (b) of this section by April 15 of a regular election year or at least 60 days before a special primary election [, THE ELECTION SUPERVISOR MAY APPOINT ANY QUALIFIED INDIVIDUAL REGISTERED TO VOTE].

***Sec. 3.** AS 15.10.170 is amended to read:

Sec. 15.10.170. Appointment and privileges of watchers. (a) The precinct party committee, where an organized precinct committee exists, or the party district committee where no organized precinct committee exists, or the state party chairperson where neither a precinct nor a party district committee exists, may appoint one or more persons as watchers in each precinct and counting center for any election. Each candidate [NOT REPRESENTING A POLITICAL PARTY] may appoint one or more watchers for each precinct or counting center in the

August 22, 2022

Heather Hebdon, Executive Director
Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Room #128
Anchorage, Alaska 99508

Re: Ballot Measure 2's "Dark Money" prohibition cannot be applied to campaign funds raised and spent in federal elections or the elections of another state

Dear Ms. Hebdon:

My name is Scott Kendall, and I am an attorney with over 16 years' experience practicing before the Alaska Public Offices Commission ("APOC" or "Commission"). In addition, I was the primary author of Ballot Measure 2 (also known as "19AKBE" or the "Better Elections Initiative"), an initiative that appeared on the 2020 general election ballot.

Ballot Measure 2 proposed three principal reforms to Alaska's elections: 1) the replacement of closed party primary elections with non-partisan "Top 4" primaries; 2) the replacement of "first past the post" general elections with Ranked-Choice Voting requiring general election winners to obtain majority support; and 3) a prohibition on "Dark Money" in candidate campaigns. The last point's intent was to end the practice of obscuring the true sources of contributions to Independent Expenditure groups by funneling them through intermediaries. In November 2020, the voters of Alaska passed Ballot Measure 2 and on approximately February 28th, 2021 the measure became effective. The only element relevant to this letter is Ballot Measure 2's prohibition on "Dark Money" in candidate elections.

I have learned of concerns that Ballot Measure 2's ban on "Dark Money" will be applied in an overly broad and potentially unconstitutional manner to sweep in *all* of an entities' donor information, regardless of whether those donors' contributions are actually used in an Alaska election. Such an interpretation would be illogical and contrary to the purposes of Ballot Measure 2, and actual application of such an interpretation could be vulnerable to constitutional challenge.

Ballot Measure 2 added a new subsection “r” to AS 15.13.040 which requires that—for contributions of \$2,000 or more to an entity making independent expenditures in candidate elections—the “true source” of such funds must be disclosed. Such contributions can no longer be diverted through intermediaries and have those intermediaries be reported as the actual donor, which in the past has been done in order to obscure the true source. *However*, Ballot Measure 2 *did not* impact or change the actual definition of “contribution” codified at AS 15.13.400(4).

As applied within APOC’s statutes, a “contribution” applies only to funds donated for specific purposes: 1) influencing the nomination or election of a candidate *in Alaska*; 2) influencing a ballot proposition or question *in Alaska*; or 3) supporting or opposing an initiative proposal application filed with the *Alaska* lieutenant governor under AS 15.45.020.¹ With respect to Ballot Measure 2’s Dark Money restriction, only this first purpose is relevant because AS 15.13.040(r) applies *only* to candidate spending, not ballot propositions or questions.² Accordingly, APOC has no statutory authority to regulate contributions *unless* they are \$2,000 or more *and* are made to influence a candidate election for office *in Alaska*.

In short, the Dark Money provision in Ballot Measure 2 *did not* give APOC the authority to regulate contributions made for purposes *other than* impacting candidate elections in Alaska. To the extent an entity receives funds for non-campaign purposes³ and keeps those funds segregated from campaign funds, the non-campaign funds do not fall within Ballot Measure 2 or under APOC’s authority at all. And, to the extent an entity receives funds that it expends on federal elections or elections outside the state of Alaska, APOC has no jurisdiction to regulate or force disclosure of those funds.⁴

Indeed, even if APOC had a statute authorizing it to force disclosure of contributions bound for elections in other states (and it doesn’t) such a statute would likely be held unconstitutional. The United State Supreme Court has made clear that donor disclosure requirements implicate and burden the First Amendment.⁵ Accordingly, such requirements must be substantially related to a compelling governmental interest.⁶ In the case of campaign-related contributions,

¹ See AS 15.13.400(4).

