



# Alaska Public Offices Commission

## EXPEDITED COMPLAINT



<b>EXPEDITED COMPLAINT REQUEST</b>	<b>ALL COMPLAINTS MUST INCLUDE:</b>	<i>APOC case name/number/date</i>
<p><b>PRIOR</b> to requesting expedited review, ensure your filing meets the factors required for expedited approval in AS 15.13.380(c). Those factors are whether the alleged violation:</p> <p><input type="checkbox"/> if not immediately restrained (stopped), could materially affect the outcome of an election or other impending event;</p> <p><input type="checkbox"/> could cause irreparable harm that penalties could not adequately remedy; and</p> <p><input type="checkbox"/> whether there is reasonable cause to believe that a violation has occurred or will occur</p> <p>Expedited review requires the <u>complainant</u> to prove the violation by a <u>preponderance of the evidence</u>.</p>	<ol style="list-style-type: none"> <li>1. Complainant's name + contact info</li> <li>2. Respondent's name + contact info</li> <li>3. Laws, regulations allegedly violated</li> <li>4. Description of allegations</li> <li>5. Basis of knowledge of alleged facts</li> <li>6. Documentation to support allegations</li> <li>7. Notarized signature of the complainant</li> <li>8. Proof that complaint <i>and</i> all supporting documents were served on respondent</li> </ol>	<div style="border: 1px solid blue; padding: 5px; width: fit-content; margin: auto;"> <p style="color: blue; font-weight: bold;">ARRIVED</p> <p style="color: blue;">10/19/2024</p> <p style="color: blue; font-size: small;">APOC - ANCH PM HC FAX ELE</p> </div>
<b>APOC LAWS ALLEGEDLY VIOLATED</b> <i>Specify section of law or regulation</i>		
<b>Campaign Disclosure Law</b> <input checked="" type="checkbox"/> AS 15.13 <input type="checkbox"/> 2 AAC 50.250-405		<b>Public Official Financial Disclosure</b> <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799
<b>Lobbying Regulation</b> <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590		<b>Legislative Financial Disclosure</b> <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799

<input type="checkbox"/> APOC <input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	<b>COMPLAINANT</b>		<b>RESPONDENT</b> <i>Person or group allegedly violating law</i>
	907 Initiative		<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group Families of the Last Frontier
<b>Address City / Zip</b>	645 G Street, STE 100-1082		PO BOX 220336
<b>Phone/Fax</b>	907-903-7017		907-248-1028; 907-444-4406
<b>E-mail</b>	info@907initiative.org		christystrutz@hotmail.com; stevestrait@gci.net
<b>COMPLAINANT'S REPRESENTATIVE</b>		<b>RESPONDENT'S REPRESENTATIVE</b>	

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

<b>Name/Title</b>	Noah I. Star		Not known to the Complainant at this time
<b>Address</b>	701 West 8th Avenue, Suite 1100		
<b>Phone/Fax</b>	(907) 276-5152		
<b>E-mail</b>	noahs@lbbllawyers.com		

<b>DESCRIPTION or SUMMARY of ALLEGED VIOLATION</b>	<i>Use extra pages if needed</i>	<input type="checkbox"/> <b>SUPPORTING DOCUMENTS - DESCRIBE:</b>
Please see extra pages for description of violation and exhibits of supporting documents.		

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

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

Signature	<div style="border: 1px solid blue; padding: 5px; display: inline-block;"> <p style="margin: 0;">STATE OF ALASKA</p> <p style="margin: 0;">NOTARY PUBLIC</p> <p style="margin: 0; font-size: small;">Cheri L. Woods Commission #240307003</p> </div>	<p style="font-size: large; margin: 0;">EXECUTIVE DIRECTOR</p> <p style="margin: 0;">Date 10/22/24</p>
Subscribed and sworn to or affirmed by me at Anchorage, AK on 10.22.24		
Signature	Title <i>Notary Public</i>	

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

<b>APOC ANCHORAGE</b>	<b>APOC JUNEAU</b>	<b>APOC COMPLAINT PROCESS: 2 AAC 50.460-476</b>
2221 E. NORTHERN LIGHTS #128 ANCHORAGE, AK 99508 907-276-4176 / FAX 907-276-7018 TOLL-FREE 800-478-4176 WEB: <a href="http://doa.alaska.gov/apoc/">http://doa.alaska.gov/apoc/</a>	240 MAIN STREET #500 P.O. BOX 110222 JUNEAU, AK 99811 465-4864 / FAX 465-4832 APOC FORMS: <a href="http://doa.alaska.gov/apoc/forms_all.html">http://doa.alaska.gov/apoc/forms_all.html</a>	FILING COMPLAINTS: 2AAC 50.870    ANSWERING COMPLAINTS: 2AAC 50.880 APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870 INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891 RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c) APOC LAWS: <a href="http://doa.alaska.gov/apoc/apoclaws.html">http://doa.alaska.gov/apoc/apoclaws.html</a>

## INTRODUCTION

Families of the Last Frontier (“FLF”) is an Independent Expenditures group who has raised funds intended to influence the 2024 election and “elect conservatives to public office.”<sup>1</sup> In September 2024, FLF received two large contributions from out-of-state political action committees (“PACs”). These contributions are subject to Alaska’s “true source” disclosure requirements because “a person or legal entity who derived funds via contributions, donations, dues, or gifts is not the true source, but rather an intermediary for the true source.”<sup>2</sup> Groups and contributors have worked hard to comply with the new rules for true source disclosure, with near universal compliance. However, FLF is the exception to this rule.

