

jnu.law.ecf@alaska.gov

**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

ALASKA PUBLIC INTEREST	)	
RESEARCH GROUP & 907	)	
INITIATIVE	)	
	)	
Complainant,	)	
	)	
v.	)	
	)	
REPUBLICAN GOVERNOR’S	)	
ASSOC., A STRONGER ALASKA,	)	
et al.	)	
	)	
Respondents.	)	Case No. 22-01-CD

**MOTION FOR ISSUANCE OF SUBPOENA DUCES TECUM**

The undersigned, on behalf of APOC Staff, hereby moves for the issuance of subpoenas duces tecum in this case, pursuant to AS 44.62.440(a). APOC Staff is conducting an investigation into whether the respondents in this matter have engaged in or are about to engage in an act or practice that constitutes or will constitute a violation of AS 15.13 or a regulation adopted under AS 15.13. Specifically, Staff has delivered to Erim Canligil, Treasurer for A Stronger Alaska, and Dave Rexrode, Chair of A Stronger Alaska, requests for information and documents pursuant to AS 15.13.045(c). In response to those requests, counsel for A Stronger Alaska and Republican Governor’s Association have refused to respond to Staff’s request unless a subpoena is issued pursuant to AS 15.13.045(d).

The subpoenas duces tecums directed at Messrs. Canligil and Rexrode are intended to aid Staff in its investigation regarding A Stronger Alaska’s plans, projects,

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FAX: (907) 465-2520

needs, campaign messaging, the creation of campaign messaging, and the placement of campaign messaging related to the upcoming gubernatorial election.

DATED: October 3, 2022.

TREG R. TAYLOR  
ATTORNEY GENERAL

By: /s/Morgan A. Griffin  
Morgan A. Griffin  
Assistant Attorney General  
Alaska Bar No. 1511113

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**CERTIFICATE OF SERVICE**

The foregoing was served on the following via:

USPS Email Fax

Tom Lucas  
tom.lucas@alaska.gov

Scott Kendall, Esq.  
scott@cashiongilmore.com

Brett Huber Sr.  
bretthuber62@gmail.com

John Sturgeon  
Kevin F. Fimon  
info@dunleavygovernor.com  
ffskevin@gmail.com

Michel J. Dunleavy, Candidate for Governor  
info@dunleavygovernor.com

Richard Moses, Esq.  
rmoses@hwb-law.com

/s/Rachel Iafolla

LOA III 10/3/2022, 2:55pm

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ASSOC., A STRONGER ALASKA,	)	
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	)	
Respondents.	)	Case No. 22-01-CD

**ORDER**

Having considered the motion to issue subpoenas duces tecum, and having reviewed those requests, the motion is GRANTED. Messrs. Canligil and Rexrode shall have **7 calendar days from the date of this ORDER** to respond to the subpoenas duces tecum as requested by APOC Staff. The Chair of the Commission will sign the subpoenas.

**BY ORDER OF THE COMMISSION**      Date: \_\_\_\_\_

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**SUBPOENA DUCES TECUM**

REPUBLICAN GOVERNOR'S )  
ASSOC., A STRONGER ALASKA, )  
et al. )

Respondents. )

Case No. 22-01-CD

**TO:** Erim Canligil  
Treasurer, A Stronger Alaska  
c/o Richard R. Moses  
701 W 8th Ave, Ste. 700  
Anchorage, AK 99501-3408

**INSTRUCTIONS AND DEFINITIONS**

1. This subpoena is directed to Mr. Erim Canligil and A Stronger Alaska.

It calls for the production of documents or things in your possession, custody, or control, and for documents or things that are in the possession, custody, or control of your agents, attorneys, representatives, or other persons who have documents or things deemed to be in your possession, custody, or control.

2. Each request calls for all information that is available to you by reasonable inquiry of your agents, attorneys, representatives, or others acting on your behalf.

3. It is not intended that these requests for production require the disclosure of any information that is protected against disclosure as “work product” of attorneys

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or information protected by “privilege,” although APOC Staff reserves the right to move for disclosure or production of such materials. Accordingly, whenever information or documents requested in these requests are claimed to be protected against disclosure as “work product” or “privileged” and are withheld on that ground, please provide a written response with the following information:

- a. A description of the information or document sufficiently particular to identify it and to enable you to identify, disclose, or produce it in response to an order;
- b. The nature of the protection claimed;
- c. A list of all persons with knowledge of the information, or who participated in the preparation of the document; and
- d. With regard to documents, a list of all persons to whom the document was circulated, or its contents communicated.

4. In these requests, the following definitions apply:

- a. “Document” means any written, recorded, or graphic matter, however produced or reproduced. If a document has been prepared in several copies, or if additional copies have been made, and the copies are not identical, or have undergone alteration, each non-identical copy is a separate “document.” The word “document” shall also include all drafts of any requested documents.

