

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

1
2 ALASKANS FOR BETTER)
3 ELECTIONS, INC.,)
4 Complainant,) APOC Case No. 23-02-CD
5 v.)
6 PRESERVE DEMOCRACY, KELLY)
7 TSHIBAKA and ALASKANS FOR)
8 HONEST ELECTIONS,)
9 Respondents.)
_____)

**PRESERVE DEMOCRACY AND KELLY TSHIBAKA
RESPONSE TO COMPLAINT**

I. INTRODUCTION

13 Kelly Tshibaka and Preserve Democracy ask that the complaint be dismissed.
14
15 The complainant, Mr. Kendall, is a political operative who files similar complaints
16 every election cycle, often on thin or non-existent evidence. Such is the case here. The
17 things that Mr. Kendall complains about are the free exercise of speech, protected by
18 the First Amendment, and do not trigger any reporting or registration obligations.
19 APOC should not be used as a tool to silence debate on important political topics or to
20 punish those whose views happen to be opposite those of the complainant and his dark-
21 money clients.
22

II. BACKGROUND

24 After the results of the November 2022 election in Alaska and across the United
25 States, a group of concerned citizens joined together to form Preserve Democracy. The
26

1 original founders of the organization include Simcha Weed of Brownsville, TX; Stuart
2 Gates of Lakewood Ranch, FL; Heather Gottshall of Anchorage, AK; and Kelly
3 Tshibaka of Anchorage, AK. This group formed a 501(c)(4) entity, Preserve
4 Democracy (PD), for the purpose of preserving the fundamentals of our democracy—
5 “election systems should be simple to understand and accessible to all Americans.” Ms.
6 Weed, Mr. Gates, and Ms. Gottshall serve as the Board of Directors for the
7 organization; Ms. Tshibaka serves as the President and Chief Executive Officer (CEO),
8 a position for which she does not draw a salary or other compensation.
9

10
11 The founders of PD were concerned by the low voter turnout in the Southern
12 U.S. and Alaska compared to the rest of the United States. They were focused on
13 increasing low voter turnout and fixing some of the causes behind low turnout. They
14 were inspired by the Honest Elections Project, which talks on its website about
15 “preserving our democracy,” “election integrity,” and how “[i]t should be easy to vote
16 and hard to cheat.”
17

18
19 The directors and officers of PD are not all registered as members of the same
20 political party; their intent was to start an apolitical group with an overarching mission
21 of “protecting election integrity and increasing voter turnout.”

22 The projects the Board had the CEO focus on included:

- 23
24 1. A Get-Out-the-Vote pilot project in the 2023 Anchorage Municipal race
25 to determine if and how medium propensity voters of all political
26 persuasions could be motivated to vote.
2. A statewide poll to determine the reasons Alaskans did not vote in 2022.

- 1 3. Speaking at events to inform constituents how they could be involved in
2 election integrity, from contacting their legislators about HB 1 (“An Act
3 Relating to Elections”) or HB 4 (“An Act Relating to Elections”), to
4 encouraging state compliance with the National Voter Registration Act.
- 5 4. Fighting the spread of Ranked-Choice Voting (RCV) in states where it
6 was *not yet* implemented by providing information, data, or testimony to
7 legislatures or advocacy groups.
- 8 5. Assisting with voter registration and absentee ballot drives in advance of
9 the 2024 election.

10 Preserve Democracy initiated contact with APOC in mid-January and a couple times in
11 February to seek guidance on its Get-Out-the-Vote campaign, which was its primary
12 focus through the beginning of the year. PD has sought to comply with Alaska law in
13 all regards. PD also began seeking guidance from APOC in mid-January and retained
14 legal counsel from Birch Horton Bittner & Cherot in February, to help navigate the
15 rules of APOC. Birch Horton attorney Jason Brandeis conferred with APOC on behalf
16 of PD in several communications between March and May, 2023, as PD sought
17 guidance to confirm that its activities would not trigger reporting obligations.

18 In response to guidance Ms. Tshibaka received from APOC and follow-up
19 guidance from Birch Horton Bittner & Cherot, Tshibaka and PD took action to be extra
20 careful in their messaging and activities to ensure they were neither making
21 expenditures nor giving an appearance that they were making an expenditure to support
22 an initiative proposal application. Complainants, Alaskans for Better Elections (ABE),
23 are trying to conflate Ms. Tshibaka’s personal political views, protected under the First
24 Amendment and the Alaska State Constitution, with her activities as the CEO of PD.
25
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1 The two are not the same. APOC regulates expenditures, not speech, and PD has not
2 incurred any expenditures intended to influence a candidate or ballot initiative election.

3
4 **III. TESTIFYING ONCE IN PUBLIC LEGISLATIVE HEARING DOES NOT
5 REQUIRE REGISTRATION AS A LOBBYIST**

6 The complaint asserts that Kelly Tshibaka was required to register as a lobbyist
7 because she testified at a hearing before the Alaska legislature. As a matter of law, Ms.
8 Tshibaka is not a lobbyist. Alaska Statute 24.45.171(11) defines a “lobbyist” as “a
9 person who:

10 (A) is *employed and receives payments, or who contracts for economic*
11 *consideration*, including reimbursement for reasonable travel and living
12 expenses, *to communicate* directly or through the person’s agents *with*
13 *any public official for the purpose of influencing legislation* or
14 administrative action *for more than 10 hours in any 30-day period* in
15 one calendar year; or

16 (B) represents oneself as engaging in the **influencing of legislative or**
17 **administrative action** as a **business**, occupation, or profession.

18 Alaska Statute 24.45.171(9) defines “influencing legislative or administrative
19 action” as “to communicate directly for the purpose of introducing, promoting,
20 advocating, supporting, modifying, opposing, or delaying or seeking to do the same
21 with respect to any legislative or administrative action.”

22 Pursuant to AS 24.45.161(a)(1)(B), a person is exempt from registering as a
23 lobbyist if the person “limits lobbying activities to appearances before public sessions
24 of the legislature, or its committees or subcommittees, or to public hearings or other
25 public proceedings of state agencies.”

1 Because the only “lobbying” identified by the complaint is that Ms. Tshibaka on
2 one occasion testified at a public hearing of the legislature, the complaint does not
3 identify “more than 10 hours in any 30-day period” and does not identify any activity
4 other than conduct that is expressly exempt because it involves testifying before a
5 public hearing of the legislature. Thus, the complaint fails to identify any conduct that
6 would require registration as a lobbyist.
7

8 Furthermore, the complaint erroneously speculates that Ms. Tshibaka is paid as
9 the CEO of Preserve Democracy. This fact is untrue. Ms. Tshibaka’s role as CEO is
10 voluntary. [See Affidavit of Tshibaka] In her one appearance in front of the legislature,
11 Ms. Tshibaka appeared remotely and did not incur any travel or other expenses. PD
12 did not incur any expenses associated with Ms. Tshibaka’s single appearance in a public
13 hearing of the legislature.
14

15 Dismissal is generally appropriate when the allegations of a complaint fail to
16 state a valid claim. Because the complaint fails to state a claim regarding lobbying, that
17 allegation should be dismissed.
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19
20 **IV. PRESERVE DEMOCRACY WAS NOT FORMED TO SUPPORT OR**
21 **OPPOSE A BALLOT INITIATIVE**