FLF violated AS 15.13’s disclosure and communication requirements for its three largest contributions. FLF failed to fully disclose the “true sources” of its top two contributions received from out-of-state PACs. FLF also did not properly disclose its third largest contribution received from a sole proprietorship. In addition to these disclosure failures, FLF did not state its top contributor and that the majority of its funding came from out-of-state PACs in its “paid for by” on a mailer sent to voters earlier this month. Such across-the-board compliance failure creates an unfair advantage for FLF relative to other regulated parties. FLF’s conduct also produces inaccurate and unequal public information as the election nears. To remedy these violations, 907 Initiative files the following administrative complaint and requests expedited consideration.

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<sup>1</sup> <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=6323&ViewType=GR>

<sup>2</sup> AS 15.13.400(19).

## FACTUAL BACKGROUND

### A. Republican State Leadership Committee Contribution

1. On July 6, 2024, the Republican State Leadership Committee (“RSLC”), a PAC residing in Washington, D.C., contributed \$25,000.00 to FLF.<sup>3</sup>
2. On September 19, 2024, RSLC contributed \$125,000.00 by electronic funds transfer to FLF. *See* Exhibit 1.
3. On September 20, 2024, the RSLC submitted a Statement of Contributions Report. *See* Exhibit 1. Appended to that report was a list of donors, listing the donors’ names, addresses, the date of their true source contribution, and the amount of their contribution to the RSLC.<sup>4</sup> *See* Exhibit 1.
4. On September 25, 2024, FLF reported this contribution on a Twenty-Four Hour True Sources Report. Appended to that report, however, was only a list of the names and dates of the donors to the RLSC. The list did not include the amount of the individual donors contributions.<sup>5</sup> *See* Exhibit 2.
5. In total, RSLC has contributed \$150,000.00 to FLF this cycle and is one of FLF’s two top contributors.

### B. GOPAC Contribution

1. On September 23, 2024, GOPAC Election Fund contributed to FLF

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<sup>3</sup> <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=6601&ViewType=FE>

<sup>4</sup> Due to the size of the disclosure, 907 Initiative directs the Commission to download the “full list of True Sources” available for download or by request of staff as stated here: <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=5168&ViewType=SC>

<sup>5</sup> Similar to the above footnote, the full CSV can be downloaded here: <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=44910&ViewType=CD>

\$150,000.00. *See Exhibit 3.* GOPAC is FLF's other top contributor this cycle.

2. That same day, GOPAC Election Fund submitted a Statement of Contributions, which reported the \$150,000.00 contribution to Families of the Last Frontier. *See Exhibit 3.*

3. GOPAC's Statement of Contributions reported that GOPAC is a "FEDERAL POLITICAL ACTION COMMITTEE," based out of Arlington, Virginia. *See Exhibit 3.*

4. GOPAC's Statement of Contributions stated that the \$150,000.00 was "Received Directly from True Source. No Intermediaries." *See Exhibit 3.*

5. GOPAC's Statement of Contributions therefore included no True Source Reporting Disclosures. *See Exhibit 3.*

6. FLF submitted an incomplete Twenty-Four Hour True Source Report in apparent reliance on this representation that GOPAC is the true source of its \$150,000.00 contribution. The Twenty-Four Hour Report stated: "Contributor is True Source." *See Exhibit 4.*

### **C. Arctic E&P Advisors**

1. FLF received a \$22,000.00 contribution from "Arctic E&P Advisors" on September 26, 2024. *See Exhibit 5.*

2. Arctic E&P Advisors appears to be a sole proprietorship without a valid business license. *See Exhibit 6; 7.*

3. FLF filed an Independent Expenditures Report on September 26, 2024, reporting the contribution as from Arctic E&P Advisors, and listing "Randolph Ruedrich"

as the owner of the Contributor organization. *See Exhibit 5.*

4. The sole proprietor of Arctic E&P Advisors appears to be the Treasurer of FLF, Randy Ruedrich. *See Exhibit 6;7.*

**D. Contributors Listed in “Paid For By”**

1. On or around October 15, 2024, FLF distributed a mailer in support of David Nelson for State House. *See Exhibit 8.*

2. The mailer included a paid for by but only listed FLF’s top two contributors, RSLC and Arctic E&P Advisors. *See Exhibit 8.*

3. The GOPAC Contribution was received and reported on September 23, 2024. *See Exhibit 8.*

4. Therefore, GOPAC was a contributor to FLF at the time FLF sent the communication but FLF did not list GOPAC as its top contributor, let alone a contributor, in the required paid for by on the mailer. *See Exhibit 8.*

5. Not only did FLF fail to identify GOPAC as its largest contributor, FLF failed to include a disclaimer that the majority of its funds came from out of state organizations. *See Exhibit 8.*

**ARGUMENT**

**A. The Commission should grant expedited consideration because FLF has failed to comply with clear disclosure rules, which materially affects the information available to the public and irreparably harms other regulated parties.**

Expedited consideration is necessary when “the alleged violation, if not immediately restrained, could materially affect the outcome of an election . . . whether

the alleged violation could cause irreparable harm that penalties could not adequately remedy and whether there is reasonable cause to believe that a violation has occurred or will occur.”<sup>6</sup>

The Commission should grant expedited consideration because remediating these violations of true source disclosure is essential to providing the public full information before voting starts. The election is on November 5, 2024, and each day that passes diminishes the information available to the public regarding who is influencing Alaska’s elections. Disregarding true source reporting for the vast majority of FLF’s funds raised to date casts a shadow on all the electoral activity funded by those contributions. Without action by APOC, voters are kept in the dark. And for at least one of the violations below, FLF is actively omitting information that AS 15.13.090 requires in the paid for by statements on print political communications.

