

[TAB 10]

Complaint 25-03-CD

Long v. Borgquist/Keep It Alaska

Presented By:

Kim Stone, Campaign Disclosure Coordinator

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

David Long,)	
)	
Complainant,)	
)	
vs.)	Case No. 25-03-CD
)	
Joel Borgquist, Keep It Alaska,)	
)	
Respondents.)	
)	

NOTICE OF HEARING AND PROCEDURAL ORDER

A hearing in this case will take place before the Alaska Public Offices Commission at approximately 2:30 p.m. on Wednesday September 10, 2025.

The Commissioners will be present in person, by telephone, or via Microsoft Teams and will receive evidence regarding this matter. You may be present at the hearing either by telephone (1-907-202-7104, Access Code: 218 853 540#), in-person (2221 E. Northern Lights Blvd, Ste 128, Anchorage, Alaska), or via [Microsoft Teams Meeting](#).¹ You may be, but are not required to be, represented by an attorney or agent.

If you wish to participate by telephone and are an individual who requires a special accommodation to participate, you must advise the Commission office on or before September 3, 2025, so that a special accommodation can be made.

PREHEARING AND HEARING PROCEDURES

- 1) Parties.** The parties in this case are Commission Staff and Respondents.
- 2) Issues.** At the hearing, the Commission will consider whether Respondents failed to include complete details of true sources, failed to file complete expenditure reports, and failed to include a supported candidate's name in its group name and paid-for-identifiers in the 2024 State General Election.
- 3) Procedural history.** Complainant David Long filed a complaint against Respondents Joel Borgquist and Keep It Alaska IE group on January 10, 2025. Respondents did not file a response. Staff's investigation report was issued August 13, 2025.

¹ Meeting ID: 234 956 901 993 7, Passcode: Yb9UE6WW

- 4) Hearing procedures.** The hearing will be conducted as provided in AS 15.13.380, 2 AAC 50.891, and the Alaska Administrative Procedure Act, AS 44.62.330 – 44.62.630. All testimony must be presented or submitted under oath. A party may call witnesses, cross-examine witnesses, present and rebut evidence. If the respondent does not testify, the respondent may be called and examined as if under cross-examination.
- 5) Evidence and exhibits.** All relevant evidence may be admissible at the hearing. In passing upon the admissibility of evidence, the Commission may consider, but is not bound to follow, the rules of evidence governing general civil proceedings in the courts of the State of Alaska. The Commission may exclude inadmissible evidence and order repetitive evidence discontinued.
- 6) Prehearing filings.** No later than September 2, 2025, a party:
- a) may file a list of witnesses expected to testify at the hearing;
 - b) may file copies of exhibits to be presented at the hearing that are marked and identified (for example, Resp.'s Ex. A);
 - c) may file a prehearing memorandum;
 - d) may file prehearing motions, including motions to dismiss, for summary judgment, or to exclude evidence, and
 - e) shall serve all parties and the Complainant with filings submitted.
- 7) Response to motions and requests for subpoenas.** No later than September 9, 2025, a party
- a) may respond to a motion; and
 - b) may request the Commission to issue subpoenas to compel the attendance of witnesses, the production of documents, or other things related to the subject of the hearing, and is responsible for serving the subpoena and paying the appropriate witness fee.
- 8) Extensions of time.** Requests to extend the deadlines in this order must be in writing, filed with the Commission, served on all parties and the Complainant, and supported by good cause.
- 9) Burden of proof.** The Commission staff has the burden to prove any charges by a preponderance of the evidence.

10) Order of proceedings. Matters considered at a hearing will ordinarily be disposed of in substantially the following order:

- a) pending motions, if any;
- b) complainant may present argument under 2 AAC 50.891(d)
- c) presentation of cases as follows, unless otherwise ordered by the Commission:
 - i) The Commission Staff's direct case, including the investigative report, evidence, and testimony of witnesses;
 - ii) Respondent's direct case;
 - iii) Rebuttal by the Commission Staff; and
 - iv) Closing statements, if any, by Respondent and Commission Staff.

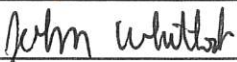
10) Decision and Order. The Commission will issue an order no later than 10 days after the close of the record.

Dated: August 25, 2025



Heather Hebdon, Executive Director
Alaska Public Offices Commission

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to:	
David Long 1830 E. Parks Hwy A107 Wasilla, AK 99654 dblong52@gmail.com	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email
Joel Borgquist Keep it Alaska IE Group PO Box 772081 Eagle River, Alaska 99677 joel@borgquist.org	<input checked="" type="checkbox"/> Certified Mail <input checked="" type="checkbox"/> Email


Signature

8-25-25
Date



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

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TO: APOC Commissioners
DATE: August 13, 2025
FROM: Kim Stone, Campaign Disclosure Coordinator
SUBJECT: Staff Report, Complaint 25-03-CD, *David Long v. Keep it Alaska IE Group / Joel Borgquist*

SUMMARY OF COMPLAINT AND RESPONSE

Complainant David Long alleges Respondent Joel Borgquist and Keep It Alaska independent expenditure (IE) group violated Alaska campaign disclosure law by failing to properly identify true source contributors, making prohibited contributions, accepting prohibited contributions, not disclosing expenditures, and “planning and coordinating” between groups and individuals.¹ Respondents Joel Borgquist and Keep It Alaska IE group did not file a response.

SUMMARY OF APOC FINDINGS

Complainant asserts several allegations against Respondents. As described in further detail in the Law and Analysis section, this staff report addresses only those allegations against persons named as parties to the complaint and that constitute violations of Alaska campaign disclosure law. They include failing to include required details concerning true sources and failing to file independent expenditure reports due within ten days of the expenditure. During staff’s investigation of the group’s financial activities, it was also determined that Keep It Alaska failed to include a supported candidate’s name in its group name and paid-for-by identifiers.

BACKGROUND FACTS

On April 1, 2024, Joel Borgquist registered Keep It Alaska (KIA) as an IE group, identifying its purpose as “supporting/opposing state and local candidates, causes, and

¹ Exhibit 1, Complaint.

ballot measures” and its campaign plans as the Anchorage Municipal, State General, and State Primary. Borgquist named himself as chair.

Borgquist is also the manager and registered agent of Red Dirt Campaigns LLC.² According to its website, Red Dirt Campaigns “run(s) campaigns for candidates” and provides campaign planning and management, messaging, and digital ads among its services.³ Borgquist initially listed “joel@reddirtcampaigns.com” as an additional email for KIA group email but later replaced it with chair@keepitalaska.org.

KIA’s treasurer is Tom Datwyler of Dublin, Ohio and KIA’s group address originally was Datwyler’s Ohio address. Datwyler appears to be the same individual as Thomas Datwyler of Hudson, Wisconsin, treasurer and custodian of records for Keep It Alaska Federal PAC (KIA Fed), formed on February 29, 2024.⁴

a. 2024 Anchorage Municipal Runoff Election

On April 11, Borgquist identified KIA’s intention to expend 33 1/3 or more of its funds in support of Dave Bronson, one of two candidates in the Anchorage Mayoral (Runoff) Election held May 14, 2024:⁵

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

More than 1/3 of total spending going to the following candidate(s).

Dave Bronson

As he completed KIA’s registration forms, Borgquist requested and received APOC staff assistance, by phone and email. Borgquist first called APOC and explained that the group planned to have a fundraiser to support Bronson’s race and asked whether Bronson

² Exhibit 2, Borgquist Red Dirt Campaigns State of Alaska business registration.

³ [Red Dirt Campaigns](https://reddirtcampaigns.com/), most recently accessed July 16, 2025, <https://reddirtcampaigns.com/>.

⁴ Exhibit 3, Federal Election Commission Statement of Organization, Keep It Alaska Federal PAC FEC. Datwyler uses the Hudson, WI address in other APOC filings, for example in the KIA (IE group) [IndependentExpenditure](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6544?Type=571) form filed May 8, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6544?Type=571>.