² See *id.* repeatedly stating that the Dark Money restriction applies *only* to contributions to entities making independent expenditures in “candidate elections”.

³ Many entities such as Planned Parenthood, the National Rifle Association and the like have significant non-campaign activities. They provide services and education to their members and the public that are unrelated to any candidate campaign. The APOC does not have the authority to disclose or inquire into donations made to them for these non-campaign purposes just because they have a separate account or affiliated entity that also engages in campaign activities. If those funds are segregated, APOC *only* has the authority to regulate and disclose those “contributions” made towards campaign activities.

⁴ See *e.g.* AS 15.13.010 “Applicability”. Nothing in this statute, or any of APOC’s governing statutes indicate that the Commission has the authority to regulate campaign spending in federal elections or elections for office in states other than Alaska. Indeed, as a matter of federal law (and under the basic tenets of federalism) APOC could not be given the authority to do so.

⁵ *Buckley v. Valeo*, 424 U.S. 1, 60-84 (1976).

⁶ *Id.*

the compelling interests are fighting corruption and providing information to voters regarding who funds candidates' campaigns. In the case of donations made to entities for elections occurring in other states, there is no interest at all, let alone a compelling interest. Alaska voters cannot cast a ballot in other states' elections and there exists no reason why they would need such information.

Ballot Measure 2 was never intended to sweep in all funds raised by an entity—whether spent in an Alaska election or not—because there is no policy purpose to do so. Voters in Alaska will not be better informed by knowing the identity of funders for spending that occurs in other states' elections. In fact, “dumping” a giant volume of irrelevant financial data onto voters could actually obscure the very information voters need—attribution of the funds that *will* be spent in Alaska. Such “over-reporting” could only serve to confuse voters and could be a tool to bury the real “true sources” of funding.

Additionally, a contrary position from APOC would seem to conflict with prior AOs in which the Commission allowed for the segregating of funds by purpose (campaign vs. non-campaign). A more logical extension would be to allow the same segregation here (Alaska bound vs. non-Alaska bound funds).

Finally, I have reviewed compilations and digests of the campaign finance laws in other jurisdictions. In that research I have been unable to find a single state in which an organization's spending in that state's elections requires the disclosure of campaign spending in all other states. Indeed, as discussed above, if the burden on the reporting entity is balanced against the voters' interest in such information, it could lead a court to find such a regime to be unconstitutional.

In summary, Ballot Measure 2's Dark Money restriction applies *only* to contributions of \$2,000 or more made for the purpose of impacting a candidate election through independent expenditures *in Alaska*. To the extent donations are made to entities for use in other states' elections, such donations are not intended to be swept up in the reports. Requiring such reporting could not only obscure useful information under the sheer volume of this financial “bycatch” but it also would likely violate the First Amendment. For this reason, if the Commission does decide to require disclosure of donations raising in connection with elections outside of Alaska, it must do so in a manner that minimizes the burden on the disclosing entity—and minimizes confusion for the public—by limiting the “bycatch”. For this reason, the position advanced by Unite America PAC's advisory opinion request (to disclose donors whose donations aggregate to at least the amount of the Alaska “contribution” being reported) is a much more rational and legally-sound approach than a requirement to disclose every donation to such an entity since its formation.

If you have any questions, or if I can assist the Commission or your staff in any way, please do not hesitate to contact me.

Best regards,



Scott Kendall, Attorney

Scott@cashiongilmore.com

(907) 222-7932 (Main)

(907) 339-4967 (Direct)

(907) 222-7938 (Fax)

From: [Jason Brandeis](#)
To: [Lucas, Tom R \(DOA\)](#)
Subject: Additional Information for Unite America PAC AO Request
Date: Monday, September 12, 2022 10:26:50 AM

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

Mr. Lucas:

We spoke last week and you requested additional information from Unite America PAC related to its revised advisory opinion request. Below are my transcriptions of your questions and Unite America PAC's responses to those questions. Please let me know if anything is inaccurate or if you need any additional information.

