



Alaska Public Offices Commission

ARRIVED

OCT 17 2022



APOC - ANCHORAGE
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COMPLAINT

FILING A COMPLAINT <i>To be accepted, complaint must include</i>	APOC LAWS ALLEGEDLY VIOLATED <i>Specify section of law or regulation</i>		APOC case name/number/date
1. Complainant's name + contact info 2. Respondent's name + contact info 3. Laws, regulations allegedly violated 4. Description of allegations 5. Basis of knowledge of alleged facts 6. Documentation to support allegations 7. Notarized signature of the complainant 8. Proof that complaint <i>and</i> all supporting documents were served on respondent	Campaign Disclosure Law	<input checked="" type="checkbox"/> AS 15.13 <input type="checkbox"/> 2 AAC 50.250-405	
	Public Official Financial Disclosure	<input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799	
	Legislative Financial Disclosure	<input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799	
	Lobbying Regulation	<input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590	

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

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

If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info

Name/Title	Scott M. Kendall for Complainants	RGA: Stacey Stone, Holmes Weddle & Barcott, PC 701 W. 8 th Ave., Ste. 700, Anchorage, AK 99501, ststone@hwb-law.com , (907) 274-0666
Address	510 L Street, Ste. 601	
Phone/Fax	907-222-7932 / 907-222-7938	ASA: Richard Moses, Holmes Weddle & Barcott, PC 701 W. 8 th Ave., Ste. 700, Anchorage, AK 99501, rmoses@hwb-law.com , (907) 274-0666
E-mail	scott@cashiongilmore.com	

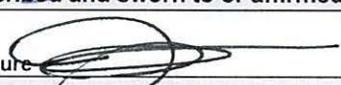
DESCRIPTION or SUMMARY of ALLEGED VIOLATION	Use extra pages if needed	<input checked="" type="checkbox"/> SUPPORTING DOCUMENTS – DESCRIBE:
Please see attached supporting information and documentation.		Please see attached complaint and associated exhibits and website links.

PROOF of SERVICE ATTACHED: Fax – receipt confirmation Certified mail – signed receipt Process server – return of service E-mail – delivery/read receipt Other:

COMPLAINANT'S SWORN STATEMENT: To the best of my knowledge and belief, these statements are true

Signature  Title Scott M. Kendall Date October 17, 2022

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

Signature  Title Paralegal

APOC COMPLAINTS, RESPONSES, INVESTIGATION REPORTS & COMMISSION ACTIONS ARE PUBLIC DOCUMENTS

APOC ANCHORAGE	APOC JUNEAU	APOC COMPLAINT PROCESS: 2 AAC 50.450 - 476
2221 E. NORTHERN LIGHTS #128 ANCHORAGE, AK 99508 907-276-4176 / FAX 907-276-7018 TOLL-FREE 800-478-4176 WEB: http://doa.alaska.gov/apoc/	240 MAIN STREET #500 P.O. BOX 110222 JUNEAU, AK 99811 465-4864 / FAX 465-4832 APOC FORMS: http://doa.alaska.gov/apoc/forms_all.html	FILING COMPLAINTS: 2 AAC 50.870 ANSWERING COMPLAINTS: 2 AAC 50.880 APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870 INVESTIGATIONS & HEARINGS: 2 AAC 50.875-897 RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c) APOC LAWS: http://doa.alaska.gov/apoc/apoclaws.html



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

To Whom It May Concern:

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



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

To Whom It May Concern:

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



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2022.10.17
AKPIR...ion.pdf

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EMERGENCY/REQUEST TO EXPEDITE

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

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

Respondents:¹

Republican Governors Association

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

A Stronger Alaska

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

I. INTRODUCTION

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

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

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

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

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

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

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

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

² See APOC Complaint No. 22-01-CD.

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

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

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

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

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

III. THE PARTIES

A. The Republican Governors Association:

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

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

B. A Stronger Alaska:

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

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

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

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

IV. EVIDENCE AND APPLICATION OF THE LAW

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

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

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

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

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

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

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

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

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

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

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

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

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

donation of \$225,000 from “Keep Dunleavy” on March 22, 2022.¹¹ “Keep Dunleavy” was a political group formed in 2020 to raise money in opposition of a potential recall election against Governor Dunleavy.¹² If the RGA had already donated its full \$3 million to ASA in support of Governor Dunleavy over a year prior, then why would a group — whose sole purpose is supporting Governor Dunleavy — be donating to the RGA? Logically, it would have made more sense for “Keep Dunleavy” to simply donate the funds to ASA directly.

2. Potential Violations

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

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

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

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

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

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

¹⁵ See AS 15.13.090(a).

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

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

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

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

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

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

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

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

2. Potential Violations.

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

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

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

¹⁸ See AS 15.13.050.

¹⁹ See AS 15.13.090(a).

²⁰ See AS 15.13.040; AS 15.13.110.

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

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

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

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

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

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

²¹ See AS 15.13.090(a).