⁵ [GroupRegistration Amendment \(Amended\)](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6216?Type=576) filed April 11, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6216?Type=576>. Borgquest also changed KIA’s group address from treasurer Tom Datwyler’s Ohio address to a post office box in Eagle River.

could attend and speak at the fundraising event. On April 11, APOC staff responded to Borgquist via email and advised that under Alaska campaign disclosure law, an “independent expenditure” group supporting a candidate could not coordinate activities with that candidate, including fundraisers.⁶ In this same email, APOC staff informed Borgquist that under AS 15.13.050(b), KIA must include Bronson’s name in KIA’s group name because KIA – per its registration – intended to spend more than one-third of its spending in support of the candidate. Borgquist replied to the APOC staff email asking for “clarity” about the timeframe of the “1/3 statute,” noting KIA had “no way of guaranteeing future donations” and asking how the “1/3 statute” could be met.⁷ Borgquist also asserted that the statute violated the group’s First Amendment right to freedom of association. The following day, April 12, 2024, Borgquist deleted the group’s stated intention to spend one-third of its spending on Dave Bronson:⁸

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

More than 1/3 of total spending going to the following candidate(s):

Dave Bronson

On April 16, 2024, Borgquist sent APOC staff a “tester” flyer supporting Bronson,⁹ asking for input on the communication disclaimer.¹⁰

On April 17, 2024, APOC staff again communicated with Borgquist regarding group name requirements, noting that “if you are able to provide more specific information about the group’s planned activities, staff may be able to provide further guidance.”¹¹ Borgquist asked no further questions concerning the group name requirement.

⁶ Exhibit 4, April 11, 2024 emails, pp. 1-2.

⁷ Exhibit 4, April 11, 2024 emails, p. 1.

⁸ [Registration \(Amended\)](https://hickory.state.ak.us/ApocAdmin/Filings/CompareForms/6216/6217?Type=576), filed April 12, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/CompareForms/6216/6217?Type=576>. Borgquist also changed KIA’s bank from Chain Bridge Bank of McLean, VA to Northrim Bank in Anchorage.

⁹ Exhibit 5, Bronson flyer.

¹⁰ Exhibit 6, April 17, 2024 emails, p. 2.

¹¹ Exhibit 6, April 17, 2024 emails, p. 1.

On April 27, 2024, Borgquist filed KIA’s first independent expenditure report, reflecting \$3,750 of debt to support “2024 – Dave Bronson Election” in the Anchorage Municipal Runoff election, including \$1,500 to Red Dirt Campaigns.¹²

On April 30, 2024, KIA’s treasurer Thomas C. Datwyler filed a 24-hour true source report, disclosing \$9,925.48 in contributions transferred from KIA Fed PAC to KIA (IE group) from April 4 through April 24. The report disclosed the funds were from 46 individual contributors, all channeled through an intermediary identified as “Keep It Alaska ‘Federal.’”¹³ KIA Fed PAC, as the contributor, did not file a statement of contribution itself.

On May 3, 2024, Datwyler as KIA’s treasurer filed a 24-hour true source report, disclosing an additional \$1,800 in contributions from KIA Fed PAC from April 25 through April 26. The report discloses four individuals as true sources, again all channeled through Datwyler’s “Keep It Alaska (Federal)” as an intermediary, on May 2.¹⁴ KIA Fed as the contributor did not file a statement of contribution.

Also on May 3, 2024, Datwyler filed an independent expenditure report for KIA disclosing \$11,147.11 in paid expenditures and a \$1,500 debt (to Red Dirt Campaigns) from April 24 through May 1. The reported expenditures and debt all indicated they were to support “2024 – Dave Bronson Election.”¹⁵

On May 7, 2024, Datwyler filed KIA’s 7-day report for the Anchorage Municipal Runoff Election, disclosing \$17,263.48 in total contributions and \$16,097.11 in expenditures.¹⁶

¹² [Independent Expenditure](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6494?Type=571), filed April 27, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6494?Type=571>.

¹³ [24-hour true source report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43381?Type=570) filed April 30, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43381?Type=570>.

¹⁴ [24-hour true source report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43398?Type=570) filed May 5, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43398?Type=570>.

¹⁵ [Independent Expenditures](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6511?Type=571) filed May 3, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6511?Type=571>.

¹⁶ [7-day report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43396?Type=570) filed May 7, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43396?Type=570>.

On May 8, 2024, in a 24-hour true source report, KIA reported \$1,040.48 in contributions from “Keep It Alaska Federal PAC” on May 8, from three true sources from May 1 through May 2, but did not disclose how much came from each true source.¹⁷

Also on May 8, 2024, Datwyler filed an independent expenditure report showing \$1,631.32 in expenses in support of “2024 – Dave Bronson Election” and showing KIA with \$0.00 funds remaining but disclosed no contributions.¹⁸

The Anchorage Municipal Runoff Election occurred May 14, 2024.

Datwyler filed KIA’s “No Activity” 105-day report to close out the Anchorage Municipal Runoff Election cycle on August 13, 2024, and August 15, 2024.¹⁹ The report disclosed \$0.00 for cash on hand, income, expenditures, and debts. Year-to-date totals were only disclosed on October 7, 2024, when KIA amended its next report, the 30-day primary report.

b. The August 20, 2024 State Primary Election

On July 15, 2024, Datwyler filed KIA’s 30-day report for the State Primary – KIA’s first report for an election other than the Anchorage Municipal Runoff Election.²⁰ Datwyler amended the report October 7, 2024 to “correct cash on hand” to \$1,476.95 and to include year-to-date income of \$18,303.96 and year-to-date expenses as \$16,827.01.²¹ This report disclosed a June 10, 2024 expenditure of \$729 for “voter data” but disclosed no contributions and no other expenditures for the State Primary Election. KIA filed no independent expenditure report for the voter data expenditure.

¹⁷ [24-hour true source report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43432?Type=570) filed May 8, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43432?Type=570>.

¹⁸ [Independent Expenditure](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6544?Type=571) filed May 8, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/6544?Type=571>.

¹⁹ [105-day report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44245?Type=570) filed August 13, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44245?Type=570> and [105-day report Amendment](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44384?Type=570) filed August 15, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/44384?Type=570>. KIA describes the amendment as a “change of report type” but the reports appear to be otherwise identical.

²⁰ [State Primary 30-day report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43631?Type=570) filed July 15, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/43631?Type=570>.

²¹ [State Primary 7-day report Amendment](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45175?Type=570) filed October 7, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45175?Type=570>.

c. The November 6, 2024 State General Election

Datwyler filed “No Activity” 30-day²² and 7-day²³ reports for the State General Election reflecting no change in its finances from the State Primary. KIA reported no contributions and no expenditures during the State General Election cycle.

d. Post-election contribution and expenditure on December 13, 2024

On December 13, 2024 Datwyler filed a 24-hour true source report to disclose KIA’s receipt of a \$3,000 contribution from KIA Fed PAC made on December 12, 2024.²⁴ On this same day, KIA made a \$3,000 contribution to the Alaska Voter Coalition²⁵ that was then used to make that group’s only expenditure – a payment to satisfy a debt incurred two months prior for \$3,000 of work by Borgquist’s company Red Dirt Campaigns.²⁶

KIA did not file an independent expenditure report for the \$3,000 contribution made to Alaska Voter Coalition. True sources Trenitie Yundt, Anthony Pitcher,²⁷ and Robert Hall contributed the funds to Datwyler’s KIA Fed PAC prior to the State General Election – Yundt and Pitcher on October 21 and Hall on October 28.

LAW AND ANALYSIS

Complainant Long asserts a number of allegations against respondents Joel Borgquist and KIA. Some of the facts Long points to are true but do not, by themselves, violate APOC laws and regulations; for example, that KIA (IE group) and KIA Fed PAC share the same banks, or that KIA received contributions through an intermediary, or that there is planning and coordinating of various campaign activities.²⁸ Long also makes

²² [State General 30-day report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45178?Type=570) filed October 7, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45178?Type=570><https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45178?Type=570>.

²³ [State General 7-day report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45651?Type=570) filed October 29, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45651?Type=570>.

²⁴ [State General 24-hour true source report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45953?Type=570) filed December 13, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45953?Type=570>.

²⁵ [Year-end report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46898?Type=570) filed February 18, 2025, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46898?Type=570>.

²⁶ [AVC debt to Red Dirt Campaigns](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45660?Type=570) shown on AVC 7-day report filed October 29, 2024, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/45660?Type=570>.

²⁷ The true source listed as Anthony “Pitvher” is identified on KIA’s year-end report as being an electrician with Pitcher Electric and residing in Wasilla, Alaska. For purposes of this report, it is assumed the proper spelling is Pitcher.