22 A group is required to register with APOC when it is formed for the purpose of
23 supporting or opposing a ballot initiative. *See AS 15.13.050.* PD was not formed for
24 such purpose, and so had no obligation to register as a ballot group. Instead, PD was
25 formed with regard to more general concerns about the health of democracy, including
26

1 the need to improve voter turnout and stop the national spread of ranked-choice voting.
2 PD is not a sponsor of any ballot initiative and has not spent money in support of any
3 initiative.
4

5 **V. PRESERVE DEMOCRACY HAS NOT MADE ANY EXPENDITURES**
6 **THAT TRIGGER INDEPENDENT EXPENDITURE GROUP**
7 **REPORTING**

8 A group or individual is required to report independent expenditures in excess
9 of \$500 that are made in support of or against a ballot initiative. *See* AS 15.13.110. PD
10 has not incurred \$500 in such expenditures. First, Ms. Tshibaka is not paid in her role
11 as CEO. [*See* Affidavit of Tshibaka] When she attends events, provides testimony, or
12 provides an interview, she is not being paid. Second, PD has not incurred any expenses
13 in excess of \$500 related to events. PD has not rented space, paid for catering, or paid
14 for advertising for any events. On one occasion, a volunteer intended to donate some
15 supplies for an event but did not have the cash available, and so PD provided \$209.89
16 to the volunteer for supplies, and the volunteer later reimbursed PD for the same
17 amount. This \$209.89 is the only expenditure PD has made for events, and this amount
18 does not trigger a reporting obligation under AS 15.13.110.
19
20

21 APOC regulates political spending, not political speech. People are not required
22 to register with the government before expressing their opinions. Because PD has not
23 made independent expenditures in support of a ballot initiative, it is not an Independent
24 Expenditure group under AS 15.13.110 and had no reporting requirement.
25
26

1 Complainant asserts that the language on earlier versions of the PD website
2 could only be read as advocacy related to the ballot initiative. This is untrue. The
3 exhibit Complainant provides, Exhibit F, makes no mention of a ballot initiative. The
4 website did not ask for voters to vote a certain way. Rather, the website discusses the
5 spread of ranked-choice voting around the country and the risks that this phenomenon
6 poses to democracy.
7

8
9 During a ballot initiative about the Pebble mine, APOC issued advisory opinions
10 that distinguished educational communications from initiative-related advocacy.
11 APOC advised that an issue group was not required to report expenditures for issue
12 advertisements that do not mention ballot initiatives, do not advocate a position on the
13 initiatives, and are susceptible to interpretations other than as exhortations to vote for
14 the initiatives. *See* Advisory Opinion 08-02-CD. Under APOC's established advisory
15 opinion, PD did not come close to the line in its earliest website iterations, because it
16 made no mention of a ballot initiative, nor did it advocate a position on the initiatives,
17 and its message can reasonably be interpreted as educating readers about the national
18 spread of ranked-choice voting, not the circumstances in Alaska. PD's website
19 language that was critical of ranked-choice voting was intended to halt the spread of
20 the phenomenon in other states, and can reasonably be read as such. Nonetheless, as
21 PD interacted with APOC and as the initiative effort heated up, PD sought to avoid any
22 concerns in this regard, and so toned down its mention of ranked-choice voting on its
23
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1 website. PD's effort to be conservative and avoid any controversy with APOC should
2 not be construed as anything other than a good faith effort to stay clear of any violations.
3

4 Here is a timeline relevant to PD's website:

5 **TIMELINE**

- 6 • 12/6/22 PD Formed
- 7 • 12/19/22 PD Website Goes Live
- 8 • Mid-January 2023 PD Contacts APOC for Get-Out-the-Vote Guidance
- 9 • 1/22/23 AHE Initiative Application Accepted by Lt. Governor
- 10 • 2/14/23 Tshibaka E-Mailed APOC Paralegal Mr. Stormont for Get-
11 Out-the-Vote Guidance
- 12 • 2/16/23 APOC Mr. Stormont Responds; Provides Unsolicited
13 Advice, Does Not Advise PD Register with APOC or
14 Amend Its Website
- 15 • 2/16/23 AHE Launches Campaign to Repeal RCV (Tshibaka and
16 PD Did Not Attend)
- 17 • 2/18/23 Tshibaka Sends Website Revisions to Web Development
18 Team
- 19 • 2/22/23 PD Reaches Out to Retain Legal Counsel, Following Board
20 Meeting to Approve Retention of Counsel
- 21 • 2/23/23 PD Board of Directors Re-Prioritizes PD's Mission Focus
22 Areas
- 23 • 2/27/23 Website Revisions Completed by Website Development
24 Team

25 **VI. AN INDEPENDENT POLL IS NOT A CAMPAIGN EXPENDITURE AND
26 PRESERVE DEMOCRACY HAS NOT SHARED THE POLL WITH ANY
CAMPAIGN GROUPS**

The complaint alleges, without factual support, that PD conducted a poll and

1 shared it with Alaskans for Honest Elections (AHE). This is untrue. While PD did
2 conduct a poll to try to understand the reasons for low voter turnout in Alaska’s recent
3 election, it did so to inform its own Get-Out-the-Vote efforts. PD has not conveyed the
4 poll results to AHE, nor any of its principals or agents.
5

6 PD contracted with Cygnal to conduct a poll concerning the causes for low voter
7 turnout in the Alaska November 2022 General Election. Cygnal is an award-winning
8 international polling, public opinion, and predictive analytics firm that pioneered multi-
9 mode polling, text-to-web collection, and emotive analysis.
10

11 PD conducted a poll to assess the reasons for low voter turnout in 2022. The poll
12 questions focused exclusively on previous election experiences. The poll fell outside of
13 APOC regulation because: (1) the intent of the poll was for purposes other than to
14 influence the outcome of any candidate or ballot initiative election; (2) the substance of
15 the poll did not express support for or opposition to the 22AKHE ballot proposition or
16 RCV; and (3) the polling information was not used for or supplied to a campaign or
17 ballot initiative group and was not used to influence any election.
18
19

20 **VII. PRESERVE DEMOCRACY DID NOT TARGET PARTISAN VOTERS**
21 **IN THE ANCHORAGE MUNICIPAL ELECTION**

22 The complaint alleges, without factual support, that PD must have targeted
23 partisan voters in its Get-Out-the-Vote (GOTV) effort because two lawyers for
24 complainant did not receive PD’s mailers, and those lawyers reside in Assembly
25 Districts 3 and 4. PD targeted its GOTV effort at Anchorage Assembly Districts 5
26

1 and 6. Within those districts, PD did not distinguish partisan affiliation. The majority
2 of recipients of mailers in the two targeted districts were not registered as Republicans,
3 but instead as non-partisan, unregistered, or Democrats. PD targeted those two
4 Assembly districts because data showed them to have a high percentage of voters who
5 had not voted in the past election but had voted in prior elections. In other words, PD
6 targeted districts where it thought it would have the most success in getting out the
7 votes. PD’s mailers do not identify specific candidates or issues, and are plainly
8 permissible GOTV communications not regulated by APOC.
9
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11 As stated by Complainants, “nonpartisan GOTV efforts are not regulated by
12 APOC.” PD engaged in a *nonpartisan* GOTV campaign during the 2023 Anchorage
13 Municipal race.
14

