



Alaska Public Offices Commission

EXPEDITED COMPLAINT



EXPEDITED COMPLAINT REQUEST	ALL COMPLAINTS MUST INCLUDE:	APOC case name/number/date
<p>PRIOR 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 checked="" type="checkbox"/> if not immediately restrained (stopped), could materially affect the outcome of an election or other impending event;</p> <p><input checked="" type="checkbox"/> could cause irreparable harm that penalties could not adequately remedy; and</p> <p><input checked="" type="checkbox"/> whether there is reasonable cause to believe that a violation has occurred or will occur</p> <p>Expedited review requires the complainant to prove the violation by a preponderance of the evidence.</p>	<ol style="list-style-type: none"> 1. Complainant's name + contact info 2. Respondent's name + contact info 3. Laws, regulations allegedly violated 4. Description of allegations 5. Basis of knowledge of alleged facts 6. Documentation to support allegations 7. Notarized signature of the complainant 8. Proof that complaint <i>and</i> all supporting documents were served on respondent 	<div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>ARRIVED</p> <p>07/07/2026</p> <p>APOC - ANCH PM HC FAX ELE</p> </div> <p style="text-align: center; font-size: 1.2em;">26-08-CD</p>
APOC LAWS ALLEGEDLY VIOLATED <i>Specify section of law or regulation</i>		
Campaign Disclosure Law <input checked="" type="checkbox"/> AS 15.13 <input type="checkbox"/> 2 AAC 50.250-405		Public Official Financial Disclosure <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799
Lobbying Regulation <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590		Legislative Financial Disclosure <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	COMPLAINANT	<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	RESPONDENT <i>Person or group allegedly violating law</i>
Alaskans for Better Elections		Repeal Now; Aurora Action Network	
Address	510 L St., Ste 300	See attached Complaint, page 1	
City / Zip	Anchorage, AK 99501		
Phone/Fax	907-222-7932 / 907-222-7938		
E-mail	sam@cashiongilmore.com scott@cashiongilmore.com		
COMPLAINANT'S REPRESENTATIVE		RESPONDENT'S REPRESENTATIVE	
<i>If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info</i>			
Name/Title	Samuel G. Gottstein for Complainant	See attached Complaint, page 1	
Address	510 L St., Ste 300, Anchorage, AK 99501		
Phone/Fax	907-222-7932 / 907-222-7938		
E-mail	sam@cashiongilmore.com		

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

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

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

Signature: Title: Samuel G. Gottstein, Attorney Date: July 7, 2026

Subscribed and sworn to or affirmed by me at _____

Signature: Title: Paralegal

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

APOC ANCHORAGE	APOC JUNEAU	APOC COMPLAINT PROCESS: 2 AAC 50.450 -476	
2221 E. NORTHERN LIGHTS #128	240 MAIN STREET #500	FILING COMPLAINTS: 2AAC 50.870	ANSWERING COMPLAINTS: 2AAC 50.880
ANCHORAGE, AK 99508	P.O. BOX 110222	APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870	
907-276-4176 / FAX 907-276-7018	JUNEAU, AK 99811	INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891	
TOLL-FREE 800-478-4176	465-4864 / FAX 465-4832	RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c)	
WEB: http://doa.alaska.gov/apoc/	APOC FORMS: http://doa.alaska.gov/apoc/forms_all.html	APOC LAWS: http://doa.alaska.gov/apoc/apoclaws.html	

To: Alaska Public Offices Commission
From: Alaskans for Better Elections, Complainant

Re: Expedited Complaint Against Repeal Now and Aurora Action Network for Numerous Violations of Campaign Finance Laws (AS 15.13)

Respondents:¹

Repeal Now

P.O. Box 240382
Anchorage, Alaska 99524
Telephone: 907-440-7000
Emails: cfrascaAK@gmail.com
bethanymarcum@gmail.com
crichards@pioneerlawllc.com
jpack@pioneerlawllc.com
jnortoneledge@gmail.com

Aurora Action Network

502 6th Street
Hudson, Wisconsin 54016
Telephone: 202-866-8229
Emails: Compliance@AXCAPTEAM.com
derek@rosspoliticallaw.com
tcdatwyler@gmail.com

I. SUMMARY OF COMPLAINT

In May 2026, Complainant filed an APOC Complaint against Respondents Repeal Now and Aurora Action Network for significant violations of Alaska’s campaign disclaimer and disclosure requirements.² A copy of that Complaint (26-06-CD), along with Respondents’ answers, are attached and incorporated by reference.³

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

² See APOC Complaint 26-06-CD (May 26, 2026) (Attachment 1) to Affidavit of Samuel G. Gottstein (July 7, 2026) [hereinafter Second Gottstein Aff.]. 26-06-CD was accepted by APOC on May 28, 2026.

³ See *id.*; Repeal Now’s Response to 26-06-CD (June 22, 2026) (Attachment 2) to Second Gottstein Aff.; Aurora Action Network’s Response to 26-06-CD (June 22, 2026) (Attachment 3) to Second Gottstein Aff.; see also Advancing Alaska Action’s Response to 26-06-CD (Attachment 4) to Second Gottstein Aff.

Unfortunately, since 26-06-CD was filed, Repeal Now has committed a *new* series of violations. Repeal Now has produced and published *new* advertisements that falsely report Aurora Action Network’s principal place of business as Anchorage, Alaska on its disclaimers, even though *none* of Aurora Action Network’s own filings with APOC make that claim.⁴ Worse still, Repeal Now apparently no longer feels compelled to even pretend to follow AS 15.13.090(c)’s requirement that a disclosure “must remain onscreen throughout the entirety of the communication” — as it’s most recent video does not contain *any* written (or spoken) disclaimer, let alone one for the duration of the ad.⁵ The damage from these violations is immense and growing: these violations have occurred in campaign communications that have been seen *over 1.4 million times* on YouTube as of this filing,⁶ and the false disclaimers are also included on its large and small campaign signs.⁷

The Commission has previously made clear that *new* violations of Alaska campaign finance law can form the basis for a new APOC complaint.⁸ The Commission also has a longstanding interpretation that an entity’s “three largest contributors” under AS 15.13.090(a)(2)(C) are based on reports that have been filed with APOC at the time a

⁴ See Exhibits 5A-5K to Affidavit of Samuel G. Gottstein (May 26, 2026) [hereinafter First Gottstein Aff.]; Exhibit 5L to Second Gottstein Aff.

⁵ See Exhibit 17D to Affidavit of Seung Ah Baek (July 7, 2026) [hereinafter Baek Aff.]; see also Exhibit 17E to Baek Aff.

⁶ See Baek Aff. at ¶ 13 (explaining that, as of July 7, 2026, Repeal Now’s YouTube ads have been viewed approximately 1,440,834 times); see also Exhibits 17A-17E to Baek Aff.

⁷ See Exhibits 19A-19C to Second Gottstein Aff.

⁸ See Exhibit 18A to Second Gottstein Aff.

communication is originally placed.⁹ And the Commission has previously granted and ordered expedited relief to prevent “campaigns from spreading inaccurate information” when a Respondent’s disclaimer was “wildly” “inaccurate” from the moment the ads were placed.¹⁰

Repeal Now is knowingly publishing advertisements and producing and placing physical signs with a false (or even non-existent) disclaimer in violation of AS 15.13.090.¹¹ The Commission should swiftly GRANT expedited consideration and order Repeal Now to immediately correct its misleading, and nonexistent, disclaimers.

II. BACKGROUND INFORMATION ABOUT RESPONDENTS

A. Repeal Now

Repeal Now is the group supporting 24ESEG,¹² a ballot initiative scheduled to appear on the November 2026 ballot.¹³ If enacted by voters, 24ESEG would repeal major

⁹ See Exhibit 18B to Second Gottstein Aff. Specifically, in October 2020, “[t]he Commission decide[d] that the top three contributors are those who contributed the most as reported on campaign disclosure reports during the 12-month period before the . . . ads first aired.” See *id.* at 5. This was later reiterated by the Commission in June 2021, even if no civil penalties were imposed in that instance. See Exhibit 18C at 7-9 to Second Gottstein Aff.

¹⁰ Exhibit 18B at 6 (“[T]he Commission’s interpretation at least prevents campaigns from spreading inaccurate information to voters by using a top three disclosure that is already inaccurate—perhaps wildly, as was the case here—by the time the voters first hear the . . . ads.”) to Second Gottstein Aff; see Exhibit 18D to Second Gottstein Aff.

¹¹ See Exhibits 17A-17E to Baek Aff.

¹² See Exhibit 1A to First Gottstein Aff.; see also Exhibit 10A to First Gottstein Aff. 24ESEG was designated as such by the Lieutenant Governor before Repeal Now registered as a group with APOC. See Exhibits 1A & 10A to First Gottstein Aff.

¹³ See First Gottstein Aff. at ¶ 98.

aspects of Alaska’s current election system.¹⁴ Broadly, 24ESEG would repeal Alaska’s current election regime of: (1) an open primary election system; (2) ranked-choice voting for general elections; and (3) a ban on “dark money” contributions in state and local elections, as well as more detailed and stringent disclaimer policies and higher fines for campaign finance violations.¹⁵

24ESEG is intended to fully repeal 19AKBE, a ballot initiative passed by voters in the 2020 general election.¹⁶ Unlike a recent repeal effort involving a different ballot initiative (22AKHE) from the last statewide election cycle,¹⁷ Repeal Now — through 24ESEG — seeks to repeal Alaska’s stringent “dark money” ban and other strict campaign finance disclaimer and disclosure requirements in addition to repealing the election system itself.¹⁸

Repeal Now’s disclaimers on its communications have changed over time.¹⁹ Since the end of June 2025, Repeal Now’s top donor has been an entity called “Aurora Action Network.”²⁰ And Repeal Now’s prior disclaimers correctly noted that Aurora Action Network is located in Hudson, Wisconsin,²¹ which is consistent with all of Aurora Action

¹⁴ See Exhibit 10B to First Gottstein Aff.

¹⁵ See *id.*; see also Exhibit 10C to First Gottstein Aff.

¹⁶ See Exhibit 10C to First Gottstein Aff.

¹⁷ See Exhibit 10D to First Gottstein Aff.

¹⁸ See Exhibits 10B-10C to First Gottstein Aff.

¹⁹ See, e.g., Exhibits 6A-6C to First Gottstein Aff.

²⁰ See Exhibit 2G to First Gottstein Aff.

²¹ See Exhibit 6A to First Gottstein Aff.

Network's Statement of Contribution reports filed with APOC, including an amended report filed as recently as June 19, 2026.²²

However, Repeal Now's disclaimers for Aurora Action Network recently changed. Repeal Now has begun falsely relying on the address of a residential home in Anchorage, Alaska as Aurora Action Network's primary place of business,²³ even though that address has no plausible connection to the group, has not been part of any APOC report filed by Aurora Action Network,²⁴ and was only first reported by Repeal Now through amendments that were filed on June 8, 2026.²⁵ This false disclaimer appears in Repeal Now's video advertisements on YouTube,²⁶ which were published or discovered subsequent to the filing of 26-06-CD,²⁷ and which have been viewed over 1.4 million times as of this date.²⁸ Repeal Now's false disclaimer also appears on its large and small campaign signs.²⁹

²² See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff. Aurora Action Network's address is also identical to that of another organization, "Beautiful America," which used to be one of Repeal Now's three largest contributors. See Exhibits 11A-11B to First Gottstein Aff.; see also Exhibits 5A-5J to First Gottstein Aff.

²³ See Exhibits 6B-6C to First Gottstein Aff.; Exhibit 7A to First Gottstein Aff.; Exhibit 8A to First Gottstein Aff.; see also Exhibit 4B to First Gottstein Aff.

²⁴ See Exhibits 2A-2AD to First Gottstein Aff.; Exhibits 3A-3D to First Gottstein Aff.; Exhibits 5A-5K to First Gottstein Aff. Repeal Now apparently has a history of using incurrent addresses for entities; it used an Eagle River PO Box for one of Beautiful America's sizeable contributions. See Exhibit 3B at 7-8 to First Gottstein Aff.

²⁵ See Exhibits 2AE, 2AG, 2AH to Second Gottstein Aff. Some of those amended independent expenditures form 15-6s have been amended by Repeal Now again, sometimes repeatedly. See Exhibits 2AF, 2AI to Second Gottstein Aff.

²⁶ See Exhibits 17A-17C to Baek Aff.; see also Exhibits 17D-17E to Baek Aff.

²⁷ See generally Attachment 1.

²⁸ See Baek Aff. at ¶ 13.

²⁹ See Exhibits 19A-19C to Second Gottstein Aff.

B. Aurora Action Network

Aurora Action Network first registered as a Super PAC with the FEC on June 6, 2025, with a business address in Hudson, Wisconsin.³⁰ Aurora Action Network’s custodian of records and treasurer is also listed at the same address, and its bank account is based at a bank in Lino Lakes, Minnesota.³¹

Recently, Repeal Now began using an Alaska residential address for Aurora Action Network in required disclaimers on its communications.³² This appears to be because Aurora Action Network listed a new *mailing* address in a recent *FEC* filing.³³ But Aurora Action Network still lists its treasurer and custodian of records at its Hudson, Wisconsin address, and its bank account remains in Lino Lakes, Minnesota.³⁴ Furthermore, Aurora Action Network is not — and has never been — an Alaska-based corporation or entity,³⁵ and *none* of its APOC filings lists the residential address in Alaska as its “principal place of business.”³⁶ Indeed, Aurora Action Network *continues* to correctly report its Wisconsin

³⁰ See Exhibit 4A to First Gottstein Aff.

³¹ See Exhibit 4A to First Gottstein Aff.

³² See Exhibits 6B-6C to First Gottstein Aff.; Exhibit 7A to First Gottstein Aff.; Exhibit 8A to First Gottstein Aff.; Exhibits 17A-17C to Baek Aff.; see also Exhibit 9A to First Gottstein Aff.; First Gottstein Aff. at ¶ 58.

³³ See Exhibit 4B to First Gottstein Aff.; see also Attachment 3 to Second Gottstein Aff.

³⁴ See Exhibit 4B to First Gottstein Aff.; see also Exhibits 5A-5K to First Gottstein Aff.

³⁵ See Exhibit 13A to First Gottstein Aff.

³⁶ See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.; see also Exhibit 13B to First Gottstein Aff.

address in its statements of contributions, including an amended report filed with APOC on June 19, 2026.³⁷

The Alaska address Aurora Action Network used for its FEC filing belongs to Bob Griffin, a prior (and early) contributor to Repeal Now.³⁸ Mr. Griffin is *not* Aurora Action Network’s treasurer, does not appear to be an employee of the entity, and does not appear to have ever donated to the entity.³⁹ He is, however, currently listed as staff for the Alaska Policy Forum,⁴⁰ which has its own history of APOC violations.⁴¹ The sole purpose of using Mr. Griffin’s address appears to be falsely portraying Aurora Action Network as an “Alaska” entity for Repeal Now’s mandatory disclaimers, and to deceive voters about the fact that Aurora Action Network *and* the sources of the vast majority of the funds contributed to Repeal Now are from Outside Alaska.

Whether or not Aurora Action Network will now falsely claim to be “principally” based at Mr. Griffin’s residential address in Anchorage, there is *zero* evidence that the entity’s principal place of business is actually located at that address. There is no indication that any of Aurora Action Network’s employees live or work at that address, that there is any dedicated phone line for its work at that location, or that its address has changed on

³⁷ See Exhibit 5L to Second Gottstein Aff.; see also Exhibits 5I-5K to First Gottstein Aff.

³⁸ See Exhibit 4B to First Gottstein Aff.; see also Exhibit 2A to First Gottstein Aff.

³⁹ See Exhibits 4A-4F to First Gottstein Aff.; Exhibits 5A-5K to First Gottstein Aff.

⁴⁰ See Exhibit 13C to First Gottstein Aff.

⁴¹ See generally *Alaska Pol’y F. v. APOC*, 583 P.3d 701 (Alaska 2026). The Alaska Policy Forum has indicated that it intends to file a petition for writ of certiorari to the United States Supreme Court later this summer.

any of its bank accounts or other governing documents.⁴² We do not currently know why Aurora Action Network changed its mailing address with the FEC, but a likely explanation could be that they were asked to do so by Repeal Now. And even though Aurora Action Network represents that they receive mail at this Anchorage address, that does not transform this residential address into Aurora Action Network's principal place of business.⁴³

Indeed, even after belatedly filing a change of address with the FEC,⁴⁴ Aurora Action Network has *continued* to correctly list its Hudson, Wisconsin address on *all* of its Statement of Contribution reports with APOC.⁴⁵ In fact, *none* of Aurora Action Network's APOC reports list an Anchorage address for Aurora Action Network.⁴⁶ This is true even for Statement of Contribution reports filed as recently as April 10 and 28, May 14, and June 19, 2026,⁴⁷ all of which were after the FEC filing purporting to adopt the false Alaska address.⁴⁸ The only places the Alaska address is listed as Aurora Action Network's principal place of business is on Repeal Now's top three disclaimers,⁴⁹ and Repeal Now's

⁴² See, e.g., Exhibit 18E to Second Gottstein Aff.

⁴³ See Attachment 3 to Second Gottstein Aff.

⁴⁴ See Exhibit 4B to First Gottstein Aff.

⁴⁵ See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.

⁴⁶ See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.; *see also* Exhibits 2A-2AD to First Gottstein Aff.; Exhibits 3A-3D to First Gottstein Aff.

⁴⁷ See Exhibits 5I-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.

⁴⁸ See Exhibit 4B to First Gottstein Aff.

⁴⁹ See Exhibits 6B-6C to First Gottstein Aff.; Exhibit 7A to First Gottstein Aff.; Exhibit 8A to First Gottstein Aff.; *see also* Exhibit 9A to First Gottstein Aff.

recently-amended reports to APOC,⁵⁰ which stand in direct contradiction of Aurora Action Network’s own Statement of Contribution reports.⁵¹

III. ALLEGATIONS

A. **Alleged Violations By Aurora Action Network.**

i. **Falsely and deceptively changing its address to an Alaska address.**

Whenever a group like Repeal Now communicates, AS 15.13.090 requires that certain disclaimers be included. Chief among them is the requirement to list a group’s “three largest contributors,” including their “city and state of residence or principal place of business.”⁵²

It appears that Aurora Action Network is somehow complicit in Repeal Now’s distortion of the required disclaimer in AS 09.13.090(a)(2)(C). There is no indication that *any* employees or officers do any “business” at a residential address in Anchorage, let alone that it is Aurora Action Network’s “*principal* place of business.”⁵³ After all, Aurora Action Network still has *not* claimed that the Anchorage, Alaska address is its “principal place of business,” either in APOC reports,⁵⁴ or in response to 26-06-CD.⁵⁵ Instead, Aurora Action Network appears to be reporting correctly while passively allowing Repeal Now to mislead

⁵⁰ See Exhibits 2AE, 2AG, 2AH to Second Gottstein Aff.

⁵¹ See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.

⁵² AS 15.13.090(a)(2)(C); see also AS 15.13.040(e).

⁵³ AS 15.13.090(a)(2)(C); see also Attachment 3 to Second Gottstein Aff.

⁵⁴ See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.

⁵⁵ See Attachment 3 to Second Gottstein Aff.

Alaskans about where its contributions come from based on a false residential mailing address.⁵⁶

B. Alleged Violations By Repeal Now.

i. Improper disclaimers.

Repeal Now is required by AS 15.13.090(a)(2)(C) to disclaim its “three largest contributors,” along with their “city and state of residence or principal place of business,” for every communication.⁵⁷ The primary source of this requirement comes from AS 15.13.040(e)(5). And the Commission has a longstanding interpretation about how to determine the “three largest contributors” for a group like Repeal Now; it is based on “who contributed the most as reported on campaign disclosure reports during the 12-month period before the . . . ads first aired.”⁵⁸

Critically, Aurora Action Network has *never* filed a *single* report with APOC claiming Anchorage, Alaska as its “principal place of business.”⁵⁹ Indeed, it appears quite obvious that Aurora Action Network is based in Wisconsin,⁶⁰ even if it recently claimed to have an Alaska *mailing* address.⁶¹ Nevertheless, Repeal Now has now listed Anchorage,

⁵⁶ See Exhibits 6B-6C to First Gottstein Aff.; Exhibit 7A to First Gottstein Aff.; Exhibits 8A-8X to First Gottstein Aff.; Exhibits 9A-9J to First Gottstein Aff.

⁵⁷ AS 15.13.090(a)(2)(C).

⁵⁸ See Exhibit 18B at 5 to Second Gottstein Aff.; see also Exhibit 18C at 7-9 to Second Gottstein Aff.

⁵⁹ See Exhibits 2A-2AD to First Gottstein Aff.; Exhibits 3A-3D to First Gottstein Aff.; Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.

⁶⁰ See Exhibits 4A-4B to First Gottstein Aff.; Exhibits 5A-5K to First Gottstein Aff.

⁶¹ See Attachment 3 to Second Gottstein Aff.

Alaska on dozens of communications, including radio advertisements and multiple video ads on YouTube that have garnered over 1.4 million views.⁶² Additionally, Repeal Now is using the same inaccurate disclaimer on its large and small physical campaign signs.⁶³ That is false and misleading, and a clear violation of AS 15.13.090.

Moreover, in light of Aurora Action Network's Statement of Contribution reports which state otherwise,⁶⁴ Repeal Now's use of a false disclaimer appears to be intentional.⁶⁵ Repeal Now is either relying on Aurora Action Network's FEC filing,⁶⁶ or, more likely, there are communications between the two entities requesting that Aurora Action Network utilize this false Alaska address. Either way, incorrectly and misleadingly listing the Alaska residential address is a farcical and intentional ploy by Repeal Now to deceive Alaskans about the source of its contributions.⁶⁷ Moreover, it directly contradicts other filed APOC reports.⁶⁸

⁶² See Exhibits 6B-6C to First Gottstein Aff.; Exhibit 7A to First Gottstein Aff.; Exhibits 8A-8Y to First Gottstein Aff.; Exhibits 9A-9L to First Gottstein Aff.; Exhibits 17A-17C to Baek Aff.; see also Baek Aff. at ¶ 13.

⁶³ See Exhibits 19A-19C to Second Gottstein Aff.

⁶⁴ See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.

⁶⁵ See Exhibits 17A-17C to Baek Aff.

⁶⁶ See Exhibit 4B to First Gottstein Aff.

⁶⁷ See Exhibits 17A-17C to Baek Aff.; see also Exhibit 13B to First Gottstein Aff.; First Gottstein Aff. at ¶ 58; Exhibit 7B to First Gottstein Aff.

⁶⁸ See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.

Repeal Now also appears to be incorrectly listing its third largest contributor as well.⁶⁹ This is because Repeal Now has reported the true source of a \$10,000 contribution as “Jim Lot Turner.”⁷⁰ Yet Repeal Now is reporting the true source of the contribution as “LOT Inc.,” which is contrary to its own reports *and* Mr. Turner’s personal statement of contribution form.⁷¹ Repeal Now should *also* be required to correct this error on its disclaimers everywhere it has occurred, including but not limited to its video and radio advertisements,⁷² its website,⁷³ as well as its large and small signs across Alaska.⁷⁴

ii. Missing disclaimers.

Subsequent to the filing of 26-06-CD, Repeal Now appears to be acting with even *less* regard to AS 15.13.090. In addition to making a mockery of the statute’s reporting

⁶⁹ See Exhibits 17A-17C to Baek Aff.; *see also* Exhibits 6B-6C to First Gottstein Aff.; Exhibit 7A to First Gottstein Aff.; Exhibit 8A to First Gottstein Aff.; Exhibit 9A to First Gottstein Aff.