²⁸ The complaint also alleges violations of contribution restrictions set forth in AS 15.13.070(c)(2), which limits “group to group” contributions to \$1,000 per year. As a result of the Supreme Court decision in *Citizens United v.*

allegations concerning John Carr and Alaska Voter Coalition IE group, but Long did not name them as parties to this complaint; additionally, these same allegations are addressed in a separate complaint brought by Long, 25-02-CD, *Long v. Carr, Alaska Voter Coalition*.

In this staff report, APOC staff addresses only those facts in the complaint that constitute violations of Alaska campaign disclosure law against those named as parties to the complaint, Joel Borgquist and KIA. The violations found by staff include failing to include a supported candidate's name in KIA's group name and paid-for-by identifiers, failing to include required details concerning true sources, and failing to file independent expenditure reports due within ten days of the expenditure, as follows:

a. KIA failed to identify and include candidate Dave Bronson in its group name and failed to identify Bronson in its paid-for-by identifiers.

Alaska campaign disclosure law requires a group intending to contribute or expend “33 1/3 percent or more of its funds” on behalf of one candidate to include the name of that candidate in its group name.²⁹ If a group's name does not initially include the supported candidate's name, the group must change its name to make it “readily apparent to the general public” that the group supports that candidate.³⁰ Alaska campaign disclosure law also requires a group to use the full group name identifying the supported candidate in its paid-for-by identifiers required by AS 15.13.090.³¹

Alaska Statute 15.13.050(b)'s mandate that a group identify a supported candidate is one of “intent”: “If a group *intends* . . . to contribute to or expend on behalf of one candidate 33 1/3 percent or more of its funds, the name of the candidate shall be a part of the name of the group.” (Emphasis added.) Assessment of a person's subjective intent can be difficult, and .050 does not list specific indicia of intent upon which to evaluate it. Still,

FEC, 558 U.S. 310 (2010) the Commission has concluded that contribution restrictions as applied to independent expenditure-only groups are likely unconstitutional, and APOC has not enforced contribution limits for those groups. See [AO 12-09-CD](#) *Alaska Deserves Better*, approved June 6, 2012.

²⁹ AS 15.13.050(b).

³⁰ [AO 14-17-CD](#) *Beltrami for Putting Alaskans First Committee* at p. 2, heard and approved October 21, 2014, <https://hickory.state.ak.us/ApocAdmin/Paper/View?FileID=8461>.

³¹ *Id.*; see also AS 15.13.090(a). Under AS 15.13, a “person” includes a group. See AS 15.13.400(16).

intent may be inferred from actions.³² In this matter, Borgquist and KIA’s actions provide a preponderance of evidence indicating an intent to spend one-third or more of its funds to support Bronson:

1. KIA stated that it planned to utilize more than one-third of its total spending to support Bronson on its group registration April 11, 2024.
2. On April 12, 2024, after the group learned campaign disclosure law required Bronson’s name to be included in KIA’s group name, it deleted its statement of intent to support Bronson.
3. In the following six weeks, until the May 14, 2024, Anchorage Municipal Runoff Election, 100% of KIA’s total spending supported Bronson.
4. During the year 2024, KIA made only two expenditures to support any candidate other than Bronson in any election for which it registered (the 2024 Anchorage Municipal Runoff, State Primary, and State General Elections), with two exceptions: a \$729.90 expenditure for “voter data” during the State Primary, and a post-State Election contribution on December 12, 2024 of \$3,000 made to Alaska Voter Coalition IE group.³³
5. KIA spent more than \$16,000 of its \$21,000 in contributions to support Bronson.³⁴
6. Only after all elections finished did KIA make a post-election contribution of \$3,000 to another IE group for the State General Election.

In objecting to the “33 1/3” naming requirement of AS 15.13.050(b), Borgquist asserted KIA’s difficulty in identifying supported candidates and races when it had “no way of guaranteeing future donations.”³⁵ While it’s the rare entity that will know exactly what its future donations will be, this uncertainty does not render it impossible to identify

³² Cf. *Sisters of Providence in Wash. v. A.A. Pain Clinic, Inc.*, 81 P.3d 989, 1003 (Alaska 2003) (reasoning that “[a] reasonable juror could [examine defendants’] actions and find intent”).

³³ On December 12, 2024, after all 2024 elections concluded, KIA received from KIA Fed PAC \$3,000, which KIA turned around as a contribution to Alaska Voter Coalition on the same day.

³⁴ The total 2024 numbers are difficult to reconcile as KIA’s [Anchorage Municipal Runoff 105-day report](#) filed August 15, 2024 states \$0.00 for year-to-date income and expenses in the Entire Campaign box, and KIA’s [2024 year-end report](#) appears to have double reported most contributions.

³⁵ Exhibit 6, April 17, 2024 emails, p. 1.

which candidate or races the group *intends* to support – particularly so where a race, like the Anchorage Municipal Runoff Election – features only two candidates. And any uncertainty does not absolve persons from complying with the statute. A group can always amend its registration if circumstances change, with a few simple keystrokes. Amending “paid-for-by” identifiers similarly would have taken little effort; KIA effected its support for candidate Bronson primarily through digital communications, so it could have quickly and at little cost edited its campaign communications to reflect its intent to support the candidate.

Finally, it must be noted that KIA was far better equipped than most groups to understand what its future donations would be, because virtually all of them came from KIA Fed PAC, controlled by KIA’s own treasurer, Datwyler. Under these circumstances, KIA’s protest that it could not comply with AS 15.13.050(b) – because it had no way of guaranteeing future donations – is disingenuous, at best.

A preponderance of the evidence supports that KIA violated AS 15.13.050(b) by failing to include Bronson’s name in its group name and violated AS 15.13.090 by failing to include Bronson’s name in its paid-for-identifiers.

b. KIA failed to provide complete true source information on 24-hour true sources reports filed May 8, 2024 and December 13, 2024.

Once an entity making independent expenditures in a candidate election receives contributions exceeding \$2,000 “from an individual, person, nongroup entity, or group” in a single year, AS 15.13.110(k) requires that entity to report the contribution within 24 hours.³⁶ The 24-hour report must identify “the true source, and all intermediaries” of the contribution.³⁷

When KIA filed its 24-hour report disclosing the contribution from KIA Fed PAC on May 8, 2024, it provided the names of true sources Ralph Samuels, Susan Edwards, and John White Jr. behind the collective \$1,040.48 contribution but did not identify amounts

³⁶ AS 15.13.110(k).

³⁷ AS 15.13.110(k), AS 15.13.400(19).

attributable to the true sources. Similarly, when KIA filed its 24-hour report for another KIA Fed PAC contribution on December 13, 2024, it again provided no details beyond names of true sources Trenitie Yundt, Anthony Pitcher, and Robert Hall.

Where a person discloses 24-hour contributions under AS 15.13.110(k), the report “must include . . . the following information”:

- (1) the date of each contribution;
- (2) the amount of each contribution;
- (3) the full name of the contributor;
- (4) a description of item or services contributed, if necessary; and
- (5) the full name of all intermediaries, if any, within the meaning of “true sources” under AS 15.13.400.³⁸

In failing to provide complete true source information in its May 8 and December 13 24-hour true sources reports, KIA violated AS 15.13.110(k) and 2 AAC 50.270(d).

c. KIA failed to file independent expenditure reports, filed incomplete independent expenditure reports, and failed to file a statement of contribution within 24 hours of making a contribution in excess of \$2,000.

Under Alaska campaign disclosure law, each group must fully report all expenditures made, incurred, or authorized by it, including their dates and amounts, and separately file an independent expenditure report.³⁹ In its independent expenditure report, the group must identify the candidate supported or opposed by each expenditure, disclose each contribution to include the name, date, and amount, and file it not later than 10 days after making the expenditure.⁴⁰ Additionally, a group that contributes more than \$2,000 to an entity that makes independent expenditures in candidate elections must disclose the contribution and identify its true sources within 24 hours.⁴¹

On June 10, 2024, KIA made a \$729.90 expenditure to i360 through an electronic funds transfer. While the expenditure was reported on KIA’s 30-day primary report, it

³⁸ 2 AAC 50.270(d).

³⁹ AS 15.13.040(b), (d), (e); 2 AAC 50.321(b)(2), (a)(5) and (6).

⁴⁰ AS 15.13.040(d) and (e); AS 15.13.110(h).