“Document” shall also include any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, copies and drafts, and including but not limited to:

papers, books, accounts, letters, photographs, objects, tangible things, correspondence, telegrams, memoranda, notes, desk calendars, diaries, notations, work papers, communications to, between and among directors, officers, agents, partners, secretaries, or any other employees, transcripts, minutes, reports, and recordings of telephone or other conversations, or interviews, or of committee meetings or of other meetings, affidavits, statements, summaries, opinions, reports, indices, studies, analyses, evaluations, contracts, licenses, agreements, balance sheets, income statements, questionnaires, answers to questionnaires, statistical records, appointment books, telephone logs, lists, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, information or documents stored in computer hard drives, discs or memory, microfilms, all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing, regardless of their author or origin, however denominated by it.

b. “You” or “your” refers to A Stronger Alaska and Mr. Erim Canligil.

Pursuant to AS 15.13.045(d), you are **HEREBY COMMANDED TO PRODUCE** the following documents for copying and inspection in person at the offices of the Alaska Public Offices Commission, 2221 E. Northern Lights #128, Anchorage, AK 99508 or by email to [tom.lucas@alaska.gov](mailto:tom.lucas@alaska.gov) **WITHIN 7 CALENDAR DAYS** of the date of the Commission’s Order granting the issuance of this subpoena.

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1. Please identify each individual and/or person that has knowledge of A Stronger Alaska’s campaign plans, projects or needs. When used herein the phrase, “plans, projects or needs” includes, but is not limited to, the formulation of campaign messaging, its conceptualization, drafting, recording (both video and audio), and placing. Please identify each such individual and/or person by name, address, phone number and email.
2. For everyone identified above, please state the role the individual and/or person plays or played in A Stronger Alaska’s campaign and the specific activities related to its campaign that individual or person engaged in or has knowledge of.
3. Please identify all communications you or any officer or agent of A Stronger Alaska’s campaign has had with the Republican Governors Association since February 24, 2021. This request includes, but is not limited to, all phone calls, emails, text messages, social media messaging, and in-person conversations. In this request, the term, “identify” means identify by name of person communicated with, date and time of communication and the subject of the communication. Please provide a copy of all recorded communications responsive to this request. This includes, but is not limited to all texts, emails, social messaging, and phone messages.
4. Please identify all communications you or any officer or agent of A Stronger Alaska has had with Strategic Synergies, LLC or any of its officers or agents, including Brett Huber, since February 25, 2021. This request includes, but is not limited to, all phone calls, emails, text messages, social media messaging, and in-person conversations. In this request, the term, “identify” means identify by name of person communicated with, date and time of communication and the subject of the communication. Please provide a copy of all recorded communications responsive to this request. This includes, but is not limited to all texts, emails, social messaging, and phone messages.

You are further notified that failure to comply with this subpoena may result in legal action against you. If you have questions about compliance with this subpoena or wish to arrange for an earlier time to produce, please contact Thomas Lucas at (907) 276-4176.

**DATE:** \_\_\_\_\_ **CHAIR:** \_\_\_\_\_



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Subpoena issued at the request of:  
**Morgan Griffin**  
Assistant Attorney General  
123 4<sup>th</sup> St., Suite 600  
Juneau, AK 99801

Before this subpoena may be issued, the above date and signature of Chair must be completed and proof must be presented to the clerk that the subpoena has been served upon opposing counsel.

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**SUBPOENA DUCES TECUM**

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Respondents. )

Case No. 22-01-CD

**TO:** Dave Rexrode  
Chair, A Stronger Alaska  
c/o Richard R. Moses  
701 W 8th Ave, Ste. 700  
Anchorage, AK 99501-3408

**INSTRUCTIONS AND DEFINITIONS**

1. This subpoena is directed to Mr. Dave Rexrode and A Stronger Alaska.

It calls for the production of documents or things in your possession, custody, or control, and for documents or things that are in the possession, custody, or control of your agents, attorneys, representatives, or other persons who have documents or things deemed to be in your possession, custody, or control.

2. Each request calls for all information that is available to you by reasonable inquiry of your agents, attorneys, representatives, or others acting on your behalf.

3. It is not intended that these requests for production require the disclosure of any information that is protected against disclosure as “work product” of attorneys

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papers, books, accounts, letters, photographs, objects, tangible things, correspondence, telegrams, memoranda, notes, desk calendars, diaries, notations, work papers, communications to, between and among directors, officers, agents, partners, secretaries, or any other employees, transcripts, minutes, reports, and recordings of telephone or other conversations, or interviews, or of committee meetings or of other meetings, affidavits, statements, summaries, opinions, reports, indices, studies, analyses, evaluations, contracts, licenses, agreements, balance sheets, income statements, questionnaires, answers to questionnaires, statistical records, appointment books, telephone logs, lists, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, information or documents stored in computer hard drives, discs or memory, microfilms, all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing, regardless of their author or origin, however denominated by it.

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**DATE:** \_\_\_\_\_ **CHAIR:** \_\_\_\_\_

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Subpoena issued at the request of:  
**Morgan Griffin**  
Assistant Attorney General  
123 4<sup>th</sup> St., Suite 600  
Juneau, AK 99801

Before this subpoena may be issued, the above date and signature of Chair must be completed and proof must be presented to the clerk that the subpoena has been served upon opposing counsel.