⁷⁰ See Exhibit 2Z to First Gottstein Aff. This was confirmed by a subsequent statement of contribution form 15-5 filed by Mr. Turner. See Exhibit 15A to First Gottstein Aff.

⁷¹ See Exhibit 15A to First Gottstein Aff.; Exhibits 6B-6C to First Gottstein Aff.; Exhibit 7A to First Gottstein Aff.; Exhibit 8A to First Gottstein Aff.; Exhibit 9A to First Gottstein Aff.

⁷² See Exhibits 17A-17C to Baek Aff.; Exhibits 7A-7B to First Gottstein Aff.

⁷³ See Exhibits 6B-6C to First Gottstein Aff.

⁷⁴ See Exhibits 19A-19C to Second Gottstein Aff.

requirements in its video advertisements,⁷⁵ Repeal Now presently seems emboldened to ignore that statute's requirements altogether.⁷⁶

Despite previously including *some* disclaimer on online video advertisements,⁷⁷ Repeal Now's most recent video ad does not include *any* required disclaimer *at all*.⁷⁸ This is a brand-new category of violation that must be promptly corrected as well.

IV. CONCLUSION

Repeal Now continues to intentionally deceive voters regarding the principal place of business of Aurora Action Network, the pass-through organization for nearly all of Repeal Now's funding. By claiming Aurora Action Network is based at a residential address in Anchorage, Alaska, Repeal Now can fool any voter who only hears or reads their disclaimers into believing their campaign is locally funded. And Repeal Now is doing so with such intensity and frequency that the Commission must enjoin Repeal Now immediately to prevent further irreparable harm as described in a concurrently-filed request to expedite.

⁷⁵ See Exhibit 17A to Baek Aff. (stating, on screen during the verbal disclaimer required by AS 15.13.090, that “[t]he people pushing Ranked Choice Voting are the **same loonies responsible for this absurdly long disclaimer**” (emphasis added)); Exhibit 17B to Baek Aff. (stating, on screen during the verbal disclaimer required by AS 15.13.090, that “[t]he people pushing Ranked Choice Voting are the **same geniuses requiring this absurdly long disclaimer**” (emphasis added)).

⁷⁶ See Exhibit 17D to Baek Aff.; see also Exhibit 17E to Baek Aff.

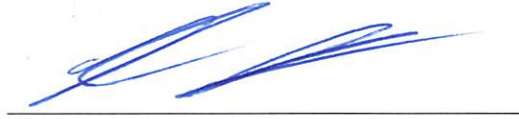
⁷⁷ See Exhibits 17A-17C to Baek Aff.

⁷⁸ See Exhibit 17D to Baek Aff.; see also Exhibit 17E to Baek Aff.

CASHION GILMORE & LINDEMUTH
Attorneys for Complainant, Alaskans for Better
Elections

DATE: July 7, 2026

By:



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

AFFIDAVIT OF SAMUEL G. GOTTSTEIN

STATE OF ALASKA)
) ss
THIRD JUDICIAL DISTRICT)

I, Samuel G. Gottstein, being first duly sworn and deposed, hereby state as follows:

1. I am an attorney representing Complainant Alaskans for Better Elections in an Expedited APOC Complaint against Repeal Now and Aurora Action Network that is being filed today, along with an accompanying motion to expedite.
2. Attached as Attachment 1 is a true and correct copy of a prior APOC Complaint, now designated 26-06-CD, which was filed by Complainant on May 26, 2026.
3. Attached as Attachment 2 is a true and correct copy of Repeal Now’s Response to 26-06-CD, which was filed on June 22, 2026.
4. Attached as Attachment 3 is a true and correct copy of Aurora Action Network’s Response to 26-06-CD, which was filed on June 22, 2026.
5. Attached as Attachment 4 is a true and correct copy of Advancing Alaska Action’s Response to 26-06-CD, which was filed on June 22, 2026. Advancing Alaska Action is not a Respondent for Complainant’s Expedited APOC Complaint.
6. Attached as Exhibit 2AE is a true and correct copy of the first of Repeal Now’s three amended independent expenditures form 15-6, dated June 8, 2026. Exhibit 2AE amends one of Repeal Now’s prior independent expenditure forms (Exhibit 2Y).

7. Attached as Exhibit 2AF is a true and correct copy of one of Repeal Now's amended independent expenditures form 15-6, dated June 17, 2026. Exhibit 2AF amends one of Repeal Now's prior independent expenditure forms (Exhibits 2Y and 2AE), and is the most recent version of this independent expenditure form.

8. Attached as Exhibit 2AG is a true and correct copy of the second of Repeal Now's three amended independent expenditures form 15-6, dated June 8, 2026. Exhibit 2AG amends one of Repeal Now's prior independent expenditure forms (Exhibit 2AC).

9. Attached as Exhibit 2AH is a true and correct copy of the third of Repeal Now's three amended independent expenditures form 15-6, dated June 8, 2026. Exhibit 2AH amends one of Repeal Now's prior independent expenditure forms (Exhibit 2AD).

10. Attached as Exhibit 2AI is a true and correct copy of one of Repeal Now's amended independent expenditures form 15-6, dated June 17, 2026. Exhibit 2AI amends one of Repeal Now's prior independent expenditure forms (Exhibits 2AD and 2AH), and is the most recent version of this independent expenditure form.

11. Attached as Exhibit 5L is a true and correct copy of Aurora Action Network's amended statement of contributions for 15-5, dated June 19, 2026. Exhibit 5L amends one of Aurora Action Network's prior statement of contribution forms (Exhibit 5K) to correct the address of a true source.

12. Attached as Exhibit 18A is a true and correct copy of an Order Accepting Complaint and Remanding to Staff for Investigation, which issued by the Alaska

Public Offices Commission (“the Commission”) on September 9, 2024, in what would later become APOC Complaint 24-03-CD.

13. Attached as Exhibit 18B is a true and correct copy of an Emergency Order, which was issued by the Commission on October 8, 2020, in APOC Complaint 20-06-CD.

14. Attached as Exhibit 18C is a true and correct copy of a Final Order, which was issued by the Commission on June 21, 2021, in APOC Complaint 20-06-CD.

15. Attached as Exhibit 18D is a true and correct copy of an Order Granting Expedited Consideration, which was issued by the Commission on October 6, 2020, in APOC Complaint 20-06-CD.

16. Attached as Exhibit 18E is a true and correct copy of an Order on Expedited Consideration, which was issued by the Commission on October 24, 2022, in APOC Complaint 22-04-CD.

17. Attached as Exhibit 19A is a true and correct copy of a photograph of a large campaign sign for Repeal Now.

18. Attached as Exhibit 19B is a true and correct copy of a photograph of a small campaign sign for Repeal Now.

19. Attached as Exhibit 19C is a true and correct copy of a second photograph of a small campaign sign for Repeal Now. This second photograph more clearly shows the disclaimer printed on the sign.

FURTHER AFFIANT SAYETH NAUGHT.



Samuel G. Gottstein
Alaska Bar No. 1511099

SUBSCRIBED AND SWORN to before me on this 7th day of July, 2026, at Anchorage, Alaska.



Notary Public in and for Alaska
My Commission Expires: 4/5/29

PLACEHOLDER FOR
ATTACHED ELECTRONIC FILE

ATTACHMENT 1
(Attachment 1.pdf)

Available at:

<https://www.dropbox.com/scl/fo/ph12fcx9g9eefyjsp8mj1/AEHzmTQ1CIYUo93l4Vq08c?rlkey=755c6lhr95v90toaprcsowur&st=7rw4m11z&dl=0>



Alaska Public Offices Commission



RESPONSE TO COMPLAINT

RESPONDENT – ANSWERING A COMPLAINT	APOC use / Date received
APOC case number	
<ul style="list-style-type: none"> • Submit this signed form as a cover sheet for your response to a complaint • You have 15 days to answer a complaint after APOC notifies you that it has accepted a complaint for investigation of the allegations. • Include your contact info + contact info for your representative or attorney (if applicable) • Your response to the complaint may state any defenses to the allegations • Include all relevant documentation with your response • Provide proof that response + supporting documents were provided to complainant 	
<input type="checkbox"/> Request expedited Review. Reason:	

RESPONDENT	RESPONDENT'S REPRESENTATIVE
<i>If the respondent is a political party or group, list a contact person. If respondent is represented by an attorney, list name and contact info</i>	
<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	Name: Judy Eledge Title: Chair, Repeal Now
Address City / Zip: P.O. Box 240382, Anchorage, AK 99524	
Phone/Fax: (907) 351-1876	
E-mail: jnortoneledge@gmail.com	

DESCRIPTION or SUMMARY of RESPONSE	Use extra pages if needed for detailed response Include back-up docs	<input type="checkbox"/> SUPPORTING DOCUMENTS – DESCRIBE
Please see attached documentation		Please see attached documentation

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

RESPONDENT'S SIGNATURE: To the best of my knowledge and belief, these statements are true

Signature: *Judy Eledge* Title: Chair, Repeal Now Date: 6-22-26

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

APOC ANCHORAGE	APOC JUNEAU	APOC COMPLAINT PROCESS	
2221 E. NORTHERN LIGHTS #128	240 MAIN STREET #500	FILING COMPLAINTS : 2AAC 50.450	ANSWERING COMPLAINTS: 2AAC 50.458
ANCHORAGE, AK 99508	P.O. BOX 110222	APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.452	
907-276-4176 / FAX 907-276-7018	JUNEAU, AK 99811	INVESTIGATIONS & HEARINGS: 2 AAC 50.460 – 470	
TOLL-FREE 800-478-4176	465-4864 / FAX 465-4832	RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c)	
WEB: WWW.APOC.ALASKA.GOV	APOC FORMS: www.apoc.alaska.gov/forms_all.shtml	APOC LAWS: www.apoc.alaska.gov/apoclaws.shtml	

Repeal Now Answer to APOC Complaint dated May 26, 2026 (APOC 2 AAC 50.870(e) Notice received June 4, 2026).

Alaska Public Offices Commission 2221 E. Northern Lights Blvd. #128 Anchorage, AK 99508

Re: Response of Repeal Now to Complaint by Alaskans for Better Elections – Allegations Directed at Repeal Now Only

Repeal Now submits this response to the allegations in the above Complaint that concern Repeal Now. This is the first election year where a ballot measure has been subject to true source requirements, and Repeal Now appreciates APOC’s assistance in navigating this new legal terrain. Attachment 1 (APOC email stating “we have run into some issues with the true source reporting on the IE form, and it is likely what has caused, at least in part, some of your confusion” and apologizing “for the confusion”). Repeal Now has corrected the identified issues through amended filings, and will make additional amendments promptly as directed by APOC staff. Repeal Now also points out that these inadvertent technical errors resulted in no harm to voters, a key factor in APOC’s review of the complaint.

Repeal Now respectfully takes issue with the inflammatory and accusatory tone of the allegations made by Complainant. Repeal Now is variously accused, without evidence, of falsifying reporting, undertaking a pure and intentional farce, making a farcical and intentional play, and acting intentionally and recklessly. While there is an important governmental interest in ensuring compliance with campaign disclosure and finance laws, Repeal Now urges APOC to be mindful of political foes weaponizing APOC’s investigatory process to paint their ideological opponents in a bad light. This is a matter of Alaskans who made good-faith efforts to comply with a complex and novel reporting regime as part of their efforts to exercise their constitutional rights to direct democracy, and who have turned to APOC for guidance wherever uncertainty arose. Repeal Now has acted in good, not bad, faith in its efforts to comply with Alaska’s laws.

Below, Repeal Now addresses each relevant allegation in the order presented in the Complaint.

Responses to Allegations

1. July 31, 2025 Wire Transfer Discrepancy (Complaint pp. 14 & 22, under Aurora Action Network delayed/inaccurate reporting section)

The Complaint identifies a \$500 discrepancy between amounts reported by Aurora Action Network and Repeal Now for a contribution around July 31, 2025, and notes related reporting differences.

Response: Admitted that an inadvertent difference in reported amounts existed, which has been corrected. Otherwise denied. This was an administrative error. Repeal Now received two wire transfers from Aurora Action Network on July 31, 2025, totaling \$44,500 (\$25,000 and \$19,500); Aurora Action Network’s true source list totaled \$45,000. Repeal Now’s August 9, 2025 IE report has been amended to delete the inadvertent reporting of a \$500 expenditure because no such expenditure occurred.

2. Improper Disclaimers – Use of Incorrect Anchorage Address for Aurora Action Network (Complaint p. 16, § B.i.)

The Complaint alleges Repeal Now used a false Anchorage, Alaska residential address for Aurora Action Network in required top-three-contributor disclaimers on communications, when Aurora Action Network’s actual principal place of business is in Hudson, Wisconsin.

Response: Denied. The address used for Aurora Action Network in the disclaimers is not false; this is the correct address as stated by Aurora Action Network. Repeal Now received notification of Aurora Action Network’s address change from Wisconsin to Anchorage in early April 2026 and subsequently updated its disclaimers. Repeal Now inadvertently did not update its own reports with the new address, and has since amended the three affected reports (filings dated April 9, May 19, and May 23, 2026) to now list the correct address for Aurora Action Network, which is the Anchorage address. Repeal Now has, at all times in listing Aurora Action Network’s address, relied on statements made by Aurora Action Network. Aurora Action Network has represented to Repeal Now that its Anchorage address is the correct address. As of the date of this filing, Repeal Now is still told that the Anchorage address is the correct address to use.

Additionally, nothing in AS 15.13.040(r) or AS 15.13.400(19) makes Repeal Now responsible for deficiencies, if any, in the information provided by another: AS 15.13.040(r) places the burden on “the reporting contributor” to “report and certify the true sources of the contribution” and reiterates that it is the “contributor” who “is also required to provide the identity of the true source to the recipient of the contribution.” Consistent with this language, 2 AAC 50.258(a) imposes the prohibition on the *contributor* from “using the name of another, or a third-party conduit to obscure” the origin of the funds. Additionally, APOC AO 26-01-CD, Moses for the Organization, is an APOC staff opinion discussing an organization’s requirements to “report itself” under the new true source requirements. These sources all make clear that the requirement to ensure the accuracy of the true source disclosure requirements is on the contributor organization, not the receiving organization. Therefore, Repeal Now cannot be held responsible for any inaccuracies or incompleteness in a contributor’s statements.

3. Inaccurate Reports – Incorrect Ballot Initiative Number (Complaint p. 18, § B.ii.)

The Complaint alleges Repeal Now incorrectly reported 232 of 234 expenditures and debts as supporting either the prior 22AKHE measure or an unassigned/placeholder numbered initiative (“2” or “3”) instead of the current active ballot initiative 24ESEG.

Response: Admitted that the incorrect designation was used, which has been corrected. Otherwise denied. Repeal Now made a mistake using the wrong ballot number because it did not understand the Division of Elections’ ballot numbering system. Repeal Now has amended all reports to correctly reflect its efforts as supporting ballot measure 24ESEG and effective with its May 23, 2026 IE report, APOC’s automated system populates the ballot measure as supporting “2 - Repeal.”

4. Delayed, Inaccurate, and Missing Reporting; Discrepancies with Aurora Action Network (Complaint p. 20, § B.iii.)

This section raises multiple issues which can be summarized into two categories: (a) delayed or missing 2026 quarterly reports; and (b) discrepancies in dates, amounts, true-source reporting for contributions from Aurora Action Network, alleged post-dating of true-source contributions.

Response:

(a) Quarterly reports: Denied. APOC advised Repeal Now via email on January 5, 2026 that following Repeal Now’s designation change from an initiative committee to ballot proposition group would change the reports due (Attachment 2). Repeal Now made this designation change shortly after the APOC email, on January 13, 2026 (Attachment 3). Repeal Now has relied on APOC’s advice in ceasing to file quarterly reports following its designation change to ballot proposition group. If Repeal Now misinterpreted that guidance, or APOC now advises differently, Repeal Now will comply with whatever direction APOC gives.

(b) Discrepancies in contribution amounts and timing from Aurora Action Network: Denied. Repeal Now reported contributions received and provided true sources as required by AS 15.13 and guidance from APOC. Recent guidance from APOC in person to Repeal Now’s compliance professional Cheryl Frasca on Tuesday June 16, 2026 indicated that a list of all true source donors to Aurora Action Network is the preferred way of reporting, even when the true source contribution amounts don’t match up with contribution amounts being reported. Following this guidance from APOC, Repeal Now amended relevant reports to reflect all Aurora Action Network true source donors. All names and other required information which Repeal Now received from Aurora action have been filed with APOC by Repeal Now, consistent with APOC guidance. This moots the alleged discrepancies noted in the bullet points in the Complaint on pages 22 and 23 regarding the specific contribution amounts.

5. True Source Violations (Complaint p. 24, § B.iv.)

The Complaint alleges (a) Repeal Now improperly listed Advancing Alaska Action as the true source for a \$5,000 contribution and (b) reported Timothy Mellon as residing in the nonexistent location “Saratoga, Alaska.”

Response:

(a) Advancing Alaska Action: Denied. In April 2026, by phone call, Repeal Now requested from Aurora Action Network the list of true-source donors for one of its contributors, Advancing Alaska Action. Aurora Action Network represented that Advancing Alaska Action itself was the true source and thus in good faith, Repeal Now reported this accordingly. If the information was incomplete or inaccurate, Repeal Now was not aware of it at the time of reporting. For the same reasons discussed under allegation 2, Repeal Now cannot be held responsible for any inaccuracies or incompleteness of the statements of another.

(b) Timothy Mellon: Denied. Repeal Now’s report listed Saratoga, Wyoming as the residence for this individual. This is the correct state of residence.

6. Allegation That Repeal Now Is a Sophisticated Filer That Acted with Intent or Bad Faith (Complaint p. 24, § B.vi.)

The Complaint suggests that Repeal Now's retention of experienced compliance help and its fundraising level indicate that violations were intentional or reckless rather than inadvertent.

Response: Denied. Repeal Now takes compliance seriously and retained Cheryl Frasca, an experienced APOC compliance professional and former municipal and state OMB director who works with multiple current campaigns, specifically to ensure accurate and timely filings. Due to the fact that this is the first election year where a ballot measure has been subject to true source requirements, Repeal Now has communicated with APOC staff on multiple occasions to seek guidance and resolve questions as they arose. The retention of professional compliance assistance and our communication with APOC demonstrates a good-faith effort to navigate complex requirements of this new reporting requirement for ballot measures, not an attempt to evade them. Indeed, Complainant's accusatory and inflammatory rhetoric indicates a partisan motivation in its filings.

Defenses:

1. The imposition of civil penalties for conduct whose legality was not clear would violate Repeal Now's rights to due process.

It is fundamentally unfair to penalize Repeal Now for conduct that Repeal Now could not have known was a violation of the true source requirements. The true source requirements only recently became law (following the passage of a ballot measure in 2020) and even more recently been applied to ballot measures (in an approved APOC advisory opinion issued September 9, 2024). Repeal Now has been working with APOC wherever possible to ensure compliance with the law, and has demonstrated its willingness to meet any additional requirements set by APOC.

2. Good-faith.

Repeal Now has at all times acted in good faith to comply with reporting requirements. When in doubt, Repeal Now has reached out to APOC for compliance assistance and followed APOC's direction. Under such circumstances, it would be unfair and unjust to penalize Repeal Now.

3. Reservation.

Repeal Now reserves the right to assert additional defenses upon the review of APOC's investigation report.

Conclusion

Repeal Now has already taken action to correct any issues necessary to be fully compliant with APOC. Repeal Now will continue working to ensure all past and future reporting meets statutory requirements and APOC guidance. Repeal Now has not acted willfully or with intent to mislead. It respectfully requests that APOC consider Repeal Now's good-faith corrective actions, its

ongoing cooperation, and the absence of any showing of voter harm when evaluating whether civil penalties are appropriate. Repeal Now remains available to meet with staff, provide bank records or other documentation, and answer questions to resolve this matter efficiently before the November 2026 election.

Respectfully submitted,

Repeal Now
PO Box 240382
Anchorage, AK 99524
(907) 351-1876

By:

Judy Eledge,

Chair, Repeal Now

Date: June 22, 2026

Proof of service: I, Judy Eledge, certify that on June 22nd, 2026 , a copy of this Answer was emailed to Alaskans for Better Elections, 510 L St., Ste. 300, Anchorage, Alaska 99501 at scott@cashiongilmore.com and sam@cashiongilmore.com. /s/ Judy Eledge



Alaska Public Offices Commission

RESPONSE TO COMPLAINT




RESPONDENT – ANSWERING A COMPLAINT		<i>APOC use / Date received</i>
APOC case number		
<ul style="list-style-type: none"> • Submit this signed form as a cover sheet for your response to a complaint • You have 15 days to answer a complaint after APOC notifies you that it has accepted a complaint for investigation of the allegations. • Include your contact info + contact info for your representative or attorney (if applicable) • Your response to the complaint may state any defenses to the allegations • Include all relevant documentation with your response • Provide proof that response + supporting documents were provided to complainant 		
<input type="checkbox"/> Request expedited Review. Reason:		

RESPONDENT		RESPONDENT'S REPRESENTATIVE	
<i>If the respondent is a political party or group, list a contact person. If respondent is represented by an attorney, list name and contact info</i>			
<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	Aurora Action Network	Name Title	Derek H. Ross; Ross Political Law, APC Counsel to Aurora Action Network
Address City / Zip	11790 Cange Street Anchorage, AK 99516		3333 Michelson Drive STE 300 Irvine, CA 92612
Phone/Fax	NA/NA		202.816.2021/NA
E-mail	tcdatwyler@gmail.com		derek@rosspoliticallaw.com

DESCRIPTION or SUMMARY of RESPONSE	<i>Use extra pages if needed for detailed response Include back-up docs</i>	<input type="checkbox"/> SUPPORTING DOCUMENTS – DESCRIBE
Please see attached response and supporting information		

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

RESPONDENT'S SIGNATURE: To the best of my knowledge and belief, these statements are true

Signature  Title Attorney Date 6.22.26

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

APOC ANCHORAGE	APOC JUNEAU	APOC COMPLAINT PROCESS	
2221 E. NORTHERN LIGHTS #128 ANCHORAGE, AK 99508 907-276-4176 / FAX 907-276-7018 TOLL-FREE 800-478-4176 WEB: WWW.APOC.ALASKA.GOV	240 MAIN STREET #500 P.O. BOX 110222 JUNEAU, AK 99811 465-4864 / FAX 465-4832 APOC FORMS: www.apoc.alaska.gov/forms_all.shtml	FILING COMPLAINTS : 2AAC 50.450	ANSWERING COMPLAINTS: 2AAC 50.458 APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.452 INVESTIGATIONS & HEARINGS: 2 AAC 50.460 – 470 RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c) APOC LAWS: www.apoc.alaska.gov/apoclaws.shtml

June 22, 2026

VIA EMAIL TO APOC@ALASKA.GOV

Heather Hebdon
Executive Director
Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508

Re: Response to Complaint 26-06-CD *Alaskans for Better Elections v. Repeal Now, Aurora Action Network, Advancing Alaska Action*

Dear Ms. Hebdon:

Respondent Aurora Action Network (“AAN”), by and through undersigned counsel, hereby submits this Answer to the Complaint filed by Alaskans for Better Elections (“Complainant”) on May 26, 2026. AAN responds only to the allegations set forth in Paragraph III.A of the Complaint, which are directed at AAN specifically. In support of its Answer, AAN states as follows.