⁴¹ AS 15.13.040(r)

failed to file an independent expenditure within 10 days as required by AS 15.13.040(d)-(e) and AS 15.13.110(h). On December 12, 2024, KIA contributed \$3,000 to Alaska Voter Coalition through an electronic funds transfer.⁴² While KIA reported this as an expenditure on its year-end report, it failed to file the required independent expenditure report within 10 days pursuant to AS 15.13.040(d) and (e) and AS 15.13.110(h). KIA also failed to file a statement of contribution within 24 hours of its contribution to the Alaska Voter Coalition as required by AS 15.13.040(r).

Additionally, based on KIA's 7-day report for the Anchorage Runoff election, it appears that its April 27, 2024 independent expenditure report failed to disclose \$5,038 in contributions and its May 3, 2024 independent expenditure report failed to disclose an additional \$500 contribution as required by AS 15.13.040(e)(5).

CONCLUSION

APOC staff finds by a preponderance of the evidence Borgquist and KIA violated Alaska campaign disclosure law by failing to identify supported candidates in its group name and paid-for-by disclaimers, failing to file independent expenditure reports, and failing to include full true source information in its 24-hour independent expenditure reports.

MAXIMUM CIVIL PENALTIES

The maximum civil penalty for reporting violations, other than a 7-day report or report under AS 15.13.110(b), is \$50 per day for each day the violation continues.⁴³ The maximum penalty for failing to file a statement of contribution under AS 15.13.040(r) is \$1,000 per day for each day the violation continues.⁴⁴

For purposes of calculating the penalty for failing to identify a candidate (Bronson) in a group name where the group states an intent to expend at least one-third of its funds on those candidates, the penalty runs from the time of registration through the day of the election. For purposes of calculating the penalty for inaccurate paid-for-by identifiers in its

⁴² [Year-end report](https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46898?Type=570) filed February 18, 2025, <https://hickory.state.ak.us/ApocAdmin/Filings/ViewForm/46898?Type=570>.

⁴³ AS 15.13.390(a)(1).

⁴⁴ AS 15.13.390(a)(2).

communications, the penalty runs from the time of the communication through the day of the election.⁴⁵

For KIA’s incomplete IE reports, the penalties run from the date they were filed until the contributions were first disclosed on the 7-day runoff report. For KIA’s missing IE reports, the penalties accrue from 10 days after the date of expenditure (when the reports were due) until the expenditures were first disclosed on the 30-day primary report or the date the complaint was filed. For KIA’s incomplete 24-hour true sources reports, the penalties accrue from the time of filing; for KIA’s unfiled statement of contribution report, the penalty accrues from the day after the date of the contribution. For these reporting violations, the accrual of penalties are tolled on January 10, 2025, the day the complaint was filed.

Violation	Dates of Violation	Total Days	Maximum Penalty
Failure to name supported candidate in group name	4/12/24 – 5/14/24	33	\$1,650
Inaccurate paid-for-by identifiers	4/18/24 – 5/14/24	27	\$1,350
Incomplete IE reports:			
April 27, 2024	4/27/24 – 5/7/24	10	\$500
May 3, 2024	5/3/24 – 5/7/24	4	\$200
Incomplete 24-hour true sources reports:			
May 8, 2024	5/8/24 – 7/15/2024	68	\$3,400
December 13, 2024	12/13/24 – 1/10/25	28	\$1,400
Failure to file IE reports:			
June 21, 2024	6/21/24 – 7/15/2024	24	\$1,200
December 23, 2024	12/23/24 – 1/10/25	18	\$900
Failure to file 24-hour SoC report:			
December 13, 2024	12/13/24 – 1/10/25	28	\$28,000
		TOTAL	\$42,500

⁴⁵ KIA’s expenditures for texting services began on April 18, 2024 and APOC uses this as the date of the communications began.

MITIGATION AND RECOMMENDATION

When staff assesses penalties, the starting points for calculating those penalties are found in AS 15.13.390, which outlines applicable penalties for violations of Alaska’s campaign disclosure laws, and 2 AAC 50.855, which outlines the penalty assessment procedure and available reductions. KIA was a first-time filer during the 2024 Anchorage Runoff Election; it had not filed any prior registrations or reports and had not participated in any prior elections in Alaska. As such, for KIA’s violations related to their incomplete IE reports, regulation allow staff to simply document the violation and forego a penalty. The rest of the reporting violations may be assessed at 50% of the maximum under 2 AAC 50.855(b)(2)(C)(i) considering this was KIA’s first election cycle. However, as discussed further below, staff does not recommend any reductions to the penalties associated with the group’s registered name and inaccurate paid-for-by identifiers. Instead, staff recommends those penalties be assessed at the maximum under 2 AAC 50.865(d).

After the reduced assessment, staff looks to 2 AAC 50.865 for mitigation criteria that may apply for further reductions of the assessed penalty.

A civil penalty may be reduced by up to 50% if the person is an inexperienced filer who has been subject to reporting for less than one year.⁴⁶ 2024 was KIA’s first time participating in Alaska elections and at that time the group had been subject to reporting requirements for less than one year. Accordingly, the penalties for KIA’s **reporting violations** can all be reduced by 50%.

A penalty may be further reduced, by a percentage greater than 50% or waived entirely, where it is “significantly out of proportion to the degree of harm to the public for not having the information,” defined as exceeding the value of the transactions that were reported late, or for 24-hour reports, as exceeding twice the value of the transactions that were reported late.⁴⁷ staff takes into consideration that the information KIA’s incomplete May 8, 2024 true sources report failed to disclose – individual amounts for a contribution

⁴⁶ 2 AAC 50.865(a)(1)(B).

⁴⁷ 2 AAC 50.865(b)(5).

totaling \$1,040.48 – was only a portion of the required information, and KIA did provide the full information in its 105-day and year-end reports. APOC therefore recommends a further reduction by 90% to **\$170** for KIA’s penalty associated with the May 8 true sources report. For KIA’s penalty for the December 13 true sources report (for the \$3,000 contribution), APOC applies the mitigator of 2 AAC 50.865(b)(6), where unique circumstances justify reducing the penalty, to reduce the penalty by 80%, to **\$140**, making the penalties commensurate for what is essentially the same violation. For the missing statement of contributions report, staff recommends a 95% reduction to **\$700** based on the group’s inexperience and because the contribution was made after the date of the election.⁴⁸

For failing to name its supported candidate in its group name and failing to name Bronson in its paid-for-by identifiers in election communications, 2 AAC 50.865(d) applies: A civil penalty may be imposed in the maximum amount where a person has a poor reporting history, as indicated by evidence suggesting deliberate non-reporting.⁴⁹ Here, evidence reflects APOC staff specifically informed KIA that Alaska campaign disclosure law required it to include Bronson in its group name as a candidate for whom one-third or more of their contributions or expenditures would support. KIA understood the requirement and thereafter took deliberate action to evade it by removing the 33.3% intention from its group registration. The group then immediately committed 100% of its contributions and expenditures to support Bronson. At no point did KIA amend its registration or take any action to inform voters through its paid-for-by identifiers of the group’s intent. In failing to do so, KIA effectively circumvented a primary tenet of campaign disclosure laws, which is to provide information to the public for an informed electorate and to make voters aware of the financing behind election communications.

In all, staff recommends a civil penalty in the amount of **\$4,535** as demonstrated below.

⁴⁸ 2 AAC 50.865(b)(6).

⁴⁹ 2 AAC 50.865(d)(2)(B).

Violation	Total Days	Maximum Penalty	.855 Assessment	.865 Mitigation
Failure to name supported candidate in group name	33	\$1,650	\$1,650	\$1,650 ⁵⁰
Inaccurate paid-for-by identifiers	27	\$1,350	\$1,350	\$1,350 ⁵¹
Incomplete IE reports:				
April 27, 2024	10	\$500	\$0 ⁵²	\$0
May 3, 2024	4	\$200	\$0 ⁵³	\$0
Incomplete 24-hour true sources reports:				
May 8, 2024	68	\$3,400	\$1,700 ⁵⁴	\$170 ⁵⁶
December 13, 2024	28	\$1,400	\$700 ⁵⁵	\$140 ⁵⁷
Failure to file IE reports				
June 21, 2024	24	\$1,200	\$600 ⁵⁸	\$300 ⁶⁰
December 23, 2024	18	\$900	\$450 ⁵⁹	\$225 ⁶¹
Failure to file 24-hour SoC report:				
December 13, 2024	28	\$28,000	\$14,000 ⁶²	\$700 ⁶³
	TOTAL	\$42,500	\$20,800	\$4,535

⁵⁰ 2 AAC 50.865(d).