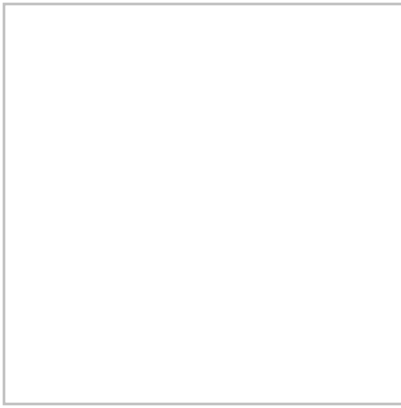
1. **As a hybrid PAC, Unite America PAC has a segregated bank account for the purposes of making independent expenditures, and a separate account that is permitted to make contributions to federal candidates. Which of Unite America PAC's accounts did the contribution to Putting Alaskans First come from?**

In the case of the contribution to Putting Alaskans First, the funds came from, and would only come from, Unite America PAC's independent expenditure account.

2. **The "Financial Summary" available on the FEC website for each reporting period shows "Total Contributions" broken down as follows: "Itemized individual contributions" (which links to the individual contributors) and "Unitemized individual contributions" (which has no information about individual contributors). You asked Unite America PAC to provide additional information about why the sources of the "Unitemized individual contributions" are not available on the FEC reports. For example, do the unitemized contributions come from sources that are in amounts below the reporting threshold, and that is why there are no individual sources listed?**

Yes, unitemized contributions are from sources that are in amounts below the reporting threshold. Unitemized individual contributions are contributions received from individuals whose aggregate contributions are, at the close of the applicable reporting period, \$200 or less in the then-current calendar year. By federal law, these contributions are not itemized.

Thank you,
Jason Brandeis



Jason Brandeis

Senior Counsel

Birch Horton Bittner & Cherot

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Kevin Meyer
Lieutenant Governor
State Capitol
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**OFFICE OF THE LIEUTENANT GOVERNOR
ALASKA**

MEMORANDUM

TO: Heather Hebdon
Alaska Public Offices Commission

FROM: April Simpson, Office of the Lieutenant Governor 
465.4081

DATE: August 26, 2022

RE: Filed Permanent Regulations: Alaska Public Offices Commission

Alaska Public Offices Commission regulations re: Revisions Required by Ballot Initiative
2 (2 AAC 50)

Attorney General File:	2022200033
Regulation Filed:	8/26/2022
Effective Date:	9/25/2022
Print:	243, October 2022

cc with enclosures: Colleen Bailey, Department of Law
Judy Herndon, LexisNexis

ORDER CERTIFYING THE CHANGES TO
REGULATIONS OF THE ALASKA PUBLIC OFFICES COMMISSION

The attached eleven pages of regulations, dealing with contributions, independent expenditures, political communications, reporting requirements, and penalty mitigation to carry out statutory revisions after the passage of 2020 Ballot Measure 2, are certified to be a correct copy of the regulation changes that the Alaska Public Offices Commission adopted at its June 9, 2022, meeting, under the authority of AS 15.13.030, 15.13.040, 15.13.052, 15.13.090, 15.13.110, and 15.13.400, and after compliance with the Administrative Procedure Act (AS 44.62), specifically including notice under AS 44.62.190 and 44.62.200 and opportunity for public comment under AS 44.62.210.

This action is not expected to require an increased appropriation.

Although no public comments were received, the Alaska Public Offices Commission paid special attention to the cost to private persons of the regulatory action being taken.

The regulation changes described in this order take effect on the 30th day after they have been filed by the lieutenant governor, as provided in AS 44.62.180.

Date: August 23, 2022

Heather Hebdon Digitally signed by Heather Hebdon
Date: 2022.08.23 16:20:06 -08'00'

Heather R. Hebdon, Executive Director

April Simpson for

FILING CERTIFICATION

I, Kevin Meyer, Lieutenant Governor for the State of Alaska, certify that on

August 26, 2022 at 3:17 p.m., I filed the attached regulations according to the provisions of AS 44.62.040 - 44.62.120.