ANSWER TO ALLEGATIONS

Allegation 1 (Paragraph III.A.i): Falsely and deceptively changing its address to an Alaska address.

Answer: Denied.

Allegation 2 (Paragraph III.A.ii): Delayed and inaccurate reporting.

Answer: Denied as to AAN’s own filings. AAN is without sufficient information to admit or deny the existence or cause of any discrepancy between its filings and those of Repeal Now, and on that basis denies the same.

Allegation 3 (Paragraph III.A.iii): True source violations—specifically, that AAN repeatedly and improperly reported Advancing Alaska Action as the true source of a \$5,000 contribution received October 21, 2025.

Answer: Denied. AAN admits that it listed Advancing Alaska Action as the true source of the referenced contribution but denies that doing so constituted a violation. AAN sought true source information from AAA beginning on the date of the contribution, was advised through available channels on or about February 9, 2026 that AAA did not receive contributions that triggered Alaska’s true source reporting regime. AAN relied on that representation in good faith in its filings. Upon receiving the Complaint and becoming aware that this guidance may have been incorrect, AAN refunded the \$5,000 contribution to AAA out of an abundance of caution.

Allegation 4 (Paragraph III.A.iii): That AAN falsely reported Timothy Mellon’s location as “Saratoga, Alaska.”

Answer: AAN admits that its Form 15-5 filed May 14, 2026 listed Timothy Mellon’s location as “Saratoga, Alaska.” AAN denies that this was intentional. This was a typographical error. AAN filed an amended Form 15-5 correcting Mr. Mellon’s location to Saratoga, Wyoming on June 14, 2026.

Allegation 5 (Paragraph III.A.iv): Any other violations of AS 15.13 et seq. discovered during the proceeding.

Answer: AAN is unable to admit or deny this allegation as it fails to identify any specific conduct, transaction, or filing alleged to constitute a violation. Due process requires that a respondent be given fair notice of the specific allegations it must answer. A catch-all placeholder alleging unspecified future violations satisfies neither that requirement nor the basic pleading standards applicable to APOC complaints under 2 AAC 50.870(a). AAN reserves all rights with respect to any specific allegation that may be identified in the course of this proceeding.

ARGUMENTS IN SUPPORT

I. AAN’s Designation of an Anchorage, Alaska Address as Its Principal Place of Business

The Complaint’s most prominent allegation is that AAN falsely designated an Anchorage, Alaska address—the address of Bob Griffin—as its principal place of business in an amended FEC Statement of Organization filed April 7, 2026. This allegation rests on the faulty premise that a political committee’s principal place of business must be where its treasurer lives, where its bank account is held, or where paid staff physically work. That is not the law, and the address designation is not false.

A. The Anchorage Address Is Not False

The Complaint’s central allegation against AAN is that it falsely designated an Anchorage, Alaska address—11790 Cange Street—as its address of record in an amended FEC Statement of Organization filed April 7, 2026. This allegation fails at the threshold because it applies the wrong legal standard.

FEC Form 1 requires a committee to provide its “full name and mailing address.” Those are the instructions, verbatim. Not principal place of business. Not headquarters. Not the location of paid staff, officers, or bank accounts. A mailing address—an address where the committee can and has received mail. AAN is authorized to receive mail at 11790 Cange Street, Anchorage, Alaska. That address therefore satisfies the only federal standard AAN is required to meet. The Complaint does not allege otherwise.

By the same token, AAN’s prior address—502 6th Street, Hudson, Wisconsin, the personal residence of AAN’s compliance vendor—also satisfied that standard. Both addresses are valid mailing addresses. The April 2026 amendment was a lawful update from one valid mailing address to another. There is nothing false about it.

It also bears emphasis that AAN is a federally registered political committee. Its address of record is established and maintained pursuant to FECA and FEC regulations, which require a committee to report and update its mailing address on Form 1. 11 CFR 102.2. AAN complied with those requirements. APOC is not well-positioned to declare AAN’s FEC-registered mailing address false or fictitious simply because the Complaint disagrees with it. Doing so would require APOC Staff to substitute its own judgment for that of the FEC as to where a federally registered committee may receive mail—a determination that is not APOC’s to make.

B. Even Under a Principal Place of Business Analysis, Alaska Is the Correct Designation

Even if APOC were to look past the federal mailing address standard and evaluate AAN’s address under the “principal place of business” language of AS 15.13.090(a)(2)(C), the result is the same. Alaska is AAN’s principal place of business.

In the absence of a statutory or regulatory definition of that term in the political committee context, the most natural and legally coherent interpretation draws from the well-established nerve center test: an entity’s principal place of business is where its officers direct, control, and coordinate its activities—where the real decisions get made. *See Hertz Corp. v. Friend*, 559 U.S.

77, 92–93 (2010). AAN is a federal Super PAC whose purpose is political activity in Alaska. Its disbursements have been directed toward Alaska political campaigns and causes. The decisions AAN makes—where to spend, which Alaska political efforts to support, which communications to fund—are decisions about Alaska politics made with Alaska’s electorate in mind. AAN’s political activity does not occur in Wisconsin. It occurs in Alaska.

The Complaint makes much of the fact that AAN’s treasurer and custodian of records, Thomas Datwyler, is located in Hudson, Wisconsin—as if that settles the question of where AAN’s principal place of business is. It does not. Mr. Datwyler is a hired compliance vendor. He keeps AAN’s books and files its reports. He is, in the parlance of federal campaign finance practice, a treasurer-for-hire—a common arrangement among political committees that do not have in-house compliance staff. The Complaint’s logic is the equivalent of arguing that a company’s principal place of business is wherever its outside bookkeeper happens to live. That is not the law, and it is not a reasonable reading of what “principal place of business” means in any context. Mr. Datwyler’s Wisconsin address reflects where AAN’s compliance vendor is located, nothing more. It says nothing about where AAN’s political activity is directed, where its spending decisions are made, or where its business is actually conducted. Those activities occur in Alaska.

II. Alleged Reporting Discrepancies

The Complaint identifies several discrepancies between AAN’s Form 15-5 filings and Repeal Now’s independent expenditure reports: differing dates for a June 2025 contribution, a \$500 discrepancy in July 31, 2025 contributions, a \$5,000 discrepancy in an October 20, 2025 contribution, and unresolved questions about the timing and amounts of contributions from Jeff Yass. AAN believes its own filings are accurate as filed. Because these discrepancies necessarily implicate Repeal Now’s reporting of the same transactions, AAN defers to Repeal Now to address any variance between Repeal Now’s records and AAN’s. AAN nonetheless stands ready to review its records cooperatively with APOC Staff and will file any amended statement of contributions that a specific, substantiated discrepancy in AAN’s own filings may warrant upon conclusion of that review.

III. True Source Reporting—Advancing Alaska Action

The Complaint alleges that AAN improperly listed Advancing Alaska Action (“AAA”) as the true source of a \$5,000 contribution received on October 21, 2025, on the grounds that AAA is

itself a pass-through political organization and therefore cannot qualify as a true source under AS 15.13.400(19). AAN disagrees with the premise and, more importantly, acted in good faith throughout—actively and repeatedly seeking the true source information that the Complaint now faults it for not having.

On or about October 21, 2025—the same date AAN received AAA’s contribution—AAN sought to obtain true source information from AAA. To that end, AAN worked through available channels to reach AAA’s principals and obtain the required information. AAN continued to seek that information over the months that followed. On or about February 9, 2026, AAN was advised that AAA did not receive contributions that triggered Alaska’s true source reporting, and as a result, AAA was not required to disclose any funding source beyond itself. AAN relied on that representation in its Form 15-5 filings listing AAA as the true source of the contribution.

AAN had no basis at the time to question or disregard that representation. AAN is aware of no provision of Alaska law that imposes an independent investigative obligation on a recipient committee to look behind a contributor’s representation of its own funding sources. AAN did what the statute contemplates: it identified the true source as represented to it by the contributing entity, filed accordingly, and certified its reports as accurate based on the information available to it. The fact that AAN began seeking this information on the very date it received the contribution—and continued to pursue it for months—is inconsistent with any suggestion of indifference or intentional noncompliance.

The Complaint now asserts that AAA’s funding disqualifies it from being a true source under the statutory language of AS 15.13.400(19), which excludes entities that derived their funds from “contributions, donations, dues, or gifts.” AAN takes this concern seriously. Upon receiving the Complaint and becoming aware that the guidance regarding AAA’s status may have been incorrect, AAN refunded the \$5,000 contribution to AAA out of an abundance of caution. That refund is not an admission of any violation—it reflects AAN’s commitment to compliance and its determination to resolve any uncertainty conservatively. If AAA’s representation about its funding was legally insufficient to establish true source status under Alaska law, that is a matter for AAA to answer for. AAN cannot be held to have intentionally or recklessly misreported a true source when it sought that information from the date of the contribution, pursued it persistently over several months, received a representation through available channels, and filed accordingly. Any violation that may have occurred here is, at most, a good-faith error

attributable to inaccurate guidance rather than any failure on AAN's part. AAN respectfully submits that this is precisely the kind of circumstance in which a finding of intentional or reckless conduct would be unsupported by the record.

IV. Timothy Mellon's Listed Location

The Complaint notes that AAN's Form 15-5 listed contributor Timothy Mellon's location as "Saratoga, Alaska." This was a typographical error. Mr. Mellon resides in Saratoga, Wyoming—a fact that is publicly known and easily verifiable. It strains the imagination to suggest that AAN would purposefully misstate the residence of a billionaire contributor whose Wyoming domicile is a matter of wide public record. The only plausible explanation is the obvious one: a data-entry error transposed "Wyoming" to "Alaska." AAN has already corrected this error. An amended Form 15-5 reflecting Mr. Mellon's correct location of Saratoga, Wyoming was filed on June 14, 2026.

V. The Complaint's Allegations of Intentional Deception

The Complaint frames AAN's conduct as part of a deliberate scheme to obscure the identity of a single large donor—Jeff Yass—and to falsely portray AAN as an Alaska entity. AAN categorically denies this characterization. Mr. Yass's contributions to AAN are disclosed in AAN's FEC filings, which are public. AAN has reported him as a true source in its APOC filings, which are also public. The Complaint itself acknowledges this. The notion that AAN has "sanitized" Mr. Yass's contributions or created an artificial conduit to obscure his involvement is inconsistent with the public record. To the extent any of AAN's filings contain errors or inconsistencies, AAN states that those errors were unintentional, administrative in nature, and not made with knowledge of falsity or in reckless disregard of the truth. Indeed, the Complaint characterizes every error in AAN's filings—including an obvious two-letter state abbreviation typo in a contributor's address—as further evidence of a deliberate scheme to deceive Alaska voters. That the Complaint must reach so far to sustain its theory of intentional misconduct says more about the weakness of that theory than it does about AAN's conduct.

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VI. Conclusion

For the foregoing reasons, AAN respectfully requests that APOC Staff find no violation of AS 15.13 with respect to the allegations addressed herein.

Respectfully submitted,

ROSS POLITICAL LAW, APC



Derek H. Ross

Counsel for Respondent Aurora Action Network. Mr. Ross is not a member of the Alaska Bar Association. He appears in this administrative proceeding as counsel for Respondent pursuant to Alaska RPC 5.5, as this matter arises out of and is reasonably related to his practice in the jurisdictions in which he is admitted.

Richard R. Moses
Birch Horton Bittner & Cherot
510 L Street, Suite 700
Anchorage, Alaska 99501
RMoses@BHB.com
Telephone 907.276.1550
Facsimile 907.276.3680

Attorney for Advancing Alaska Action, Inc.

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Alaskans for Better Elections,)	
)	
Complainant,)	
)	
v.)	Case No. 26-06-CD
)	
Repeal Now, Aurora Action Network, &)	
Advancing Alaska Action, Inc.,)	
)	
Respondents.)	

ANSWER TO COMPLAINT

Respondent, Advancing Alaska Action, Inc. (“AAA”), by and through undersigned counsel, answers the Complaint of Complainant Alaskans for Better Elections as follows. As a preliminary matter, the Complaint contains numerous allegations directed solely at one or more Co-Respondents and other non-parties. AAA responds only to those allegations directed at it or for which a response is otherwise required. To the extent any allegation concerns a Co-Respondent or non-party and requires a response from AAA, AAA lacks knowledge or information sufficient to form a belief as to the truth of the allegation and therefore denies the same. Unless expressly admitted herein, AAA denies each allegation of the Complaint requiring a response.

I. ALLEGATIONS

AAA admits that it contributed \$5,000 to Aurora Action Network on or around October 21, 2025. AAA also admits that it did not file statement of contributions 15-5 form with APOC.

II. MITIGATION

On June 8, 2026, an authorized representative of AAA contacted Aurora Action Network and requested that the \$5,000 contribution be refunded. Aurora Action Network, through Bob Griffin, advised that the refund would be processed and mailed by June 10, 2026. AAA subsequently received the refund by check, eliminating any benefit associated with the contribution.

APOC should not assess a civil penalty under these circumstances. First, AAA was a first-time filer and therefore qualifies for the protections afforded by 2 AAC 50.855(b)(2)(A)(i). Even if APOC determines that a penalty is technically available, the circumstances present substantial mitigating factors. This matter involves a single, isolated violation rather than a pattern or practice of noncompliance. AAA acted promptly upon learning of the issue, immediately sought return of the contribution, and successfully obtained a full refund. Under these circumstances, it would be appropriate for APOC to suspend any monetary penalty or set it aside after one year pursuant to AS 15.13.390(e)(1)-(2).

Continuing, the amount should be substantially reduced or eliminated altogether. See 2 AAC 50.865(b)(5). Neither Repeal Now nor Aurora Action Network received a lasting financial benefit from the contribution because the full \$5,000 was returned. Courts evaluating campaign-finance penalties have recognized that good-faith efforts to promptly

remedy and undo a violation are relevant mitigating factors. See *Fed. Election Comm'n v. Furgatch*, 869 F.2d 1256, 1259 (9th Cir. 1989). Here, AAA voluntarily initiated corrective action, secured a full refund, and cooperated throughout the process.

Moreover, any substantial monetary penalty would be disproportionate to the nature of the violation. The contribution at issue represented a single \$5,000 contribution that was ultimately returned in full. Based upon prior election cycles, the campaign surrounding Ballot Measure 2 is expected to involve expenditures totaling hundreds of thousands of dollars, if not more than \$1 million. In that context, the refunded contribution had no meaningful effect on the overall campaign. Because the violation was isolated, promptly corrected, and resulted in no continuing financial benefit, the purposes of Alaska's campaign-finance laws would not be advanced by imposing a monetary penalty.

III. PROPOSED SOLUTION

Advancing Alaska proposes that it enter into a consent agreement with APOC staff to resolve this complaint short of a contested hearing given that it has admitted that it failed to file a statement of contributions with APOC detailing the true source of the \$5,000 contribution. As stated, it would be appropriate for APOC to refrain from imposing a monetary fine under these circumstances.

DATED this 22nd day of June, 2026.

BIRCH HORTON BITTNER & CHEROT
Attorney for Advancing Alaska Action, Inc.

By: /s/ Richard R. Moses
Richard R. Moses, ABA #1311096

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 22nd day of June, 2026, a true and correct copy of the foregoing was served on the following in the manner indicated:

Scott M. Kendall
510 L Street, Ste. 300
Anchorage, AK 99501
scott@cashiongilmore.com

U.S. Mail
 Facsimile
 Electronic Delivery
 Hand Delivery

Aurora Action Network
Thomas Datwyler
502 6th St
Hudson, WI 54016
tcdatwyler@gmail.com
compliance@axcapteam.com

U.S. Mail
 Facsimile
 Electronic Delivery
 Hand Delivery

Repeal Now
PO Box 240382
Anchorage, AK 99524
cfrascaak@gmail.com
jnortoneledge@gmail.com
bethanymarcum@gmail.com

U.S. Mail
 Facsimile
 Electronic Delivery
 Hand Delivery

BIRCH HORTON BITTNER & CHEROT

By: /s/ Ashley L McKenzie
Ashley L. McKenzie

INDEPENDENT EXPENDITURES FORM 15-6

AMENDMENT

Amendment Description: Update True Source address information

COMPLETED

Submission Date: **06/08/2026**

FILER INFORMATION

Filer First Name: **CHERYL**
Filer Middle Name: **L**
Filer Last Name: **FRASCA**
Filer Full Address: **2415 La Honda Dr
Anchorage, Alaska 99517**
Filer Occupation: **N/A**
Filer Employer: **N/A**
Filer's Title with Other Entity: **APOC Reporting Administrator**

REPORT INFORMATION

Report Year: **2026**
Election Year: **-1**
Report Type: **Ten Day**
Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Repeal Now**
Type of Business or Organization: **Registered Group**
Address: **P.O. Box 240382**
City: **Anchorage**
State: **Alaska**
99524
Country: **United States**
Business/Other Entity Contact Person: **Bethany Marcum**
Contact E-mail: **bethanymarcum@gmail.com**
Contact Phone: **907-440-7000**

ELECTION INFORMATION

Election: **Multiple Elections / Other**
Election Description: **Nothing to Report**

OFFICERS

Name	Full Address	Title
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Judy Eledge	3743 Richard Evelyn Byrd St #B Anchorage, Alaska 99517	Chair
Bethany Marcum	7463 White Hawk Dr Anchorage, Alaska 99507	Treasurer
Judy Eledge	3743 Richard Evelyn Byrd B Anchorage, Alaska 99517	Deputy Treasurer
Cynthia Glassmaker	33361 Keystone Dr Soldotna, Alaska 99669	Deputy Treasurer
Linn McCabe	P.O. Box 520248 Big Lake, Alaska 99652	Deputy Treasurer
Kathy McCollum	5780 W. Birch Harbor Dr Wasilla, Alaska 99623	Deputy Treasurer
Barbara Tyndall	P.O. Box 82977 Fairbanks, Alaska 99708	Deputy Treasurer
Al Smay	2861 Porcupne Trail Rd Anchorage, Alaska 99516	Deputy Treasurer
Dawn Bockelman	8100 E. 2nd Ave Anchorage, Alaska 99502	Deputy Treasurer
Carolyn Overstreet	8122 Lamplighter Ct Anchorage, Alaska 99502	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
04/01/2026	Dave Hultquist 3420 E. 112th Ave Anchorage, Alaska 99516	Non-Monetary Description: Sign materials	SUPPORT: 22AKHE Election: Lumber for signs	\$2,732.82
04/08/2026	Anchorage Fastners & Fire Equipment 123 E. International Airport Rd Anchorage, Alaska 99515	Debit Card	SUPPORT: 22AKHE Election: Sign materials	\$930.79
04/08/2026	Home Depot Home Depot Anchorage, Alaska 99507	Debit Card	SUPPORT: 22AKHE Election: Sign materials	\$656.00
04/09/2026	Canopy Insurance P.O. Box 34833 North Chesterfield, Virginia 23234	Debit Card	SUPPORT: 22AKHE Election: Event liability insurance	\$49.00
04/09/2026	Excelazing 8084 S 6120 W West Jordan, Utah 84081	Debit Card	SUPPORT: 22AKHE Election: Ads management: Google (\$719.20); Facebook (\$226.67)	\$945.87
04/09/2026	Stratus Intelligence 3745 Medina Rd Suite C Medina, Ohio 44256	Electronic Funds Transfer	SUPPORT: 22AKHE Election: Polling	\$30,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details			Amount												
04/01/2026	Type: Individual Name: Dave Hultquist 3420 E. 112th Ave Anchorage, Alaska 99516	Occupation: Business Owner Employer: Self , Alaska			\$2,732.82												
Contributor is True Source																	
04/09/2026	Type: Individual Name: Kurt Lindsey P.O. Box 92267 Anchorage, Alaska 99509	Occupation: CEO Employer: Petro Marine and Shoreside Petroleum , Alaska			\$2,500.00												
Contributor is True Source																	
04/09/2026	Type: Other Name: Aurora Action Network 11790 Cange St Anchorage, Alaska 99516	Officers / Directors			\$250,000.00												
		Name	Full Address	Title													
		Thomas Datwyler	502 6th St, Hudson, WI 54016 , Alaska	Treasurer													
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th>Date</th> <th>True Source</th> <th>Address</th> <th>Details</th> <th>Amount</th> <th>Total Annual</th> </tr> </thead> <tbody> <tr> <td>03/16/2026</td> <td>Type: Individual Name: Jeff Yass</td> <td>Address: 401 E. City Ave Ste 220 Bala Cynwyd, 19004</td> <td>Occupation: Managing Director Employer: SIG</td> <td>\$250,000.00</td> <td>\$575,000.00</td> </tr> </tbody> </table>						Date	True Source	Address	Details	Amount	Total Annual	03/16/2026	Type: Individual Name: Jeff Yass	Address: 401 E. City Ave Ste 220 Bala Cynwyd, 19004	Occupation: Managing Director Employer: SIG	\$250,000.00	\$575,000.00
Date	True Source	Address	Details	Amount	Total Annual												
03/16/2026	Type: Individual Name: Jeff Yass	Address: 401 E. City Ave Ste 220 Bala Cynwyd, 19004	Occupation: Managing Director Employer: SIG	\$250,000.00	\$575,000.00												

DEBTS

Date	Recipient	Candidate / Proposition	Amount
04/09/2026	Kinley's Restaurant 3230 Seward Hwy Anchorage, Alaska 99503	SUPPORT: 22AKHE Election: Event food, beverages	\$4,000.00
04/09/2026	Chase & Co. 2912 Executive Parkway Suite 200 Lehi, Utah 84043	SUPPORT: 22AKHE Election: Creative work and ad production	\$5,000.00

REPORT SUMMARY

Number of Expenditures Reported with this Report: 6
Total of paid Expenditures: \$35,314.48

Previous Contributions:	\$256,860.20
Number of Contributions Reported with this Report:	3
Total of Contributions Reported with this Report:	\$255,232.82
Cumulative Contribution Amounts:	\$512,093.02
Number of Officers: 10	
Number of Debts Reported with this Report:	2
Total of Debts Incurred but not yet paid:	\$9,000.00

