

**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

|                                   |   |                        |
|-----------------------------------|---|------------------------|
| 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<sup>th</sup> 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: /s/ Richard R. Moses  
Richard R. Moses  
Alaska Bar No. 1311096

**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 20<sup>th</sup> 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  
[scott@cashiongilmore.com](mailto:scott@cashiongilmore.com)  
[sam@cashiongilmore.com](mailto:sam@cashiongilmore.com)

John Ptacin  
[ptacin@alaskalaw.pro](mailto:ptacin@alaskalaw.pro)

Tom Lucas  
[tom.lucas@alaska.gov](mailto:tom.lucas@alaska.gov)

Heather Hebdon  
[heather.hebdon@alaska.gov](mailto:heather.hebdon@alaska.gov)

By: /s/ Brian J. Fontaine  
Legal Assistant  
Holmes Weddle & Barcott, P.C.



FURTHER AFFIANT SAYETH NAUGHT.

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

Erim Canligil  
Erim Canligil

SUBSCRIBED AND SWORN TO before me this 20th day of October, 2022.

Frederick Powell III  
Notary Public in and for District of Columbia  
My Commission Expires: 02-14-2023





**Chain Bridge Bank, N.A.**  
 1445-A Laughlin Avenue  
 McLean, Virginia 22101  
 (703) 748-2005



1362675

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

Date 2/26/21  
 Account  
 Enclosures

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 XXXXX56344

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**CHECKING ACCOUNT**

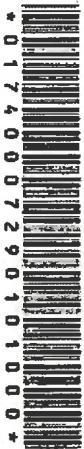
Account Title: Republican Governors Association  
 A Stronger Alaska

|                        |              |                              |                      |
|------------------------|--------------|------------------------------|----------------------|
| Easy Business Checking |              | Number of Enclosures         | 0                    |
| Account Number         | XXXXX56344   | Statement Dates              | 2/19/21 thru 2/28/21 |
| Previous Balance       | .00          | Days in the Statement Period | 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<br>CH x6344 TMID:fbacd1f7-d49f-4<br>CONTRIBUTION | 3,000,000.00 | 3,000,000.00 |

To report a lost or stolen ATM or Debit Card, call 1-866-546-8273.





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1368383

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Date 3/31/21  
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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              | 3/01/21 thru 3/31/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 31                   |
| Deposits               | .00          | Average Ledger               | 3,000,000.00         |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00         |
| Service Charge         | .00          |                              |                      |
| Interest Paid          | .00          |                              |                      |
| Current Balance        | 3,000,000.00 |                              |                      |

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# Chain Bridge Bank



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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              | 4/01/21 thru 5/02/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 32                   |
| Deposits               | .00          | Average Ledger               | 3,000,000.00         |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00         |
| Service Charge         | .00          |                              |                      |
| Interest Paid          | .00          |                              |                      |
| Current Balance        | 3,000,000.00 |                              |                      |

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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              | 5/03/21 thru 5/31/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 29                   |
| Deposits               | .00          | Average Ledger               | 3,000,000.00         |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00         |
| Service Charge         | .00          |                              |                      |
| Interest Paid          | .00          |                              |                      |
| Current Balance        | 3,000,000.00 |                              |                      |

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# Chain Bridge Bank



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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              | 6/01/21 thru 6/30/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 30                   |
| Deposits               | .00          | Average Ledger               | 3,000,000.00         |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00         |
| Service Charge         | .00          |                              |                      |
| Interest Paid          | .00          |                              |                      |
| Current Balance        | 3,000,000.00 |                              |                      |

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# Chain Bridge Bank



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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              | 7/01/21 thru 8/01/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 32                   |
| Deposits               | .00          | Average Ledger               | 3,000,000.00         |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00         |
| Service Charge         | .00          |                              |                      |
| Interest Paid          | .00          |                              |                      |
| Current Balance        | 3,000,000.00 |                              |                      |

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## CHECKING ACCOUNT

Account Title: Republican Governors Association  
A Stronger Alaska

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|                        |              |                              |                      |
|------------------------|--------------|------------------------------|----------------------|
| Easy Business Checking |              | Number of Enclosures         | 0                    |
| Account Number         | XXXXX56344   | Statement Dates              | 8/02/21 thru 8/31/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 30                   |
| Deposits               | .00          | Average Ledger               | 3,000,000.00         |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00         |
| Service Charge         | .00          |                              |                      |
| Interest Paid          | .00          |                              |                      |
| Current Balance        | 3,000,000.00 |                              |                      |