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

Neither Jake Eaton nor the Political Company appear *anywhere* in *any* of ASA’s campaign disclosure reports. However, according to the RGA’s IRS filings the Political Company has been under contract to the RGA since January 18, 2022.²³ The description of these activities is “political support services” and their duration — monthly starting in January through the end of the reports to date — corroborates Mr. Huber’s testimony that Mr. Eaton of the Political Company is “running” ASA. The problem is, the RGA is paying Mr. Eaton, not ASA. Through June of this year,²⁴ Mr. Eaton has been paid \$62,792 to run ASA, and yet he has never appeared in ASA’s APOC reports.

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

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

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

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

²⁵ See all of ASA’s APOC filings.

²⁶ See *generally* Exhibit F; *see also id.* at 3.

2. Potential Violations.

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

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

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

²⁷ See AS 15.13.040; AS 15.13.110.

²⁸ See AS 15.13.040; AS 15.13.110.

V. CONCLUSION

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

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

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

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

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

CASHION GILMORE & LINDEMUTH
Attorneys for Complainants

DATE: October 17, 2022

By:



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

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

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

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

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

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

- **Mid Year Report 2021** (1/1/21 through 6/30/21)

https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=125966&formtype=e8872&execution=e8s3

- **Year End Report 2021** (7/1/21 through 12/31/21)

https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=129026&formtype=e8872&execution=e8s3

- **Year End Report - Amended** (7/1/21 through 12/31/2021)

https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=130683&formtype=e8872&execution=e1s3

- **First Quarter Report 2022** (1/1/2022 through 3/31/2022)

https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=130974&formtype=e8872&execution=e1s3

- **Second Quarter Report 2022** (4/1/22 through 6/30/22)

https://forms.irs.gov/app/pod/basicSearch/search?_eventId_displayForm=true&formId=133399&formtype=e8872&execution=e2s3

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

6 contributions totaling \$2,710,000

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

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

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

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

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

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

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

Recipient's name, mailing address and ZIP code STRATEGIC SYNERGIES, LLC 200 W. 34TH ST. STE. 586 ANCHORAGE, AK 99503	Name of recipient's employer N/A Recipients's occupation N/A	Amount of Expenditure \$ 11500 Date of expenditure 06/10/2022
Purpose of expenditure POLITICAL SUPPORT SERVICES		

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

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

Political Organization Report of Contributions and Expenditures

▶ See separate instructions.

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

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

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

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

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

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

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

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

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

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

8 Type of report (check only one box)

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

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

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

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

Erim Canligil

04/18/2022

Sign Here

Signature of authorized official

Date

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

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

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

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

**Political Organization
Report of Contributions and Expenditures**

OMB No. 1545-1696

▶ See separate instructions.

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

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

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

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

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

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

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

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

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

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

8 Type of report (check only one box)

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

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

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

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

Erim Canligil

07/15/2022

Sign Here ▶ Signature of authorized official ▶ Date

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

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

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

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

INDEPENDENT EXPENDITURES FORM 15-6

COMPLETED

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

FILER INFORMATION

Filer First Name: **Erim**

Filer Middle Name:

Filer Last Name: **Canligil**

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

Filer Occupation: **Treasurer**

Filer Employer: **A Stronger Alaska**

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

REPORT INFORMATION

Report Year: **2022**

Election Year: **2022**

Report Type: **Twenty-four Hour**

Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

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

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

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

City: **Washington**

State: **District of Columbia**

20006

Country: **United States**

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

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

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

ELECTION INFORMATION

Election: **State Primary**

OFFICERS

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

EXPENDITURES

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

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
No Contributions / Nothing to Report			

DEBTS

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

REPORT SUMMARY

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

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

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

Total: \$62,792

From RGA's Form 8872 Filings

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	N/A Recipients's occupation N/A	\$ 10000 Date of expenditure 01/18/2022

Purpose of expenditure
POLITICAL SUPPORT SERVICES

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	N/A Recipients's occupation N/A	\$ 10000 Date of expenditure 02/28/2022

Purpose of expenditure
POLITICAL SUPPORT SERVICES

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	N/A Recipients's occupation N/A	\$ 10000 Date of expenditure 03/07/2022

Purpose of expenditure
POLITICAL SUPPORT SERVICES

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	N/A Recipients's occupation N/A	\$ 10000 Date of expenditure 04/11/2022

Purpose of expenditure
POLITICAL SUPPORT SERVICES

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	N/A Recipients's occupation N/A	\$ 10000 Date of expenditure 05/31/2022

Purpose of expenditure
POLITICAL SUPPORT SERVICES

Recipient's name, mailing address and ZIP code	Name of recipient's employer	Amount of Expenditure
THE POLITICAL COMPANY 113 N. BROADWAY STE. 400 BILLINGS, MT 59101	N/A Recipients's occupation N/A	\$ 12792 Date of expenditure 08/06/2022

Purpose of expenditure
POLITICAL SUPPORT SERVICES

A STRONGER ALASKA

May 1, 2022

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

Dear Mr. Huber:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

A STRONGER ALASKA

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

NAME: Dave Rexrode

TITLE: Chair

DATE: 4/28/2022

Strategic Synergies, LLC
("INDEPENDENT CONTRACTOR")

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

NAME: Brett Huber Sr.

TITLE: Authorized Signatory

DATE: 4/29/2022