- 15 1. PD focused its GOTV campaign on medium-propensity voters in
16 Districts 5 and 6, with the intent of evaluating whether voters who
17 otherwise were less inclined to vote in an election could be motivated to
18 vote.
- 19 2. PD worked with Cygnal to identify districts that had a large number of
20 “medium propensity voters” who did not vote in 2022, but could be
21 motivated to vote in the Municipal race.
- 22 3. PD asked Cygnal to include voters of all registered parties in the mailer
23 list group.
- 24 4. To the best of PD’s knowledge, Cygnal worked with a contractor to create
25 a voter file that included voters of all parties in Districts 5 and 6.
- 26 5. In total, 42% of voters’ parties were Republican, 41% of voters’ parties
were Democrat or Other, and 17% of voters’ parties were
Independent. In other words, 58% of voters identified were not registered
Republican.

- 1 6. The raw voter file was not shared with Ms. Tshibaka or PD before or
2 during the GOTV campaign.
- 3 7. Messaging for the GOTV campaign was neutral as to candidates, political
4 parties, and issues.
- 5 8. Ms. Tshibaka sought and received guidance from APOC staff between
6 mid-January 2023, and February 16, 2023, on the Get-Out-the-Vote
7 effort.
- 8 9. In her originating e-mail to APOC, Tshibaka indicated PD “intend[ed] to
9 run Get-Out-the-Vote ads targeting medium or low propensity voters in
10 up to 3 districts for the Anchorage Assembly races.” She also indicated
11 that PD emailed APOC in mid-January, left a message for APOC in early
12 February, and left a message for the Director of APOC. Tshibaka’s clear
13 intent was to comply with the letter and spirit of APOC’s guidance, which
14 is why she made those efforts to communicate with APOC.
- 15 10. The statements of support Tshibaka made for individual candidates on
16 her *personal* social media sites: a) did not represent PD, b) did not
17 constitute an expenditure, and c) were not made in coordination, direct or
18 indirect, with the candidate(s). Tshibaka took a photo of a PD mailer
19 received by a moderate voter registered at her house. Posting a photo of
20 the front of that mailer with support for candidates by name on her
21 personal social media account did not constitute an APOC regulated
22 expenditure. Any Alaskan who receives mailers has the right to post a
23 photo online with support for their candidate or ballot proposition of
24 choice. If this were to fall within APOC’s jurisdiction, APOC staff would
25 become social media police. Regulating Tshibaka’s ability to make
26 statements of support for candidates on her personal social media sites
27 would prohibitively infringe on her First Amendment free speech rights.
- 28 11. On the *Must Read Alaska* podcast, Tshibaka described PD’s GOTV
29 efforts in party-neutral terms, explaining that PD targeted only 2 districts:

30 The idea behind this was to do a pilot project, John, to
31 figure out can we actually mobilize voters to vote, because
32 we saw in 2022, we had such strong voter drop off. And so
33 we used some of the same methods and techniques that they
34 were using in Florida. We used one of the top analytics
35 firms...data analytics firms in the country to *target voters*
36 *who normally vote in every four year elections or the two*
37 *year elections* (emphasis added). *Maybe they don’t vote in*

1 *Muni races, but they could be prompted to vote* (emphasis
2 added). ...And we targeted just two districts, too, because
3 it's just an experiment (emphasis added).

- 4 12. On the *Must Read Alaska* podcast, Tshibaka made recommendations for
5 the 2024 election cycle in her personal capacity. She recommended
6 Republicans use data analytics, absentee ballots, and ballot chasing
7 strategies to help increase voter turnout in the 2024 election. Those
8 statements had no relevance to PD's GOTV efforts in 2023. Ms.
9 Tshibaka was not being paid by PD to participate in the podcast.

10 Complainants' only evidence that PD targeted Republican voters are two affidavits
11 stating that two attorneys, who are not registered Republican and who live in separate
12 districts not targeted by PD, did not receive PD GOTV mailers. These attorneys would
13 not have received the PD GOTV mailers because: a) they did not live in either District
14 5 or 6, where PD's GOTV campaign occurred, and b) even if they had lived in those
15 districts, they are super-voters, not medium propensity voters.

16 There is no merit to Complainants' allegation that PD or Ms. Tshibaka led a
17 partisan GOTV campaign.

18 **VIII. PRESERVE DEMOCRACY'S EVENTS ARE NOT REPORTABLE TO** 19 **APOC**

20 The United States and Alaska Constitution protect the right of people to gather
21 peaceably and discuss politics. This free speech activity is core to our democracy.
22 APOC does not regulate political speech, and citizens are not required to register with
23 the state before they gather or express an opinion. Because PD has not coordinated
24 with any ballot group and has not incurred expenditures of over \$500, it has no
25 reportable obligations with regard to any public events. PD did not purchase or transfer
26

1 money or anything of value, nor promise or agree to purchase or transfer money or
2 anything of value, in order to speak at or have these events.

3
4 Furthermore, the purpose of PD’s events was not to “influence the outcome of”
5 22AKHE. Rather, the purpose of these events was to support the passage of HB 1, to
6 increase voter participation, enhance election integrity, determine the cause for low
7 voter turnout in 2022, and fight the spread of RCV in states other than Alaska (to avoid
8 any misperception of attempting to influence the outcome of a ballot question, PD
9 refrained from speaking on this after receiving guidance from APOC and legal counsel
10 in late February). If 22AKHE came up, it did so after PD’s main remarks, during Q&A
11 time as a question from an attendee, which shows influencing the outcome of 22AKHE
12 was not the “purpose” of the event.
13
14

15 **Mat-Su Republican Women’s Event on January 14th**

- 16 1. On January 14, 2023, Ms. Tshibaka was invited to speak at a Mat-Su
17 Republican Women’s meeting in Wasilla, Alaska.
- 18 2. PD does not know whether this event was open to the public.
- 19 3. This event occurred before 22AKHE was approved by the Lt. Governor as a
20 pending ballot initiative.
- 21 4. PD does not have an invitation for this event.
- 22 5. Neither Ms. Tshibaka nor PD have a record of any expenditure, transfer of
23 money, or anything of value made in connection with hosting the event.
24 AS 15.13.400(7). It was PD’s intent to not make any expenditures for this
25 kind of event.
- 26 6. Principals or agents of PD did not specifically invite Phillip Izon, Art
Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
Choice Education Association, Wellspring Ministries or Wellspring

1 Fellowship to attend the event. Ms. Tshibaka does not know who the
2 principals or agents are of Alaskans for Honest Elections, Ranked Choice
3 Education Association, Wellspring Ministries or Wellspring Fellowship.
Nor does PD know everyone who may have attended the event.

4 7. PD understands that the Mat-Su Republican Women’s Club invited Phil Izon
5 to speak at the event, and he spoke before Ms. Tshibaka. Ms. Tshibaka does
6 not recall having any prior knowledge that Phil Izon would be in attendance
at the event.