INDEPENDENT EXPENDITURES FORM 15-6

AMENDMENT

Amendment Description: Correct Initiative reference on debt

COMPLETED

Submission Date: **06/17/2026**

FILER INFORMATION

Filer First Name: **CHERYL**

Filer Middle Name: **L**

Filer Last Name: **FRASCA**

Filer Full Address: **2415 La Honda Dr
Anchorage, Alaska 99517**

Filer Occupation: **N/A**

Filer Employer: **N/A**

Filer's Title with Other Entity: **APOC Reporting Administrator**

REPORT INFORMATION

Report Year: **2026**

Election Year: **-1**

Report Type: **Ten Day**

Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Repeal Now**

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

Address: **P.O. Box 240382**

City: **Anchorage**

State: **Alaska**

99524

Country: **United States**

Business/Other Entity Contact Person: **Bethany Marcum**

Contact E-mail: **bethanymarcum@gmail.com**

Contact Phone: **907-440-7000**

ELECTION INFORMATION

Election: **Multiple Elections / Other**

Election Description: **Nothing to Report**

OFFICERS

Name	Full Address	Title
------	--------------	-------

Judy Eledge	3743 Richard Evelyn Byrd St #B Anchorage, Alaska 99517	Chair
Bethany Marcum	7463 White Hawk Dr Anchorage, Alaska 99507	Treasurer
Judy Eledge	3743 Richard Evelyn Byrd B Anchorage, Alaska 99517	Deputy Treasurer
Cynthia Glassmaker	33361 Keystone Dr Soldotna, Alaska 99669	Deputy Treasurer
Linn McCabe	P.O. Box 520248 Big Lake, Alaska 99652	Deputy Treasurer
Kathy McCollum	5780 W. Birch Harbor Dr Wasilla, Alaska 99623	Deputy Treasurer
Barbara Tyndall	P.O. Box 82977 Fairbanks, Alaska 99708	Deputy Treasurer
Al Smay	2861 Porcupne Trail Rd Anchorage, Alaska 99516	Deputy Treasurer
Dawn Bockelman	8100 E. 2nd Ave Anchorage, Alaska 99502	Deputy Treasurer
Carolyn Overstreet	8122 Lamplighter Ct Anchorage, Alaska 99502	Deputy Treasurer
Justin Tyler Slater	112 S. Alaska St #100 Palmer, Alaska 99645	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
04/01/2026	Dave Hultquist 3420 E. 112th Ave Anchorage, Alaska 99516	Non-Monetary Description: Sign materials	SUPPORT: 24ESEG Election: Lumber for signs	\$2,732.82
04/08/2026	Anchorage Fastners & Fire Equipment 123 E. International Airport Rd Anchorage, Alaska 99515	Debit Card	SUPPORT: 24ESEG Election: Sign materials	\$930.79
04/08/2026	Home Depot Home Depot Anchorage, Alaska 99507	Debit Card	SUPPORT: 24ESEG Election: Sign materials	\$656.00
04/09/2026	Canopy Insurance P.O. Box 34833 North Chesterfield, Virginia 23234	Debit Card	SUPPORT: 24ESEG Election: Event liability insurance	\$49.00
04/09/2026	Excelazing 8084 S 6120 W West Jordan, Utah 84081	Debit Card	SUPPORT: 24ESEG Election: Ads management: Google (\$719.20); Facebook (\$226.67)	\$945.87
04/09/2026	Stratus Intelligence 3745 Medina Rd Suite C	Electronic Funds Transfer	SUPPORT: 24ESEG Election:	\$30,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details			Amount		
04/01/2026	Type: Individual Name: Dave Hultquist 3420 E. 112th Ave Anchorage, Alaska 99516	Occupation: Business Owner Employer: Self , Alaska			\$2,732.82		
Contributor is True Source							
04/09/2026	Type: Individual Name: Kurt Lindsey P.O. Box 92267 Anchorage, Alaska 99509	Occupation: CEO Employer: Petro Marine and Shoreside Petroleum , Alaska			\$2,500.00		
Contributor is True Source							
04/09/2026	Type: Other Name: Aurora Action Network 11790 Cange St Anchorage, Alaska 99516	Officers / Directors			\$250,000.00		
		Name	Full Address	Title			
		Thomas Datwyler	502 6th St, Hudson, WI 54016 , Alaska	Treasurer			
		Date	True Source	Address	Details	Amount	Total Annual
		03/16/2026	Type: Individual Name: Jeff Yass	Address: 401 E. City Ave Ste 220 Bala Cynwyd, 19004	Occupation: Managing Director Employer: SIG	\$250,000.00	\$575,000.00
		03/16/2026	Type: Individual Name: Jeff Yass	Address: 401 E. City Ave Ste 220 Bala Cynwyd, 19004	Occupation: Managing Director Employer: Jeff Yass	\$100,000.00	\$675,000.00

DEBTS

Date	Recipient	Candidate / Proposition	Amount
04/09/2026	Kinley's Restaurant 3230 Seward Hwy Anchorage, Alaska 99503	SUPPORT: 24ESEG Election: Event food, beverages	\$4,000.00

04/09/2026	Chase & Co. 2912 Executive Parkway Suite 200 Lehi, Utah 84043	SUPPORT: 24ESEG Election: Creative work and ad production	\$5,000.00
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REPORT SUMMARY

Number of Expenditures Reported with this Report: 6 Total of paid Expenditures:	\$35,314.48
Previous Contributions: Number of Contributions Reported with this Report: 3 Total of Contributions Reported with this Report: Cumulative Contribution Amounts:	\$256,860.20 \$255,232.82 \$512,093.02
Number of Officers: 11	
Number of Debts Reported with this Report: 2 Total of Debts Incurred but not yet paid:	\$9,000.00

INDEPENDENT EXPENDITURES FORM 15-6

AMENDMENT

Amendment Description: Update True Source address information

COMPLETED

Submission Date: **06/08/2026**

FILER INFORMATION

Filer First Name: **CHERYL**
 Filer Middle Name: **L**
 Filer Last Name: **FRASCA**
 Filer Full Address: **2415 La Honda Dr
 Anchorage, Alaska 99517**
 Filer Occupation: **N/A**
 Filer Employer: **N/A**
 Filer's Title with Other Entity: **APOC Reporting Administrator**

REPORT INFORMATION

Report Year: **2026**
 Election Year: **2026**
 Report Type: **Ten Day**
 Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Repeal Now**
 Type of Business or Organization: **Registered Group**
 Address: **P.O. Box 240382**
 City: **Anchorage**
 State: **Alaska**
99524
 Country: **United States**
 Business/Other Entity Contact Person: **Bethany Marcum**
 Contact E-mail: **bethanymarcum@gmail.com**
 Contact Phone: **907-440-7000**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Judy Eledge	3743 Richard Evelyn Byrd St #B Anchorage, Alaska 99517	Chair
Bethany Marcum	7463 White Hawk Dr	Treasurer

	Anchorage, Alaska 99507	
Judy Eledge	3743 Richard Evelyn Byrd B Anchorage, Alaska 99517	Deputy Treasurer
Cynthia Glassmaker	33361 Keystone Dr Soldotna, Alaska 99669	Deputy Treasurer
Linn McCabe	P.O. Box 520248 Big Lake, Alaska 99652	Deputy Treasurer
Kathy McCollum	5780 W. Birch Harbor Dr Wasilla, Alaska 99623	Deputy Treasurer
Barbara Tyndall	P.O. Box 82977 Fairbanks, Alaska 99708	Deputy Treasurer
Al Smay	2861 Porcupne Trail Rd Anchorage, Alaska 99516	Deputy Treasurer
Dawn Bockelman	8100 E. 2nd Ave Anchorage, Alaska 99502	Deputy Treasurer
Carolyn Overstreet	8122 Lamplighter Ct Anchorage, Alaska 99502	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
04/20/2026	Chase & Co 2912 W. Executive Pkwy Ste 200 Lehi, Utah 84048	Electronic Funds Transfer	SUPPORT: 2 - Repeal Election: State General Media Buy (iHeart Media Anchorage/Fairbanks KGOT, KBFY, KASH KIAK, KENI, KFBX - \$91426); ConMedia Anchorage (KBER, KWHL, KFQD - \$47374.75); FBXRadio Fairbanks KWLF, KFAR - \$22819.10; Radio Kenai KSRM, KWHQ - \$9434.15; MyAlaska Radio Kenai KXBA - \$3663.50; AlaskaFirst Radio Ketchikan - \$3400.85; Christian Broadcasting Anchorage KAFC - \$9054.20); Commission \$33030.45	\$220,203.00
04/20/2026	Al Smay P.O. Box 110235 Anchorage, Alaska 99511	Check Check Number: 114	SUPPORT: 2 - Repeal Election: State General Campaign sign frames	\$5,000.00
04/20/2026	Mat Su Homebuilders Association 609 S Knik Goose Bay Rd Wasilla, Alaska 99654	Debit Card	SUPPORT: 2 - Repeal Election: State General Booth rental	\$205.00
04/20/2026	Mat Su Republican Women's Club P.O. Box 875662 Wasilla, Alaska 99687	Non-Monetary Description: Booth rental	SUPPORT: 2 - Repeal Election: State General Booth rental	\$150.00
04/22/2026	Rev Alaska 4142 Ingra Anchorage, Alaska 99503	Debit Card	SUPPORT: 2 - Repeal Election: State General Booth fee	\$563.75

04/23/2026	Porcaro Communications 1221 Lilac Cir Anchorage, Alaska 99516	Check Check Number: 116	SUPPORT: 2 - Repeal Election: State General Media consulting	\$4,000.00
04/24/2026	City of Wasilla 290 E Herning Ave Wasilla, Alaska 99654	Electronic Funds Transfer	SUPPORT: 2 - Repeal Election: State General Business license	\$25.00
04/27/2026	Mat-Su Homebuilders Association 609 S Knik Goose Bay Rd Wasilla, Alaska 99654	Debit Card	SUPPORT: 2 - Repeal Election: State General Booth fee	\$205.00
04/30/2026	Chase & Co 2912 W. Executive Pkwy Ste 200 Lehi, Utah 84048	Electronic Funds Transfer	SUPPORT: 2 - Repeal Election: State General Video production; vendor was Strategus \$31,166.95; commission \$5500.05	\$36,667.00
04/30/2026	Chase & Co 2912 W. Executive Pkwy Ste 200 Lehi, Utah 84048	Electronic Funds Transfer	SUPPORT: 2 - Repeal Election: State General Digital radio ads - May \$14161.00; vendor was Strategus; agency commission \$2499.00	\$16,660.00

CONTRIBUTIONS

Contribution Date	Contributor	Details			Amount
04/20/2026	Type: Registered Group Name: Mat Su Republican Women's Club Est. 1947 PO Box 875662 Wasilla, Alaska 99687	Officers / Directors			\$150.00
		Name	Full Address	Title	
		Kathy McCollum	5780 W Birch Harbor Dr , Alaska	Chair	
		Natalie Martin	3901 E Palmdale Dr , Alaska	Treasurer	
		Cherie Kajdan	4250 Birch Forest , Alaska	Deputy Treasurer	
		Linn McCabe	PO Box 520248 , Alaska	Deputy Treasurer	
		Carolyn Porter	2011 S Jensen Rd , Alaska	Deputy Treasurer	
		Kaitlyn Espada	4274 S Taffy Cir , Alaska	Deputy Treasurer	
		Lynn Hallford	1201 N Old Town Dr , Alaska	Deputy Treasurer	

		Janet Engan	330 W Sheelite Dr , Alaska	Deputy Treasurer
		Tammy Bunker	PO Box 875516 , Alaska	Deputy Treasurer
		Genevieve Owens	1440 N Landmark Dr , Alaska	Deputy Treasurer
		Colleen Vague	801 N Northshore Dr , Alaska	Deputy Treasurer
		Michelle Dempsey	605 N Golden Hills Dr , Alaska	Deputy Treasurer
		Pamela Farley	2330 N Verde Dr , Alaska	Deputy Treasurer

Contributor is True Source

04/20/2026	Type: Individual Name: Mark Sundquist 2921 Wetwind Ct Anchorage, Alaska 99516	Occupation: Business Owner Employer: Self , Alaska	\$2,500.00
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Contributor is True Source

04/20/2026	Type: Individual Name: Georgianna Zimmerle 410 Cook St Ketchikan, Alaska 99901	Occupation: Retired Employer: N/A , Alaska	\$500.00
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Contributor is True Source

04/20/2026	Type: Individual Name: Thomas Milosevic 4915 S. Bannock Ave Sierra Vista, Arizona 85650	Occupation: N/A Employer: N/A , Alaska	\$20.86
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Contributor is True Source

04/20/2026	Type: Individual Name: Beth Farnstrom 18751 Villages Scenic Pkwy Anchorage, Alaska 99516	Occupation: Retired Employer: N/A , Alaska	\$100.00
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Contributor is True Source

04/21/2026	Type: Individual Name: Jaimee Coon 2558 Clydesdale Dr North Pole, Alaska 99705	Occupation: Owner/Manager Employer: Havenbrook Farm Stables & Rentals , Alaska	\$103.00
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Contributor is True Source

04/27/2026	Type: Other Name: Aurora Action Network 11790 Cange St Anchorage, Alaska 99516	Officers / Directors			\$100,000.00
		Name	Full Address	Title	
		Thomas Datwyler	502 6th St, Hudson, WI 54016 , Alaska	Treasurer	

Date	True Source	Address	Details	Amount	Total Annual
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04/03/2026	Type: Individual Name: April Reilly	Address: 840 Botanical Heights Cir Anchorage, 99515	Occupation: Retired Employer: N/A	\$500.00	\$500.00
04/03/2026	Type: Individual Name: Patrick Reilly	Address: 840 Botanical Heights Cir Anchorage, 99515	Occupation: Retired Employer: N/A	\$500.00	\$500.00
04/07/2026	Type: Individual Name: John Nolte	Address: 9400 Ponderosa Dr Anchorage, 99507	Occupation: Retired Employer: N/A	\$5,000.00	\$5,000.00
04/08/2026	Type: Individual Name: Michael Samson	Address: 2031 Van Horn Ct Fairbanks, 99701	Occupation: Contractor Employer: Samson Electric	\$2,500.00	\$2,500.00
04/10/2026	Type: Individual Name: John Sturgeon	Address: 4450 Shoshoni Ave Anchorage, 99516	Occupation: Retired Employer: N/A	\$2,000.00	\$2,000.00
04/13/2026	Type: Individual Name: Emma Campbell	Address: 1150 S. Colony Wy Palmer, 99645	Occupation: Office Administrator Employer: Self	\$500.00	\$500.00
04/14/2026	Type: Individual Name: David Miller	Address: 4951 S. Colonist Dr Palmer, 99645	Occupation: General Contractor Employer: Self	\$1,000.00	\$1,000.00
04/22/2026	Type: Individual Name: Wade Erickson	Address: 8535 E. Sotrmy Hill Cir Wasilla, 99654	Occupation: Doctor Employer: Capstone Clinic	\$2,500.00	\$2,500.00
04/22/2026	Type: Individual Name: Martin Eckmann	Address: 5100 Currin Cir Anchorage, 99516	Occupation: Business Owner Employer: Self	\$3,000.00	\$3,000.00
04/15/2026	Type: Individual Name: Carolyn Overstreet	Address: 8122 Lamplighter Ct Anchorage, 99502	Occupation: Retired Employer: N/A	\$2,500.00	\$2,500.00
04/22/2026	Type:	Address:		\$2,500.00	\$2,500.00

	Other Name: Natural Pantry	3680 Barrow St Anchorage, 99503		
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True Source Officers / Directors		
Name	Full Address	Title
Richard Solberg	2000 Belmont Dr, Anchorage, AK 99517	Director, President, Shareholder
Victoria Solberg	2000 Belmont Dr, Anchorage, AK 99517	Director, Secretary, Treasurer, Shareholder

04/22/2026	Type: Other Name: Alaska Quality Care	Address: P.O. Box 111587 Anchorage, 99511		\$2,500.00	\$2,500.00
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True Source Officers / Directors		
Name	Full Address	Title
Lucy Bauer	8811 Cordell Cir, Anchorage, AK 99502	Member

04/22/2026	Type: Individual Name: Deena Bishop	Address: 2521 E. Mountain Village Dr Wasilla, 99654	Occupation: Educator Employer: State of Alaska	\$2,500.00	\$2,500.00
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04/24/2026	Type: Individual Name: Vikki Solberg	Address: 3680 Barrow St Anchorage, 99503	Occupation: Business Owner Employer: Self	\$2,500.00	\$2,500.00
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03/16/2026	Type: Individual Name: Jeff Yass	Address: 401 E. City Ave Bala Cynwyd, 19004	Occupation: Regional Director Employer: SIG	\$68,000.00	\$118,000.00
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04/17/2026	Type: Individual Name: Steve Swinney	Address: 1225 Well St Fairbanks, 99701	Occupation: Business Owner Employer: Glassolutions Inc.	\$2,000.00	\$2,000.00
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04/28/2026	Type: Individual	Occupation: Retired	\$100.00
	Name: Brian Martin 6570 E. Robinson Cir Wasilla, Alaska 99654	Employer: N/A , Alaska	

Contributor is True Source

04/29/2026	Type: Individual	Occupation: Retired	\$100.00
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Name: Colleen Sullivan-Leonard
P.O. Box 874380
Wasilla, Alaska 99654

Employer: N/A
, Alaska

Contributor is True Source

DEBTS

Date	Recipient	Candidate / Proposition	Amount
04/30/2026	Google 1600 Amphitheatre Pkwy Mountain View, California 94043	SUPPORT: 2 - Repeal Election: State General Social media	\$27,200.00
04/30/2026	Facebook 1 Meta Way Menlo Park, California 94025	SUPPORT: 2 - Repeal Election: State General Social media	\$27,200.00

REPORT SUMMARY

Number of Expenditures Reported with this Report: 10	
Total of paid Expenditures:	\$283,678.75
Previous Contributions:	\$552,343.02
Number of Contributions Reported with this Report: 9	
Total of Contributions Reported with this Report:	\$103,573.86
Cumulative Contribution Amounts:	\$655,916.88
Number of Officers: 10	
Number of Debts Reported with this Report: 2	
Total of Debts Incurred but not yet paid:	\$54,400.00

INDEPENDENT EXPENDITURES FORM 15-6

AMENDMENT

Amendment Description: Update True Source address information

COMPLETED

Submission Date: **06/08/2026**

FILER INFORMATION

Filer First Name: **CHERYL**
 Filer Middle Name: **L**
 Filer Last Name: **FRASCA**
 Filer Full Address: **2415 La Honda Dr
 Anchorage, Alaska 99517**
 Filer Occupation: **N/A**
 Filer Employer: **N/A**
 Filer's Title with Other Entity: **APOC Reporting Administrator**

REPORT INFORMATION

Report Year: **2026**
 Election Year: **2026**
 Report Type: **Ten Day**
 Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Repeal Now**
 Type of Business or Organization: **Registered Group**
 Address: **P.O. Box 240382**
 City: **Anchorage**
 State: **Alaska**
99524
 Country: **United States**
 Business/Other Entity Contact Person: **Bethany Marcum**
 Contact E-mail: **bethanymarcum@gmail.com**
 Contact Phone: **907-440-7000**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Judy Eledge	3743 Richard Evelyn Byrd St #B Anchorage, Alaska 99517	Chair
Bethany Marcum	7463 White Hawk Dr	Treasurer

	Anchorage, Alaska 99507	
Judy Eledge	3743 Richard Evelyn Byrd B Anchorage, Alaska 99517	Deputy Treasurer
Cynthia Glassmaker	33361 Keystone Dr Soldotna, Alaska 99669	Deputy Treasurer
Linn McCabe	P.O. Box 520248 Big Lake, Alaska 99652	Deputy Treasurer
Kathy McCollum	5780 W. Birch Harbor Dr Wasilla, Alaska 99623	Deputy Treasurer
Barbara Tyndall	P.O. Box 82977 Fairbanks, Alaska 99708	Deputy Treasurer
Al Smay	2861 Porcupne Trail Rd Anchorage, Alaska 99516	Deputy Treasurer
Dawn Bockelman	8100 E. 2nd Ave Anchorage, Alaska 99502	Deputy Treasurer
Carolyn Overstreet	8122 Lamplighter Ct Anchorage, Alaska 99502	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
05/13/2026	Lowe's 10900 Old Seward Hwy Anchorage, Alaska 99515	Debit Card	SUPPORT: 2 - Repeal Election: State General Sign materials	\$517.10
05/13/2026	Excelazing 8084 S 6120 W West Jordan, Utah 84081	Debit Card	SUPPORT: 2 - Repeal Election: State General Ads management April (Google/Meta)	\$975.85
05/13/2026	Judy Eledge 3743 Richard Evelyn Byrd St #B Anchorage, Alaska 99517	Check Check Number: 121	SUPPORT: 2 - Repeal Election: State General Travel reimbursement (lodging, gas) for three people	\$519.00
05/15/2026	Vulcan Towing 2134 E. 88th Anchorage, Alaska 99507	Debit Card	SUPPORT: 2 - Repeal Election: State General Tow vehicle for campaign event	\$149.50
05/18/2026	Pioneer Law 810 N St #100 Anchorage, Alaska 99501	Check Check Number: 120	SUPPORT: 2 - Repeal Election: State General Legal services; check amount was \$37,992.83, which includes \$14,385.22 previously reported as a "debt"	\$23,607.61
05/18/2026	Stickergiant 880 Weaver Park Rd Longmont, Colorado 80501	Debit Card	SUPPORT: 2 - Repeal Election: State General Bumper stickers	\$639.26
05/21/2026	AT Printing & Publishing 1720 Abbott Rd Anchorage,	Check Check Number: 121	SUPPORT: 2 - Repeal Election: State General Printing campaign materials	\$105.00

CONTRIBUTIONS

Contribution Date	Contributor	Details			Amount
05/13/2026	Type: Other Name: Aurora Action Network 11790 Cange St Anchorage, Alaska 99516	Officers / Directors			\$250,000.00
		Name	Full Address	Title	
		Thomas Datwyler	502 6th St, Hudson, WI 54016 , Alaska	Treasurer	
Date	True Source	Address	Details	Amount	Total Annual
10/21/2025	Type: Other Name: Advancing Alaska Action	Address: 721 Depot Dr #700 Anchorage, 99501		\$5,000.00	\$0.00
	True Source Officers / Directors				
	Name	Full Address	Title		
	Ann Riggs	P.O. Box 1432, Palmer, AK 99645	Director, Vice President		
	Leon Barbachano	424 W. Founders Blvd, Saratoga Springs, UT 84045	Director, President		
	Sandra Lempke	2844 Seafarer Lp, Anchorage, AK 99516	Director, Secretary, Treasurer		
10/20/2025	Type: Individual Name: Robert Dindinger	Address: 5611 196th Ave NE Redmond, 98053	Occupation: Tour Operator Employer: Alaska Travel Adventures	\$500.00	\$0.00
03/10/2026	Type: Individual Name: Stanley English	Address: P.O. Box 91971 Anchorage, 99509	Occupation: Business Owner Employer: Northern Solutions Aviation	\$20,000.00	\$20,000.00
10/16/2025	Type: Other Name: Godspeed Leasing	Address: 5325 Chena Small Tracts Rd Fairbanks, 99709		\$10,000.00	\$0.00

True Source Officers / Directors					
Name		Full Address		Title	
John Binkley		5325 Cena Small Tracts Rd, Fairbanks, AK 99709		Member	
05/06/2026	Type: Individual Name: Timothy Mellon	Address: P.O. Box 1500 Saratoga, 82331	Occupation: Investor Employer: Self Employed	\$50,000.00	\$50,000.00
11/04/2025	Type: Individual Name: Andy Miller	Address: 30 Burton Hills Blvd Nashville, 37215	Occupation: Business Owner Employer: Angry Eagle Lodge	\$10,000.00	\$0.00
05/05/2026	Type: Individual Name: Les Nichols	Address: 3318 N. Van Horn Rd Fairbanks, 99701	Occupation: Homemaker Employer: Family	\$1,000.00	\$1,000.00
08/06/2025	Type: Individual Name: Michael Rydin	Address: 5500 Holly St Houston, 77081	Occupation: Retired Employer: N/A	\$3,000.00	\$0.00
06/27/2025	Type: Individual Name: Damien Stella	Address: 4011 Romanzof Cir Anchorage, 99517	Occupation: Engineering Consultant Employer: Self	\$6,000.00	\$0.00
10/10/2025	Type: Individual Name: Maria Uchytel	Address: 2921 Blueberry Hills Rd S Juneau, 99801	Occupation: Regional Director Employer: US Senate	\$500.00	\$0.00
10/08/2025	Type: Individual Name: Elizabeth Uihlein	Address: 1396 N. Waukegan Rd Lake Forest, 60045	Occupation: President Employer: Uihlein	\$10,000.00	\$0.00
10/06/2025	Type: Individual Name: Jeff Yass	Address: 401 E City Ave Bala Cynwyd, 19004	Occupation: Managing Director Employer: SIG	\$134,000.00	\$350,000.00