Further, other regulated parties suffer irreparable harm until APOC clarifies the scope of true source reporting requirements. If FLF’s reporting is compliant with AS 15.13, other parties should know. FLF’s conduct diverges from the established understanding of true source reporting’s requirements. Complying with the requirements is time-intensive and all regulated parties should operate under the same set rules. As APOC recognized in its recent advisory opinion, consistent advice to regulated parties is essential in the waning days of an election.<sup>7</sup> To level the playing field, APOC must

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<sup>6</sup> AS 15.13.380

<sup>7</sup> *See, e.g.*, Advisory Opinion 24-04 (delaying the effective date of new guidance to avoid inconsistent advice to regulated parties).

respond quickly so that either: (a) the public learns of the true sources behind FLF's contributions, or (b) other regulated parties understand what true source reporting requires and adapt their behavior accordingly.

**B. FLF failed to report the full true source information for the RSLC contribution.**

Under AS 15.43.110(k) an entity making independent expenditures in a candidate election that receives a contribution that exceeds \$2,000 dollars in a single year "shall report that contribution, and all subsequent contributions, not later than 24 hours after receipt." 2 AAC 50.270 requires that the report under AS 15.13.110(k) include:

The report must include a certification that all true sources and intermediaries have been disclosed and the following information: (1) the date of each contribution; (2) the amount of each contribution; (3) the full name of the contributor; (4) a description of item or services contributed, if necessary; and (5) the full name of all intermediaries, if any, within the meaning of "true source under AS 15.13.400."

FLF violated this provision by failing to include the amount of each contribution.

The list of contributors attached to FLF's 24-hour report only includes the names and dates of the contributors. The amount of the contribution appears to be redacted. To date, other groups have reported true source requirements and included the amount of each contribution – a requirement established in AO 21-01.<sup>8</sup>

**C. Neither FLF nor GOPAC reported the true sources behind GOPAC's \$150,000.00 contribution.**

GOPAC self-reported that it is a federal political action committee. A federal political action committee exists to receive contributions from individuals, corporations,

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<sup>8</sup> See AO 21-01 at 4. <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=22699>.

unions, and other PACs to finance independent expenditures and other political activity.<sup>9</sup> A federal political action committee therefore must report the true source of its individual contributions under AS 15.13.400(19).

GOPAC is a federal PAC and not the true source of its contribution to FLF. AS 15.13.400(19) establishes in plain and unequivocal terms: “a person or legal entity who derived funds via contributions, donations, dues, or gifts is not the true source, but rather an intermediary for the true source.” GOPAC derives its funds through contributions and therefore cannot be the true source of its \$150,000.00 contribution. Moreover, FLF’s reliance on GOPAC’s representation conflicts with FLF’s attempted true source reporting for the RSLC contribution. RSLC also self-reported that it is a “FEDERAL PAC.” The discrepancy in FLF’s reporting across contributions reveals the unfair advantage that FLF obtained. A group cannot pick and choose when to comply with true source reporting. The public’s right to know applies to all contributions from intermediaries.

**D. FLF include a complete paid for by statement required on all political communications.**

FLF distributed a political communication almost a month after the GOPAC contribution was received without identifying GOPAC in the required paid for by statement. Alaska Statute 15.13.090 states that a print communication must list the three largest contributors toward the group.<sup>10</sup> This is not an ambiguous requirement; AS 15.13.090 gives the exact language that must appear. A print communication must state

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<sup>9</sup> 26 U.S.C. § 527(e)(1); *see also* AO-23-03 (describing a Hybrid PAC structure); <https://www.fec.gov/press/resources-journalists/political-action-committees-pacs/>

<sup>10</sup> AS 15.13.090(a)(2)(C)



in a clear and discernible manner:

This communication was paid for by (person's name and city and state of principal place of business). The top contributors of (person's name) are (the name and city and state of residence or principal place of business, as applicable, of the largest contributors to the person under AS 15.13.090(a)(2)(C)).<sup>11</sup>

And APOC has stressed in Advisory Opinion 17-03 that the unambiguous paid for by requirement in AS 15.13.090, indeed, applies to "all communications."<sup>12</sup>

Despite this clear instruction FLF did not include a compliant paid for by in its political communications. Exhibit 8 evidences that failure. Every day that passes deprives the public of information guaranteed by state law and actively misleads voters as to the source of funding behind FLF's political communications.

This is not the only violation of FLF's required paid for by disclaimer. Doubling down, FLF failed to include the disclaimer that the "majority of contributions to [FLF] came from outside the State of Alaska," which AS 15.13.090 requires for an "outside-funded entity."<sup>13</sup> GOPAC resides in Arlington, Virginia as stated in its Statement of Contributions. The RSLC resides in Washington, D.C. These two PACs comprise the majority of FLF's funding, which makes FLF an outside-funded entity. But, voters do not know that because it is omitted from FLF's communications supporting David Nelson.