⁵¹ 2 AAC 50.865(d).

⁵² 2 AAC 50.855(b)(2)(A)(iv).

⁵³ Id.

⁵⁴ 2 AAC 50.855(b)(2)(C)(i).

⁵⁵ 2 AAC 50.855(b)(2)(C)(i).

⁵⁶ 2 AAC 50.865(b)(5).

⁵⁷ 2 AAC 50.865(b)(6).

⁵⁸ 2 AAC 50.865(a)(1)(B).

⁵⁹ 2 AAC 50.865(a)(1)(B).

⁶⁰ 2 AAC 50.865(a)(1)(B).

⁶¹ 2 AAC 50.865(a)(1)(B).

⁶² 2 AAC 50.865(a)(1)(B).

⁶³ 2 AAC 50.865(b)(6).

I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered as indicated to the following:	
David Long 1830 E Parks Highway A107 Wasilla, Alaska 99654 DBLong@gmail.com	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail
Joel Borgquist Keep it Alaska IE Group PO Box 772081 Eagle River, Alaska 99677 joel@borgquist.org	<input checked="" type="checkbox"/> Email <input checked="" type="checkbox"/> Certified Mail

KIM STONE

Signature

08.13.25

Date



Alaska Public Offices Commission



COMPLAINT

FILING A COMPLAINT <i>To be accepted, complaint must include</i>	APOC LAWS ALLEGEDLY VIOLATED <i>Specify section of law or regulation</i>		APOC case name/number/date
1. Complainant's name + contact info	Campaign Disclosure Law	<input checked="" type="checkbox"/> AS 15.13 <input checked="" type="checkbox"/> 2 AAC 50.250-405	<div style="border: 1px solid black; padding: 5px; text-align: center;"> ARRIVED 1/10/25 <small>APOC - ANCH PM HC FAX/ELE</small> </div> 25-03-CD
2. Respondent's name + contact info	Public Official Financial Disclosure	<input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799	
3. Laws, regulations allegedly violated	Legislative Financial Disclosure	<input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.680-799	
4. Description of allegations	Lobbying Regulation	<input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590	
5. Basis of knowledge of alleged facts			
6. Documentation to support allegations			
7. Notarized signature of the complainant			
8. Proof that complaint and all supporting documents were served on respondent			

If complaint meets requirements for acceptance, APOC will investigate the allegations and notify the respondent of the right to respond. APOC will notify Complainant and Respondent when APOC accepts or rejects a complaint.

<input type="checkbox"/> APOC <input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group	COMPLAINANT	RESPONDENT <i>Person or group allegedly violating law</i>
	David Long	<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group Keep It Alaska IE Group Joel Christopher Borgquist
Address City / Zip	1830 E Parks Hwy A107 Wasilla, AK 99654	PO Box 772081 18730 Mills Bay Dr Eagle River, AK 99577
Phone/Fax	(907) 232-3124	(808) 892-9813
E-mail	DBLong52@Gmail.com	joel@borgquist.org

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			
Address			
Phone/Fax			
E-mail			

DESCRIPTION or SUMMARY of ALLEGED VIOLATION	Use extra pages if needed	<input checked="" type="checkbox"/> SUPPORTING DOCUMENTS – DESCRIBE:
Keep It Alaska accepted and paid Alaska Voter Coalition with "dark money" violating AS 15.13.040(a), AS 15.13/400(5), AS 15.13.400(19) and 2AAC 50.258(a) by accepting and transferring "dark money" contributions from Anthony Pitvher, Robert Hall, and Trenitie Yundt, wife of Senator Rob Yundt.		<input checked="" type="checkbox"/> Keep It Alaska Disclosure Forms <input checked="" type="checkbox"/> Alaska Voter Coalition Disclosure Forms <input checked="" type="checkbox"/> Keep It Alaska Federal SuperPAC Contribution Reports <input checked="" type="checkbox"/> Relevant Statutes and Administrative Codes

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 <i>David Long</i>	Title	ALEXANDRIA FULLER Notary Public State of Alaska My Commission Expires Feb 6, 2028	Date <i>1-3-25</i>
Subscribed and sworn to or affirmed by me at <i>205 S Bailey St. Palmer, AK</i> on <i>1/3/2025</i>			
Signature <i>Alexandria Fuller</i>	Title <i>Notary Public</i>		

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

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<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
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City, State, ZIP+4® Eagle River, AK 99577	
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Keep It Alaska Independent Expenditure Group Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

Shared Banking

Chain Bridge Bank is the
Dark Money Source for both
Keep It Alaska groups



Money Transferred

Keep it Alaska IE Group
transfers \$3,000 Dark Money
to Alaska Voter Coalition



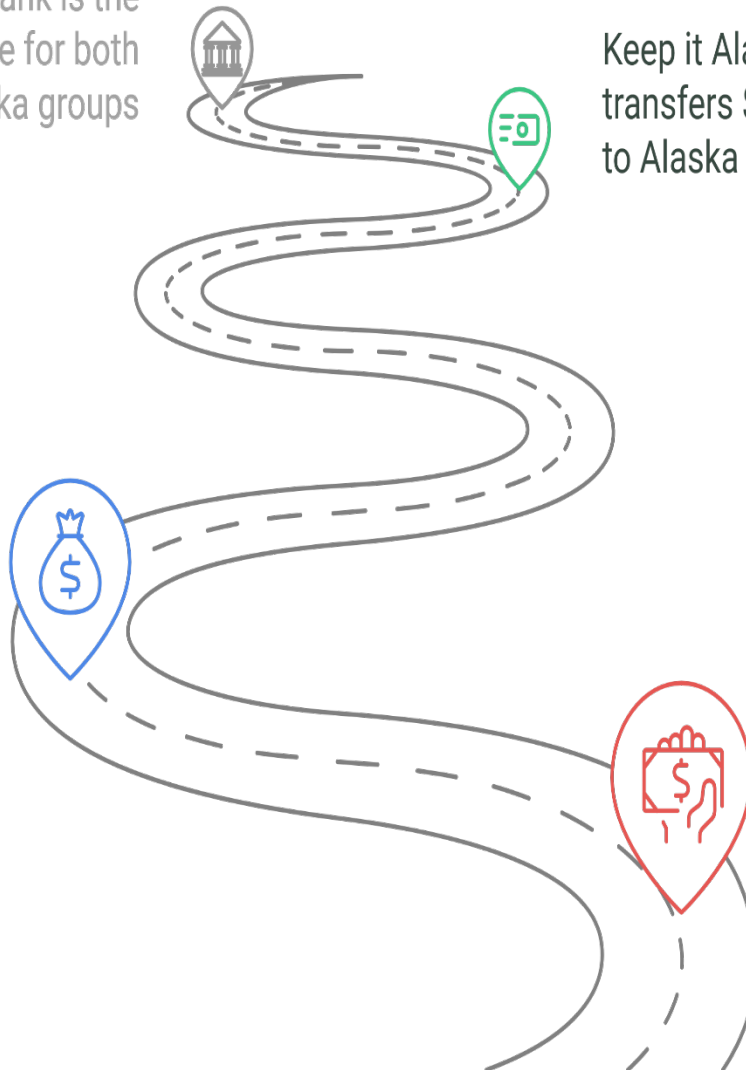
Dark Money Received

Keep it Alaska IE
Group receives
\$3,000 Dark Money
from Keep it Alaska
SuperPAC



Debt Incurred

Alaska Voter
Coalition owes
\$3,000 to Red Dirt
Campaigns



Keep It Alaska Independent Expenditure Group Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

Introduction

This complaint addresses egregious violations of Alaska campaign finance law by the *Keep It Alaska Independent Expenditure Group* during the 2024 election cycle. The organization funded a coordinated disinformation campaign that broadcasted demonstrably false and defamatory attacks against multiple candidates, most notably Representative David Eastman in House District 27. Investigation reveals these malicious activities were financed through an elaborate dark money network centered around the Yundt family—specifically Trenitie Yundt, wife of Senator Rob Yundt—and the *Keep It Alaska* entities.

Of particular concern is the organization's intricate web of relationships with the Alaska Voter Coalition, Red Dirt Campaigns and *Keep It Alaska* Federal Super PAC—connections that suggest a calculated effort to conceal funding origins through a labyrinth of affiliated entities.