April Simpson

for Kevin Meyer, Lieutenant Governor

Effective: September 25, 2022.

Register: 243, October 2022.

FOR DELEGATION OF THE LIEUTENANT GOVERNOR'S AUTHORITY

**I, KEVIN MEYER, LIEUTENANT GOVERNOR OF THE STATE OF ALASKA,
designate the following state employees to perform the Administrative Procedures Act
filing functions of the Office of the Lieutenant Governor:**

**Josh Applebee, Chief of Staff
Kady Levale, Notary Administrator
April Simpson, Regulations and Initiatives Specialist**

**IN TESTIMONY WHEREOF, I have
signed and affixed the Seal of the State of
Alaska, in Juneau, on December 11th,
2018.**



Kevin Meyer
.....

**KEVIN MEYER
LIEUTENANT GOVERNOR**

~~The introductory language of 2 AAC 50.258(a) is amended to read:~~

~~(a) A contribution must be made in the name of the true source, as defined in AS 15.13.400(19), of the money or thing of value. A person may not make a contribution using the name of another or use a third-party conduit to obscure the true source of any money or thing of value contributed to a campaign. A contribution in the name of another prohibited by this section includes any contribution.~~

Pub. Publisher: Existing introductory language of 2 AAC 50.258(a) is unchanged.)))

2 AAC 50.258(a) is amended by adding a new paragraph to read:

(7) made with funds derived from contributions, donations, gifts, or dues ~~except as permitted under AS 15.13.400(5) and (19)~~ whose source is not disclosed to the public at the time the contribution is made. (Eff. 1/1/2001, Register 156; am 1/7/2001, Register 157; am 2/20/2005, Register 173; am 12/22/2011, Register 200; am 9/25/2022, Register 243)

Pub. Publisher: To reflect new 2 AAC 50.258(a)(7), please relocate the "or" link from 2 AAC 50.258(a)(5) to 2 AAC 50.258(a)(6), formatted by a semicolon.)))

Authority: AS 15.13.030 AS 15.13.040 AS 15.13.070
AS 15.13.072 AS 15.13.074 AS 15.13.400

2 AAC 50.270 is amended by adding a new ~~paragraph~~ ^{subsections} to read:

(d) A person required to report under AS 15.13.110(k) shall disclose contributions received from a single source that exceed \$2,000, in the aggregate, and all subsequent contributions from that same source not later than (after) The 24 hours of receipt. This 24-hour report must include a certification that all true sources and intermediaries have been disclosed and the following information:

- (1) the date of each contribution;
- (2) the amount of each contribution;
- (3) the full name of the contributor;
- (4) a description of item or services contributed, if necessary; and
- (5) the full name of all intermediaries, within the meaning of "true source" under AS 15.13.400, if any.

~~2 AAC 50.270 is amended by adding a new paragraph to read:~~

(e) A person required to report under AS 15.13.110(k) is not required to report donations that are not intended to influence the outcome results of an election if the person

- (1) est. Establishes a political activities account as required by AS 15.13.052;
- (2) est. Makes no expenditures intended to influence the outcome results of an election regulated

under AS 15.13 from its general fund;

(3) est. Establishes a written policy that all contributions to the person's political activities account must be from a contributor who has expressly indicated a desire that the contribution be used for political activities or has been expressly solicited for the purpose of making a contribution to the person's political activities account ; and

(4) est. Establishes a written policy that the donor contributor is the only person to decide whether a donation contribution goes to the person's general fund or the person's political activities account.

~~2 AAC 50.270 is amended by adding a new paragraph to read:~~

W/CAF 7/10

before

(f) during the nine days ~~prior~~ to an election, a person required to file reports within 24 hours under AS 15.13.110(h) and (k), may satisfy both requirements by filing a report under (d) of this section.