The complete disregard of the reporting and communication requirements for the GOPAC Contribution calls into question whether FLF's other conduct is state law compliant. Exhibit 8 is just one mailer that FLF has distributed with the funds received

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<sup>11</sup> AS 15.13.090(c)

<sup>12</sup> <https://aws.state.ak.us/apocreports/Paper/Download.aspx?ID=15979>

<sup>13</sup> AS 15.13.400(15).

from GOPAC. APOC must take action to remediate FLF’s noncompliant conduct and ensure that accurate paid for by statements are present on all FLF communications.

**E. FLF failed to properly report its third largest contribution from Arctic E&P Advisors, a sole proprietor.**

The Arctic E&P Advisors contribution does not comply with APOC regulations.<sup>14</sup> Arctic E&P Advisors appears to be a sole proprietorship organized by Randy Ruedrich, who also serves as the Treasurer for FLF. A contribution from a sole proprietorship is not prohibited, but it must be reported in the name of the owner of the sole proprietorship.<sup>15</sup> FLF’s reporting names “Randolph Ruedrich” as the owner of the business, but does not name Mr. Ruedrich as the contributor.<sup>16</sup> Furthermore, Arctic E&P Advisors has not had an active business license since 2019. *See* Exhibit 6;7. This combination of evidence—that Mr. Ruedrich is an officer of FLF who used an inactive sole proprietorship to contribute the third largest donation to FLF this election, which FLF failed to report as APOC regulations require—suggests an attempt to muddy the waters and confuse the public.

**CONCLUSION & RELIEF REQUESTED**

FLF has spent \$237,000 this election cycle, almost all of which it raised from the three contributors at issue here: GOPAC, RSLC, and Arctic E&P Advisors. That the majority of FLF’s funds come from contributions with significant reporting violations creates an unfair advantage and imperils the public’s right to know who and how much

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<sup>14</sup> 2 AAC 50.250.

<sup>15</sup> *Id.*

<sup>16</sup> 2 AAC 50.250.

money is influencing Alaska state elections. APOC must take prompt action to remediate these violations or clarify how FLF's conduct is lawful so that all regulated parties understand the permissible state of play.

Therefore, the 907 Initiative requests the following relief:

1. That APOC's administrative order in response to this complaint clarify the information that both the recipient of a contribution and the contributor must report to comply with AS 15.13.<sup>17</sup>
2. An order that remediates and ceases any violations of AS 15.13 that has occurred.
3. Civil penalties as are appropriate under AS 15.13.390(a).

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<sup>17</sup> AS 15.13.040(r), AS 15.13.110(k), and 2 AAC 5.270.

## **APPLICABLE STATUTES AND REGULATIONS**

### **AS 15.13.040(r)**

Every individual, person, nongroup entity, or group that contributes more than \$2,000 in the aggregate in a calendar year to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent expenditures in one or more candidate elections in the current election cycle shall report making the contribution or contributions on a form prescribed by the commission not later than 24 hours after the contribution that requires the contributor to report under this subsection is made. The report must include the name, address, principal occupation, and employer of the individual filing the report and the amount of the contribution, as well as the total amount of contributions made to that entity by that individual, person, nongroup entity, or group during the calendar year. For purposes of this subsection, the reporting contributor is required to report and certify the true sources of the contribution, and intermediaries, if any, as defined by AS 15.13.400(19). This contributor is also required to provide the identity of the true source to the recipient of the contribution simultaneously with providing the contribution itself.

### **AS 15.13.110(k)**

Once contributions from an individual, person, nongroup entity, or group to an entity that made one or more independent expenditures in one or more candidate elections in the previous election cycle, that is making one or more independent expenditures in one or more candidate elections in the current election cycle, or that the contributor knows or has reason to know is likely to make independent expenditures in one or more candidate elections in the current election cycle exceed \$2,000 in a single year, that entity shall report that contribution, and all subsequent contributions, not later than 24 hours after receipt. For purposes of this subsection, the entity is required to certify and report the true source, and all intermediaries, if any, of the contribution as defined by AS 15.13.400(18).

### **AS 15.13.090**

- (a) All communications shall be clearly identified by the words “paid for by” followed by the name and address of the person paying for the communication. In addition, except as provided by (d) of this section, a person shall clearly
- (1) provide the person’s address or the person’s principal place of business;
  - (2) for a person other than an individual or candidate, include
    - (A) the name and title of the person’s principal officer;
    - (B) a statement from the principal officer approving the communication; and
    - (C) unless the person is a political party, identification of the name and city and state of residence or principal place of business, as applicable, of each of the person’s three largest contributors under AS 15.13.040(e)(5), if any, during the 12-month period before the date of the communication.
- (b) The provisions of (a) of this section do not apply when the communication

- (1) is paid for by an individual acting independently of any other person;
- (2) is made to influence the outcome of a ballot proposition as that term is defined by AS 15.13.065(c); and
- (3) is made for
  - (A) a billboard or sign; or
  - (B) printed material other than an advertisement made in a newspaper or other periodical.
- (c) To satisfy the requirements of (a)(1) of this section and, if applicable, (a)(2)(C) of this section, a communication that includes a print or video component must have the following statement or statements placed in the communication so as to be easily discernible, and, in a broadcast, cable, satellite, Internet or other digital communication, the statement must remain onscreen throughout the entirety of the communication; the second statement is not required if the person paying for the communication has no contributors or is a political party:

This communication was paid for by (person's name and city and state of principal place of business). The top contributors of (person's name) are (the name and city and state of residence or principal place of business, as applicable, of the largest contributors to the person under AS 15.13.090(a)(2)(C)).