7 8. AHE did not bring a signature book(s) to the event.

8 9. Ms. Tshibaka has no recollection of advocating for repealing RCV in Alaska,
9 nor supporting 22AKHE, nor advocating for the gathering of signatures at
10 the event. No principal or agent of PD requested attendees to sign 22AKHE
initiative application booklets.

11 10. No attendees brought a 22AKHE signature book to the event.

12 11. Neither Tshibaka nor PD filmed the events, broadcast them on social media,
13 disseminated them on the internet, posted them online, or intended to
14 disseminate her communications at the event through print, broadcast media,
15 or the internet. Neither PD nor Tshibaka ever had a Facebook Live video of
this event posted online.

16 12. Ms. Tshibaka’s statements at the event did not constitute a regulated “express
17 communication” that was an “exhortation to vote for or against a specific
candidate” as defined under AS 15.13.400(8).

18 13. At this event, Ms. Tshibaka’s remarks included the types of activities PD
19 would be engaging in, including a Get-Out-the-Vote campaign and a
20 statewide poll to determine the causes for low voter turnout.

21 **Kenai Republican Women’s Meeting on February 7th**

22 1. On February 7, 2023, Ms. Tshibaka spoke at a Kenai Republican Women’s
23 meeting in Kenai, Alaska.

24 2. This meeting was open to the public.

25 3. An invitation for this meeting is attached as Exhibit 1.

26 4. Neither Ms. Tshibaka nor PD have a record of any expenditure, transfer of
money, or anything of value made in connection with hosting the event.

1 AS 15.13.400(7). It was PD’s intent to not make any APOC-regulated
2 expenditures.

3 5. Principals or agents of PD did not specifically invite Phillip Izon, Art
4 Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
5 Choice Education Association, Wellspring Ministries or Wellspring
6 Fellowship to attend the event. Ms. Tshibaka does not know who the
principals or agents are of Alaskans for Honest Elections, Ranked Choice
Education Association, Wellspring Ministries or Wellspring Fellowship.

7 6. AHE did not bring a signature book(s) to the event, nor did members of the
8 organization attend the event.

9 7. Ms. Tshibaka has no recollection of advocating for repealing RCV in Alaska,
10 nor supporting 22AKHE, nor advocating for the gathering of signatures at
the event.

11 8. No principal or agent of PD requested attendees to sign 22AKHE initiative
12 application booklets.

13 9. No attendees brought a 22AKHE signature book to the event.

14 10. Neither Tshibaka nor PD filmed the events, broadcast them on social media,
15 disseminated them on the internet, posted them online, or intended to
16 disseminate her communications at the event through print, broadcast media,
or the internet. Neither PD nor Tshibaka ever had a Facebook Live video of
17 this event posted online.

18 11. Ms. Tshibaka’s statements at the event did not constitute a regulated “express
19 communication” that was an “exhortation to vote for or against a specific
candidate” as defined under AS 15.13.400(8).

20 12. At this event, Ms. Tshibaka’s remarks included the types of activities PD
21 would be engaging in, including a Get-Out-the-Vote campaign and a
statewide poll to determine the causes for low voter turnout.

22 **Bell’s Nursery Event on February 9th**

23 1. On February 9, 2023, Tshibaka spoke at a fundraiser for PD at Bell’s
24 Nursery, hosted by leaders in Anchorage.

25 2. This event was open to the public.

26 3. An invitation for this meeting is attached as Exhibit 2.

- 1 4. A volunteer for PD wished to pay for supplies for this event but did not have
2 funds available on the day, and so PD advanced \$209.89 for supplies to the
3 volunteer, who later reimbursed PD in the same amount. This is the only
4 time that PD expended any funds on an event, and after reimbursement the
5 net cost to PD was zero (\$0).
- 6 5. Except as explained above, Ms. Tshibaka nor PD have a record of any
7 expenditure, transfer of money, or anything of value made in connection with
8 hosting the event. AS 15.13.400(7). It was PD's intent to not make any
9 APOC-regulated expenditures.
- 10 6. Principals or agents of PD did not specifically invite Phillip Izon, Art
11 Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
12 Choice Education Association, Wellspring Ministries or Wellspring
13 Fellowship to attend the event. Ms. Tshibaka does not know who the
14 principals or agents are of Alaskans for Honest Elections, Ranked Choice
15 Education Association, Wellspring Ministries or Wellspring Fellowship.
- 16 7. Neither Phillip Izon, nor Art Mathias, nor any principal nor agent of Alaskans
17 for Honest Elections, Ranked Choice Education Association, Wellspring
18 Ministries nor Wellspring Fellowship spoke at the event.
- 19 8. AHE did not bring a signature book(s) to the event, nor did principals or
20 agents of the organization attend the event.
- 21 9. No attendees brought a 22AKHE signature book to the event.
- 22 10. When Ms. Tshibaka was asked if AHE and PD were "combining the efforts
23 to coordinate," she did not say PD and AHE were coordinating efforts
24 because PD and AHE were not and have never coordinated efforts.
- 25 11. Ms. Tshibaka did not and does not have any knowledge of the structure or
26 organization of AHE, including its principals or agents. When she said, "We
have many of the people who are the co-leads of Alaskans for Honest
Elections in the room right now, they are the co-hosts on this," Ms. Tshibaka
was referring to co-hosts for the PD event who had told Ms. Tshibaka that
they were volunteering for AHE. Ms. Tshibaka was incorrect in labeling
them "co-leads;" they were merely volunteers.
12. It is clear from the recording of the event that Ms. Tshibaka did not know
where AHE's event would be, what date it would be, or what time it would
be—she asked members in the audience who were supporting AHE's
initiative for that information. This is further evidence that PD was not

1 coordinating with AHE and PD had no intent to promote AHE’s petition
2 signature launch event at the February 9th PD fundraiser. In other words, the
3 purpose of the event was not to influence the outcome of 22AKHE.

4 13. Ms. Tshibaka’s intent in saying “we [PD and AHE] are running in parallel”
5 was to convey that PD is not working with, supporting, or contributing to
6 AHE. Ms. Tshibaka’s intent in saying, “what they [AHE] are
7 doing...Alaskans for Honest Elections have a ballot initiative to overturn
8 Ranked-Choice Voting. They’re collecting signatures,” was to distinguish
9 the activities of PD from AHE.

10 14. When Ms. Tshibaka said, “We wanted the petitions to be here tonight,” the
11 “we” referred to co-hosts who sponsored the event who intended to bring the
12 petition books to collect signatures afterwards.

13 15. Ms. Tshibaka said, “please join them [AHE] there [at their event]...that’s
14 absolutely critical.” “We’ve got to get a counter message out there so when
15 it’s on the ballot, we win. I think that’s super important.” “Please volunteer
16 to help get them signed.”

17 16. Ms. Tshibaka then turned her comments back to fundraising for PD by
18 talking about educating the public about how voters were affected in the
19 Alaska November 2022 election. At the time, she thought a voter education
20 effort might work “in tandem” with the efforts of AHE, but after receiving
21 guidance from APOC shortly after this event, Ms. Tshibaka refrained from
22 including in her education efforts any material that could be considered to
23 support or oppose 22AKHE.