05/15/2026

Type: Individual

Occupation: Retired

\$100.00

	Name: Robert Tilley 9690 Trennie Lp Palmer, Alaska 99645	Employer: N/A , Alaska	
Contributor is True Source			
05/18/2026	Type: Individual Name: Christine Sasse P.O. Box 3105 Valdez, Alaska 99686	Occupation: Accountant Employer: Harris Sand & Gravel , Alaska	\$51.50
Contributor is True Source			
05/18/2026	Type: Individual Name: Eric Colegrove 19137 Nunivak Cir Eagle River, Alaska 99577	Occupation: Optometrist Employer: Self , Alaska	\$50.00
Contributor is True Source			
05/19/2026	Type: Individual Name: Leo Tardy 7501 E. 20th Ave Anchorage, Alaska 99504	Occupation: Retired Employer: N/A , Alaska	\$100.00
Contributor is True Source			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
05/20/2026	Pioneer Law 810 N St #100 Anchorage, Alaska 99501	SUPPORT: 2 - Repeal Election: State General Legal services	\$40,000.00
05/22/2026	Revere Payments 100 Avenue of Champions, Suite 100 Palm Beach Gardens, Florida 33418	SUPPORT: 2 - Repeal Election: State General Credit card processing fees	\$400.00

REPORT SUMMARY

Number of Expenditures Reported with this Report: 7	
Total of paid Expenditures:	\$26,513.32
Previous Contributions:	\$658,241.88
Number of Contributions Reported with this Report: 5	
Total of Contributions Reported with this Report:	\$250,301.50
Cumulative Contribution Amounts:	\$908,543.38
Number of Officers: 10	
Number of Debts Reported with this Report: 2	
Total of Debts Incurred but not yet paid:	\$40,400.00

INDEPENDENT EXPENDITURES FORM 15-6

AMENDMENT

Amendment Description: Update True Source information

COMPLETED

Submission Date: **06/17/2026**

FILER INFORMATION

Filer First Name: **CHERYL**
 Filer Middle Name: **L**
 Filer Last Name: **FRASCA**
 Filer Full Address: **2415 La Honda Dr
 Anchorage, Alaska 99517**
 Filer Occupation: **N/A**
 Filer Employer: **N/A**
 Filer's Title with Other Entity: **APOC Reporting Administrator**

REPORT INFORMATION

Report Year: **2026**
 Election Year: **2026**
 Report Type: **Ten Day**
 Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Repeal Now**
 Type of Business or Organization: **Registered Group**
 Address: **P.O. Box 240382**
 City: **Anchorage**
 State: **Alaska**
99524
 Country: **United States**
 Business/Other Entity Contact Person: **Bethany Marcum**
 Contact E-mail: **bethanymarcum@gmail.com**
 Contact Phone: **907-440-7000**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Judy Eledge	3743 Richard Evelyn Byrd St #B Anchorage, Alaska 99517	Chair
Bethany Marcum	7463 White Hawk Dr	Treasurer

	Anchorage, Alaska 99507	
Judy Eledge	3743 Richard Evelyn Byrd B Anchorage, Alaska 99517	Deputy Treasurer
Cynthia Glassmaker	33361 Keystone Dr Soldotna, Alaska 99669	Deputy Treasurer
Linn McCabe	P.O. Box 520248 Big Lake, Alaska 99652	Deputy Treasurer
Kathy McCollum	5780 W. Birch Harbor Dr Wasilla, Alaska 99623	Deputy Treasurer
Barbara Tyndall	P.O. Box 82977 Fairbanks, Alaska 99708	Deputy Treasurer
Al Smay	2861 Porcupne Trail Rd Anchorage, Alaska 99516	Deputy Treasurer
Dawn Bockelman	8100 E. 2nd Ave Anchorage, Alaska 99502	Deputy Treasurer
Carolyn Overstreet	8122 Lamplighter Ct Anchorage, Alaska 99502	Deputy Treasurer
Justin Tyler Slater	112 S. Alaska St #100 Palmer, Alaska 99645	Deputy Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
05/13/2026	Lowe's 10900 Old Seward Hwy Anchorage, Alaska 99515	Debit Card	SUPPORT: 2 - Repeal Election: State General Sign materials	\$517.10
05/13/2026	Excelazing 8084 S 6120 W West Jordan, Utah 84081	Debit Card	SUPPORT: 2 - Repeal Election: State General Ads management April (Google/Meta)	\$975.85
05/13/2026	Judy Eledge 3743 Richard Evelyn Byrd St #B Anchorage, Alaska 99517	Check Check Number: 121	SUPPORT: 2 - Repeal Election: State General Travel reimbursement (lodging, gas) for three people	\$519.00
05/15/2026	Vulcan Towing 2134 E. 88th Anchorage, Alaska 99507	Debit Card	SUPPORT: 2 - Repeal Election: State General Tow vehicle for campaign event	\$149.50
05/18/2026	Pioneer Law 810 N St #100 Anchorage, Alaska 99501	Check Check Number: 120	SUPPORT: 2 - Repeal Election: State General Legal services; check amount was \$37,992.83, which includes \$14,385.22 previously reported as a "debt"	\$23,607.61
05/18/2026	Stickergiant 880 Weaver Park Rd Longmont, Colorado 80501	Debit Card	SUPPORT: 2 - Repeal Election: State General Bumper stickers	\$639.26
05/21/2026	AT Printing & Publishing	Check Check	SUPPORT: 2 - Repeal Election: State General	\$105.00

1720 Abbott Rd Anchorage, Alaska 99507	Number: 121	Printing campaign materials	
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CONTRIBUTIONS

Contribution Date	Contributor	Details			Amount
05/13/2026	Type: Other Name: Aurora Action Network 11790 Cange St Anchorage, Alaska 99516	Officers / Directors			\$250,000.00
		Name	Full Address	Title	
		Thomas Datwyler	502 6th St, Hudson, WI 54016, Alaska	Treasurer	

Date	True Source	Address	Details	Amount	Total Annual
10/21/2025	Type: Other Name: Advancing Alaska Action	Address: 721 Depot Dr #700 Anchorage, 99501		\$5,000.00	\$0.00
	True Source Officers / Directors				
	Name	Full Address	Title		
	Ann Riggs	P.O. Box 1432, Palmer, AK 99645	Director, Vice President		
	Leon Barbachano	424 W. Founders Blvd, Saratoga Springs, UT 84045	Director, President		
	Sandra Lempke	2844 Seafarer Lp, Anchorage, AK 99516	Director, Secretary, Treasurer		
10/20/2025	Type: Individual Name: Robert Dindinger	Address: 5611 196th Ave NE Redmond, 98053	Occupation: Tour Operator Employer: Alaska Travel Adventures	\$500.00	\$0.00
03/10/2026	Type: Individual Name: Stanley English	Address: P.O. Box 91971 Anchorage, 99509	Occupation: Business Owner Employer: Northern Solutions Aviation	\$20,000.00	\$20,000.00
10/16/2025	Type: Other Name: Godspeed	Address: 5325 Chena Small		\$10,000.00	\$0.00

	Leasing	Tracts Rd Fairbanks, 99709			
True Source Officers / Directors					
	Name	Full Address		Title	
	John Binkley	5325 Cena Small Tracts Rd, Fairbanks, AK 99709		Member	
05/06/2026	Type: Individual Name: Timothy Mellon	Address: P.O. Box 1500 Saratoga, 82331	Occupation: Investor Employer: Self Employed	\$50,000.00	\$50,000.00
11/04/2025	Type: Individual Name: Andy Miller	Address: 30 Burton Hills Blvd Nashville, 37215	Occupation: Business Owner Employer: Angry Eagle Lodge	\$10,000.00	\$0.00
05/05/2026	Type: Individual Name: Les Nichols	Address: 3318 N. Van Horn Rd Fairbanks, 99701	Occupation: Homemaker Employer: Family	\$1,000.00	\$1,000.00
08/06/2025	Type: Individual Name: Michael Rydin	Address: 5500 Holly St Houston, 77081	Occupation: Retired Employer: N/A	\$3,000.00	\$0.00
06/27/2025	Type: Individual Name: Damien Stella	Address: 4011 Romanzof Cir Anchorage, 99517	Occupation: Engineering Consultant Employer: Self	\$6,000.00	\$0.00
10/10/2025	Type: Individual Name: Maria Uchytel	Address: 2921 Blueberry Hills Rd S Juneau, 99801	Occupation: Regional Director Employer: US Senate	\$500.00	\$0.00
10/08/2025	Type: Individual Name: Elizabeth Uihlein	Address: 1396 N. Waukegan Rd Lake Forest, 60045	Occupation: President Employer: Uihlein	\$10,000.00	\$0.00
10/06/2025	Type: Individual Name: Jeff Yass	Address: 401 E City Ave Bala Cynwyd, 19004	Occupation: Managing Director Employer: SIG	\$225,000.00	\$675,000.00

05/15/2026	Type: Individual Name: Robert Tilley 9690 Trennie Lp Palmer, Alaska 99645	Occupation: Retired Employer: N/A , Alaska	\$100.00
Contributor is True Source			
05/18/2026	Type: Individual Name: Christine Sasse P.O. Box 3105 Valdez, Alaska 99686	Occupation: Accountant Employer: Harris Sand & Gravel , Alaska	\$51.50
Contributor is True Source			
05/18/2026	Type: Individual Name: Eric Colegrove 19137 Nunivak Cir Eagle River, Alaska 99577	Occupation: Optometrist Employer: Self , Alaska	\$50.00
Contributor is True Source			
05/19/2026	Type: Individual Name: Leo Tardy 7501 E. 20th Ave Anchorage, Alaska 99504	Occupation: Retired Employer: N/A , Alaska	\$100.00
Contributor is True Source			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
05/20/2026	Pioneer Law 810 N St #100 Anchorage, Alaska 99501	SUPPORT: 2 - Repeal Election: State General Legal services	\$40,000.00
05/22/2026	Revere Payments 100 Avenue of Champions, Suite 100 Palm Beach Gardens, Florida 33418	SUPPORT: 2 - Repeal Election: State General Credit card processing fees	\$400.00

REPORT SUMMARY

Number of Expenditures Reported with this Report: 7	
Total of paid Expenditures:	\$26,513.32
Previous Contributions:	\$658,241.88
Number of Contributions Reported with this Report: 5	
Total of Contributions Reported with this Report:	\$250,301.50
Cumulative Contribution Amounts:	\$908,543.38
Number of Officers: 11	
Number of Debts Reported with this Report: 2	
Total of Debts Incurred but not yet paid:	\$40,400.00

STATEMENT OF CONTRIBUTIONS FORM 15-5

AMENDMENT**Amendment Description: Fixing contributor address.****COMPLETED**Submission Date: **06/19/2026**

REPORT TYPE

Filing Reason: **Contributions in excess of \$2,000**Report Year: **2026**Filed As: **Other**

FILING

Filer First Name: **Thomas**

Filer Middle Name:

Filer Last Name: **Datwyler**Filer Phone: **7153388544**Filer Email: **tcdatwyler@gmail.com**Occupation: **Accountant**Employer: **Self-Employed**Filer's Title with Other Entity: **Treasurer**

BUSINESS INFORMATION

Business Entity Name: **Aurora Action Network**Business Type: **LLC**Address: **502 6th St**City: **Hudson**State: **Wisconsin****54016**Country: **United States**

CONTACT PERSON INFORMATION

First Name: **Thomas**Last Name: **Datwyler**Phone: **7153388544**Email: **tcdatwyler@gmail.com**

CONTRIBUTIONS

Contribution Date	Recipient	Form of Contribution	Amount	Total Annual Contribution
05/13/2026	2026 - Repeal Now	Electronic Funds Transfer	\$250,000.00	\$350,000.00

TRUE SOURCES

Date	Name	Address	Employment	Amount	Total Annual
04/07/2026	Name: John Nolte	Address: 9400 Ponderosa Dr,	Retired Retired	\$5,000.00	\$5,000.00

		Anchorage, Alaska 99507			
		Phone: 9072238476			
		Email: johnnolte@gmail.com			
Received Directly from True Source No Intermediaries					
04/03/2026	Name: Patrick Reilly	Address: 840 Botanical Heights Cir, Anchorage, Alaska 99515	Retired Retired	\$500.00	\$500.00
		Phone: 9073601753			
		Email: pat@reillyak.com			
Received Directly from True Source No Intermediaries					
04/03/2026	Name: April Reilly	Address: 840 Botanical Heights Cir, Anchorage, Alaska 99515	Retired Retired	\$500.00	\$500.00
		Phone: 19073602575			
		Email: april@reillyak.com			
Received Directly from True Source No Intermediaries					
03/16/2026	Name: Jeff Yass	Address: 401 E City Ave, Bala Cynwyd, Pennsylvania 19004	Managing director SIG	\$350,000.00	\$350,000.00
		Phone: 6106172600			
		Email: j.yass@aol.com			
Received Directly from True Source No Intermediaries					
03/10/2026	Name: Stanley English	Address: PO Box 919, Anchorage, Alaska 99509	Owner Northern Solutions Aviation	\$20,000.00	\$20,000.00
		Phone: 9073178786			
		Email: rst6nih9@netzero.com			
Received Directly from True Source No Intermediaries					
11/04/2025	Name: Andy Miller	Address: 30 Burton Hills Blvd, Nashville, Tennessee 37215	Owner Angry Eagle Lodge	\$10,000.00	\$0.00
		Phone: 6154654875			
		Email: info@thrivelogic.com			
Received Directly from True Source No Intermediaries					
09/22/2025	Name: Rhonda Boyles	Address: 20639 W. Meadowbrook Ave., Buckeye, Arizona 85396	Retired Retired	\$1,000.00	\$0.00
		Phone: 9074521792			
		Email: RhondaBoyles@gci.net			
Received Directly from True Source No Intermediaries					
10/06/2025	Name:	Address:	Managing director	\$225,000.00	\$0.00

	Jeff Yass	401 E City Ave, Bala Cynwyd, Pennsylvania 19004	SIG		
		Phone: 6106172600			
		Email: j.yass@aol.com			
Received Directly from True Source No Intermediaries					
10/08/2025	Name: Elizabeth Uihlein	Address: 1396 N. Waukegan Rd, Lake Forest, Illinois 60045	President Uihlein	\$10,000.00	\$0.00
		Phone: 8002955571			
		Email: customer.service@uline.com			
Received Directly from True Source No Intermediaries					
10/10/2025	Name: Maria Uchytíl	Address: 2921 Blueberry Hills Rd S, Juneau, Alaska 99801	Regional al director US Senate	\$500.00	\$0.00
		Phone: 2069726738			
		Email: mariaelena.uchytíl@gmail.com			
Received Directly from True Source No Intermediaries					
10/20/2025	Name: Robert Dindinger	Address: 5611 196th Ave NE, Redmond, Alaska 98053	Tour Operator Alaska Travel Adventures, Inc	\$500.00	\$0.00
		Phone: 4254971212			
		Email: atalap@msn.com			
Received Directly from True Source No Intermediaries					
09/09/2025	Name: Albert Haynes	Address: PO Box 873881, Wasilla, Alaska 99687	Retired Retired	\$10,000.00	\$0.00
		Phone: 9078412372			
		Email: aloyp2s5@gmail.com			
Received Directly from True Source No Intermediaries					
09/12/2025	Name: Jeff Yass	Address: 401 E City Ave, Bala Cynwyd, Pennsylvania 19004	Managing director SIG	\$100,000.00	\$0.00
		Phone: 6106172600			
		Email: j.yass@aol.com			
Received Directly from True Source No Intermediaries					
09/01/2025	Name: JK Ginger Johnson	Address: PO Box 20868, Juneau, Alaska 99802	Retired Retired	\$1,000.00	\$0.00
		Phone: 9073213319			
		Email: gingersnap@gci.net			

Received Directly from True Source No Intermediaries					
08/29/2025	Name: Paulette Simpson	Address: 402 Alaska Belle Ct, Douglas, Alaska 99824	Retired Retired	\$500.00	\$0.00
		Phone: 19073210056			
		Email: paulettemak@gmail.com			
Received Directly from True Source No Intermediaries					
08/29/2025	Name: David Cruz	Address: 3852 North Clark-Wolverine Rd, Old Harbor, Alaska 99643	President & CEO Cruz Construction	\$10,000.00	\$0.00
		Phone: 9077463144			
		Email: information@cruzconstruct.com			
Received Directly from True Source No Intermediaries					
08/26/2025	Name: Michael Samson	Address: 2031 Van Horn Ct, Fairbanks, Alaska 99701	Contractor Samson Electric	\$1,000.00	\$0.00
		Phone: 9074510252			
		Email: mesamson@yahoo.com			
Received Directly from True Source No Intermediaries					
08/21/2025	Name: Stephen Colligan	Address: PO Box 2474294, Wasilla, Alaska 99687	Business Owner 3GLP Inc	\$2,000.00	\$0.00
		Phone: 9075621500			
		Email: scolligan@3glp.net			
Received Directly from True Source No Intermediaries					
08/20/2025	Name: Neil Mackinnon	Address: PO Box 240766, Douglas, Alaska 99824	Retired Retired	\$500.00	\$0.00
		Phone: 9075863494			
		Email: e.neil@aelp.com			
Received Directly from True Source No Intermediaries					
08/14/2025	Name: William Armstrong	Address: 1421 Blake Street, Denver, Colorado 80202	Investor Self Employed	\$10,000.00	\$0.00
		Phone: 3036231821			
		Email: bill@armstrongoilandgas.com			
Received Directly from True Source No Intermediaries					
08/06/2025	Name: David Cruz	Address: 3852 North Clark-Wolverine Road, Palmer, Alaska 99645	President & CEO Cruz Construction	\$10,000.00	\$0.00

		Phone: 9077463144			
		Email: information@cruzconstruct.com			
Received Directly from True Source No Intermediaries					
08/06/2025	Name: MB Gillis	Address: 8131 Evans Circle, Anchorage, Alaska 99507	House Dist. 25 Rep. Self-Employed	\$1,500.00	\$0.00
		Phone: 7153388544			
		Email: tcdatwyler@gmail.com			
Received Directly from True Source No Intermediaries					
08/06/2025	Name: Karen Michel	Address: 3236 Riverview Drive, Fairbanks, Alaska 99707	Manager American Medical Inc	\$1,000.00	\$0.00
		Phone: 7153388544			
		Email: tcdatwyler@gmail.com			
Received Directly from True Source No Intermediaries					
08/06/2025	Name: Leon Chandler	Address: 16880 Briarcliff Pointe Circle, Anchorage, Alaska 99516	Retired Retired	\$5,000.00	\$0.00
		Phone: 7153388544			
		Email: tcdatwyler@gmail.com			
Received Directly from True Source No Intermediaries					
07/31/2025	Name: John Minder	Address: P O Box 71163, Fairbanks, Alaska 99707	President/CEO Great Northwest Inc.	\$1,000.00	\$0.00
		Phone: 9073228894			
		Email: jminder@grtnw.com			
Received Directly from True Source No Intermediaries					
07/31/2025	Name: James Udelhoven	Address: PO Box 126, Kasiolf, Alaska 99610	CEO UOSS	\$15,000.00	\$0.00
		Phone: 9072625905			
		Email: james@udelhoven.com			
Received Directly from True Source No Intermediaries					
07/31/2025	Name: Stanley English	Address: PO Box 91971, Anchorage , Alaska 99509	Owner Northern Solutions Aviation	\$10,000.00	\$0.00
		Phone: 9073178786			
		Email: rst6nih9@netzero.com			
Received Directly from True Source No Intermediaries					
07/26/2025	Name: James Fields	Address: PO Box 397, Glennallen, Alaska 99588	Owner Hub of Alaska	\$10,000.00	\$0.00

		Phone: 9078223302			
		Email: james@avak.biz			
Received Directly from True Source No Intermediaries					
07/17/2025	Name: Ed Gohr	Address: 10322 Prince William Circle, Anchorage , Alaska 99515	CEO Delta Constructors	\$5,000.00	\$0.00
		Phone: 9073447792			
		Email: bgohr@msn.com			
Received Directly from True Source No Intermediaries					
07/16/2025	Name: Scott Bringmann	Address: 2309 Harbor Landing Cir, Anchorage, Alaska 99515	Director Alcan Electrical & Eng Inc.	\$5,000.00	\$0.00
		Phone: 4087866232			
		Email: sbringmann@alcanelectric.com			
Received Directly from True Source No Intermediaries					
06/27/2025	Name: Damien Stella	Address: 4011 Romanzof Cir, Anchorage , Alaska 99617	Engineering Consultant Self-Employed	\$6,000.00	\$0.00
		Phone: 9076021946			
		Email: tcdatwyler@gmail.com			
Received Directly from True Source No Intermediaries					
06/20/2025	Name: Michael Rydin	Address: 5500 Holly St, Houston, Texas 77081	Retired Retired	\$30,000.00	\$0.00
		Phone: 3857991513			
		Email: mike@hcss.com			
Received Directly from True Source No Intermediaries					
08/20/2025	Business/Entity: Hyak Mining Company, Inc.	Address: PO Box 240766, Douglas, Alaska 99824	Retired Retired	\$750.00	\$0.00
	Contact Name: Neil Mackinnon	Phone: 9075863494			
		Email: e.neil@aelp.com			
Received Directly from True Source No Intermediaries					
10/21/2025	Business/Entity: Advancing Alaska Action INC	Address: 721 DEPOT DR, ANCHORAGE, Alaska 99501	Owner Advancing Alaska Action INC	\$5,000.00	\$0.00
	Contact Name: Thomas Datwyler	Phone: 7153388544			
		Email: tcdatwyler@gmail.com			
Received Directly from True Source No Intermediaries					
08/14/2025	Business/Entity: Furie Operating	Address: 433 W 9th Avenue,	CEO Furie Operating	\$10,000.00	\$0.00

	Contact Name: John Hendrix	Anchorage, Alaska 99501			
		Phone: 9072773726			
		Email: j.hendrix@furiealaska.com			
Received Directly from True Source No Intermediaries					
10/16/2025	Name: John Binkley	Address: 5325 Chena Small Tracts Rd, Fairbanks, Alaska 99709	Owner Godspeed Leasing	\$10,000.00	\$0.00
		Phone: 9077701496			
		Email: jbinkley@alaska.net			
Received Directly from True Source No Intermediaries					
07/03/2025	Business/Entity: Frontier Supply	Address: 981 Van Horn Rd, Fairbanks, Alaska 99701	Retired Retired	\$10,000.00	\$0.00
	Contact Name: Todd Hume	Phone: 9073743500			
		Email: Frontier@vivlamore.com			
Received Directly from True Source No Intermediaries					
04/08/2026	Name: Michael Samson	Address: 2031 Van Horn Ct, Fairbanks, Alaska 99701	Contractor Samson Electric	\$2,500.00	\$2,500.00
		Phone: 9074510252			
		Email: mesamson@yahoo.com			
Received Directly from True Source No Intermediaries					
04/10/2026	Name: John Sturgeon	Address: 4450 Shoshoni Abe, Anchorage, Alaska 99516	Retired Retired	\$2,000.00	\$2,000.00
		Phone: 9072300072			
		Email: frontiertradellc@aol.com			
Received Directly from True Source No Intermediaries					
04/13/2026	Name: Emma Campbell	Address: 1150 S Colony Way, Palmer, Alaska 99645	Office administrator Self	\$500.00	\$500.00
		Phone: 7153388544			
		Email: emleca@aol.com			
Received Directly from True Source No Intermediaries					
04/14/2026	Name: David Miller	Address: 4951 S Colonist Dr, Palmer, Alaska 99645	Retired Retired	\$1,000.00	\$1,000.00
		Phone: 9077955194			
		Email: dmak2016@yahoo.com			
Received Directly from True Source No Intermediaries					

