BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

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ALASKA PUBLIC INTEREST RESEARCH GROUP & 907 INITIATIVE,

Complainants,

v.

REPUBLICAN GOVERNORS ASSOCIATION, and A STRONGER ALASKA,

Respondents.

APOC Case No. 22-04-CD

NOTICE OF FILING

Respondents, by and through their counsel of record, Holmes Weddle & Barcott, P.C. hereby file the attached Affidavit of Erim Canligil in preparation for the hearing on the Motion for Expedited Consideration of the above-captioned matter. Respondents do not expect to present any witnesses this afternoon. Respondents reserve the right to supplement the record, as any relevant information is discovered and/or becomes available.

DATED this 20^{th} day of October, 2022.

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

By: /s/ Stacey C. Stone

Stacey C. Stone Alaska Bar No. 1005030

HOLMES WEDDLE & BARCOTT, P.C. Attorneys for Respondent A Stronger Alaska

By: <u>/s/ Richard R. Moses</u>

Richard R. Moses Alaska Bar No. 1311096

NOTICE OF FILING Alaska Public Interest Research Group, et al. v. Republican Governors Association, et al. Case No. 22-04-CD Page 1 of 2

CERTIFICATE OF SERVICE

The undersigned certifies that on this 20^{th} day of October, 2022, a true and correct copy of the foregoing document was served via Email to:

Scott Kendall, Esq. Samuel G. Gottstein, Esq. Cashion Gilmore & Lindemuth <u>scott@cashiongilmore.com</u> <u>sam@cashiongilmore.com</u>

John Ptacin ptacin@alaskalaw.pro

Tom Lucas tom.lucas@alaska.gov

Heather Hebdon heather.hebdon@alaska.gov

By: /s/ Brian J. Fontaine

Legal Assistant Holmes Weddle & Barcott, P.C.

NOTICE OF FILING Alaska Public Interest Research Group, et al. v. Republican Governors Association, et al.

AFFIDAVIT

STATE OF Washington, DC) SS. COUTY OF N/A)

I, Erim Canligil, provide this Affidavit and state the following:

- 1. I, Erim Canligil, have personal knowledge of the facts set forth herein. I am over the age of 18, and I am otherwise competent to provide this affidavit.
- 2. I am employed as the Chief Financial Officer for the Republican Governors Association.
- 3. I serve as the Treasurer for A Stronger Alaska.
- On or about February 25, 2021, Republican Governors Association transferred \$3,000,000 to the bank account established for its political activities group in Alaska, A Stronger Alaska. Exhibit A. This bank account was established with Chain Bridge Bank, N.A. as set forth in the disclosure report required by the Commission.
- 5. A Stronger Alaska has no employees, as all persons working with A Stronger Alaska serve on a contract or volunteer basis. Therefore, it does not have a separate employment identification number with the Internal Revenue Service. Instead, all Internal Revenue Service reporting is completed by the Republican Governors Association.
- 6. Since the deposit of funds on February 25, 2021, those funds have been segregated in the bank account held by A Stronger Alaska. Exhibit A and B.
- 7. All A Stronger Alaska expenditures are debited from the referenced bank account. Exhibit B.
- 8. There is one entry on or about June 13, 2022, that shows a credit from the Republican Governors Association. However, that was funds returned from a June 10, 2022 expenditures to Strategic Synergies, LLC that was returned due to incorrect banking information. It appears that the only reason Republican Governors Association is listed on the credit is due to the way the bank maintains its records. Exhibit B.

FURTHER AFFIANT SAYETH NAUGHT.

Dated this <u>20</u> day of October, 2022 at 1747 Penn Ave, Washington, DC 20006

Erim Canligil

SUBSCRIBED AND SWORN TO before me this 2014 day of October, 2022.