24 17. No attendees brought a 22AKHE signature book to the event.

25 18. Neither Ms. Tshibaka nor PD filmed the events, broadcast them on social
26 media, disseminated them on the internet, posted them online, or intended to
disseminate her communications at the event through print, broadcast media,
or the internet. Neither PD nor Tshibaka ever had a Facebook Live video of
this event posted online.

19. At this event, Ms. Tshibaka’s remarks included the types of activities PD
would be engaging in, including a Get-Out-the-Vote campaign and a
statewide poll to determine the causes for low voter turnout.

20. Ms. Tshibaka’s statements at the event did not constitute a regulated “express
communication” that was an “exhortation to vote for or against a specific
candidate” as defined under AS 15.13.400(8).

- 1 21. Ms. Tshibaka has a First Amendment protected free speech right to endorse
2 and encourage gathering of signatures for 22AKHE, and such statements are
3 not regulated by APOC if Ms. Tshibaka and/or PD did not make an
4 expenditure in support of 22AKHE.

4 **February 13th Event Hosted by Edna DeVries at the Mat-Su School of**
5 **Government**

- 6 1. On February 13, 2023, Ms. Tshibaka was invited to speak at a “School of
7 Government,” hosted by Matanuska-Susitna Borough Mayor, Edna DeVries.
8 2. PD does not know whether this event was open to the public.
9 3. PD does not have an invitation for this event.
10 4. Neither Ms. Tshibaka nor PD have a record of any expenditure, transfer of
11 money, or anything of value made in connection with hosting the event.
12 AS 15.13.400(7). It was PD’s intent to not make any APOC-regulated
13 expenditures.
14 5. Principals or agents of PD did not specifically invite Phillip Izon, Art
15 Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
16 Choice Education Association, Wellspring Ministries or Wellspring
17 Fellowship to attend the event. Ms. Tshibaka does not know who the
18 principals or agents are of Alaskans for Honest Elections, Ranked Choice
19 Education Association, Wellspring Ministries or Wellspring Fellowship.
20 6. Neither Ms. Tshibaka nor PD were involved with planning or organizing the
21 event.
22 7. AHE did not bring a signature book(s) to the event, nor did members of the
23 AHE organization attend the event, as best as PD knows.
24 8. Ms. Tshibaka does not recall advocating for repealing RCV in Alaska, nor
25 did she support 22AKHE, nor did she advocate for the gathering of signatures
26 at the event. No principal or agent of PD requested attendees to sign 22AKHE
initiative application booklets.
9. No attendees brought a 22AKHE signature book to the event.
10. Neither Ms. Tshibaka nor PD filmed the events, broadcast them on social
media, disseminated them on the internet, posted them online, or intended to

1 disseminate her communications at the event through print, broadcast media,
2 or the internet.

- 3 11. At this event, Ms. Tshibaka’s remarks included the types of activities PD
4 would be engaging in, including a Get-Out-the-Vote campaign and a
5 statewide poll to determine the causes for low voter turnout.
- 6 12. Ms. Tshibaka’s statements at the event do not constitute a regulated “express
7 communication” that was an “exhortation to vote for or against a specific
8 candidate” as defined under AS 15.13.400(8).
- 9 13. Ms. Tshibaka has a First Amendment protected free speech right to endorse
10 and encourage gathering of signatures for 22AKHE, and such statements are
11 not regulated by APOC if Tshibaka and/or PD did not make an expenditure
12 in support of 22AKHE.

11 **Bell’s Nursery Event on February 22nd**

- 12 1. On February 22, 2023, Ms. Tshibaka spoke at a fundraiser for PD at Bell’s
13 Nursery, hosted by leaders in Anchorage.
- 14 2. This event was open to the public.
- 15 3. An invitation for this meeting is attached as Exhibit 3.
- 16 4. Neither Tshibaka nor PD have a record of any expenditure, transfer of
17 money, or anything of value made in connection with hosting the event.
18 AS 15.13.400(7). It was PD’s intent to not make any APOC-regulated
19 expenditures.
- 20 5. Principals or agents of PD did not specifically invite Phillip Izon, Art
21 Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
22 Choice Education Association, Wellspring Ministries or Wellspring
23 Fellowship to attend the event. Ms. Tshibaka does not know who the
24 principals or agents are of Alaskans for Honest Elections, Ranked Choice
25 Education Association, Wellspring Ministries or Wellspring Fellowship.
- 26 6. AHE did not bring a signature book(s) to the event, nor did members of the
organization attend the event.
7. To Ms. Tshibaka’s knowledge, the co-hosts who sponsored the event did not
intend to bring petition books to collect signatures afterwards.

- 1 8. Neither Tshibaka nor PD filmed the events, broadcast them on social media,
2 disseminated them on the internet, posted them online, or intended to
3 disseminate her communications at the event through print, broadcast media,
4 or the internet. Neither PD nor Tshibaka ever had a Facebook Live video of
5 this event posted online.
- 6 9. Ms. Tshibaka's prepared remarks did not advocate for repealing RCV in
7 Alaska, nor support 22AKHE, nor advocate for the gathering of signatures.
- 8 10. Sometime after Ms. Tshibaka began speaking, an attendee circulated a
9 22AKHE signature book around the room. Ms. Tshibaka has no recollection
10 of saying the petition was "important" nor encouraging attendees to sign it.
11 Ms. Tshibaka was particularly cautious about her comments at this event,
12 and ensuring they did not qualify as APOC-regulated statements, given that
13 she had just received guidance from APOC and retained Birch Horton Bittner
14 & Cherot as counsel for APOC compliance.
- 15 11. At this event, Ms. Tshibaka's remarks included the types of activities PD
16 would be engaging in, including a Get-Out-the-Vote campaign and a
17 statewide poll to determine the causes for low voter turnout.
- 18 12. Ms. Tshibaka's statements at the event did not constitute a regulated "express
19 communication" that was an "exhortation to vote for or against a specific
20 candidate" as defined under AS 15.13.400(8).
- 21 13. Ms. Tshibaka has a First Amendment protected free speech right to endorse
22 and encourage gathering of signatures for 22AKHE, and such statements are
23 not regulated by APOC if Tshibaka and/or PD did not make an expenditure
24 in support of 22AKHE.

19 **Tongass Conservatives of Southeast Alaska Event in Ketchikan on February 25th**

- 20 1. On February 25, 2023, Ms. Tshibaka was invited to speak at a Tongass
21 Republicans meeting in Ketchikan, Alaska.
- 22 2. PD does not know whether this event was open to the public.
- 23 3. PD does not have an invitation for this event.
- 24 4. Neither Ms. Tshibaka nor PD have a record of any expenditure, transfer of
25 money, or anything of value made in connection with this event.
26 AS 15.13.400(7). It was PD's intent to not make any APOC-regulated
expenditures.

