

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

ALASKA PUBLIC INTEREST RESEARCH)
GROUP & 907 INITIATIVE,)

Complainants,)

v.)

BRETT HUBER, STRATEGIC SYMETRIES, LLC,)
ET AL.)

Respondents.)

APOC Case No. 22-01-CD

MOTION TO DISMISS

COMES NOW, Respondent Republican Governors Association, by and through its local counsel of record Holmes Weddle & Barcott, P.C., and hereby moves to dismiss the complaint as to the allegations against Republican Governors Association (hereinafter “RGA”).

The Complaint in this matter must be dismissed as against RGA because there is no allegation that RGA has violated any law whatsoever. Pursuant to 2 AAC 50.870, which governs complaints before this body, a complaint must provide both the statute or regulation alleged to be violated and a clear and concise description of facts that, if true, would demonstrate that respondent violated that statute or regulation. The Complaint in this matter fails to satisfy 2 AAC 50.870 as against RGA because it fails to set forth any facts that if proven true constitute a violation by RGA of Alaska campaign finance laws or regulations—or any other law or regulation for that matter.

The lack of merit to the Complaint highlights the fact that this action is motivated by nothing more than partisanship. Indeed, the inclusion of RGA specifically, despite any facts to

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support its inclusion whatsoever, is a clear attempt to score free political points in the press.¹ Complainants complain about “dark money,” but make absolutely no allegation of a violation of law. Instead, the Complaint acknowledges that RGA was aware of the law that existed as of the day that its contribution was made to A Stronger Alaska. So what? Whether RGA was aware of the law at the time a contribution was made to A Stronger Alaska does not demonstrate that RGA violated any law. The Complaint simply fails to state that RGA has done anything illegal, improper, or otherwise relevant to this matter. The fact is that RGA has followed the letter of Alaska law at all times relevant to this matter. RGA should not now be punished by having to participate in lengthy, intrusive, and expensive proceedings for acting lawfully.

In sum, because there are no facts alleged which could give rise to a violation of law and/or regulation, RGA must be summarily dismissed without delay. In the event that RGA is not dismissed, it will seek review of the same and all costs and fees associated with the same pursuant to law.

DATED this 23rd day of September, 2022.

HOLMES WEDDLE & BARCOTT, P.C.
Attorneys for Respondent Republican Governors
Association

By: /s/ Stacey C. Stone
Stacey C. Stone
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¹ This is further demonstrated by the repeated citations to expedited law before APOC without any attempt to expedite the complaint itself. This clearly demonstrates an attempt to garner negative media.