The impact of *Keep It Alaska's* deceptive practices extends beyond mere regulatory violations. Their carefully orchestrated campaign of misrepresentation and distortion materially influenced multiple election outcomes, undermining the integrity of Alaska's democratic process. These actions demand thorough investigation and appropriate enforcement measures to preserve the transparency mandated by state campaign finance laws.

Left unchecked, the tactics employed by *Keep It Alaska* and its network of affiliated organizations pose a serious threat to Alaska's democratic institutions.

When dark money groups can operate with impunity—concealing their true donors while launching coordinated attacks based on deliberate distortions—they rob Alaskans of their fundamental right to make informed decisions about their representation.

Such manipulation of the electoral process erodes public trust, discourages qualified candidates from seeking office, and ultimately threatens the very foundation of representative government in Alaska.

The Commission's decisive action on this complaint is essential not only to address these specific violations but to protect the integrity of Alaska's electoral system for future generations.

Keep It Alaska Independent Expenditure Group Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

Allegation Overview

This complaint alleges that *Keep It Alaska Independent Expenditure Group* violated Alaska campaign finance statutes and administrative codes by misreporting the true source of a \$3,000 contribution received on December 12, 2024, and by failing to ensure transparency and accuracy in the disclosure of campaign contributions. These violations pertain to AS 15.13.040(b), AS 15.13.400(19), AS 15.13.400(5), 2 AAC 50.258, and AS 15.13.070(c)(2).

The facts of the case indicate that *Keep It Alaska Independent Expenditure Group* accepted and transferred to another group \$3,000 in “dark money (as defined in AS 15.13.400(5)) from a source that clearly does not exist.

1. *Keep It Alaska Independent Expenditure Group’s* 12/13/2024 – True Sources Report
 - a. Indicates a \$3,000 contribution was received from Keep It Alaska Federal SuperPAC, listing the True Sources of income as:
 - i. Trenitie Yundt on 10/21/2024
 1. No individual amount disclosed
 2. No address provided
 3. No occupation provided
 4. No employer provided
 - ii. Anthony Pitvher on 10/21/2024
 1. No individual amount disclosed
 2. No address provided
 3. No occupation provided
 4. No employer provided
 - iii. Robert Hall on 10/28/2024
 1. No individual amount disclosed
 2. No address provided
 3. No occupation provided
 4. No employer provided
 - b. *Keep It Alaska Independent Expenditure Group* may have accepted a Prohibited Contribution as defined 2 AAC 50.258(a) by accepting a contribution and not disclosing to the public the True Source of the funds.
2. Alaska Voter Coalition’s 12/13/2024 – 24 Hour True Sources Report
 - a. Indicates *Keep It Alaska IE Group* acted as an illegal intermediary for \$3,000 income that reported the True Sources as:

Keep It Alaska Independent Expenditure Group Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

- i. Trenitie Yundt on 10/21/2024
 - ii. Anthony Pitvher on 10/21/2024
 - iii. Robert Hall on 10/28/2024
 - b. Indicates the purpose of the contribution was to benefit Robert Yundt, a candidate for State Senate, and Trenitie Yundt's husband.
 - i. At the time of the supposed contributions listed above, Alaska Voter Coalition's registration indicated that "more than 1/3 of total spending going to the following candidate(s).
 1. Robert Yundt
 2. Jubilee Underwood"
 - c. *Keep It Alaska Independent Expenditure Group* acted as an intermediary by transferring a Prohibited Contribution to a separate group.
 - i. In doing so, *Keep It Alaska Independent Expenditure Group* may have violated 2 AAC 50.258(a)(7) by not meeting the statute's requirements for disclosing to the public the True Source of the funds.
 - d. *Keep It Alaska Independent Expenditure Group* may have violated AS 15.13.070(c)(2) by contributing more than \$1,000 to another group.
3. *Keep It Alaska Independent Expenditure* has not disclosed on any report to the Commission an expenditure transferring \$3,000 to Alaska Voter Coalition on 12/12/2024.
 - a. Final reporting is due February 18, 2025.
 - b. Regardless of when the income and expenditures are reported, each violates Alaska campaign finance law in multiple ways.
4. Keep It Alaska Federal SuperPAC Reports of Receipts and Disbursements indicate the group never received or released any such contributions.
 - a. Keep It Alaska Federal SuperPAC quarterly reports indicate no income and only \$272.54 expenditure in the period 7/1/2024 to 9/30/2024.
 - i. Had the contributions listed above been made on the dates indicated, Keep It Alaska Federal SuperPAC quarterly reports would have included those contributions.
 - b. Keep It Alaska Federal SuperPAC pre-election reports indicate no income and no expenditures
 - i. Pre-Election Reports covered the 12 days leading up to the General Election on 11/5/2024.

Keep It Alaska Independent Expenditure Group

Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

- c. Keep It Alaska Federal SuperPAC post-election reports indicate no income and no expenditures
 - i. Post-Election Reports covered the 30 days following the General Election on 11/5/2024
 - ii. Keep It Alaska Federal SuperPAC included the period of 10/17/2024 to 11/25/2024 in this report.
 - iii. Keep It Alaska Federal SuperPAC reports \$300 income from Vince Pomeroy of Anchorage on 10/18/2024.
 - 1. No other income is reported for the period covered.
- 5. *Keep It Alaska Independent Expenditure*, Keep It Alaska Federal SuperPAC, Alaska Voter Coalition, and Red Dirt Campaigns represent an intricate web of relationships that, while may not violate specific laws, indicate planning and coordinating various campaign activities and illegal contributions, acceptance, use, and transferal of dark money in those campaign activities.
 - a. Alaska Voter Coalition reported \$3,000 debt to Red Dirt Campaigns.
 - b. Alaska Voter Coalition presumably used or intends to use the \$3,000 dark money contribution to pay its debt to Red Dirt Campaigns.
 - i. Red Dirt Campaigns is owned by **Joel Borgquist** of Eagle River, AK.
 - ii. Red Dirt Campaigns is owed \$3,000 by Alaska Voter Coalition.
 - iii. Red Dirt Campaigns received many payments from *Keep It Alaska Independent Expenditure Group* and made many in-kind donations to *Keep It Alaska Independent Expenditure Group*.
 - c. *Keep It Alaska Independent Expenditure Group* accepted and transferred prohibited dark money contributions as alleged above.
 - i. **Joel Borgquist** is the Chair of *Keep It Alaska Independent Expenditure Group*.
 - ii. **Thomas Detwyler** is the Treasurer of *Keep It Alaska Independent Expenditure Group*.
 - 1. **Chain Bridge Bank**, McLean Virginia is listed as *Keep It Alaska Independent Expenditure Group's* bank.
 - iii. **Thomas** Datwyler filed the 12/13/2024 *Keep It Alaska Independent Expenditure Group* 24 Hour True Sources Report.

Keep It Alaska Independent Expenditure Group

Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

- d. Keep It Alaska Federal SuperPAC is the unverified source of prohibited contributions of dark money through intermediary *Keep It Alaska Independent Expenditure Group*.
 - i. **Thomas Datwyler** the Keep It Alaska Federal SuperPAC Treasurer.
 - ii. **Chain Bridge Bank**, McLean Virginia is listed as the group's bank.

Alaska Campaign Finance Law Violations

1. Violation of AS 15.13.040(b): False Reporting of True Source

- (a) Each group shall make a full report upon a form prescribed by the commission, listing
 - (1) the name and address of each officer and director;
 - (2) the aggregate amount of all contributions made to it; and, for all contributions in excess of \$100 in the aggregate a year, the name, address, principal occupation, and employer of the contributor, and the date and amount contributed by each contributor; for purposes of this paragraph, "contributor" means the true source of the funds, property, or services being contributed; and
 - (3) the date and amount of all contributions made by it and all expenditures made, incurred, or authorized by it.
- (c) The report required under (b) of this section shall be filed in accordance with [AS 15.13.110](#) and shall be certified as correct by the group's treasurer.
- (d) Every person making an independent expenditure shall make a full report of expenditures made and contributions received, upon a form prescribed by the commission, unless exempt from reporting.
- (e) Each person required to report under (d) of this section shall file a full report in accordance with [AS 15.13.110](#)(h) on a form prescribed by the commission. The report must contain
 - (1) the name, address, principal occupation, and employer of the individual filing the report;
 - (2) an itemized list of all expenditures made, incurred, or authorized by the person;
 - (3) the name of the candidate or the title of the ballot proposition or question supported or opposed by each expenditure and whether the expenditure is made to support or oppose the candidate or ballot proposition or question;
 - (4) the name and address of each officer and director, when applicable;

Keep It Alaska Independent Expenditure Group

Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

(5) the aggregate amount of all contributions made to the person, if any, for the purpose of influencing the outcome of an election; for all contributions, the date of the contribution and amount contributed by each contributor; and, for a contributor

(A) who is an individual, the name and address of the contributor and, for contributions in excess of \$50 in the aggregate during a calendar year, the name, address, principal occupation, and employer of the contributor; or

(B) that is not an individual, the name and address of the contributor and the name and address of each officer and director of the contributor.