~~2 AAC 50.270 is amended by adding a new paragraph to read:~~

(g) A contributor contributing more than \$2,000. in the aggregate, to a person described in (d) of this section shall file a statement of contributions in compliance with AS 15.13.040(r), on a form prescribed by the commission. The statement of contributions must be filed ~~no~~ not later than 24 hours after the contributor's total contributions to the person exceed \$2,000. A contributor making a contribution to a person described in (d) of this section shall make the contribution in the name of the true source of the money or thing of value ~~as required under AS 15.13.400(19) and 2~~

~~AAC 50.258.~~

(eff. 1/1/2001, Register 156; am 2/20/2005, Register 173; am 12/22/2011, Register 200; am 9/25 /2022, Register 243)

1/1/2001

Authority: AS 15.13.030 AS 15.13.040 AS 15.13.050
AS 15.13.052 AS 15.13.082 AS 15.13.090
AS 15.13.135

2 AAC 50.306 is repealed and readopted to read:

2 AAC 50.306. Identification of political communication. (a) Except for an individual exempt under AS 15.13.090(b), a person that pays for a political communication, including a person that makes an independent expenditure, shall ensure that

(1) in any communication that includes a print ~~or video~~ component, the information required under AS 15.13.090(a), (c), and (g) is visible, separate from the text of the communication, ~~and~~ of sufficient size ~~and duration~~ to be read by a viewer, ~~and remains onscreen for the duration of the communication;~~

(2) in any communication that includes a video component, the information required under AS 15.13.090(a), (c), and (g) is placed in the communication; ~~is~~ visible, separate from the text of the communication, ~~and~~ of sufficient size to be read by a viewer; and remains onscreen for the duration of the communication; and

(3) in any communication by radio, automated telephone, or other audio media, or that includes an audio component, the information required under AS 15.13.090(a) and (d) is spoken and audible at the same volume as the communication.

(b) In a written communication, standard English abbreviations may be used in the information required by AS 15.13.090(a) and (c).

(c) The information required under AS 15.13.090(a) and (c) need not be affixed to an object used for a political communication if the size or nature of the object makes it impractical to affix that information. Objects for which it is impractical to affix that information include pencils, pens, buttons, or other objects that are smaller than 3.5 inches by 5 inches in size but do not include



↑

media advertisements, electronic correspondence, or material on an Internet website. The cost of any object used for a political communication must be reported under AS 15.13 even if the information required under AS 15.13.090(a) and (c) is not affixed.

(d) A political communication by electronic media, including a candidate's or group's website, electronic mail, electronic social media, or other electronic methods capable of transmitting a political communication, must include or be electronically linked to information required by AS 15.13.090(a), (c), and (g). The cost of political communications by electronic media must be reported as a campaign expense under 2 AAC 50.321.

(2)

(e) In this section, "political communication"

(1) has the meaning given "communication" in AS 15.13.400;

(2) includes

at one more
0.5" tab

(A) all material related to campaign fundraisers, campaign letterhead, thank-you notes, and press releases;

at one more
0.5" tab

(B) media advertisements, electronic correspondence, or material on an

at one more
0.5" tab

Internet website, regardless of size or nature;

(C) except as provided under (3)(B) of this subsection, campaign signs

at one more
0.5" tab

larger than 3.5 inches by 5 inches;

(3) does not include

(A) envelopes paid for by the campaign that are used solely to convey the campaign's communications;

(B) signs created by an individual or nongroup entity for a total cost of less than \$500;

(C) T-shirts, ballcaps, and similar items of personal apparel of minimal value;

(D) berry buckets, coffee cups, water bottles, and similar objects having a principal purpose not related to campaigns or elections. (Eff. 1/1/2001, Register 156; am 2/20/2005, Register 173; am 12/22/2011, Register 200; am 9/25/2022,

Handwritten: 0.3 "L.A.R. 2/5" Register 243

Authority: AS 15.13.030 AS 15.13.090 AS 15.13.400

2 AAC 50.321 is amended by adding a new subsection to read:

(Eff. 7/2/78, Register 67; am 1/1/2001, Register 156; am 2/20/2005, Register 173; *(h)*) In the nine days preceding an election, contributions in excess of \$250 in the aggregate from a single source, shall be reported to the commission *not later than* within 24 hours *after* of receipt, as required under AS 15.13.110(b), and must disclose the contributor, aggregate amount, and date received. *(am 1/10/2015, Register 213;)* (Eff. 12/20/..., Register 164; am 12/22/2011, Register 200; am 9/25/2022, Register 243)