Suderink Powell The Notary Public in and for District of My Commission Expires: 02-14-2 lum bia







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Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006

Date 2/26/21 Account Enclosures Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

Easy Business Checking		Number of Enclosures	0
Account Number	XXXXX56344	Statement Dates 2/19/2	1 thru 2/28/21
Previous Balance	.00	Days in the Statement Pe	riod 10
1 Deposits	3,000,000.00	Average Ledger	1,200,000.00
Checks/Charges	.00	Average Collected	1,200,000.00
Service Charge	.00	-	
Interest Paid	.00		
Current Balance	3,000,000.00		

Activity in Date Order		
Date Description	Amount	Balance
2/25 Transfer CH x4179 to CH x6344 TMID:fbacd1f7-d49f-4 CONTRIBUTION	3,000,000.00	3,000,000.00



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Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006

Date 3/31/21 Account Enclosures Page 1 xxxxx56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

Number of Enclosures Easy Business Checking 0 Statement Dates 3/01/21 thru 3/31/21 XXXXX56344 Account Number 3,000,000.00 Days in the Statement Period 31 Previous Balance 3,000,000.00 Average Ledger .00 Deposits 3,000,000.00 .00 Average Collected Checks/Charges .00 Service Charge .00 Interest Paid Current Balance 3,000,000.00





Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006 Date 4/30/21 Account Enclosures Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

Deposits Checks/Charges Service Charge Interest Paid	XXXXX56344 3,000,000.00 .00 .00 .00 3,000,000.00	Number of Enclosures Statement Dates 4/01/21 Days in the Statement Peri Average Ledger Average Collected	0 thru 5/02/21 3,000,000.00 3,000,000.00
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Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006 Date 5/28/21 Account Enclosures Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

Previous Balance 3,000,000.00 Days Deposits 00 Aver Checks/Charges 00 Aver Service Charge 00 Interest Paid 00 Current Balance 3,000,000.00	age Ledger 3,000,000.00 age Collected 3,000,000.00
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Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006 Date 6/30/21 Account Enclosures Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

Account NumberXXXX56344StatementPrevious Balance3,000,000.00Days in thDeposits.00Average LeChecks/Charges.00Average CoService Charge.00Interest Paid.00Current Balance3,000,000.00	Dates 6/01/21 thru 6/30/21 he Statement Period 30 edger 3,000,000.00 ollected 3,000,000.00
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Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006 Date 7/30/21 Account Enclosures

Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

Easy Business Checking Account Number XXXX56344 Previous Balance 3,000,000.00 Deposits 00 Checks/Charges 00 Service Charge 00 Interest Paid 00 Current Balance 3,000,000.00	Number of Enclosures 0 Statement Dates 7/01/21 thru 8/01/21 Days in the Statement Period 32 Average Ledger 3,000,000.00 Average Collected 3,000,000.00
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Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006

Date 8/31/21 Account Enclosures Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

PRIVACY NOTICE-Federal law requires us to tell you how we collect, share, and protect your personal information. Our privacy policy has not changed and you may review our policy and practices with respect to your personal information at https://www.chainbridgebank.com/privacystatement or we will mail you a free copy upon your request if you call us at 703-748-2005.

Easy Business Checking Account Number Previous Balance Deposits Checks/Charges Service Charge Interest Paid Current Balance

xxxxx56344 3,000,000.00 .00 .00 .00 3,000,000.00

Chain Bridge Bank



Chain Bridge Bank N A Home Page

Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006

Date 9/30/21 Account Enclosures

Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

carrent barando o, co, co	Easy Business Checking Account Number Previous Balance Deposits Checks/Charges Service Charge Interest Paid Current Balance	XXXXX56344 3,000,000.00 .00 .00 .00 3,000,000.00	Number of Enclosures Statement Dates 9/01 Days in the Statement Average Ledger Average Collected	0 /21 thru 9/30/21 Period 30 3,000,000.00 3,000,000.00
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Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006

Date 10/29/21 Account Enclosures Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

Easy Business Checking Account Number Previous Balance Deposits Checks/Charges Service Charge Interest Paid Current Balance	xxxxx56344 3,000,000.00 .00 .00 .00 3,000,000.00	Number of Enclosures Statement Dates 10/01/21 Days in the Statement Per Average Ledger Average Collected	. thru 10/31/21 iod 31 3,000,000.00 3,000,000.00
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Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006