- 1 5. Principals or agents of PD did not specifically invite Phillip Izon, Art
2 Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
3 Choice Education Association, Wellspring Ministries or Wellspring
4 Fellowship to attend the event. Ms. Tshibaka does not know who the
5 principals or agents are of Alaskans for Honest Elections, Ranked Choice
6 Education Association, Wellspring Ministries or Wellspring Fellowship.
- 7 6. AHE did not bring a signature book(s) to the event, nor did members of the
8 organization attend the event.
- 9 7. Ms. Tshibaka did not advocate for repealing RCV in Alaska, nor did she
10 support 22AKHE, nor did she advocate for the gathering of signatures at the
11 event. No principal or agent of PD requested attendees to sign 22AKHE
12 initiative application booklets.
- 13 8. Ms. Tshibaka recalls a 22AKHE signature book was at the event. Ms.
14 Tshibaka did not know before her trip to Ketchikan that there would be a
15 petition signature book at the event.
- 16 9. Neither Tshibaka nor PD filmed the events, broadcast them on social media,
17 disseminated them on the internet, posted them online, or intended to
18 disseminate her communications at the event through print, broadcast media,
19 or the internet. Neither PD nor Tshibaka ever had a Facebook Live video of
20 this event posted online.
- 21 10. Ms. Tshibaka’s statements at the event did not constitute a regulated “express
22 communication” that was an “exhortation to vote for or against a specific
23 candidate” as defined under AS 15.13.400(8).
- 24 11. At this event, Ms. Tshibaka’s remarks focused on encouragement, the re-
25 telling of a faith-based story, and included the types of activities PD would
26 be engaging in, focusing primarily on the Get-Out-the-Vote campaign. Ms.
Tshibaka does not recall whether she discussed the statewide poll to
determine the causes for low voter turnout.

Biblical Citizenship Class on March 1st

1. On March 1, 2023, Ms. Tshibaka was invited to speak about PD at a Biblical
Citizenship Class in Anchorage, Alaska.
2. PD does not know whether this event was open to the public.
3. An invitation for this meeting is attached as Exhibit 4.

- 1 4. Neither Ms. Tshibaka nor PD have a record of any expenditure, transfer of
2 money, or anything of value made in connection with hosting the event.
3 AS 15.13.400(7). It was PD's intent to not make any APOC-regulated
4 expenditures.
- 5 5. Principals or agents of PD did not specifically invite Phillip Izon, Art
6 Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
7 Choice Education Association, Wellspring Ministries or Wellspring
8 Fellowship to attend the event. Ms. Tshibaka does not know who the
9 principals or agents are of Alaskans for Honest Elections, Ranked Choice
10 Education Association, Wellspring Ministries or Wellspring Fellowship.
- 11 6. AHE did not bring a signature book(s) to the event, nor did members of the
12 organization attend the event.
- 13 7. Ms. Tshibaka did not advocate for repealing RCV in Alaska, nor did she
14 support 22AKHE, nor did she advocate for the gathering of signatures at the
15 event. No principal or agent of PD requested attendees to sign 22AKHE
16 initiative application booklets.
- 17 8. No principal or agent of PD was aware that individuals seeking signatures in
18 connection with the 22AKHE initiative application were present, if any.
- 19 9. To the best of Ms. Tshibaka's knowledge, no attendees brought a 22AKHE
20 signature book to the event.
- 21 10. Neither Tshibaka nor PD filmed the event, broadcast it on social media,
22 disseminated it on the internet, posted it online, or intended to disseminate
23 her communications at the event through print, broadcast media, or the
24 internet. Neither PD nor Tshibaka ever had a Facebook Live video of this
25 event posted online.
- 26 11. Ms. Tshibaka's statements at the event did not constitute a regulated "express
communication" that was an "exhortation to vote for or against a specific
candidate" as defined under AS 15.13.400(8).
12. At this event, Ms. Tshibaka's remarks included the types of activities PD
would be engaging in, focusing primarily on the Get-Out-the-Vote campaign.
Ms. Tshibaka does not recall whether she discussed the statewide poll to
determine the causes for low voter turnout.

1 **Republican Women of Fairbanks Meeting on May 24th**

- 2 1. On May 24, 2023, Ms. Tshibaka was invited to speak at a Republican Women
3 of Fairbanks meeting in Fairbanks, Alaska.
- 4 2. Neither Ms. Tshibaka nor PD have a record of any expenditure, transfer of
5 money, or anything of value made in connection with hosting this event.
6 AS 15.13.400(7). It was PD’s intent to not make any APOC-regulated
7 expenditures.
- 8 3. PD does not know whether this event was open to the public.
- 9 4. An invitation for this meeting is attached as Exhibit 5.
- 10 5. Neither Ms. Tshibaka nor PD were involved in organizing this event.
- 11 6. Principals or agents of PD did not specifically invite Phillip Izon, Art
12 Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
13 Choice Education Association, Wellspring Ministries or Wellspring
14 Fellowship to attend the event. Ms. Tshibaka does not know who the
15 principals or agents are of Alaskans for Honest Elections, Ranked Choice
16 Education Association, Wellspring Ministries or Wellspring Fellowship.
- 17 7. Neither Ms. Tshibaka nor PD filmed the event, broadcast it on social media,
18 disseminated it on the internet, posted it online, or intended to disseminate
19 her communications at the event through print, broadcast media, or the
20 internet. Neither PD nor Tshibaka ever had a Facebook Live video of this
21 event posted online.
- 22 8. Ms. Tshibaka did not advocate for repealing RCV in Alaska, nor did she
23 support 22AKHE, nor did she advocate for the gathering of signatures at the
24 event. No principal or agent of PD requested attendees to sign 22AKHE
25 initiative application booklets.
- 26 9. No principal or agent of PD was aware that individuals seeking signatures in
connection with the 22AKHE initiative application were present, if any.
10. To the best of Ms. Tshibaka’s knowledge, no attendees brought a 22AKHE
signature book to the event.
11. Ms. Tshibaka’s statements at the event do not constitute a regulated “express
communication” that was an “exhortation to vote for or against a specific
candidate” as defined under AS 15.13.400(8).

1 12. At this event, Ms. Tshibaka’s remarks included the types of activities PD
2 would be engaging in, including a statewide poll to determine the causes for
3 low voter turnout.

4 13. Regardless, Ms. Tshibaka has protected First Amendment free speech rights
5 that may not be abridged.

6 **District 33 and District 34 PD Fundraiser on May 25th**

7 1. Districts 33 and 34 hosted a fundraiser for PD on May 25, 2023 in Fairbanks,
8 Alaska.

9 2. This event was open to the public.

10 3. An invitation for this meeting is attached as Exhibit 6.

11 4. Neither Ms. Tshibaka nor PD have a record of any expenditure, transfer of
12 money, or anything of value made in connection with hosting this event.
13 AS 15.13.400(7). It was PD’s intent to not make any APOC-regulated
14 expenditures.

15 5. Neither Ms. Tshibaka nor PD were involved in organizing this event.

16 6. Principals or agents of PD did not specifically invite Phillip Izon, Art
17 Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
18 Choice Education Association, Wellspring Ministries or Wellspring
19 Fellowship to attend the event. Ms. Tshibaka does not know who the
20 principals or agents are of Alaskans for Honest Elections, Ranked Choice
21 Education Association, Wellspring Ministries or Wellspring Fellowship.

22 7. Neither Ms. Tshibaka nor PD filmed the event, broadcast it on social media,
23 disseminated it on the internet, posted it online, or intended to disseminate
24 her communications at the event through print, broadcast media, or the
25 internet. Neither PD nor Tshibaka ever had a Facebook Live video of this
26 event posted online.