04/17/2026	Name: Steve Swinney	Address: 1225 Well St, Fairbanks, Alaska 99701 Phone: 19076999633 Email: steveswinney63@gmail.com	Owner Glassolutions Inc.	\$2,000.00	\$2,000.00
Received Directly from True Source No Intermediaries					
04/22/2026	Name: Wade Erickson	Address: 8535 E Stormy Hill Cir, Wasilla, Alaska 99654 Phone: (907) 357-9590 Email: info@capstoneclinic.com	MD Capstone Clinic	\$2,500.00	\$2,500.00
Received Directly from True Source No Intermediaries					
04/22/2026	Name: Martin Eckmann	Address: 5100 Currin Cir, Anchorage, Alaska 99516 Phone: 345-5866 5100 Email: Info@noemail.com	Owner Alaska Sausage Co Inc	\$3,000.00	\$3,000.00
Received Directly from True Source No Intermediaries					
04/22/2026	Name: Carolyn Overstreet	Address: 8122 Lamplighter Ct, Anchorage, Alaska 99502 Phone: (662) 458-5126 Email: carolynoster@gmail.com	Retired Retired	\$2,500.00	\$2,500.00
Received Directly from True Source No Intermediaries					
04/22/2026	Name: Deena Bishop	Address: 2521 E Mountain Village Dr, Wasilla, Alaska 99654 Phone: (907) 376-6245 Email: Info@noemail.com	SOA Attwood Center	\$2,500.00	\$2,500.00
Received Directly from True Source No Intermediaries					
04/24/2026	Name: Vikki Solberg	Address: 3680 Barrow St, Anchorage, Alaska 99503 Phone: 19073507759 Email: vikki@natpan.com	Owner Natural Pantry	\$2,500.00	\$2,500.00
Received Directly from True Source No Intermediaries					
04/22/2026	Business/Entity: Natural Pantry Inc Contact Name: Victoria Solberg	Address: 3680 Barrow St, Anchorage, Alaska 99503 Phone: (907) 770-1444 Email: Info@NaturalPantry.com	Owner Natural Pantry Inc	\$2,500.00	\$2,500.00
Received Directly from True Source No Intermediaries					

04/22/2026	Business/Entity: Alaska Quality Care LLC	Address: PO Box 111587, Anchorage, Alaska 99511	Owner Alaska Quality Care LLC	\$2,500.00	\$2,500.00
	Contact Name: Lucy Bauer	Phone: (907) 433-9189 Email: lucy@alaskaqualitycares.com			
Received Directly from True Source No Intermediaries					
05/05/2026	Name: Les Nichols	Address: 3318 N Van Horn Rd, Fairbanks, Alaska 99701	homemaker homemaker	\$1,000.00	\$1,000.00
		Phone: 907-336-3343 Email: Sales@NSAKLLC.com			
Received Directly from True Source No Intermediaries					
05/06/2026	Name: Timothy Mellon	Address: PO Box 1500, Saratoga, Wyoming 82331	Investor Self Employed	\$50,000.00	\$50,000.00
		Phone: (307) 745-0413 Email: panam.captain@yahoo.com			
Received Directly from True Source No Intermediaries					

REPORT SUMMARY

Number of Contributions Reported with this Report: 1	
Total of Contributions Reported with this Report:	\$250,000.00

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Alaskans for Better Elections, Inc.,)
)
 Complainant,)
)
 v.)
)
 Alaskans for Honest Elections, Alaskans for)
 Honest Government, Ranked Choice Education)
 Association, and Art Mathias,)
)
 Respondents.)
 _____)

**ORDER ACCEPTING COMPLAINT AND
REMANDING TO STAFF FOR INVESTIGATION**

Alaskans for Better Elections filed a complaint against several parties, including Alaskans for Honest Elections, Alaskans for Honest Government, Ranked Choice Education Association, and Art Mathias (the Respondents). These same parties were involved in a prior complaint matter (23-01-CD) that provides the backdrop for this matter. In that matter, we issued an order finding that the Respondents violated various campaign-related statutes.¹ The order required the Respondents to meet their respective obligations under the campaign-related statutes and pay fines corresponding to their individual violations.² Parts of the order have been appealed to the Alaska judiciary, but the order was not stayed.³

¹ Final Order in *Alaskans for Better Elections v. Alaskans for Honest Elections et. al.*, Case No. 23-01-CD (issued Jan. 3, 2024) (hereinafter “Order”).

² *Id.* at 32.

³ See Order Denying Appellants’ Motion for Partial Stay and Granting Appellee Alaskans for Better Elections Request for Expedited Briefing, 3AN-24-04508CI (Alaska Super. Ct. Mar. 15, 2024).

The complaint at issue here alleges mainly that the Respondents have failed to comply with parts of the order issued in 23-01-CD and are again failing to comply with Alaska’s campaign laws by, among other things, failing to register on time,⁴ failing to file accurate and timely reports,⁵ and failing to include accurate disclosures on campaign communications.⁶

APOC staff rejected the complaint. By regulation, staff has one day after receiving a complaint to determine if, among other things, a complaint “alleges facts that, if true, would be a violation” of the statutes under APOC’s jurisdiction, including AS 15.13.⁷ If staff “determines that the complaint does not” allege adequate facts, then it “shall . . . reject the complaint.”⁸ Here, staff rejected the complaint because its “allegations center on violations of the Commission’s Final Order in Complaint 23-01-CD . . . rather than violations of AS 15.13.” Alaskans for Better Elections appealed to the Commission.

The Commission concludes that the complaint was improperly rejected for two reasons. First, the Commission’s authority to issue orders like the one in 23-01-CD comes from AS 15.13.380(e), which says that upon finding that the statute has been violated, the Commission “shall enter an order requiring the violation to be ceased or to be remedied and shall assess civil penalties.” Thus, when someone violates an order issued under section 380(e), they are violating part of AS 15.13—namely, the part telling the Commission to issue

⁴ See AS 15.13.050(a).

⁵ See, e.g., AS 15.13.110(g); AS 15.110(h); AS 15.13.040(k).

⁶ See AS 15.13.090.

⁷ 2 AAC 50.870(c)(3).

⁸ 2 AAC 50.870(d).

orders in response to violations. Absent a unique circumstance, these types of allegations are enough to satisfy the requirement that a complaint allege “facts that, if true, would be a violation of AS 15.13.”⁹

Second, although the main allegations in the complaint are related to one of the Commission’s prior orders, they also involve new violations of AS 15.13. The relevant parts of the order simply required the Respondents begin complying the law. If the Respondents did not follow those instructions by the deadline we imposed in the order, they began violating AS 15.13 once again. These violations would necessarily be different from the ones discussed in the prior order because they cover a different time period. On the whole, the complaint thus alleges “facts that, if true, would be a violation of AS 15.13.”¹⁰

One aspect of the complaint, however, does not meet this standard. As to each respondent, the complaint invites APOC staff to investigate “[a]ny other violations of AS 15.13 et seq. that are discovered during this proceeding” without providing any additional facts. A bare request for an open-ended investigation into a political opponent is not enough to meet the standard in 2 AAC 50.870(c)(3). This aspect of the complaint is not valid.

The Commission accepts the complaint and remands the matter to staff for an investigation. Staff shall investigate all the allegations in the complaint that include specific factual claims.¹¹ Staff shall not conduct an open-ended investigation into whether the

⁹ 2 AAC 50.870(c)(3).

¹⁰ *See Id.*

¹¹ The allegations to be investigated are in the complaint sections: II.A.i.a-e, II.B.i.a-b, II.C.i.a-e, II.D.i.a.

Respondents have complied with aspects of AS 15.13 that are not cited in the complaint, unless new information arises and staff deems it necessary.¹² If the Respondents have not followed the law, staff shall calculate what penalties are appropriate and make a recommendation to the Commission.¹³

This is not a final Commission order for the purpose of an appeal to superior court. We retain jurisdiction for staff's investigation and consideration of staff's investigation report.

Dated: September 9, 2024.

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION¹⁴

Certificate of Service:

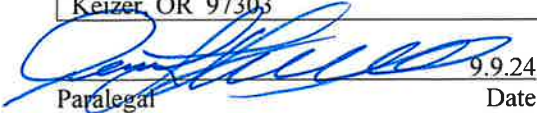
I hereby certify that on this date, I served, by **certified mail, US mail, and email** a true and correct copy of the foregoing in this proceeding on the following:

Scott Kendall
Samuel Gottstein
Cashion Gilmore & Lindemuth
510 L Street, Suite 601
Anchorage, AK 99501
sam@caahiongilmore.com
scott@cashiongilmore.com

and by **email** to:

Heather Hebdon
Executive Director
Alaska Public Offices Commission
heather.hebdon@alaska.gov

Kevin Clarkson
Law Office of Kevin Clarkson
2223 Latona Drive NE
Keizer, OR 97303


Paralegal 9.9.24
Date

¹² Staff may make recommendations about violations of AS 15.13 that are not mentioned in a complaint if new facts arise during its investigation. *Eberhart v. Alaska Pub. Offices Comm'n*, 426 P.3d 890, 900 (Alaska 2018).

¹³ In determining the penalty amounts, staff shall consider that under the order in 23-01-CD the Respondents were given 30 days to comply with some requirements, during which time no penalty accrued. Order at 32.

¹⁴ Commissioners Richard Stillie, Lanette Blodgett, Eric Feige, Dan LaSota, and Walt Monegan participated in this matter. The decision was made on a 5-0 vote.

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

YES ON 2 FOR BETTER ELECTIONS,)
)
 Complainant,)
)
 v.) APOC Case No. **20-06-CD**
)
 DEFEND ALASKA ELECTIONS – VOTE)
 NO ON 2,)
)
 Respondent.)
 _____)

EMERGENCY ORDER

Yes on 2 for Better Elections filed a complaint against Defend Alaska Elections – Vote No on 2 (DAE), alleging in part that DAE has not accurately identified its top three contributors on various advertisements. DAE is campaigning to defeat Ballot Measure 2, the Better Elections Initiative, in the statewide general election on November 3. The Commission granted expedited consideration of the top contributor issue at Yes on 2’s request.¹ After an expedited hearing, the Commission concludes that DAE’s radio ads identifying John Sturgeon, Mark Begich, and Sean Parnell as DAE’s top three contributors violate AS 15.13.090(a)(2)(C) because these individuals were no longer the top three contributors when the radio ads first aired. The Commission orders DAE to correct the top contributor disclosure on the ads as soon as possible and in no event later than three business days after the issuance of this order, so that the disclosures accurately

¹ Order Granting Expedited Consideration (Oct. 6, 2020).

identify the top contributors as of DAE's September 17 independent expenditure report.² Alternatively, DAE may stop airing the ad with the inaccurate top contributor disclosure.

Alaska Statute 15.13.090(a)(2)(C) requires DAE to identify on its communications its "three largest contributors under AS 15.13.040(e)(5), if any, during the 12-month period before the date of the communication." A "communication" is statutorily defined, in relevant part, as "an announcement or advertisement *disseminated* through print or broadcast media, including radio, television, cable, and satellite, the Internet, or through a mass mailing."³ To disseminate means "to spread (something, especially information) widely."⁴

The parties dispute when the "date of the communication" occurs for radio advertisements.⁵ DAE argues that it must identify its top three contributors as disclosed in campaign reports before the date the radio ads were produced and placed, and that it does not need to change already produced ads if they continue to air after a contribution in a later filed report results in displacing one or more of the previous top three contributors.

² Defend Alaska Elections – No on 2's Independent Expenditure Report, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4598&ViewType=IE> (filed Sept. 17, 2020). The Commission takes judicial notice of this report.

³ AS 15.13.400(3) (emphasis added).

⁴ Disseminate, Lexico.com, <https://www.lexico.com/en/definition/disseminate> (last visited Oct. 7, 2020). See AS 01.10.040 (construing statutory words "according to their common and approved usage," if they have not acquired a technical meaning through statutory definition or otherwise).

⁵ For the purposes of this order, the Commission focuses solely on the testimony and evidence addressing radio advertisements because, as explained later, the Commission concludes that expedited consideration of the other types of ads at issue in this complaint is not warranted.

Yes on 2 views the phrase “date of communication” as requiring DAE to expeditiously change the top three contributor disclosure on radio ads still airing whenever a newly filed disclosure report shows that one or more of the top three contributors has changed.

The Commission held an expedited hearing on October 7 to consider this issue. Attorney Sam Gottstein represented Yes on 2, and attorneys Matt Singer and Lee Baxter represented DAE. Three witnesses—both groups’ campaign managers and a Commission staff member—testified. Yes on 2’s campaign manager, Shea Siegert, testified that he changes the top-three identifier in radio ads that are already airing if Yes on 2’s top contributors change. He explained that changing the identification on radio ads could easily happen overnight and be done cheaply: he could splice a new disclosure on a pre-existing radio ad using an application on his computer or phone and send the revised ad to radio stations in no more than thirty minutes.

DAE’s campaign manager, Brett Huber, testified that DAE had not adjusted the contributor disclosure on its radio ads because the disclosure was accurate based on the date the ads were produced and placed. He testified that DAE correctly disclosed in its radio ads that Sturgeon, Begich, and Parnell were its top three contributors consistent with its September 7 report (as amended).⁶ Mr. Huber explained that, although the Alaska Republican Party, the Republican State Leadership Committee, and Americans For

⁶ Defend Alaska Elections – No on 2’s Independent Expenditure Report, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4663&ViewType=IE> (filed Sept. 7, 2020, as amended Oct. 3, 2020). The Commission takes judicial notice of this report.

Prosperity became DAE's top contributors, their contributions were not reported until after the radio ads were both produced and placed.⁷ Mr. Huber testified that he sent proposed radio copy and agreed to have Art Hackney of Hackney & Hackney produce the ads on September 14.⁸ Three days later—on September 17—production of the ads was complete, according to Mr. Huber, and Mr. Hackney billed DAE \$3,228 that same day.⁹ Mr. Huber testified that his agreement with a media buyer, Hellenthal and Associates, was final on September 17. An invoice reflects that DAE owed \$254,381 to Hellenthal and Associates for statewide radio ads that would run from September 23 to election day (November 3).¹⁰ Mr. Huber testified that after September 17, the agreements had not been modified, he did nothing further, and he expected the media buyer to handle the ad placement. Mr. Huber testified that DAE's September 17 independent expenditure report (as amended) was accurate; the report stated that DAE paid Hackney & Hackney on September 17 and incurred the debt for Hellenthal and Associates that same day.¹¹

Tom Lucas, the campaign disclosure coordinator for the Commission, testified that he discussed the contributor disclosure with Mr. Huber. He testified that the crucial event

⁷ Defend Alaska Elections – No on 2's Independent Expenditure Report, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4598&ViewType=IE> (filed Sept. 17, 2020).

⁸ See also Exhibit 1 (emails).

⁹ Exhibit 2 (emails).

¹⁰ Exhibit 3 (invoice).

¹¹ Defend Alaska Elections – No on 2's Independent Expenditure Report, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4634&ViewType=IE> (filed Sept. 17, 2020, as amended Sept. 27, 2020). The Commission takes judicial notice of this report.

was dissemination in his view: at the time of creation and dissemination, the group should look back over twelve months to determine who the top contributors were. He also explained that in the context of bulk ad buys, he had advised that the dissemination occurs on the date the ads were placed as long as the ads are on a set schedule, and there are no later changes to the schedule or to the substantive components of the ad itself.

The Commission decides that the top three contributors are those who contributed the most as reported on campaign disclosure reports during the 12-month period before the radio ads first aired. Alaska Statute 15.13.090(a)(2)(C) requires identification of the three largest contributors “under AS 15.3.040(e)(5), if any, during the 12-month period before the date of communication.” Because AS 15.30.040(e)(5) specifies what a *report* must contain to fully identify the source of a contribution, the Commission decides that the date a contribution was timely reported, rather than the date the contribution was received, controls for the purposes of determining when the 12-month look-back period ends. The applicable report that ends the 12-month period for a particular communication is the report timely filed closest to the “date of communication.”¹² And the “date of the communication” for a radio ad is the date that the ad will first air because, by statutory definition, a communication occurs when “disseminated.”¹³ The first date of airing a radio ad is when the information is first spread widely.¹⁴

¹² AS 15.13.090(a)(2)(C).

¹³ AS 15.13.400(3).

¹⁴ Disseminate, Lexico.com, <https://www.lexico.com/en/definition/disseminate> (last visited Oct. 7, 2020). See AS 01.10.040 (construing statutory words “according to their

This interpretation best conforms to the statutory language while not overly burdening or restraining the communications of campaigns. A group does not need to update its top three contributor disclosure on an already running radio ad every time the group receives a contribution that displaces a top contributor, but the group must ensure the disclosure is accurate on the date the ad first airs by looking at the contributions reported on its most recent timely filed report and reports filed in the previous 12 months. If a radio ad has been recorded or produced, but not yet disseminated, and the identification of the top three contributors in the ad is no longer accurate, the group must update the ad accordingly.

This interpretation also provides more accurate information to voters than DAE's or Mr. Lucas's suggestion. A top three disclosure may become inaccurate over time if the same ads continue to run for a long time, but the Commission's interpretation at least prevents campaigns from spreading inaccurate information to voters by using a top three disclosure that is already inaccurate—perhaps wildly, as was the case here—by the time the voters first hear the radio ads.

The Commission finds that DAE's most recent timely filed report before the radio ads first aired is the September 17 report. The radio ads could not have aired before September 17. Mr. Huber testified that he did not finalize the agreement with the media

common and approved usage," if they have not acquired a technical meaning through statutory definition or otherwise).

buyer to place the ads until September 17.¹⁵ Mr. Huber indicated that it was advisable for campaigns to lock in radio ad buys and placements early in a campaign to get the best rates and placements for ads that will actually air closer to election day. But in this case, the invoice reflects that the intended first air date was not until September 23—six days after the disclosure report was filed, thus making the ad incorrect at the time of even its *initial* airing.¹⁶

The Commission finds that DAE’s radio ads violate AS 15.13.090(a)(2)(C) because they do not accurately identify the top three contributors on DAE’s September 17 report. The contributions disclosed in this report displaced Sturgeon, Begich, and Parnell as the top three contributors; the new top three contributors were the Alaska Republican Party, the Republican State Leadership Committee, and either Americans For Prosperity or Northern Holding, Inc.¹⁷

¹⁵ See also Defend Alaska Elections – No on 2’s Independent Expenditure Report, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4598&ViewType=IE> (Sept. 17, 2020) (reporting that debt to media buyer was incurred on Sept. 17).

¹⁶ Exhibit 3.

¹⁷ Compare Defend Alaska Elections – No on 2’s Independent Expenditure Report, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4663&ViewType=IE> (filed Sept. 7, 2020, as amended Oct. 3, 2020) with Defend Alaska Elections – No on 2’s Independent Expenditure Report, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4598&ViewType=IE> (Sept. 17, 2020). The Sept. 17 report discloses that Americans For Prosperity and Northern Holdings, Inc., both contributed \$45,000 and so were tied. DAE is not required to identify more than the top three contributors and could choose which of these two contributors to identify under AS 15.13.090(e).

The Commission concludes that this violation must be remedied before the election because the violation could materially affect the outcome of the election,¹⁸ particularly because DAE intends to run the ads until election day, and absentee ballots have already been mailed. The Commission finds credible Mr. Siegert's estimate of how quickly and easily the top-contributor identifier on radio ads may be altered. In addition, Mr. Huber testified that the ads in their entirety took only three days to produce once he provided the radio copy to Mr. Hackney, and only the last few seconds of the ad must be replaced. Under AS 15.13.380(d), the Commission consequently orders DAE to correct the top three contributor disclosure on the radio ads as soon as possible and in no event later than three business days after the issuance of this order, so that the disclosure accurately identifies the top contributors as of DAE's September 17 report. Alternatively, DAE may stop airing the ads with the inaccurate top contributor disclosure.

Under AS 15.13.380(d), the Commission remands to staff to fully investigate and consider on a regular basis whether, and how much, of a penalty should be assessed for this violation. The Commission also remands to staff for a full investigation and consideration on a regular basis the issue of whether DAE's top three contributors were properly disclosed in DAE's communications on two political blogs, Facebook, and its website.¹⁹ The Commission concludes that expedited consideration of these

¹⁸ See AS 15.13.380(c) (factors for granting expedited consideration).

¹⁹ The Commission previously referred additional allegations in Yes on 2's complaint to staff for investigation and consideration on a regular basis in its Order Granting Expedited Consideration (Oct. 6, 2020).

communications is not warranted because an inaccurate top-contributor disclosure on the non-radio ads, while a serious violation if it occurred, is less likely to materially affect the election than an inaccurate top-contributor disclosure announced in a radio ad.

This is a not a final Commission order for the purposes of an appeal to superior court because the Commission has not yet determined a penalty amount, if any, for the violation and has not decided all the issues raised in Yes on 2's complaint.

Dated: October 8, 2020.

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION²⁰

<p>Certificate of Service: I hereby certify that on this date, I served, by certified mail and email a true and correct copy of the foregoing in this proceeding on the following:</p>	
<p>Samuel Gottstein Holmes Weddle & Barcott 701 W. 8th Avenue, Suite 700 Anchorage, AK 99501 sgottstein@hwb-law.com</p> <p>and by email to: Heather Hebdon Executive Director Public Offices Commission heather.hebdon@alaska.gov</p>	<p>Matthew Singer Lee Baxter Schwabe Williamson & Wyatt, PC 420 L Street, Suite 400 Anchorage, AK 99501 msinger@schawbe.com lbaxter@schawbe.com</p>

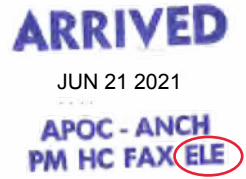
 10-8-20
Paralegal Date

²⁰ Commissioners Anne Helzer, Richard Stillie, Suzanne Hancock, Dan LaSota, and Van Lawrence participated in this decision. The decision was made on a 4-1 vote.

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

YES ON 2 FOR BETTER ELECTIONS,)
)
 Complainant,)
)
 v.)
)
 DEFEND ALASKA ELECTIONS – VOTE)
 NO ON 2,)
)
 Respondent.)
 _____)

APOC Case No. **20-06-CD**



FINAL ORDER

Yes on 2 for Better Elections alleged that Defend Alaska Elections – Vote No on 2 violated campaign disclosure laws by failing to register before making expenditures, failing to provide sufficient details for three transactions, and misidentifying its top three contributors on a variety of election-related communications. After a hearing on June 10, 2021, the Alaska Public Offices Commission concludes that Defend Alaska Elections failed to timely register as a group, to provide sufficient details for three transactions, and to include audio paid-for-by identifiers on eight advertisements, and imposes civil penalties totaling \$3,050 for these violations. The Commission previously ordered Defend Alaska Elections to correct the top-contributor identification on its radio ads, Defend Alaska Elections expeditiously did so, and the Commission does not impose a penalty for this violation or other top-contributor misidentifications in ads that Defend Alaska Elections corrected before the emergency order was issued.

I. Staff's delay in issuing the investigation report does not prevent the Commission from enforcing campaign disclosure laws.