Date 11/30/21 Account Enclosures Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

Previous Balance 3,00 Deposits Checks/Charges Service Charge Interest Paid	Number of Enclosures Statement Dates 11/ 0,000.00 Days in the Statemer .00 Average Ledger .00 Average Collected .00 .00 .00	01/21 thru 11/30/21
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Chain Bridge Bank

Chain Bridge Bank N A Home Page

Republican Governors Association A Stronger Alaska 1747 Pennsylvania Ave Suite 250 Washington DC 20006

Date 12/31/21 Account Enclosures Page 1 XXXXX56344

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CHECKING ACCOUNT

Account Title: Republican Governors Association A Stronger Alaska

Easy Business Checking Account Number Previous Balance Deposits Checks/Charges Service Charge Interest Paid Current Balance	xxxxx56344 3,000,000.00 .00 .00 .00 3,000,000.00	Number of Enclosures Statement Dates 12/01, Days in the Statement F Average Ledger Average Collected	0 21 thru 12/31/21 Period 31 3,000,000.00 3,000,000.00
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Chain Bridge Bank, N.A.

Account Number:	REDACTED 6344	Date Range:	Available Balance:	\$2,501,204.34
Account Name:	A STRONGER ALASKA	01/01/2022 to 10/19/2022	Collected Balance:	\$2,501,204.34
Account Type:	Checking		Current Balance:	\$2,501,204.34

Date	Check / Ref #	Transaction Type	Description	Debit	Credit	Balance
10/14/2022		Trans to DDA Credit Relation	Trans to DDA Credit Relation Bill Paid-DANIELLE MCCLENNAN C, onf #97	\$500.00		\$2,501,204.34
10/14/2022		Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, CREATIVE DIRECT, REDACTED REDACTED PO BOX 6654, RICHMOND VA 23230, TRUIST BANK, CHARLOTTE, NC, INV. 14965, INV. 14935, 20221014MMQFMPCZ000142, 20221014E3QP021C012646, 10141658FT03	\$183,018.00		\$2,501,704.34
10/14/2022		Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, CREATIVE DIRECT, REDACTED REDACTED , PO BOX6654, RICHMOND VA 23230, TRUIST BANK, CHARLOTTE, NC, INV. 14892; 14921; 14922; 1493, 20221014MMQFMPCZ000061, 20221014E3QP021C008271, 10141332FT03	\$131,916.00		\$2,684,722.34
10/14/2022		Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00		\$2,816,638.34
10/14/2022		Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00		\$2,816,648.34
10/13/2022		Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, REPUBLICAN GOVERNORS ASSOCIATI, REDACTED , 1747 PENNSYLVANIA AVE. NW, STE, STE. 250, WASHINGTON DC 20006, CHAIN BRIDGE BANK,, MCLEAN, VA, PAYMENT FOR STAFF SVCS, SUB-VE, GRASSROOTS TARGETING, 20221013MMQFMPCZ000101, 20221013MMQFMPCZ000090, 10131704FT03	\$78,424.66		\$2,816,658.34