8. Ms. Tshibaka did not advocate for repealing RCV in Alaska, nor did she
support 22AKHE, nor did she advocate for the gathering of signatures at the
event. No principal or agent of PD requested attendees to sign 22AKHE
initiative application booklets.

9. No principal or agent of PD was aware that individuals seeking signatures in
connection with the 22AKHE initiative application were present, if any.

1 10. To the best of Ms. Tshibaka’s knowledge, no attendees brought a 22AKHE
2 signature book to the event.

3 11. Ms. Tshibaka’s statements at the event do not constitute a regulated “express
4 communication” that was an “exhortation to vote for or against a specific
5 candidate” as defined under AS 15.13.400(8).

6 **Friday Republican Luncheon in Fairbanks on May 26th**

7 1. Ms. Tshibaka was invited to speak about Preserve Democracy at the Friday
8 Republican Luncheon on May 26, 2023.

9 2. Neither Ms. Tshibaka nor PD have a record of any expenditure, transfer of
10 money, or anything of value made in connection with hosting this event.
11 AS 15.13.400(7). It was PD’s intent to not make any APOC-regulated
12 expenditures.

13 3. This event was not open to the public.

14 4. PD does not have an invitation for this event.

15 5. Neither Ms. Tshibaka nor PD were involved in planning or organizing this
16 event.

17 6. Principals or agents of PD did not specifically invite Phillip Izon, Art
18 Mathias, or any principal or agent of Alaskans for Honest Elections, Ranked
19 Choice Education Association, Wellspring Ministries or Wellspring
20 Fellowship to attend the event. Ms. Tshibaka does not know who the
21 principals or agents are of Alaskans for Honest Elections, Ranked Choice
22 Education Association, Wellspring Ministries or Wellspring Fellowship.

23 7. Neither Ms. Tshibaka nor PD filmed the event, broadcast it on social media,
24 disseminated it on the internet, posted it online, or intended to disseminate
25 her communications at the event through print, broadcast media, or the
26 internet. Neither PD nor Tshibaka ever had a Facebook Live video of this
event posted online.

8. Ms. Tshibaka did not advocate for repealing RCV in Alaska, nor did she
support 22AKHE, nor did she advocate for the gathering of signatures at the
event. No principal or agent of PD requested attendees to sign 22AKHE
initiative application booklets.

9. No principal or agent of PD was aware that individuals seeking signatures in
connection with the 22AKHE initiative application were present, if any.

1 10. Ms. Tshibaka’s statements at the events do not constitute a regulated
2 “express communication” that was an “exhortation to vote for or against a
3 specific candidate” as defined under AS 15.13.400(8).

4 11. At this event, Ms. Tshibaka’s remarks included the types of activities PD
5 would be engaging in, including a statewide poll to determine the causes for
6 low voter turnout.

7 **IX. CONCLUSION**

8 At some point, APOC must recognize complainant as the “boy who cried wolf.”
9 Each election cycle, Mr. Kendall manufactures yet another dramatic, hyperbolic set of
10 accusations that are intended to generate headlines and media attention around his
11 candidates and ballot initiatives while tying up political opponents in needless agency
12 proceedings. This is an obvious abuse of the process envisioned under Alaska law and
13 is a waste of this agency’s limited time and resources. The complaint is frivolous and
14 should be dismissed.
15

16 DATED at Anchorage, Alaska, this 7th day of August, 2023.

17 SCHWABE, WILLIAMSON & WYATT, P.C.
18 Attorneys for Respondents Preserve Democracy and
19 Kelly Tshibaka

20 By: 
21 Matthew Singer

22 Alaska Bar No. 9911072

23 msinger@schwabe.com

24 Lee C. Baxter

25 Alaska Bar No. 1510085

26 lbaxter@schwabe.com

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 7th day of August, 2023, a
3 true and correct copy of the PRESERVE DEMOCRACY AND
4 KELLY TSHIBAKA RESPONSE TO COMPLAINT (27 pages)
with AFFIDAVIT AND EXHIBITS (8 pages) was served upon
the following by:

5 US Mail Email Fax Hand-Delivery

6 Scott M. Kendall
7 Cashion Gilmore & Lindemuth LLC
8 510 L Street, Suite 601
Anchorage, AK 99501
scott@cashiongilmore.com

9 Kevin G. Clarkson
10 Law Offices of Kevin G. Clarkson
2223 Latona Dr. NE
Keizer, OR 97303
kclarkson@kci.net

11 
12 Jeanne M. Huston
jhuston@schwabe.com

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BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

ALASKANS FOR BETTER)
ELECTIONS, INC.,)
Complainant,)
APOC Case No. 23-02-CD)
v.)
PRESERVE DEMOCRACY, KELLY)
TSHIBAKA and ALASKANS FOR)
HONEST ELECTIONS,)
Respondents.)

AFFIDAVIT OF KELLY TSHIBAKA

STATE OF ALASKA)
) ss.
THIRD JUDICIAL DISTRICT)

I, Kelly Tshibaka, being first duly sworn, depose and state as follows:

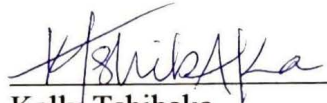
1. I serve as the CEO of Preserve Democracy in a volunteer capacity and am not paid for my CEO role.
2. To the best of my knowledge, neither I nor Preserve Democracy has shared the raw data from the poll we commissioned with any third party, including Alaskans for Honest Elections and/or anyone else.
3. Our pollster prepared an analysis and summary of the poll results, which I shared on a national listserv established by the Conservative Policy Institute’s Election Integrity group. I do not know the identity of all participants on that listserv. My purpose in sending the analysis and summary was to educate fellow concerned citizens

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from the Lower 48 who share similar concerns about low voter turnout and how to improve participation in future elections.

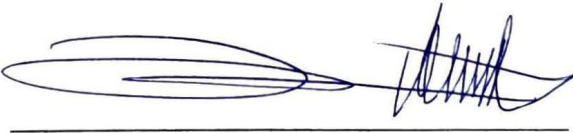
4. I also wrote an Op-Ed piece that was published in Must Read Alaska in which I discuss the poll: <https://mustreadalaska.com/tshibaka-new-poll-shows-main-cause-of-2022-low-voter-turnout-in-alaska/>. As is clear from the opinion piece, the purpose of my communication was to address concerns about low voter turnout and encourage ideas for improved participation in future elections.

FURTHER AFFIANT SAYETH NAUGHT.



Kelly Tshibaka

SUBSCRIBED AND SWORN TO before me this 5 day of August, 2023,
at Anchorage, Alaska.