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# Chain Bridge Bank



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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              | 9/01/21 thru 9/30/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 30                   |
| Deposits               | .00          | Average Ledger               | 3,000,000.00         |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00         |
| Service Charge         | .00          |                              |                      |
| Interest Paid          | .00          |                              |                      |
| Current Balance        | 3,000,000.00 |                              |                      |

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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              | 10/01/21 thru 10/31/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 31                     |
| Deposits               | .00          | Average Ledger               | 3,000,000.00           |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00           |
| Service Charge         | .00          |                              |                        |
| Interest Paid          | .00          |                              |                        |
| Current Balance        | 3,000,000.00 |                              |                        |

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# Chain Bridge Bank



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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              | 11/01/21 thru 11/30/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 30                     |
| Deposits               | .00          | Average Ledger               | 3,000,000.00           |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00           |
| Service Charge         | .00          |                              |                        |
| Interest Paid          | .00          |                              |                        |
| Current Balance        | 3,000,000.00 |                              |                        |

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# Chain Bridge Bank



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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              | 12/01/21 thru 12/31/21 |
| Previous Balance       | 3,000,000.00 | Days in the Statement Period | 31                     |
| Deposits               | .00          | Average Ledger               | 3,000,000.00           |
| Checks/Charges         | .00          | Average Collected            | 3,000,000.00           |
| Service Charge         | .00          |                              |                        |
| Interest Paid          | .00          |                              |                        |
| Current Balance        | 3,000,000.00 |                              |                        |

To report a lost or stolen ATM or Debit Card, call 1-866-546-8273.

# Account Transactions

@10/19/2022 3:53:35 PM

Chain Bridge Bank, N.A.



|  |                          |  |
|--|--------------------------|--|
| <b>Account Number:</b> <span style="background-color: black; color: red;">REDACTED</span> 6344 | <b>Date Range:</b>       | <b>Available Balance:</b> \$2,501,204.34 |
| <b>Account Name:</b> A STRONGER ALASKA   | 01/01/2022 to 10/19/2022 | <b>Collected Balance:</b> \$2,501,204.34 |
| <b>Account Type:</b> Checking  |                          | <b>Current Balance:</b> \$2,501,204.34   |

| Date       | Check / Ref # | Transaction Type                | Description   | Debit        | Credit | Balance        |
|------------|---------------|---------------------------------|---|--------------|--------|----------------|
| 10/14/2022 |               | Trans to DDA<br>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, <span style="background-color: black; color: red;">REDACTED REDACTED</span> 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, <span style="background-color: black; color: red;">REDACTED REDACTED</span> , 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, <span style="background-color: black; color: red;">REDACTED</span> , 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 |



# Account Transactions

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Chain Bridge Bank, N.A.



|            |       |                              |  |             |  |                |
|------------|-------|------------------------------|--|-------------|--|----------------|
| 10/13/2022 |       | Wire Transfer Debit          | 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 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, 20221012MMQFMPCZ000092, 20221012MMQFMP9O000107, 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, 20220901MMQFMP9O000182, 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 |

# Account Transactions

@10/19/2022 3:53:35 PM

Chain Bridge Bank, N.A.



|           |  |                              |  |             |             |                |
|-----------|--|------------------------------|--|-------------|-------------|----------------|
| 8/1/2022  |  | 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, 20220801MMQFMPCZ000084, 20220801MMQFMP9O000181, 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, 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, 20220613MMQFMP9O000121, 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 |

# Account Transactions

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Chain Bridge Bank, N.A.



|                        |  |                              |  |                     |                    |                |
|------------------------|--|------------------------------|--|---------------------|--------------------|----------------|
| 6/10/2022              |  | Wire Transfer Debit          | Wire Transfer Debit Wire Transfer Debit,<br>STRATEGIC SYNERGIES LLC, REDACTED<br>REDACTED, 200 W. 34TH ST., STE. 586,<br>ANCHORAGE AK 99503, ALASKA USA<br>FEDERAL, ANCHORAGE, AK,<br>20220610MMQFMPCZ000065,<br>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,<br>PINPOINT MEDIA, LLC, REDACTED<br>REDACTED, 4501 FORD AVE., #1109,<br>ALEXANDRIA VA 22302, BANK OF AMERICA, N,<br>NEW YORK, NY, A STRONGER ALASKA MEDIA<br>RESEAR, PLANNING,<br>20220311MMQFMPCZ000040,<br>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 |
| <b>28 Transactions</b> |  |                              |  | <b>\$510,295.66</b> | <b>\$11,500.00</b> |                |