- (d) Notwithstanding the requirements of (a) of this section, in a communication transmitted through radio or other audio media and in a communication that includes an audio component, the following statements must be read in a manner that is easily heard; the second statement is not required if the person paying for the communication has no contributors or is a political party: This communication was paid for by (person's name). The top contributors of (person's name) are (the name of the largest contributors to the person under AS 15.13.090(a)(2)(C)).
- (e) Contributors required to be identified under (a)(2)(C) of this section must be listed in order of the amount of their contributions. If more than three of the largest contributors to a person paying for a communication contribute equal amounts, the person may select which of the contributors of equal amounts to identify under (a)(2)(C) of this section. In no case shall a person be required to identify more than three contributors under (a)(2)(C) of this section.
- (f) The provisions of this subsection apply to a person who makes an independent expenditure for a communication described in (a) of this section. If the person paying for the communication is not a natural person, the provisions also apply to the responsible officer or officers of the corporation, company, partnership, firm, association, organization, labor organization, business trust, or society who approve the independent expenditure for the communication. A person who makes a communication under this subsection may not, with actual malice, include within or as a part of the communication a false statement of material fact about a candidate for election to public office that constitutes defamation of the candidate. For purposes of this subsection, a statement constitutes defamation of the candidate if the statement
  - (1) exposes the candidate to strong disapproval, contempt, ridicule, or reproach; or
  - (2) tends to deprive the candidate of the benefit of public confidence.
- (g) To satisfy the requirements of (a)(1) of this section and, if applicable, (a)(2)(C) of this section, a communication paid for by an outside-funded entity as that term is defined in AS 15.13.400(15) that includes a print or video component must have the following statement placed in the communication so as to be easily discernible, and, in a broadcast, cable, satellite, Internet or other digital communication, the statement must remain onscreen throughout the entirety of the communication; the statement is not required if the outside entity paying for the communication has no contributors or is a political party: "A MAJORITY OF CONTRIBUTIONS TO (OUTSIDE-FUNDED ENTITY'S NAME) CAME FROM OUTSIDE

THE STATE OF ALASKA.”

**2 AAC 50.250(c)**

A contribution from a sole proprietorship is not prohibited under AS 15.13.074(f), but must be

- (1) identified as a contribution by the owner of the sole proprietorship; and
- (2) included in the amount of the individual’s contributions limited by AS 15.13.070.

**2 AAC 50.270(d)**

A person required to report under AS 15.13.110(k) shall disclose contributions received from a single source that exceed \$2,000, in the aggregate, and all subsequent contributions from that same not later than 24 hours after receipt. The report must include a certification that all true sources and intermediaries have been disclosed and the following information:

- (1) the date of each contribution;
- (2) the amount of each contribution;
- (3) the full name of the contributor;
- (4) a description of item or services contributed, if necessary; and
- (5) the full name of all intermediaries, if any, within the meaning of “true source” under AS 15.13.400.

STATEMENT OF CONTRIBUTIONS FORM 1505

**AMENDMENT**

**Amendment Description: Original contribution sent via wire on 9/17/24 was returned and contribution was reissued on 9/19/24.**

**COMPLETED**

Submission Date: **09/20/2024**

REPORT TYPE

Filing Reason: **Contributions in excess of \$2,000**

Report Year: **2024**

Filed As: **Other**

FILING

Filer First Name: **CABELL**

Filer Middle Name:

Filer Last Name: **HOBBS**

Filer Phone: **202-448-5160**

Filer Email: **COMPLIANCE@RSLC.GOP**

Occupation: **COMPLIANCE CONSULTANT**

Employer: **RIGHTSIDE COMPLIANCE LLC**

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

BUSINESS INFORMATION

Business Entity Name: **RSLC VICTORY FUND**

Business Type: **FEDERAL PAC**

Address: **1201 F ST NW, STE 675**

City: **WASHINGTON**

State: **District of Columbia**

**20004**

Country: **United States**

CONTACT PERSON INFORMATION

First Name: **CABELL**

Last Name: **HOBBS**

Phone: **202-448-5160**

Email: **COMPLIANCE@RSLC.GOP**

DISCLOSURE URL

Contribution Date	Recipient	Form of Contribution	Amount	Total Annual Contribution
09/19/2024	2024 - Families of the Last Frontier	Electronic Funds Transfer	\$125,000.00	\$125,000.00

True Sources

This filing lists more True Source than can be displayed:

Total Amount from True Sources:	\$2,385,475.00
Average Amount of True Source Contribution:	\$18.28
Total Number of True Sources:	130513
Smallest True Source Contribution:	(\$5,000.00)
Largest True Source Contribution:	\$6,038.00
Accepted during the Period:	01/01/2024 to 09/15/2024

A full list of True Sources is available by download as a CSV file, or upon request from APOC Staff at: [doa.poc.apocforms\\_feedback@alaska.gov](mailto:doa.poc.apocforms_feedback@alaska.gov) or (907) 276-4176

Report Summary

Number of Contributions Reported with this Report: 1	
Total of Contributions Reported with this Report:	<b>\$125,000.00</b>