Authority: AS 15.13.030 AS 15.13.040 AS 15.13.110
AS 15.13.112 AS 15.13.400

2 AAC 50.324(a) is amended to read:

(a) This section applies to a candidate, a group, and a nongroup entity except

(1) a political party; and

(2) the candidates for governor and lieutenant governor running jointly under AS

15.25.030(a)(16) and (17) and appearing on the ballot as a single paired unit. [that a political party has nominated to run in the general election.] (Eff. 7/22/78, Register 67; am 5/14/80,

Register 74; am 6/29/84, Register 90; am 8/22/97, Register 143; am 1/1/2001, Register 156; am 2/20/2005, Register 173; am 12/22/2011, Register 200; am 9/25/2022, Register 243)

Authority: AS 15.13.030

AS 15.13.040

AS 15.13.070

AS 15.13.090

AS 15.13.112

2 AAC 50.352(b) is amended to read:

(b) A person contributing a total of \$500 or more, in the aggregate, to a group described in (a) of this section shall file a statement of contributions in compliance with AS 15.13.040 (k), on a form prescribed by the commission. The statement of contributions must be filed no later than 30 days after the person's total contributions to the group total [exceed] \$500 or more, in the aggregate. A person making a contribution to a group described in (a) of this section shall make the contribution in the name of the true source of the money or thing of value as required under 2

AAC 50.25. 3

(Eff. 1/7/2001, Register 157; am 12/22/2011, Register 200; am 9/25/2022, Register 243)

Authority: AS 15.13.010

AS 15.13.030

AS 15.13.040

AS 15.13.050

AS 15.13.065

AS 15.13.074

2 AAC 50.368(a) is amended to read:

~~2 AAC 50.368, joined campaigns.~~

(a) After filing a declaration of candidacy under AS 15.25.030, [the primary, nominated] candidates for governor and lieutenant governor [from the same political party] may contribute an unlimited amount to each other's campaigns notwithstanding [AS 15.13.070 and] 15.13.112(b)(7).

~~2 AAC 50.368(b) is amended to read:~~

(b) If the [NOMINATED] candidates for governor and lieutenant governor join assets after filing a declaration of candidacy under AS 15.25.030, [THE PRIMARY] they must register a new campaign and file campaign disclosure reports for the joined account. A campaign account created before filing a declaration of candidacy under AS 15.25.030 [THE PRIMARY] or a campaign depository designated under 2 AAC 50.298 before filing a declaration of candidacy under AS 15.25.030 [THE PRIMARY] may be used [after the primary].

~~2 AAC 50.368(c) is amended to read:~~

(c) Candidates [NOMINATED] for governor and lieutenant governor remain subject to the contribution limitations set out in AS 15.13.070, except as provided in (a) of this section. [An individual or nongroup entity may contribute up to \$1,000 to a joined campaign per year minus any previous contributions made that year to either of the nominated candidates. A group may contribute up to \$2,000 to a joined campaign per year minus any previous contributions made that year to either of the nominated candidates.]

(Eff. 1/1/2001, Register 156; am 2/20/2005, Register 173; am 12/22/2011, Register 200; am 9 / 25

2022, Register 243)

Authority: Art. III, sec. 8, Ak Const.





2 AAC 50.405 is amended by adding a new ^{paragraph} subsection to read:

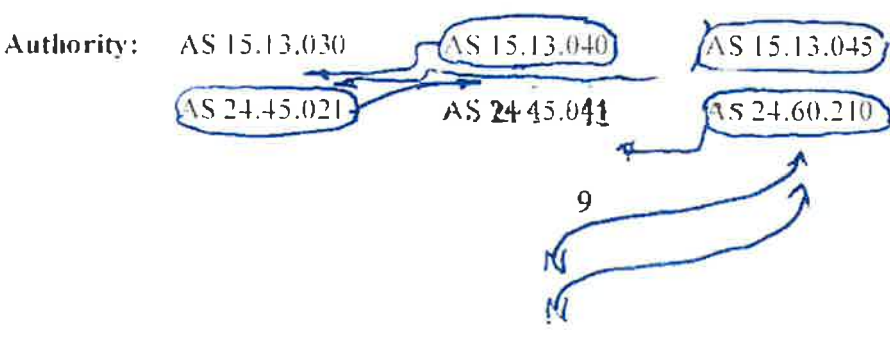
^{# 2, 2, 2} (10) "Year" when used in AS 15.13.070, AS 15.13.400(5), and AS 15.13.400(19) means ^{one} ^{or 5 Feb} calendar year. ^a