2. Use of Dark Money as defined in AS 15.13.400(5):

“dark money” means a contribution whose source or sources, whether from wages, investment income, inheritance, or revenue generated from selling goods or services, is not disclosed to the public; notwithstanding the foregoing, to the extent a membership organization receives dues or contributions of less than \$2,000 per person per year, the organization itself shall be considered the true source;

- “Dark money” was used since the contribution sources were not disclosed to the public.

3. Violation of AS 15.13.400(19): Misrepresentation of the True Source

“True source” means the person or legal entity whose contribution is funded from wages, investment income, inheritance, or revenue generated from selling goods or services; a person or legal entity who derived funds via contributions, donations, dues, or gifts is not the true source, but rather an intermediary for the true source; notwithstanding the foregoing, to the extent a membership organization receives dues or contributions of less than \$2,000 per person per year, the organization itself shall be considered the true source.

- “True source” means the person or entity that originally provided the funds, property, or services. It excludes intermediaries or conduits who merely transfer funds.

4. Violation of 2 AAC 50.258(a): Use of Intermediaries to Obscure Source

Keep It Alaska Independent Expenditure Group

Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

(a) A contribution must be made in the name of the true source of the money or thing of value. A person may not make a contribution using the name of another, or use a third-party conduit to obscure the true source of any money or thing of value contributed to a campaign. A contribution in the name of another prohibited by this section includes any contribution:

1. Made at the Direction of Another Person:

Includes contributions made at the direction of another person, such as a parent organization, subsidiary, division, department, branch, or local unit of a business, labor union, or group.

2. Made by an Employee, Agent, or Other Person with Employer Assistance:

Contributions made by an employee, agent, or other person if an employer, principal, supervisor, or contractor lends, pays, or advances money or anything of value to the employee, agent, or other person to contribute in a name other than the true source.

3. Reimbursed Contributions:

Contributions made by an employee, agent, or other person if an employer, principal, supervisor, or contractor reimburses the employee, agent, or other person for the contribution in money or anything of value.

4. Exceeding Limitations via Multiple Groups or Nongroup Entities:

Contributions in a total amount exceeding the limitations in AS 15.13.070, if made to the same recipient by two or more groups or nongroup entities that:

- A. Share the majority of members of their boards of directors;
- B. Share two or more corporate or organizational officers, where:
 - i. "Officer" has the meaning given in AS 15.13.040(r)(2); and
 - ii. Includes a chief executive officer;
- C. Are owned or controlled by the same shareholders or members; or
- D. Are in a parent-subsidary relationship.

5. Made Using a Gift for the Purpose of Contributing:

Contributions made by a person who receives a gift of money or anything of value from a parent, spouse, or domestic partner for the purpose of making a contribution.

6. Made from a Joint Bank Account Without Authorization:

Contributions made by check from a joint bank account in the name of any joint

Keep It Alaska Independent Expenditure Group

Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

account holder who does not either sign the check or authorize the contribution in writing at the time the contribution is made.

7. Made with Funds from Undisclosed Sources:

Contributions made with funds derived from contributions, donations, gifts, or dues whose source is not disclosed to the public at the time the contribution is made.

5. Violation of AS 15.13.070(c)(2): Exceeding limits on political contributions.

(a) An individual or group may make contributions, subject only to the limitations of this chapter and [AS 24.45](#), including the limitations on the maximum amounts set out in this section.

(b) An individual may contribute not more than

(1) \$500 per year to a nongroup entity for the purpose of influencing the nomination or election of a candidate, to a candidate, to an individual who conducts a write-in campaign as a candidate, or to a group that is not a political party;

(2) \$5,000 per year to a political party.

(c) A group that is not a political party may contribute not more than \$1,000 per year

(1) to a candidate, or to an individual who conducts a write-in campaign as a candidate;

(2) **to another group**, to a nongroup entity, or to a political party.

Keep It Alaska Independent Expenditure Group

Campaign Finance Law Complaint

Dark Money Networks and Coordinated Electoral Deception in the 2024 Elections

Harm to Alaskans

The misrepresentation of the true source of campaign contributions undermines the transparency critical to Alaska's campaign finance laws. Voters rely on accurate disclosures to understand who is funding political activities and to assess potential influences on candidates or issues. Hiding the true source of funds erodes public trust, obstructs informed decision-making, and enables illicit contributions and expenditures, potentially violating contribution limits or prohibitions on out-of-state or foreign funding.

Requested Remedies

1. Investigate the discrepancy in the reported true sources of the \$3,000 contribution.
2. Inspect the banking and credit card processing records of *Keep It Alaska Independent Expenditure Group*, and Keep It Alaska Federal Super PAC to identify the contribution(s) and expenditure(s) in question, and make those records available to the public should the Commission determine that the law was broken in the receipt or transfer of prohibited contributions.
3. Issue a formal determination of whether Alaska Voter Coalition, *Keep It Alaska Independent Expenditure Group*, or Keep It Alaska Federal Super PAC violated Alaska campaign finance laws by obscuring the origin of funds.
4. Issue a formal determination of whether the \$3,000 Prohibited Contribution is to be returned to the True Source(s) or surrendered to the State in accordance with 2 AAC 50.266(a).
5. Impose penalties as authorized under AS 15.13.390, including fines for false reporting and additional corrective actions.

CAMPAIGN DISCLOSURE FORM

TWENTY-FOUR HOUR TRUE SOURCES REPORT

COMPLETED

Submission Date: **12/13/2024**Filer First Name: **JOHN**Filer Middle Name: **R**Filer Last Name: **CARR**Filer's Title: **Chairman**Report Type: **24 Hour Report – Entity/IE Group**

GROUP INFORMATION

Group Name: **2024 - Alaska Voter Coalition**Group Abbreviation: **ACS**Group Address: **4401 East Country Fair Drive**City, State Zip: **Wasilla, Alaska 99654**

REPORT INFORMATION

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

Reporting Period: From // Through //

INCOME

Date Received	Payment Method	Contributor	Details	Amount
12/12/2024	Electronic Funds Transfer	Keep It Alaska IE Group , Alaska	Occupation: Employer: Description:	\$3,000.00
	True Source: 10/21/2024 Trenitie Yundt			
	True Source: 10/21/2024 Anthony Pitvher			
	True Source: 10/28/2024 Robert Hall			

Date Received	Payment Method	Contributor	Details	Amount
		Income Total:		\$3,000.00

CAMPAIGN DISCLOSURE FORM

TWENTY-FOUR HOUR TRUE SOURCES REPORT

COMPLETED

Submission Date: **12/13/2024**Filer First Name: **Thomas**

Filer Middle Name:

Filer Last Name: **Datwyler**Filer's Title: **Treasurer**Report Type: **24 Hour Report – Entity/IE Group**

GROUP INFORMATION

Group Name: **2024 - Keep It Alaska**

Group Abbreviation:

Group Address: **PO Box 772081**City, State Zip: **Eagle River, Alaska 99577**

REPORT INFORMATION

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

Reporting Period: From // Through //

INCOME

Date Received	Payment Method	Contributor	Details	Amount
12/12/2024	Electronic Funds Transfer	Keep It Alaska Federal PAC , Alaska	Occupation: Employer: Description:	\$3,000.00
	True Source: 10/21/2024 Trenitie Yundt			
	True Source: 10/28/2024 Robert Hall			
	True Source: 10/21/2024 Anthony Pitvher			

Date Received	Payment Method	Contributor	Details	Amount
		Income Total:		\$3,000.00

Image# 202412029720120051

FEC
FORM 3X

REPORT OF RECEIPTS
AND DISBURSEMENTS
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

KEEP IT ALASKA

ADDRESS (number and street)

502 6TH ST



Check if different than previously reported. (ACC)

HUDSON

WI

54016-1783

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00871525

3. IS THIS REPORT

X

NEW (N)

OR

AMENDED (A)

4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

☐

April 15
Quarterly Report (Q1)