CAMPAIGN DISCLOSURE FORM

**AMENDMENT**

**Amendment Description: Need to add True Source List for Contribution**

**TWENTY-FOUR HOUR TRUE SOURCES REPORT**

**COMPLETED**

Submission Date: **09/25/2024**  
Filer First Name: **Christy**  
Filer Middle Name:  
Filer Last Name: **Strutz**  
Filer's Title: **Treasurer**  
Report Type: **24 Hour Report – Entity/IE Group**

GROUP INFORMATION

Group Name: **2024 - Families of the Last Frontier**  
Group Abbreviation:  
Group Address: **PO BOX 220336**  
City, State Zip: **Anchorage, Alaska 99522**

REPORT INFORMATION

Election Year: **2024**  
Election: **State General**  
Report Type: **24 Hour Report – Entity/IE Group**  
Reporting Period: From // Through //

INCOME

Date Received	Payment Method	Contributor	Details	Amount
09/19/2024	Electronic Funds Transfer	Republican State Leadership Committee (RSLC)  , Alaska	Occupation: Employer: Description:	<b>\$125,000.00</b>

Date Received	Payment Method	Contributor	Details	Amount				
<p>This contribution lists more True Source than can be displayed:</p> <table border="1" data-bbox="363 386 1276 470"> <tr> <td data-bbox="363 386 854 428">Total Number of True Sources:</td> <td data-bbox="854 386 1276 428">130513</td> </tr> <tr> <td data-bbox="363 428 854 470">Accepted during the Period:</td> <td data-bbox="854 428 1276 470">01/01/2024 to 09/15/2024</td> </tr> </table> <p>A full list of True Sources is available by download as a CSV file, or upon request from APOC Staff at:  <a href="mailto:doa.poc.apocforms_feedback@alaska.gov">doa.poc.apocforms_feedback@alaska.gov</a> or (907) 276-4176</p>					Total Number of True Sources:	130513	Accepted during the Period:	01/01/2024 to 09/15/2024
Total Number of True Sources:	130513							
Accepted during the Period:	01/01/2024 to 09/15/2024							
<b>Income Total:</b>				<b>\$125,000.00</b>				

STATEMENT OF CONTRIBUTIONS FOR 2024

**COMPLETED**

Submission Date: **09/24/2024**

REPORT TYPE

Filing Reason: **Contributions in excess of \$2,000**

Report Year: **2024**

Filed As: **Other**

FILER

Filer First Name: **Melodie**

Filer Middle Name:

Filer Last Name: **Johnson**

Filer Phone: **703-566-0376**

Filer Email: **compliance@complianceconsultingva.com**

Occupation: **N/A**

Employer: **N/A**

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

BUSINESS INFORMATION

Business Entity Name: **GOPAC ELECTION FUND**

Business Type: **FEDERAL POLITICAL ACTION COMMITTEE**

Address: **1201 WILSON BLVD STE 2110**

City: **ARLINGTON**

State: **Virginia**

**22209**

Country: **United States**

CONTACT PERSON INFORMATION

First Name: **MELODIE**

Last Name: **JOHNSON**

Phone: **703-566-0376**

Email: **compliance@complianceconsultingva.com**

CONTRIBUTIONS

Contribution Date	Recipient	Form of Contribution	Amount	Total Annual Contribution
09/23/2024	2024 - Families of the Last Frontier	Electronic Funds Transfer	\$150,000.00	\$150,000.00

TRIP INFORMATION

Date	Name	Address	Employment	Amount	Total Annual
09/02/2024	Business/Entity: <b>GOPAC, INC</b>  Contact Name: <b>Melodie Johnson</b>	Address: <b>1201 Wilson Blvd. #2110, Arlington, Virginia 22209</b>  Phone: <b>703-566--0376</b>  Email: <b>compliance@complianceconsultingva.com</b>	N/A N/A	\$150,000.00	\$150,000.00
Received Directly from True Source No Intermediaries					

DISCLOSURE NOTES

Exhibit 3  
Page 1 of 2

	Number of Contributions Reported with this Report: 1	
	Total of Contributions Reported with this Report:	<b>\$150,000.00</b>

CAMPAIGN DISCLOSURE FORM

**TWENTY-FOUR HOUR TRUE SOURCES REPORT**

**COMPLETED**

Submission Date: **09/24/2024**  
 Filer First Name: **Christy**  
 Filer Middle Name:  
 Filer Last Name: **Strutz**  
 Filer's Title: **Treasurer**  
 Report Type: **24 Hour Report – Entity/IE Group**

GROUP INFORMATION

Group Name: **2024 - Families of the Last Frontier**  
 Group Abbreviation:  
 Group Address: **PO BOX 220336**  
 City, State Zip: **Anchorage, Alaska 99522**

REPORT INFORMATION

Election Year: **2024**  
 Election: **State General**  
 Report Type: **24 Hour Report – Entity/IE Group**  
 Reporting Period: From // Through //

INCOME

Date Received	Payment Method	Contributor	Details	Amount
09/23/2024	Electronic Funds Transfer	GOPAC, Inc. , Alaska	Occupation: Employer: Description: Contribution	\$150,000.00
Contributor is True Source				
			<b>Income Total:</b>	<b>\$150,000.00</b>