As a preliminary matter, the Commission rejects Defend Alaska Elections' argument that it should not impose civil penalties because staff's investigation report was overdue. The timeframe for issuing an initial investigation report is "no later than 30 days after accepting a complaint."¹ Contrary to Defend Alaska Elections' assertion that the report took almost eight months, the Commission initially heard this complaint on an expedited basis—without staff investigation—and did not accept the complaint for investigation until October 8, 2020, triggering the 30-day timeframe for issuing the report.² Thus, staff's February 23, 2021, report was about three and a half months late.³

The Commission concludes that the short delay in issuing the investigation report does not foreclose it from imposing a penalty for the violations. To hold otherwise would harm the public interest in having campaign disclosure laws enforced.⁴ The procedural

¹ 2 AAC 50.875(c).

² Emergency Order, No. 20-06-CD (Oct. 8, 2020), p. 8-9; *see* AS 15.13.380(d).

³ Defend Alaska Elections contends the complaint was accepted the day it was filed and that it took almost eight months for staff to issue the *amended* report in May, making it almost seven months late. The Commission rejects this interpretation—the timeframe for issuing a report applies to the initial report. Also, staff's helpful issuance of an amended report to correct errors did not delay the hearing because the Commission considers the investigation report at "its next regularly scheduled meeting" after the report is done, and there were no regular meetings between the dates of the two reports. 2 AAC 50.875(e).

⁴ *See State, Dep't of Commerce & Econ. Dev., Div. of Ins. v. Schnell*, 8 P.3d 351, 357-58 (Alaska 2000) (holding that, despite using "shall" language, a rule's thirty-day timeframe did not bar the director from taking action three years later because that would have resulted in a licensing violation going undisciplined contrary to the public interest).

regulation does not mandate—or even suggest—dismissal as a remedy for overdue reports.⁵ Defend Alaska Elections argues that the delay was prejudicial because it was forced to leave its campaign account open in case a penalty was owed. But the delay did not harm Defend Alaska Elections in this way because the group was not required to disburse the money in its campaign account at any particular time but only to timely report the disbursement whenever it occurred,⁶ and in any event, a group may not use campaign contributions to pay civil penalties except in limited circumstances.⁷

Furthermore, although the Commission staff should strive to meet the deadline for issuing investigation reports, the delay of three and half months was not unreasonably long. Staff attributed some of the delay to a compelling circumstance—the assigned investigator experienced serious health issues and was hospitalized. And this particular investigation was extensive and complicated—staff was tasked with evaluating more than 80 advertisements that ran on varying dates leading up to the election in addition to investigating the registration and reporting allegations.

For the above reasons, the Commission rejects Defend Alaska Elections’ argument that it should not consider the complaint’s merits due to the delayed staff report.⁸

⁵ 2 AAC 50.875(c).

⁶ 2 AAC 50.384(c) (eff. 1/16/2015) (requiring the group to report the disbursement no later than 15 days after it occurs).

⁷ AS 15.13.112(b)(6).

⁸ Commissioners Anne Helzer, Richard Stillie, Suzanne Hancock, Dan LaSota, and Van Lawrence participated in this decision. The decision was made on a 5-0 vote.

II. The Commission assesses a penalty of \$1,000 because Defend Alaska Elections failed to register before making expenditures and left out crucial details about three transactions in its disclosure reports.

The Commission concludes that Defend Alaska Elections failed to register before making expenditures and provided insufficient details on three transactions, and imposes a civil penalty of \$1,000 for these violations.

Defend Alaska Elections admits that its deputy treasurer Brett Huber bought a web domain two days before it registered as a group.⁹ Consequently, Defend Alaska Elections violated the requirement that a group supporting or opposing a ballot measure register with the Commission before making expenditures to influence the election.¹⁰

Defend Alaska Elections also failed to provide sufficient details for three transactions. Defend Alaska Elections reported owing more than \$250,000 to Hellenthal & Associates for “radio,” and paying Hackney & Hackney more than \$3,000, also for “radio.”¹¹ The group also reported reimbursing Mr. Huber \$941 for “campaign set-up costs.”¹² None of these entries complied with the reporting requirements. The entry reimbursing Mr. Huber does not explain what goods or services the campaign actually

⁹ Staff’s exhibits 8, 18.

¹⁰ AS 15.13.050(a).

¹¹ Independent Expenditure Report for Defend Alaska Elections (Sept. 17, 2021) (available at <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4598&ViewType=IE>).

¹² Independent Expenditure Report for Defend Alaska Elections (Sept. 7, 2021) (available at <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4569&ViewType=IE>).

paid for through him.¹³ The “radio” entries for consulting services (Hellenthal & Associates and Hackney & Hackney) needed to identify where the consultants placed radio ads and disclose in detail all the services that the consultants rendered.¹⁴

The Commission assesses the maximum statutory penalty of \$1,000 for these violations. The penalties accrued at \$50 per day for each day the violation continued.¹⁵ Defend Alaska Elections’ registration was two days late, resulting in a \$100 penalty for this violation. The reporting violations began with the filing of an incomplete disclosure report and ended—for the purposes of the penalty accrual—as of the filing date of the complaint, September 21, 2020. Defend Alaska Elections submitted the two incomplete reports 14 days and four days before the filing of the complaint, resulting in a \$900 combined penalty for these violations. The Commission declines to reduce the maximum penalties because Defend Alaska Elections has not corrected the reports to provide sufficient details after the filing of the complaint brought the violations to its attention. The lack of details about the political consultants’ work and the campaign set-up costs undercuts the transparency about electioneering activities that the laws require.

For these reasons, the Commission concludes Defend Alaska Elections failed to register before making expenditures and provided incomplete details about three transactions, and imposes \$1,000 in civil penalties for these violations.¹⁶

¹³ See AS 15.13.040(e)(2), 2 AAC 50.321(a)(5).

¹⁴ See 2 AAC 50.321(d).

¹⁵ AS 15.13.390(a).

¹⁶ This decision was made on a 5-0 vote.

III. The Commission assesses a penalty of \$2,050 for eight Facebook ads that did not have an audio paid-for-by identifier in violation of AS 15.13.090(d).¹⁷

The Commission concludes that eight Facebook advertisement with an audio component violated AS 15.13.090(d) by not including an audio paid-for-by identifier. In a “communication that includes an audio component,” a paid-for-by identifier that states who paid for the communication and lists the payer’s top three contributors “must be read in a manner that is easily heard.”¹⁸ Staff identified eight video advertisements—seven that Sean Parnell narrated aloud and one in which Brett Huber spoke—that had no audio paid-for-by identifier.¹⁹ These ads violated AS 15.13.090(d).

The Commission assesses a penalty of \$2,050 for these violations. A penalty set at the maximum rate accrues by \$50 per day for each day the ad runs.²⁰ The eight advertisements ran for a combined total of 82 days, resulting in a maximum civil penalty of \$4,100.²¹ The Commission halves the maximum penalty because Defend Alaska Elections was a newly formed group engaged in its first election cycle and orders the group to pay a civil penalty of \$2,050.²²

¹⁷ This decision was made on a 4-1 vote with Commissioner LaSota dissenting.

¹⁸ AS 15.13.090(d).

¹⁹ Staff’s exhibit 20 (identifying these ads as no. 37, nos. 66-70, no. 73 and no. 80). Staff’s chart at pages 2-3 of exhibit 20 indicates that these ads had an audio component but no paid-for-by identifier that was read aloud. *See also* staff’s report at page 6.

²⁰ AS 15.13.390(a).

²¹ Staff’s exhibit 20, pages 2-3 (noting ad no. 37 ran for 14 days, ad no. 67 ran for 2 days, and ads nos, 66, 68, 69-70, 73, and 80 ran for 11 days through election day, which was November 3, 2020).

²² 2 AAC 50.865(a)(1)(B).

IV. The Commission does not assess a penalty for Defend Alaska Elections' incorrect identification of the top contributors on its advertisements.

In an emergency order issued on October 8, 2020, the Commission concluded that Defend Alaska Elections' radio ads failed to accurately identify its top three contributors in violation of AS 15.13.090(a)(2)(C) and ordered the group to correct the identifiers. The Commission does not assess a penalty for this violation. Before the Commission's order clarifying the requirement, the law was ambiguous or imprecise, such that the Commission cannot impose a penalty against Defend Alaska Elections, and the group expeditiously corrected the radio ads one day after the Commission ordered it to do so.

In *Alaska Public Offices Commission v. Stevens*, the Court held that "imprecise, indefinite, or ambiguous statutory or regulatory requirements must be strictly construed in favor of the accused before an alleged breach may give rise to a civil penalty."²³ In that case, the Court rejected the Commission's assessment of a civil penalty against a legislator when the Commission had not yet made explicit its interpretation of an ambiguous filing requirement.²⁴ One could reasonably read the law as requiring a legislator to report deferred income on a financial disclosure statement when earned *or* when received, so the Commission could not fine the legislator for failing to report it when earned without first making its interpretation of the relevant provisions explicit.²⁵

Here, AS 15.30.090(a)(2)(C) requires election-related communications to name a

²³ 205 P.3d 321, 326 (Alaska 2009).

²⁴ *Id.* at 324-26.

²⁵ *Id.*

group’s “three largest contributors under AS 15.13.040(e)(5), if any, during the 12-month period before the date of the communication.” To interpret and apply this provision to Defend Alaska Elections’ ads, the Commission decided two questions of statutory interpretation in its emergency order: Is the “date of communication” the date an advertisement is placed or produced, the date it first airs, or every day it runs? Are the “three largest contributors” determined based on the group’s timely campaign reports or the group’s receipt of not-yet-reported contributions? The Commission decided that a group’s top three contributors are those who contributed the most to the group as reported on *timely filed campaign reports* during the 12-month period before the ads *first aired to the public* and did not require updates to top-contributor identification if the largest contributors changed while the same ad continued to run. But the parties and staff had reasonable and different understandings of the requirements, highlighting the law’s ambiguity. Thus, the Commission concludes that the inaccurate radio ads cannot give rise to a penalty because Defend Alaska Elections quickly corrected the ads when the Commission clarified the rules and so did not continue to violate AS 15.13.090(a)(2)(C).

Similarly, the Commission does not impose a penalty for other violations that occurred before the top-contributor requirement was made clear in the October 8 order. Defend Alaska Elections did not accurately name its top contributors on its website and in some of its Facebook ads for about four days—these ads first ran after the group’s September 17 report listed new top contributors and before it corrected the top-

contributor identification linked to the ads on September 21.²⁶ Defend Alaska Elections provided the written paid-for-by identifier through a link to its Facebook page from its Facebook ads—a permissible method of providing the identifier on social media.²⁷ Thus, the group’s correction to the top contributors on the Facebook page and website on September 21 resulted in accurate identifications for the website and on all Facebook ads after the correction was made.

Lastly, the ads that Defend Alaska Elections placed in two blogs were accurate when they *first* appeared on the blog pages under the Commission’s interpretation of AS 15.13.090(a)(2)(C) in the emergency order. These ads were first published on September 15—two days before the campaign report that identified the changes in the group’s top contributors.²⁸ Defend Alaska Elections could continue running the same ads on the blogs even after the group’s largest contributors changed without updating the ads. Thus, the ads published on the blogs did not misidentify the top contributors in violation of AS 15.13.090(a)(2)(C), and no civil penalty may be imposed.

For the above reasons, the Commission concludes some of Defend Alaska Elections’ ads incorrectly identified top contributors while other ads were in compliance; the Commission assesses no penalty for the violations of AS 15.13.090(a)(2)(C).²⁹

²⁶ Seven Facebook ads started running between September 18 and 20 when the top-contributor identification was inaccurate. Staff’s exhibit 20, page 1, ad nos. 8-14.

²⁷ 2 AAC 50.306(d).

²⁸ Staff’s exhibits 9-10, 12-13.

²⁹ This decision was made on a 5-0 vote.

V. CONCLUSION

The Commission finds that Defend Alaska Elections violated the registration requirement in AS 15.13.050(a) and the reporting requirements in AS 15.13.040(e)(2) and 2 AAC 50.321(d), and failed to include an audio paid-for-by identifier in eight advertisements in violation of AS 15.13.090(d). For these violations, the Commission orders Defend Alaska Elections to pay civil penalties totaling \$3,050. Some of Defend Alaska Elections' advertisements also inaccurately identified the group's top contributors in violation of AS 15.13.090(a)(2)(C), but the Commission does not impose a penalty for these violations. The Commission denies Yes on 2's request for attorney fees;³⁰ staff did not ask for investigation or adjudication costs, or attorney fees.³¹

This is a final Commission order. It may be appealed to the superior court within 30 days from the date of this order.³² A request for the Commission to reconsider this order must be filed within 15 days from the date this order is delivered or mailed.³³

Dated: June 21, 2021

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION

³⁰ This decision was made on a 4-1 vote with Commissioner Lawrence dissenting.

³¹ See 2 AAC 50.891(h).

³² AS 15.13.380(g), AS 44.62.560, Alaska R. App. P. 602.

³³ 2 AAC 50.891(g).

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

ARRIVED

OCT 06 2020

APOC - ANCH
PM HC FAX **ELE**

YES ON 2 FOR BETTER ELECTIONS,)
)
Complainant,)
)
v.)
)
DEFEND ALASKA ELECTIONS – VOTE)
NO ON 2,)
)
Respondent.)
_____)

APOC Case No. **20-06-CD**

ORDER GRANTING EXPEDITED CONSIDERATION

Yes on 2 for Better Elections filed a complaint against Defend Alaska Elections – Vote No on 2 (DAE), alleging in part that the disclosure of DAE’s top three contributors on various advertisements is incorrect.¹ Yes on 2 asked the Alaska Public Offices Commission to hear this alleged violation on an expedited basis. The Commission grants expedited consideration and schedules a hearing at 1:30 p.m. on Wednesday, October 7 on the merits of whether DAE’s ads violate AS 15.13.090(a)(2)(C).²

Under AS 15.13.380(c), the Commission concludes that expedited consideration is warranted because there is “reasonable cause to believe” that the top three contributors disclosure was inaccurate, and this alleged violation, “if not immediately restrained, could materially affect the outcome of an election,” and “could cause irreparable harm that penalties could not adequately remedy.”

¹ AS 15.13.090(a)(2)(C).

² APOC staff will provide a Webex invitation and call-in information to the parties and members of the public who wish to attend.

In DAE's case, its top three contributors changed from John Sturgeon, Mark Begich, and Sean Parnell on its September 7, 2020, independent expenditure report³ to the Alaska Republican Party, the Republican State Leadership Committee, and Americans For Prosperity on its September 17, 2020, independent expenditure report.⁴ DAE argues that it may continue to run advertisements disclosing the top three contributors on the last independent expenditure report filed before the ads were produced and placed; Yes on 2 argues that DAE must change the top three contributor disclosure on any ads still running as of the date a newly filed independent expenditure report shows that the top contributors have changed.

In addition, Yes on 2 argues that DAE's contributor identifications on ads were never accurate because DAE reported a contribution from Corey Mulder that would have placed Mulder in the top three, rather than Begich or Parnell, but Mulder was never identified as such in ads. DAE responds that Mulder's in-kind contribution was incorrectly estimated and actually far less than originally disclosed and thus, its ads not identifying Mulder as a top contributor were accurate. DAE has subsequently amended its independent expenditure report to reduce the amount of Mulder's contribution.⁵

³ Defend Alaska Elections – No on 2's Independent Expenditure Report originally filed Sept. 7, 2020, as amended on Oct. 3, 2020, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4663&ViewType=IE>.

⁴ Defend Alaska Elections – No on 2's Independent Expenditure Report originally filed Sept. 17, 2020, as amended on Sept. 27, 2020, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4634&ViewType=IE>.


⁵ *Compare* Defend Alaska Elections – No on 2's Independent Expenditure Report originally filed Sept. 7, 2020, <https://aws.state.ak.us/ApocReports/Common/>

The Commission will hold a hearing on the top contributor issue on Wednesday to decide whether DAE’s ads violate AS 15.13.090(a)(2)(C) and whether a penalty or other relief is warranted. The Commission accepts the rest of the alleged violations in Yes on 2’s complaint for consideration on a regular basis under AS 13.15.380(e) and refers those alleged violations to staff for investigation. These allegations are that DAE failed to properly report some campaign expenditures and made campaign expenditures before registering with the Commission.

Dated: October 6, 2020.

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION⁶

<p>Certificate of Service: I hereby certify that on this date, I served, by certified mail and email a true and correct copy of the foregoing in this proceeding on the following:</p>	
<p>Samuel Gottstein Holmes Weddle & Barcott 701 W. 8th Avenue, Suite 700 Anchorage, AK 99501 sgottstein@hwb-law.com</p> <p>and by email to: Heather Hebdon Executive Director Public Offices Commission heather.hebdon@alaska.gov</p>	<p>Matthew Singer Lee Baxter Schwabe Williamson & Wyatt, PC 420 L Street, Suite 400 Anchorage, AK 99501 msinger@schawbe.com lbaxter@schawbe.com</p>


Paralegal Date 10-6-20

View.aspx?ID=4569&ViewType=IE (showing a \$500 contribution from Mulder) *with* the report as amended on Oct. 3, 2020, <https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=4663&ViewType=IE> (amending Mulder’s contribution to \$200).

⁶ Commissioners Anne Helzer, Richard Stillie, Suzanne Hancock, Dan LaSota, and Van Lawrence participated in this decision. The decision was made on a 3-2 vote.

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

ALASKA PUBLIC INTEREST RESEARCH)
GROUP & 907 INITIATIVE,)
Complainants,) Case No. 22-04 CD
v.)
)
REPUBLICAN GOVERNOR’S ASSOCIATION &)
A STRONGER ALASKA)
Respondents.)
_____)

ORDER ON EXPEDITED CONSIDERATION

On October 21, 2022, the Alaska Public Offices Commission held an expedited hearing to determine whether the Republican Governor’s Association and A Stronger Alaska violated a series of Alaska’s campaign finance laws. After a six-hour hearing and two days of deliberation over the facts in this case, the Commission has decided to remand the complaint to the Executive Director for consideration on a regular rather than an expedited basis.

Facts

At its core, complainants have made two allegations: first, that the Republican Governor’s Association made an illegal \$3 million contribution to A Stronger Alaska because it essentially contributed the money to itself; and second—that as a natural result of the first allegation—expenditures made by A Stronger Alaska were actually made by Republican Governor’s Association, which, if true, would violate various disclosure laws.

The Alaska Public Offices Commission held an expedited hearing in this case and took direct testimony on October 21, 2022. Witnesses David Rexrode and Erim Canligil testified to the following:

- David Rexrode is the Executive Director of the Republican Governor’s Association.¹
- Erim Canligil is the Chief Financial Officer of Republican Governor’s Association.²
- On February 24, 2021, Mr. Rexrode created A Stronger Alaska by making a filing to that effect with the Alaska Public Offices Commission.³
- All officers of A Stronger Alaska are employees of Republican Governor’s Association.⁴
- Mr. Rexrode acts as the President of A Stronger Alaska and at all relevant points he was also the Executive Director of the Republican Governor’s Association.⁵
- Mr. Canligil acts as the compliance officer for A Stronger Alaska and was at all relevant points the Republican Governor’s Association’s Chief Financial Officer.⁶
- Mr. Rexrode and Mr. Canligil consider themselves volunteers for A Stronger Alaska.
- On or about February 25, 2021, the Republican Governor’s Association’s Executive Committee instructed Mr. Rexrode to transfer \$3 million to a bank account entitled “Republican Governor’s Association – A Stronger Alaska.”⁷

¹ October 21, 2022, Hearing (hereinafter “Hearing”) at 13:30.

² Stipulated to throughout.

³ Hearing at 23:40-23:55; 43:10-43:30; 2:02:00-2:03:25.

⁴ Hearing at 27:00-27:10.

⁵ Hearing at 45:25-45:45.

⁶ Hearing at 46:00-46:30.

⁷ Hearing at 40:00-40:30; 2:05:00-2:05:30

- Mr. Rexrode considers A Stronger Alaska’s bank account separate and distinct from the Republican Governor’s Association’s accounts.
- In filings to the Federal Internal Revenue Service, the Republican Governor’s Association did not report making contributions to “A Stronger Alaska.”⁸
- The Republican Governor’s Association and A Stronger Alaska share the same Federal Employer Identification Number (EIN).⁹
- There is no phone number, address, or website for A Stronger Alaska other than what appears on APOC filings.¹⁰
- Both Mr. Rexrode and Mr. Canligil appear to have conducted the business of A Stronger Alaska from their workspaces at Republican Governor’s Association.
- The Commission asked Mr. Rexrode and Mr. Canligil whether Republican Governor’s Association or A Stronger Alaska have written policies in place to ensure the two entities remain separate. There appear to be none.
- Mr. Rexrode testified he has the sole authority to make expenditures for A Stronger Alaska and there was no coordination between Republican Governor’s Association and A Stronger Alaska after Republican Governor’s Association made the \$3 million contribution on or about February 25, 2021.¹¹
- When asked “what would happen if Mr. Rexrode and A Stronger Alaska went rogue with the \$3 million,” Mr. Canligil was unsure what, if anything, the Republican Governor’s Association could or would do about it.

Analysis

Complainants agree that two or three statutes directly bear on the question of whether there was sufficient separation between Republican Governor’s Association and

⁸ Hearing at 1:45:10-1:48:59.

⁹ Hearing at 30:00-31:00.

¹⁰ Stipulated to throughout the hearing.

¹¹ Hearing at 47:00-48:00; 49:45-51:15; :09:40-1:09:19; 1:14:00-1:15:35.

A Stronger Alaska.¹² Under Alaska Statute 15.13.050, a group must register with the Alaska Public Offices Commission prior to making expenditures in support of or in opposition to a candidate. Under Alaska Statutes 15.13.074(b) and 15.13.084(2), an entity like Republican Governor's Association may not make contributions or expenditures using a fictitious name or using the name of another. Failure to follow these laws invites a host of reporting violations under Alaska's campaign finance laws, once contributions and expenditures are made.

The evidence before the Commission so far shows that Republican Governor's Association did little to distance itself from A Stronger Alaska. Apparently, Republican Governor's Association created A Stronger Alaska at the behest of their high-ranking employee David Rexrode, who in turn ran the independent expenditure group. There is no independent board overseeing A Stronger Alaska's expenditures. There is no independent address, no independent phone number, and no other existence of A Stronger Alaska other than a single APOC filing and a bank account it shares with Republican Governor's Association's own accounts. At the expedited hearing, Republican Governor's Association leadership provided no documentation or testimony showing what, if any, their instructions were to Mr. Rexrode. The Republican Governor's Association did not provide the Commission proof that its Executive Committee sanctioned the purported \$3 million contribution to A Stronger Alaska.

¹² Complainant's supplemental arguments brief, pgs. 1; 6.

The evidence also shows Mr. Rexrode put minimal effort into establishing an independent expenditure group under Alaska law. The Commission remands this case to its Executive Director on a non-expedited basis to review whether Mr. Rexrode's efforts were legally sufficient.