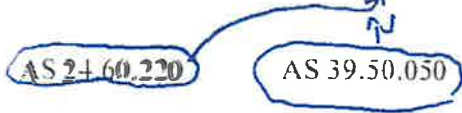
calendar year. (Eff. 7/22/78, Register 67; am 6/29/84, Register 90; am 1/4/86, Register 97; am 8/22/97, Register 143; am 1/1/2001, Register 156; am 12/22/2011, Register 200; am 9/25/2022, Register 243)



2 AAC 50.811(d) is amended to read:

(d) The time allowed for an act required or permitted under this chapter is computed by excluding the day on which the designated period begins, ^{no bold; keep brackets} and including the day on which the performance is due. ² Except for ^{that} disclosures which must be submitted within 24 hours under AS 15.13.110 ^{or} AS 15.13.040, ^[15] if the day on which the performance is due is a Saturday, Sunday, or state holiday, the due date is the next business day. ^{no bold or end} When a notice or other document requiring or permitting action under this chapter is served on a respondent or other person by mail, three days are added to the time allowed for the act. (Eff. 12/11/2011, Register 200; am 9/25/2022, Register 243)





2 AAC 50.855(b)(2)(A)(iv) is amended to read:

(iv) except for disclosures ~~which~~ ^a must be submitted within 24

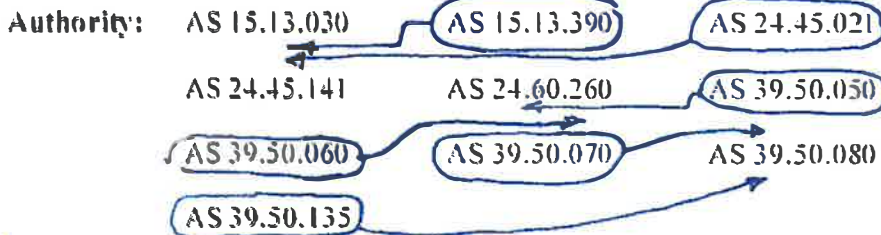
hours under AS 15.13.110 ~~and~~ ^{or} AS 15.13.040, for a statement of contributions, the

reporting error was the person's first error, and the contribution was reported by the
recipient of the contribution ^{or} within 30 days after the due date for the statement of
contributions:

(Handwritten notes: "not later than" with arrow to "within 30 days"; "or" with arrow to "or"; "a" with arrow to "which"; "must" with arrow to "must")

(EIF: 12/22/2011, Register 200; am 1/16/2015, Register 213; am 12/21/2016, Register 220; am

9/25/2022, Register 243)



2 AAC 50.865(b)(4) is amended to read:

(4) except for disclosures ~~which~~ ^a must be submitted within 24 hours under

AS 15.13.110 ~~and~~ ^{or} AS 15.13.040, a late or incomplete report did not cause significant harm to the public, and aggravating factors under (d) of this section do not exist; for purposes of this

paragraph, a late or incomplete report did not cause significant harm to the public if

(Handwritten note: "Publisher: Existing introductory language of 2 AAC 50.865(b)(4) is unchanged.")

Register 243, October 20 22 ADMINISTRATION

2 A.A.C 50.865(b)(4)(C) is amended to read:
(C) except for disclosures ^{that} must be submitted within 24 hours
^{or} under AS 15.13.110 ~~and~~ AS 15.13.040, the missing or incomplete information is readily
available to the public through another forum:

(Eff. 12/22/2011, Register 200; am 12/21/2016, Register 220; am 9/25/2022, Register 243)

Authority: AS 15.13.030 AS 15.13.390 AS 24.45.021
AS 24.45.141 AS 24.60.220 AS 24.60.240
AS 39.50.050 AS 39.50.135