INDEPENDENT EXPENDITURES FORM 13-0

**COMPLETED**

Submission Date: **09/26/2024**

FILER INFORMATION

Filer First Name: **Christy**  
Filer Middle Name:  
Filer Last Name: **Strutz**  
Filer Full Address: **4024 Brentwood Circle  
Anchorage, Alaska 99502**  
Filer Occupation: **Consultant**  
Filer Employer: **Self-Employed**  
Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2024**  
Election Year: **2024**  
Report Type: **Twenty-four Hour**  
Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Families of the Last Frontier**  
Type of Business or Organization: **Registered Group**  
Address: **PO BOX 220336**  
City: **Anchorage**  
State: **Alaska**  
**99522**  
Country: **United States**  
Business/Other Entity Contact Person: **Christy Strutz**  
Contact E-mail: **christystrutz@hotmail.com**  
Contact Phone: **907-444-4406**

ELECTION INFORMATION

Election: **State General**

COMMITTEES

Name	Full Address	Title
Steve Strait	645 G Street STE 100 PMB 1071 Anchorage, Alaska 99501	Chair

Exhibit 5  
Page 1 of 2

Name	Full Address	Title
Christy Strutz	4024 Brentwood Circle Anchorage, Alaska 99502	Treasurer
Randy Ruedrich	1515 W 13th Ave. Anchorage, Alaska 99501	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/26/2024	<b>Northrim Bank</b> 3111 C Street Anchorage, Alaska 99503	<b>Bank Fee</b>	<b>SUPPORT: 2024 - Craig Johnson</b> Election: State General Wire Transfer Fee	\$10.00

CONTRIBUTIONS

Contribution Date	Contributor	Details			Amount
09/26/2024	<b>Type: Other</b> <b>Name: Arctic E&amp;P Advisors</b> 1515 W 13th Ave Anchorage, Alaska 99501	<b>Officers / Directors</b>			\$22,000.00
		<b>Name</b>	<b>Full Address</b>	<b>Title</b>	
		Randolph Ruedrich	1515 W 13th Ave, Anchorage, AK 99501	Owner	

DEBTS

Date	Recipient	Candidate / Proposition	Amount
<b>No Debts / Nothing to Report</b>			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 1	
Total of paid Expenditures:	<b>\$10.00</b>
Previous Contributions:	<b>\$300,100.00</b>
Number of Contributions Reported with this Report: 1	
Total of Contributions Reported with this Report:	<b>\$22,000.00</b>
Cumulative Contribution Amounts:	<b>\$322,100.00</b>
Number of Officers: 3	
Number of Debts Reported with this Report: 0	
Total of Debts Incurred but not yet paid:	<b>\$0.00</b>

# LICENSE DETAILS

**License #:** 1077608

License unavailable for printing

**Business Name:** ARCTIC E&P ADVISORS

**Status:** Expired

**Issue Date:** 08/20/2018

**Expiration Date:** 12/31/2019

**Has Telemedicine:** No

**Mailing Address:** 1513 W 13TH AVENUE  
ANCHORAGE, AK 99501

**Physical Address:** 1513 W 13TH AVENUE  
ANCHORAGE, AK 99501

## Owners

RANDOLPH A RUEDRICH

## Activities

Line of Business	NAICS	Professional License #
54 - Professional, Scientific and Technical Services	541618 - OTHER MANAGEMENT CONSULTING SERVICES	
21 - Mining, Quarrying, and Oil and Gas Extraction	213112 - SUPPORT ACTIVITIES FOR OIL AND GAS OPERATIONS	



# ARCH BUSINESS LICENSES

License #:

Current Only

Business Name: Arctic E & P Advisors

Owner Entity Name:

Owner Last Name:

Owner First Name:

City:

Line Of Business: (not selected)

NAICS:

Has Telemedicine: Not Set

se#	Business Name	Owner Name	City	Stat
08	ARCTIC E&P ADVISORS	RANDOLPH A RUEDRICH	ANCHORAGE	Expi
75	ARCTIC E&P ADVISORS	RANDOLPH A RUEDRICH	ANCHORAGE	Expi

Re-Elect **David**

# Nelson

## State House

★ ★ ★ ★ ★ ★ ★ ★

Using time tested  
conservative values:

- ☑ Individual Liberty
- ☑ Personal Responsibility
- ☑ Hard Work
- ☑ Common Sense

to tackle Alaska's challenges.

# DAVID IS FIGHTING FOR

- ★ **RESTORING A FULL PFD**  
by growing the Permanent Fund and protecting your PFD for years to come.
- ★ **COMPREHENSIVE FISCAL PLAN**  
that includes a tough new Constitutional spending cap.
- ★ **DIRECT VOTE OF THE PEOPLE**  
required for every measure to raise taxes or impose new taxes.
- ★ **PROMOTING A VIBRANT ECONOMY**  
that is opportunity-driven and creates well-paying jobs for Alaskans.

PRESORT  
STANDARD  
U.S. Postage  
**PAID**  
Permit #456  
Anchorage, AK



*Neither the military information nor the photographs imply endorsement by the Department of Defense or the Alaska Army National Guard.*



# RE-ELECT DAVID NELSON

 [www.NelsonForAlaska.com](http://www.NelsonForAlaska.com)



000001 0000113 SCH 5-DIGIT 99514



This communication was paid for by Families of the Last Frontier PO BOX 220336 Anchorage, Alaska 99522. I am Steve Strait, chair of Families of the Last Frontier and I approve this message. Top contributors are RSLC and Arctic E&P. This notice to voters is required by Alaska law. I certify that this ad is not authorized, paid for, or approved by any candidate.