Notary Public in and for the State of Alaska


My Commission Expires: 11/13/2023



Can we add Fred Braun to the host list or



Kristie Babcock

A FUNDRAISING EVENT TO



**PRESERVE
DEMOCRACY**


with Kelly Tshibaka

FIGHT RANKED-CHOICE VOTING &
INCREASE VOTER PARTICIPATION

FEB. 7TH, 6:00 P.M. PARADISOS -- KENAI

CO-HOSTS:

- KRISTIE & TUCKERMAN BABCOCK
- FORMER REP. RON GILLHAM
- CINDY & MARK GLASSMAKER
- TAMMY WALTON & CATHY STURMAN
- WAYNE & HELEN OGLE
- MIKE CRAWFORD
- JILL SCHAEFER & APRIL ORTH
- CODY & BETH MISHLER
- FRED BRAUN
- RON HYDE & ROB WALL



*IF WE DON'T ACT NOW, THE ENTIRE
U.S. ELECTION SYSTEM IS ABOUT TO CHANGE*



Loren Leman




A FUNDRAISING EVENT TO



**PRESERVE
DEMOCRACY**

with Kelly Tshibaka

FIGHT RANKED-CHOICE VOTING &
INCREASE VOTER PARTICIPATION

**FEB. 9TH, 5:30 P.M. BELL'S NURSERY
(13700 SPECKING AVE)**



HOSTS

LOREN & CAROLYN LEMAN	MIKE MOSESIAN	PAUL & SUSANNE GIONET
----------------------------------	----------------------	----------------------------------

CO-HOSTS

<p>CRAIG CAMPBELL MEAD TREADWELL SHELLEY SOUTH ALYCE HANLEY RANDY & HEATHER SULTZ JASON BAER CALVIN & CHANDLER HOFFMAN MARC & SUZANNE LUIKEN JOSEPH & ERICA LEMAN WES & CYNDI SAUNDERS MAYOR DAN & LYNNETTE SULLIVAN</p>	<p>JEFF & STEPHANIE LENTFER JIM & KIM MINNERY DAN & ROBERTA ZIPAY MARTIN & ROBIN ECKMANN BUD & CHRIS DUKE NATE CALLINA JUDY & RANDY ELEDGE WIN FAULKNER ALAN & PORTIA ERICKSON BOB & CHEN GRIFFIN AL SMAY</p>	<p>EDGAR BLATCHFORD PETE & LAUREL HICKEL SAMI & BRUCE GRAHAM KATHY & STEVE HENSLEE LORAN & DUBY BAXTER WARD & CRISTIN HINGER STEPHANIE & MIKE TAYLOR BILL & ROSEMARY BORCHARDT JEFF & LISA GARNESS SANDY & TONY BLOMFIELD CHELSEA & CHARLIE POHLAND</p>
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*IF WE DON'T ACT NOW, THE ENTIRE
U.S. ELECTION SYSTEM IS ABOUT TO CHANGE*




Terri Hall (Steve...




Thanks

Wednesday, Feb 15 • 9:21 AM




AN EDUCATION & BENEFIT EVENT TO



**PRESERVE
DEMOCRACY**

with Kelly Tshibaka

FIGHT RANKED-CHOICE VOTING &
INCREASE VOTER PARTICIPATION



FEB. 22, 5:30 P.M. BELL'S NURSERY
13700 SPECKING AVE | FREE WINE & APPETIZERS
SILENT AUCTION

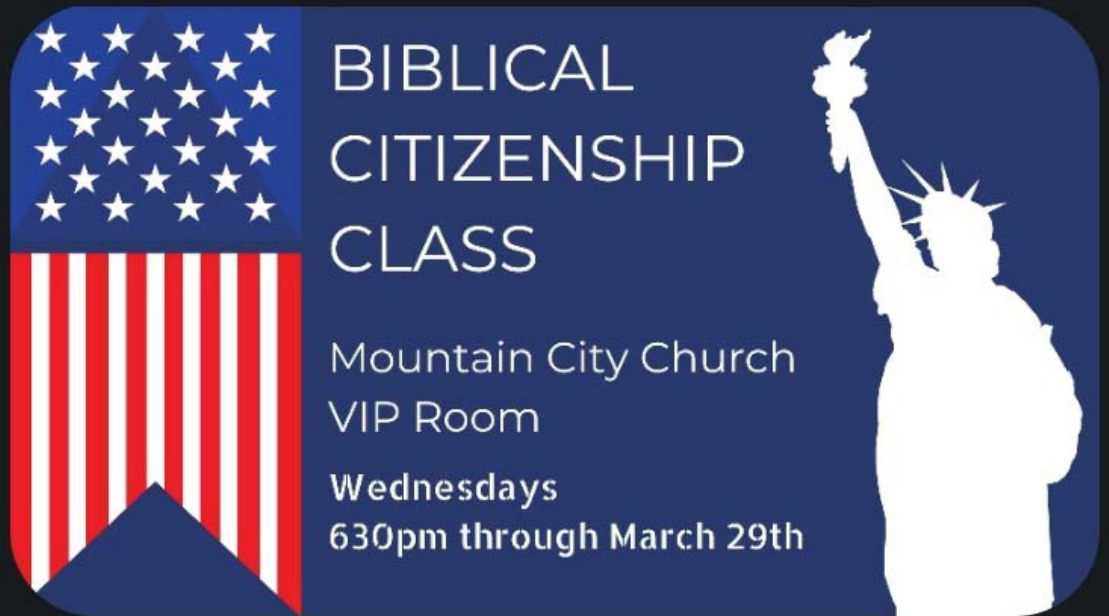
CO-HOSTS

MIKE MOSESAN	CATHY DUXBURY	CHRISTINE HILL
TERRIE PISA	TERRI HALL	KEVIN DURLING
JAY & LORELEI CREWDSON	STEVE STRAIT	RYAN & ELIZABETH HUNT

*IF WE DON'T ACT NOW, THE ENTIRE
U.S. ELECTION SYSTEM IS ABOUT TO CHANGE*



Loran Baxter (D...





Patty Wiesel FB...



Palace off of Airport way.



Republican Women of Fairbanks

invite you to our next meeting with speaker

Kelly Tshibaka, CEO, Preserve Democracy

"The Emerging Threat to Election Integrity"

Wednesday, May 24, at 5:30 p.m.


Mayan Palace, Washington Plaza, Fairbank

Paid for by the Republican Women of Fairbanks






Barbara Haney ...

A FUNDRAISING EVENT TO




**PRESERVE
DEMOCRACY**

with Kelly Tshibaka

HELP OVERTURN RANKED-CHOICE VOTING &
INCREASE VOTER PARTICIPATION

**MAY 25TH, 7 P.M. GENE'S CHRYSLER DODGE
(3400 S CUSHMAN)**



HOSTS

LANE & JULIE NICHOLS	GARY & BARB TYNDALL	RALPH & CONNIE SEEKINS
JOHN COGHILL	BARBARA HANEY	ARTHUR & SALLY DUNCAN
JOSH & RUTH CHURCH	LIBBY DALTON-SLANE	JOHN & PATTY WISEL
MELISSA BURNETT	RON & AMANDA WALL	HANK & CANDY BARTOS
CORY MONTAGUE	RICH EIDE	HARMONY TOMASZEWSKI
AILEEN COTTER	RUTH & JON EWIG	DON & RITA TROMETTER
BONNIE KULZER	CHRISTINE ROBBINS	TIM BYRNES
DUSTIN & MANDI HART	JOHN MOWERY	PAM & LONNIE LOFTS
D&G ENTERPRISES		DON THOMPSON

PRESERVEDEMOCRACY.COM