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10/13/2022	Wire Transfer Debi	Wire Transfer Debit Wire Transfer Debit, THE POLITICAL COMPANY, REDACTED , PO BOX 81274, BILLINGS MT 59108, YELLOWSTONE BANK, LAUREL, MT, INV. 1781, 20221013MMQFMPCZ000102, 20221013QMGFNP75001933, 10131705FT03	\$650.00	\$2,895,083.00
10/13/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00	\$2,895,733.00
10/13/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$2.50	\$2,895,743.00
10/12/2022	Wire Transfer Debi	Wire Transfer Debit Wire Transfer Debit, STRATEGIC SYNERGIES LLC, REDACTED REDACTED , 200 E. 34TH AVE., #586, ANCHORAGE AK 99503, ALASKA USA FEDERAL, ANCHORAGE, AK, 20221012MMQFMPCZ000092, 20221012MMQFMP90000107, 10121545FT03	\$23,000.00	\$2,895,745.50
10/12/2022	Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, FIRST CLEARING, LLC, REDACTED , 1 NORTH JEFFERSON, ST. LOUIS MO 63103, WELLS FARGO BANK,, SAN FRANCISCO, CA, FFC MCCARTHY HENNINGS WHALEN, ACCT: 2318-9872, 20221012MMQFMPCZ000093, 20221012I1B7032R019897, 10121546FT03	\$500.00	\$2,918,745.50
10/12/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00	\$2,919,245.50
10/12/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00	\$2,919,255.50
9/1/2022	Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, STRATEGIC SYNERGIES LLC, REDACTED REDACTED , 200 E. 34TH AVE., #586, ANCHORAGE AK 99503, ALASKA USA FEDERAL, ANCHORAGE, AK, 20220901MMQFMPCZ000110, 20220901MMQFMP90000182, 09011710FT03	\$11,500.00	\$2,919,265.50
9/1/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00	\$2,930,765.50
8/3/2022	80016 DDA Inclearing Check	DDA Inclearing Check	\$1,404.50	\$2,930,775.50

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8/1/2022	Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, STRATEGIC SYNERGIES LLC, REDACTED REDACTED , 200 E. 34TH AVE., #586, ANCHORAGE AK 99503, ALASKA USA FEDERAL, ANCHORAGE, AK, 20220801MMQFMPCZ000084, 20220801MMQFMP90000181, 08011548FT03	\$11,500.00		\$2,932,180.00
8/1/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00		\$2,943,680.00
7/28/2022	Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, PUBLIC OPINION STRATEGIES, LLC, REDACTED REDACTED , 214 N. FAYETTE ST., ALEXANDRIA VA 22314, NATIONAL CAPITAL B, WASHINGTON, DC, INV. 42346, 20220728MMQFMPCZ000115, 20220728MMQFMPWL000015, 07281655FT03	\$44,500.00		\$2,943,690.00
7/28/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00		\$2,988,190.00
6/13/2022	Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, STRATEGIC SYNERGIES LLC, REDACTED 200 E. 34th Ave., #586, ANCHORAGE AK 99503, ALASKA USA FEDERAL, ANCHORAGE, AK, 20220613MMQFMPCZ000048, 20220613MMQFMP90000121, 06131513FT03	\$11,500.00		\$2,988,200.00
6/13/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$20.00		\$2,999,700.00
6/13/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00		\$2,999,720.00
6/13/2022	Wire Transfer Credit	Wire Transfer Credit Wire Transfer Credit, REPUBLICAN GOVERNORS ASSOCIATI, 1747 PENNSYLVANIA AVE, SUITE 250, WASHINGTON DC 20006, 20220610MMQFMP9O000096, 20220610MMQFMPCZ000060, 06101716FT03		\$11,500.00	\$2,999,730.00

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6/10/2022	Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, STRATEGIC SYNERGIES LLC, REDACTED REDACTED , 200 W. 34TH ST., STE. 586, ANCHORAGE AK 99503, ALASKA USA FEDERAL, ANCHORAGE, AK, 20220610MMQFMPCZ000065, 20220610MMQFMP9O000134, 06101620FT03	\$11,500.00		\$2,988,230.00
6/10/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00		\$2,999,730.00
3/11/2022	Wire Transfer Debit	Wire Transfer Debit Wire Transfer Debit, PINPOINT MEDIA, LLC, REDACTED REDACTED , 4501 FORD AVE., #1109, ALEXANDRIA VA 22302, BANK OF AMERICA, N, NEW YORK, NY, A STRONGER ALASKA MEDIA RESEAR, PLANNING, 20220311MMQFMPCZ000040, 20220311B6B7HU4R014589, 03111553FT01	\$250.00		\$2,999,740.00
3/11/2022	Wire Transfer Service Charge	Wire Transfer Service Charge	\$10.00		\$2,999,990.00
28 Transactions			\$510,295.66	\$11,500.00	