The Commission instructs staff to focus on a few matters during its investigation. First, Mr. Rexrode testified that he possessed the sole authority to make expenditures for A Stronger Alaska after Mr. Rexrode's employer—the Republican Governor's Association—made a \$3 million contribution to A Stronger Alaska. This testimony was not seriously contested by Complainants, nor could it have been on such an expedited timeline. The Commission directs APOC Staff to test the validity of this assertion. Mr. Rexrode and Mr. Canligil did little to assuage the Commission's concern that the Republican Governor's Association and its Executive Committee had ultimate control over A Stronger Alaska's activities. APOC Staff should also investigate whether any other Republican Governor's Association agents or employees had dominion or control over A Stronger Alaska's bank account and whether other Republican Governor's Association employees could stop or continue spending from that account. Furthermore, Mr. Rexrode testified that he had no further discussions with anyone at the Republican Governor's Association about Alaska expenditures after the \$3 million contribution was made. Further discovery could be useful in substantiating or disproving this claim, which is relevant to whether A Stronger Alaska and Republican Governor's Association are truly two separate entities. Counsel for A Stronger Alaska and Republican Governor's

Association are instructed to assist Staff in answering the Commissioner's inquiries posed in this order.¹³

The Commission recognizes that by not finding for a violation on an expedited basis under AS 15.13.380(d)(1), A Stronger Alaska may continue to make expenditures in Alaska's elections. However, if it is later determined that sufficient separation between the two entities does not exist, A Stronger Alaska will continue to make expenditures at its own peril. Moreover, A Stronger Alaska could expose Republican Governor's Association to penalties during the pendency of Staff's investigation, if the Commission later finds that the two entities are one in the same.

The Republican Governor's Association and A Stronger Alaska are encouraged to obtain the Commission's advice whether their chosen structure complies with Alaska's

¹³ Attorneys Stacey Stone and Richard Moses both represented Mr. Rexrode and Mr. Canligil at the hearing—one as counsel for Republican Governor's Association and the other for A Stronger Alaska. Attorneys Stacey Stone and Richard Moses have obligations to this Commission. Given that this matter will be remanded for further investigation, both must instruct Mr. Rexrode, Mr. Canligil, the Republican Governor's Association, and A Stronger Alaska to preserve potentially relevant evidence related to the claims set forth in the complaint. Stacey Stone and Richard Moses shall instruct their clients to preserve all electronically stored information, paper files, copies, and backup of any information that could be discoverable during the investigation. This includes without limitation, emails, texts, paper files, and other correspondence in the possession of Respondents as it relates to the formation of A Stronger Alaska, the funding of A Stronger Alaska, the establishment of A Stronger Alaska's bank accounts, all expenditures made thereafter, and all communications between Mr. Rexrode and other employees of Republican Governor's Association as it relates to A Stronger Alaska's activities from February 2021 to the present. As counsel, Stacey Stone and Richard Moses should further advise respondents against the deletion of any information—including electronic communications such as email and text messages—which could be discoverable in the forthcoming investigation.

campaign finance laws prior to making any further contributions and expenditures.¹⁴ The door is open to Republican Governor's Association and A Stronger Alaska to request an advisory opinion now. If they choose to do so, they must be forthright about the structure of their accounts and the extent to which Mr. Rexrode and Mr. Canligil's activities are controlled or not controlled by Republican Governor's Association (their employer).

Nothing in in this order precludes the Republican Governor's Association from speaking in its own name during this election cycle, provided it complies with all campaign finance laws.

Conclusion

The matter is remanded to staff for further investigation. Republican Governor's Association and A Stronger Alaska are not insulated from penalties for future expenditures if the Commission ultimately concludes there was not sufficient separation between the entities in this case.

Dated: October 24, 2022

BY ORDER OF THE ALASKA PUBLIC OFFICES COMMISSION¹⁵

¹⁴ Alaska Statute 15.13.374.

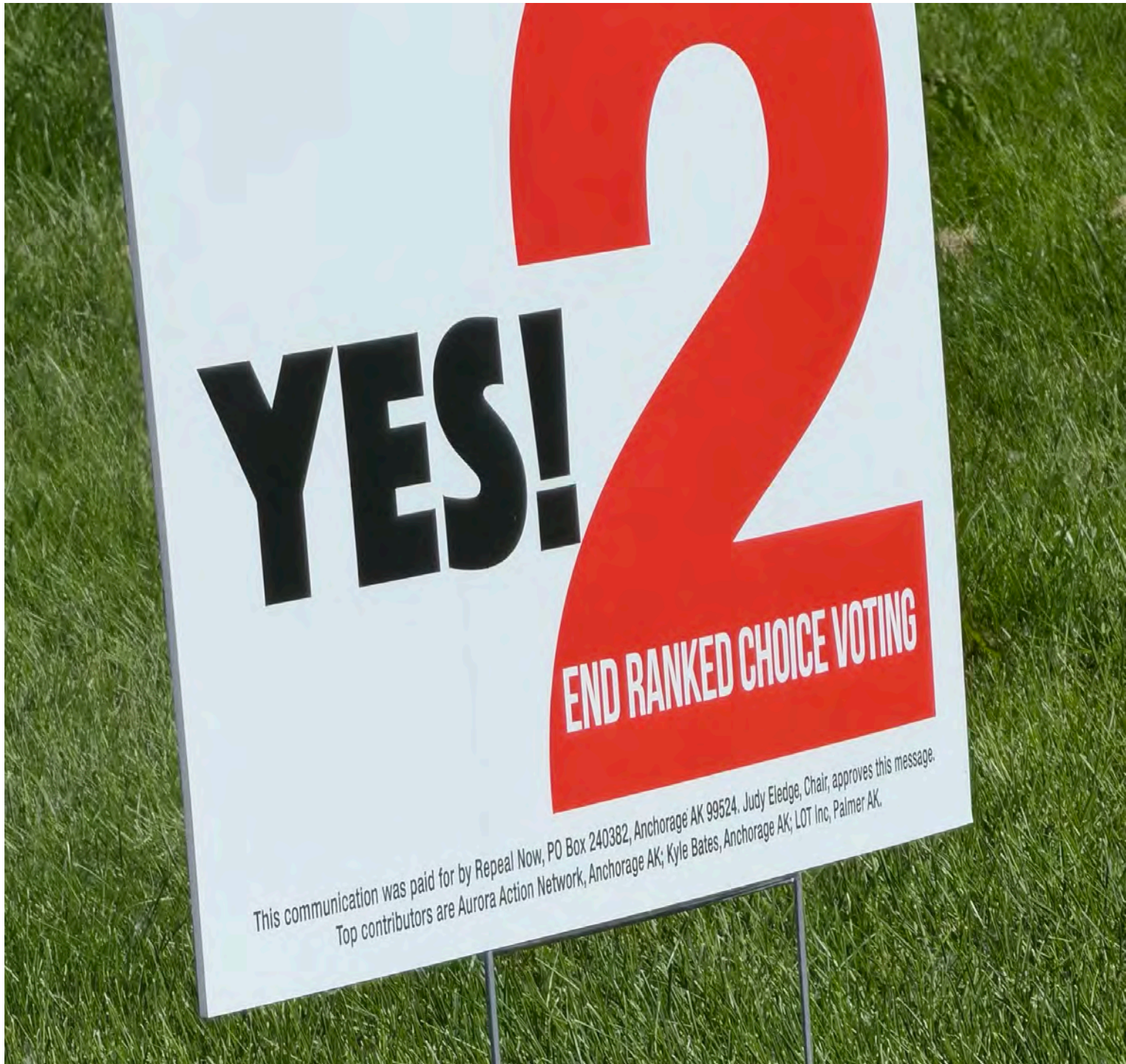
¹⁵ Commissioners Anne Helzer, Dan LaSota, Richard Stillie, Suzanne Hancock, and Lanette Blodgett participated in this decision.

**YES! END
RANKED
CHOICE
VOTING**

YES YES YES!

This communication was paid for by Repeal Now, PO Box 240382, Anchorage AK 99524. Judy Eledge, Chair, approves this message. Top contributors are Aurora Action Network, Anchorage AK; Kyle Bates, Anchorage AK; LOT Inc, Palmer AK.





as described in paragraph 3. When I recorded the ad, it had over 11,000 views. As of July 7, 2026, this ad had 341,785 views.

6. Attached as Exhibit 17B is a true and current copy of the screen recorded ad described in paragraph 5.

7. On July 2, 2026, I screen recorded another ad, “Less Complicated is Better,” posted by “Yes! End ranked choice voting in Alaska!” on YouTube, which appears to be posted on June 15, 2026, from the following web address: <https://www.youtube.com/watch?v=2vlydx3rER8>. I utilized the same methods as described in paragraph 3. When I recorded this ad, it had 134,830 views. As of July 7, 2026, this ad had 186,145 views.

8. Attached as Exhibit 17C is a true and correct copy of the screen recorded ad described in paragraph 7.

9. On July 2, 2026, I screen recorded another ad, “Let’s demolish ranked choice voting,” posted by “Yes! End ranked choice voting in Alaska!” on YouTube, which appears to be posted on July 1, 2026, from the following web address: <https://www.youtube.com/watch?v=UfjXH9CkoiA>. I utilized the same methods as described in paragraph 3. When I recorded the ad, it had 65 views. As of July 7, 2026, this ad had 161 views.

10. Attached as Exhibit 17D is a true and current copy of the screen recorded ad described in paragraph 9.


Cashion Gilmore & Lindemuth
510 L Street, Suite 300
Anchorage, Alaska 99501
(907) 222-7932 fax (907) 222-7938

11. On July 7, 2026, I screen recorded another ad, "Alaska! Yes on 2 to end ranked choice voting!" posted by "Yes! End ranked choice voting in Alaska!" on YouTube, which appears to be posted on May 25, 2026, from the following web address: <https://www.youtube.com/watch?v=KyXvCfo8a9Q>. I utilized the same methods as described in paragraph 3. When I recorded the ad, it had 60 views.

12. Attached as Exhibit 17E is a true and current copy of the screen recorded ad described in paragraph 11.

13. Combined, as of July 7, 2026, Exhibits 17A-17E have been viewed approximately 1,440,834 times.


FURTHER AFFIANT SAYETH NAUGHT.


Seung Ah Baek

SUBSCRIBED AND SWORN to before me on this 7th day of July, 2026 at

Anchorage, Alaska




Notary Public in and for Alaska

My Commission Expires: 4/5/29

PLACEHOLDER FOR
ATTACHED ELECTRONIC FILE

EXHIBIT 17A
(Exhibit 17A.mov)

Available at:

<https://www.dropbox.com/scl/fo/mxhu0kvytbv520t10hzhy/ALOPCj4VhceFhB1EMzKngCc?rlkey=3h2w6j76rjwebvkmeszmu0rk2&st=x89aytt6&dl=0>

PLACEHOLDER FOR
ATTACHED ELECTRONIC FILE

EXHIBIT 17B
(Exhibit 17B.mov)

Available at:

<https://www.dropbox.com/scl/fo/mxhu0kvytbv520t10hzhy/ALOPCj4VhceFhB1EMzKngCc?rlkey=3h2w6j76rjwebvkmeszmu0rk2&st=x89aytt6&dl=0>

PLACEHOLDER FOR
ATTACHED ELECTRONIC FILE

EXHIBIT 17C
(Exhibit 17C.mov)

Available at:

<https://www.dropbox.com/scl/fo/mxhu0kvytbv520t10hzhy/ALOPCj4VhceFhB1EMzKngCc?rlkey=3h2w6j76rjwebvkmeszmu0rk2&st=x89aytt6&dl=0>

PLACEHOLDER FOR
ATTACHED ELECTRONIC FILE

EXHIBIT 17D
(Exhibit 17D.mov)

Available at:

<https://www.dropbox.com/scl/fo/mxhu0kvytbv520t10hzhy/ALOPCj4VhceFhB1EMzKngCc?rlkey=3h2w6j76rjwebvkmeszmu0rk2&st=x89aytt6&dl=0>

PLACEHOLDER FOR
ATTACHED ELECTRONIC FILE

EXHIBIT 17E
(Exhibit 17E.mov)

Available at:

<https://www.dropbox.com/scl/fo/mxhu0kvytbv520t10hzhy/ALOPCj4VhceFhB1EMzKngCc?rlkey=3h2w6j76rjwebvkmeszmu0rk2&st=x89aytt6&dl=0>

EMERGENCY/EXPEDITED

July 7, 2026

To: Alaska Public Offices Commission
From: Alaskans for Better Elections, Complainant

Re: Complainant's Request to Expedite Consideration of APOC Complaint Against Repeal Now and Aurora Action Network

Respondents:¹

Repeal Now

P.O. Box 240382
Anchorage, Alaska 99524
Telephone: 907-440-7000
Emails: cfrascaAK@gmail.com
bethanymarcum@gmail.com
crichards@pioneerlawllc.com
jpack@pioneerlawllc.com
jnortoneledge@gmail.com

Aurora Action Network

502 6th Street
Hudson, Wisconsin 54016
Telephone: 202-866-8229
Emails: Compliance@AXCAPTEAM.com
derek@rosspoliticallaw.com
tcdatwyler@gmail.com

I. Introduction

Pursuant to AS 15.13.380(c), Complainant requests that the Commission expedite consideration of the APOC Complaint filed today for the purpose of immediately enjoining Respondents Repeal Now and Aurora Action Network from continuing to unlawfully use and rely on either false or non-existing disclaimers on Repeal Now's communications. Complainant seeks an order issuing an injunction requiring Repeal Now to lawfully include an accurate "paid for by" disclaimer on its communications immediately.

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

Respondents' violations are detailed in the simultaneously-filed complaint, which is incorporated by reference in its entirety.² In short, the Commission must act swiftly — as it has done in the past³ — to prevent irreparable harm by ensuring that Repeal Now's disclaimers comply with AS 15.13.090's requirements, while it still matters, and well before the election.

II. **Factual Background**

To summarize the Complaint, Repeal Now has been falsely relying on the address of a residential home in Anchorage, Alaska as Aurora Action Network's principal place of business. Repeal Now has been doing so even though Aurora Action Network has *never* reported that residential address as its principal place of business with APOC.⁴ This false disclaimer also now appears in Repeal Now's video advertisements,⁵ which were created and/or discovered subsequent to the filing of 26-06-CD,⁶ and which have been viewed over 1.4 million times on YouTube as a of this filing.⁷ It also appears on Repeal Now's large and small campaign signs.⁸ In short, the disclaimers on these ads are totally false — a

² See generally Expedited Complaint Against Repeal Now and Aurora Action Network for Numerous Violations of Campaign Finance Laws (AS 15.13) (July 7, 2026).

³ See Exhibit 18B to Affidavit of Samuel G. Gottstein (July 7, 2026) [hereinafter Second Gottstein Aff.]; see also Exhibit 18D to Second Gottstein Aff.

⁴ See Exhibits 5A-5K to Affidavit of Samuel G. Gottstein (May 26, 2026) [hereinafter First Gottstein Aff.]; Exhibit 5L to Second Gottstein Aff.

⁵ See Exhibits 17A-17C to Affidavit of Seung Ah Baek (July 7, 2026) [hereinafter Baek Aff.]; see also Exhibit 17D-17E to Baek Aff.

⁶ See Attachment 1 to Second Gottstein Aff.

⁷ See Baek Aff. at ¶ 13.

⁸ See Exhibits 19A-19C to Second Gottstein Aff.

complete fantasy — and Repeal Now is spending significant sums of money to spread this misinformation to thousands of voters.⁹

III. Argument

Alaska Statute 15.13.380(c) outlines three factors that APOC must consider when determining whether to expedite a complaint.¹⁰ A review of these factors make it clear that expedited consideration is appropriate in this case given the wide reach of Repeal Now’s communications, and the Commission’s own precedent for expediting consideration for similar violations.¹¹ Moreover, Repeal Now has not only acknowledged the important informational interest that Alaska’s campaign finance laws can provide,¹² but also that any claims of improper disclaimers should be resolved well in advance of the November 2026 general election.¹³ Indeed, it should be in Repeal Now’s interest to resolve this complaint quickly given that they are spending large sums producing signs and other advertisements

⁹ See Baek Aff. at ¶ 13 (noting that Repeal Now’s online video advertisements alone have been viewed over 1.44 million times on YouTube).

¹⁰ See AS 15.13.380(c) (“In deciding whether to expedite consideration, the commission shall consider factors as [(1)] whether the alleged violation, if not immediately restrained, could materially affect the outcome of an election or other impending event; [(2)] whether the alleged violation could cause irreparable harm that penalties could not adequately remedy; and [(3)] whether there is reasonable cause to believe that a violation has occurred or will occur.”).

¹¹ See Exhibit 18D to Second Gottstein Aff.; see also Exhibit 18B to Second Gottstein Aff.

¹² See Attachment 2 at 2 to Second Gottstein Aff. (“[T]here is an important governmental interest in ensuring compliance with campaign disclosure and finance laws[.]”).

¹³ See Attachment 2 at 6 to Second Gottstein Aff. (“Repeal Now remains available . . . to resolve this matter efficiently before the November 2026 election.”).

that have a defective disclaimer. APOC should grant Complainant’s request for expedited consideration.

First, Respondents’ actions “could materially affect the outcome of an election[.]”¹⁴ In a prior APOC complaint (20-06-CD), the Commission already determined that an a misleading or inaccurate disclaimer meets this standard.¹⁵ In that prior complaint, the Respondent was found to have used a “wildly” “inaccurate” disclaimer about its “three largest contributors,” and was ordered to correct the disclaimer immediately (within three business days).¹⁶ And since Repeal Now’s inaccurate disclaimers have been viewed *over 1.4 million times* on YouTube to date,¹⁷ there should be no question that this false and misleading disclaimer, when viewed that many times, “could materially affect the outcome of an election[.]”¹⁸

Second, civil “penalties could not adequately remedy” Respondents’ violations, and the violations “could cause irreparable harm.”¹⁹ We know that the threat of civil penalties will not deter Respondents, because they have chosen to double-down on these false disclaimers (and in some cases using *no* disclaimers) even after facing the threat of

¹⁴ See AS 15.13.380(c).

¹⁵ See Exhibit 18B to Second Gottstein Aff.; see also Exhibit 18C to Second Gottstein Aff.

¹⁶ See Exhibit 18B to Second Gottstein Aff.

¹⁷ See Baek Aff. at ¶ 13.

¹⁸ See AS 15.13.380(c).

¹⁹ See *id.*

significant civil penalties in the pending complaint, 26-06-CD.²⁰ Unfortunately, the specter of future civil penalties, which may not be assessed until after the election has come and gone, has not been enough to rein in Respondents' violations. And any civil penalties will pale in comparison to the impact of having Alaskans view Repeal Now's false and misleading disclaimers viewed hundreds of thousands (if not millions) more times between now and the November 2026 election.²¹

Finally, there is strong evidence showing that "a violation has occurred or will occur."²² Repeal Now's most recent advertisement actually contains no required disclaimer at all;²³ this is a blatant violation of AS 15.13.090(c).²⁴ And it also would contravene the entire purpose of that statute's "principal place of business" requirement if an entity could simply falsely report and rely on a purported mailing address.

The core of this complaint is Repeal Now's disingenuous reliance on Aurora Action Network's recently-changed *mailing* address with the FEC when reporting Aurora Action Network's principal place of business,²⁵ even though every single Statement of Contribution report Aurora Action Network has filed with APOC lists a different address:

²⁰ See Exhibits 17A-17E to Baek Aff.; see also Attachment 2 to Second Gottstein Aff.

²¹ See Baek Aff. at ¶ 13; see also Exhibits 17A-17E to Baek Aff.; Exhibits 19A-19C to Second Gottstein Aff.

²² See AS 15.13.380(c).

²³ See Exhibit 17D to Baek Aff.; see also Exhibit 17E to Baek Aff.

²⁴ See AS 15.13.090(c).

²⁵ See Exhibit 4B to First Gottstein Aff.

i.e., its actual business address.²⁶ But allowing that interpretation to stand would make a mockery of AS 15.13.090's principal place of business requirement in the first place and would render that disclaimer requirement worse than meaningless. If APOC were to condone Repeal Now's interpretation, one would expect virtually every campaign communication going forward to list all donors as based at an "Alaska" location by falsely relying on a purported mailing address alone, whether or not that mailing address was ever reported to APOC in a contributor's filing.²⁷ This cannot be the law, and this practice must be halted and corrected by the Commission immediately to prevent further abuse by Repeal Now and future filers.²⁸

IV. Conclusion

Alaskans are being bombarded with advertisements featuring intentionally false and misleading disclaimers (or no disclaimer at all) by Repeal Now.²⁹ Without expediting this complaint, Repeal Now appears dead set on continuing to violate AS 15.13.090(c) from now until election day with ads that are, on average, being shown over a hundred thousand times each week.³⁰ Their small and large signs are also appearing across Alaska. Complainant respectfully requests that the Commission grant its request to expedite consideration of the allegations in this Complaint — consistent with Repeal Now's own

²⁶ See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.

²⁷ See Exhibits 5A-5K to First Gottstein Aff.; Exhibit 5L to Second Gottstein Aff.

²⁸ See Exhibits 18B-18D to Second Gottstein Aff.

²⁹ See Exhibits 17A-17E to Baek Aff.; see also Exhibits 19A-19C to Second Gottstein Aff.

³⁰ See Baek Aff. at ¶¶ 2, 5, 7, 9, 11, 13.

desire³¹ — to ensure that Repeal Now’s advertisements between now and the election comply with the law. Complainant is not asking that fines be fully calculated and imposed on an expedited basis; Complainant is simply asking that APOC order Repeal Now to correct its false and misleading disclaimers immediately, before more harm is done.

CASHION GILMORE & LINDEMUTH
Attorneys for Complainant, Alaskans for Better
Elections

DATE: July 7, 2026

By:



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

³¹ See Attachment 2 at 6 to Second Gottstein Aff. (“Repeal Now remains available . . . to resolve this matter efficiently before the November 2026 election.”).

Expedited Complaint Against Repeal Now and Aurora Action Network for Numerous Violations of Campaign Finance Laws (AS 15.13)

1 message

Todd Cowles <todd@cashiongilmore.com>

Tue, Jul 7, 2026 at 3:27 PM

To: Repeal Now <cfrascaak@gmail.com>, Repeal Now <bethanymarcum@gmail.com>, Craig Richards <crichards@pioneerlawllc.com>, Julie Pack <jpack@pioneerlawllc.com>, Repeal Now <jnortoneledge@gmail.com>, Aurora Action Network <compliance@axcapteam.com>, derek@rosspoliticallaw.com, Aurora Action Network <tcdatwyler@gmail.com>

Good afternoon,

Please find the following documents attached for service:

- APOC Expedited Complaint Form [1 page]
- Expedited Complaint Against Repeal Now and Aurora Action Network for Numerous Violations of Campaign Finance Laws (AS 15.13) [14 pages]
- Affidavit of Samuel G. Gottstein [94 pages]
- Affidavit of Seung Ah Baek [8 pages]
- Complainant's Request to Expedite Consideration of APOC Complaint Against Repeal Now and Aurora Action Network [7 pages]

These documents and all attachments and exhibits to the affidavits can be found at:

<https://www.dropbox.com/scl/fo/lpj4978c03p6wq1hxa31m/ACpi02sYQZZG-W0kluJ0GIU?rlkey=rq2ez7I2jfuqee68ri0oldnjc&st=tzj2euck&dl=0>

This link will expire on August 7, 2026.

Thank you,

Todd Cowles

Paralegal

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This electronic message (including any attachments) contains information from the law firm of Cashion Gilmore & Lindemuth and is covered by 18 U.S.C. §§ 2510-2521, is confidential, and may be protected by attorney-client or other legal privilege. If you believe that you have received it in error, please delete it and notify the sender. Thank you.

5 attachments**2026.07.07_1 APOC Expedited Complaint Form.pdf**

601K

 **2026.07.07_2 APOC Expedited Complaint.pdf**
314K

 **2026.07.07_3 Affidavit of Samuel G Gottstein.pdf**
4772K

 **2026.07.07_4 Affidavit of Seung Ah Baek.pdf**
245K

 **2026.07.07_5 Request to Expedite Complaint.pdf**
324K