## Cheri Woods

---

**From:** Cheri Woods  
**Sent:** Wednesday, October 23, 2024 9:22 AM  
**To:** christystrutz@hotmail.com; stevestrait@gci.net  
**Cc:** Noah Star  
**Subject:** 10-23-24 Expedited Complaint by 907 Initiative  
**Attachments:** 10-23-24 Full Expedited Complaint by 907 Initiative.pdf

Tracking:	Recipient	Delivery	Read
	christystrutz@hotmail.com		
	stevestrait@gci.net		
	Noah Star	Delivered: 10/23/2024 9:22 AM	Read: 10/23/2024 9:23 AM

Please find a corrected service copy of 907 Initiative's Expedited Complaint. The filing sent over yesterday at 3:38pm unintentionally omitted some pages from the complaint. We apologize for the error.

Please contact: Noah Star, [noahs@lbblawyers.com](mailto:noahs@lbblawyers.com); 907-868-9238.

### Cheri Woods | Legal Assistant

**LANDYE BENNETT BLUMSTEIN LLP** | 701 West 8th Avenue, Suite 1100 | Anchorage, AK 99501  
Main: (907) 276-5152 | Direct: (907) 868-9225 | Fax: (907) 276-8433 | [cheriw@lbblawyers.com](mailto:cheriw@lbblawyers.com)

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## Cheri Woods

---

**From:** Microsoft Outlook  
<MicrosoftExchange329e71ec88ae4615bbc36ab6ce41109e@lbblawyers.com>  
**To:** stevestrait@gci.net  
**Sent:** Wednesday, October 23, 2024 9:22 AM  
**Subject:** Undeliverable: 10-23-24 Expedited Complaint by 907 Initiative



Your message to [stevestrait@gci.net](mailto:stevestrait@gci.net) couldn't be delivered.

[stevestrait](mailto:stevestrait@gci.net) wasn't found at [gci.net](https://www.gci.net).

**cheriw**

**Office 365**

**stevestrait**

**Action Required**

Recipient

Unknown To address

### How to Fix It

The address may be misspelled or may not exist. Try one or more of the following:

- Send the message again following these steps: In Outlook, open this non-delivery report (NDR) and choose **Send Again** from the Report ribbon. In Outlook on the web, select this NDR, then select the link "**To send this message again, click here.**" Then delete and retype the entire recipient address. If prompted with an Auto-Complete List suggestion don't select it. After typing the complete address, click **Send**.
- Contact the recipient (by phone, for example) to check that the address exists and is correct.
- The recipient may have set up email forwarding to an incorrect address. Ask them to check that any forwarding they've set up is working correctly.
- Clear the recipient Auto-Complete List in Outlook or Outlook on the web by following the steps in this article: [Fix email delivery issues for error code 5.1.1 in Office 365](#), and then send the message again. Retype the entire recipient address before selecting **Send**.

If the problem continues, forward this message to your email admin. If you're an email admin, refer to the **More Info for Email Admins** section below.

Was this helpful? [Send feedback to Microsoft.](#)

---

## More Info for Email Admins

Status code: 550 5.1.1

This error occurs because the sender sent a message to an email address outside of Office 365, but the address is incorrect or doesn't exist at the destination domain. The error is reported by the recipient domain's email server, but most often it must be fixed by the person who sent the message. If the steps in the **How to Fix It** section above don't fix the problem, and you're the email admin for the recipient, try one or more of the following:

**The email address exists and is correct** - Confirm that the recipient address exists, is correct, and is accepting messages.

**Synchronize your directories** - If you have a hybrid environment and are using directory synchronization make sure the recipient's email address is synced correctly in both Office 365 and in your on-premises directory.

**Errant forwarding rule** - Check for forwarding rules that aren't behaving as expected. Forwarding can be set up by an admin via mail flow rules or mailbox forwarding address settings, or by the recipient via the Inbox Rules feature.

**Mail flow settings and MX records are not correct** - Misconfigured mail flow or MX record settings can cause this error. Check your Office 365 mail flow settings to make sure your domain and any mail flow connectors are set up correctly. Also, work with your domain registrar to make sure the MX records for your domain are configured correctly.

For more information and additional tips to fix this issue, see [Fix email delivery issues for error code 550 5.1.1 in Office 365.](#)

### Original Message Details

Created Date: 10/23/2024 5:22:03 PM  
Sender Address: cheriw@lbblawyers.com  
Recipient Address: stevestrait@gci.net  
Subject: 10-23-24 Expedited Complaint by 907 Initiative

### Error Details

Error: 550 5.1.1 [R2] Recipient stevestrait@gci.net does not exist here.  
Message rejected by: mx02.beryl.email-ash1.sync.lan

## Cheri Woods

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**From:** postmaster@outlook.com  
**To:** christystrutz@hotmail.com  
**Sent:** Wednesday, October 23, 2024 9:25 AM  
**Subject:** Delivered: 10-23-24 Expedited Complaint by 907 Initiative

**Your message has been delivered to the following recipients:**

[christystrutz@hotmail.com](mailto:christystrutz@hotmail.com) ([christystrutz@hotmail.com](mailto:christystrutz@hotmail.com))

Subject: 10-23-24 Expedited Complaint by 907 Initiative



10-23-24  
Expedited Com...