☐

July 15
Quarterly Report (Q2)

☐

October 15
Quarterly Report (Q3)

☐

January 31
Year-End Report (YE)

☐

July 31 Mid-Year
Report (Non-election
Year Only) (MY)

☐

Termination Report
(TER)

(b) Monthly
Report
Due On:

☐

Feb 20 (M2)

☐

May 20 (M5)

☐

Aug 20 (M8)

☐

Nov 20 (M11)
(Non-Election
Year Only)

☐

Mar 20 (M3)

☐

Jun 20 (M6)

☐

Sep 20 (M9)

☐

Dec 20 (M12)
(Non-Election
Year Only)

☐

Apr 20 (M4)

☐

Jul 20 (M7)

☐

Oct 20 (M10)

☐

Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

☐

Primary (12P)

☐

General (12G)

☐

Runoff (12R)

☐

Convention (12C)

☐

Special (12S)

Election on

M M / D D / Y Y Y Y Y Y

in the
State of

(d) 30-Day
POST-Election
Report for the:

X

General (30G)

☐

Runoff (30R)

☐

Special (30S)

Election on

M M / D D / Y Y Y Y Y Y

11 / 05 / 2024

in the
State of

WI

5. Covering Period

M M / D D / Y Y Y Y Y Y

10 / 17 / 2024

through

M M / D D / Y Y Y Y Y Y

11 / 25 / 2024

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

DATWYLER, THOMAS, , ,

Signature of Treasurer

DATWYLER, THOMAS, , ,

Date

M M / D D / Y Y Y Y Y Y

12 / 02 / 2024

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office
Use
Only

FEC FORM 3X
Rev. 05/2016

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

KEEP IT ALASKA

Report Covering the Period:

From:

M M / D D / Y Y Y Y Y Y
10 17 2024

To:

M M / D D / Y Y Y Y Y Y
11 25 2024

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2024		0.00
(b) Cash on Hand at Beginning of Reporting Period.....	12993.42	
(c) Total Receipts (from Line 19)	300.00	13785.96
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	13293.42	13785.96
7. Total Disbursements (from Line 31).....	0.00	272.54
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	13293.42	13513.42
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

KEEP IT ALASKA

Report Covering the Period:

From:

M M / D D / Y Y Y Y
10 17 2024

To:

M M / D D / Y Y Y Y
11 25 2024

I. Receipts

COLUMN A
Total This PeriodCOLUMN B
Calendar Year-to-Date

11. Contributions (other than loans) From:

(a) Individuals/Persons Other
Than Political Committees

(i) Itemized (use Schedule A).....

300.00

10550.00

(ii) Unitemized

0.00

3235.96

(iii) TOTAL (add
Lines 11(a)(i) and (ii).....▶

300.00

13785.96

(b) Political Party Committees

0.00

0.00

(c) Other Political Committees
(such as PACs).....

0.00

0.00

(d) Total Contributions (add Lines

11(a)(iii), (b), and (c)) (Carry

Totals to Line 33, page 5)

300.00

13785.96

12. Transfers From Affiliated/Other

Party Committees.....

0.00

0.00

13. All Loans Received

0.00

0.00

14. Loan Repayments Received.....

0.00

0.00

15. Offsets To Operating Expenditures

(Refunds, Rebates, etc.)

(Carry Totals to Line 37, page 5).....

0.00

0.00

16. Refunds of Contributions Made
to Federal Candidates and Other
Political Committees.....

0.00

0.00

17. Other Federal Receipts

(Dividends, Interest, etc.).....

0.00

0.00

18. Transfers from Non-Federal and Levin Funds

(a) Non-Federal Account

(from Schedule H3)

0.00

0.00

(b) Levin Funds (from Schedule H5)

0.00

0.00

(c) Total Transfers (add 18(a) and 18(b))..

0.00

0.00

19. Total Receipts (add Lines 11(d),

12, 13, 14, 15, 16, 17, and 18(c))

300.00

13785.96

20. Total Federal Receipts

(subtract Line 18(c) from Line 19)

300.00

13785.96

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures	0.00	272.54
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	0.00	272.54
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E)	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	0.00	0.00
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c)) ..	0.00	272.54
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	0.00	272.54

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	300.00	13785.96
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	300.00	13785.96
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	0.00	272.54
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	272.54

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 6 OF 6

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

KEEP IT ALASKA

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

A. POMEROY, VINCE, , ,

Mailing Address 11641 TIMBERLANE DR.

City
ANCHORAGEState
AKZip Code
99515FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
RETIREDOccupation (for Individual)
RETIRED

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

300.00

Date of Receipt

M M / D D / Y Y Y Y Y
10 / 18 / 2024

Transaction ID : A642B2FB662D94D389F3

Amount of Each Receipt this Period

300.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

B.

Mailing Address

City

State

Zip Code

FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)

Occupation (for Individual)

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

M M / D D / Y Y Y Y Y

Amount of Each Receipt this Period

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

C.

Mailing Address

City

State

Zip Code

FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)

Occupation (for Individual)

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

Date of Receipt

M M / D D / Y Y Y Y Y

Amount of Each Receipt this Period

☐ Memo Item

SUBTOTAL of Receipts This Page (optional)..... ►

300.00

TOTAL This Period (last page this line number only)..... ►

300.00

Committee ID	Committee	Report Year	Report Type	Date	First Name	Last Name	Amount	City	State
C00871525	Keep It Alaska	2024	30G	10/18/2024	Vince	Pomeroy	\$300	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	5/3/2024	Susan	Edwards	\$500	Eagle River	AK
C00871525	Keep It Alaska	2024	Q2	5/1/2024	Ralph	Samuels	\$500	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/26/2024	Micheal	Dennis	\$500	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/25/2024	John & Rache	Botson	\$1,000	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/24/2024	Adam	Blomfield	\$250	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/24/2024	Scott	Myers	\$250	Eagle River	AK
C00871525	Keep It Alaska	2024	Q2	4/18/2024	Beth	Simpson	\$500	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/17/2024	Tim	Rooney	\$250	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/10/2024	Allen	Hippler	\$250	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/8/2024	Michael	Baker	\$500	Highland	IL
C00871525	Keep It Alaska	2024	Q2	4/6/2024	Bernadette	Bradley	\$500	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/5/2024	Ed	Oberts	\$250	Soldotna	AK
C00871525	Keep It Alaska	2024	Q2	4/5/2024	Mike	Robbins	\$500	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/5/2024	Jerry	Sandstrom	\$500	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/5/2024	Robert	Wall	\$500	Sterling	AK
C00871525	Keep It Alaska	2024	Q2	4/5/2024	David	Shumway	\$1,000	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/4/2024	Thomas	Dunham	\$500	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/4/2024	David	Hultquist	\$1,000	Anchorage	AK
C00871525	Keep It Alaska	2024	Q2	4/4/2024	Lawrence	Stinson	\$1,000	Anchorage	AK

Image# 202410189699170583

FEC
FORM 3X

REPORT OF RECEIPTS
AND DISBURSEMENTS
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

KEEP IT ALASKA

ADDRESS (number and street) 502 6TH ST

Check if different than previously reported. (ACC) HUDSON WI 54016-1783

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00871525

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
- July 15 Quarterly Report (Q2)
- October 15 Quarterly Report (Q3)
- January 31 Year-End Report (YE)
- July 31 Mid-Year Report (Non-election Year Only) (MY)
- Termination Report (TER)

(b) Monthly Report Due On: Feb 20 (M2) May 20 (M5) Aug 20 (M8) Nov 20 (M11) (Non-Election Year Only) Mar 20 (M3) Jun 20 (M6) Sep 20 (M9) Dec 20 (M12) (Non-Election Year Only) Apr 20 (M4) Jul 20 (M7) Oct 20 (M10) Jan 31 (YE)

(c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R) Convention (12C) Special (12S)

Election on 11 / 05 / 2024 in the State of WI

(d) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S)

Election on / / in the State of

5. Covering Period 10 / 01 / 2024 through 10 / 16 / 2024

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer DATWYLER, THOMAS, , ,

Signature of Treasurer DATWYLER, THOMAS, , , Date 10 / 18 / 2024

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office Use Only								
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FEC FORM 3X
Rev. 05/2016

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

KEEP IT ALASKA

Report Covering the Period:

From:

M M / D D / Y Y Y Y Y Y
10 01 2024

To:

M M / D D / Y Y Y Y Y Y
10 16 2024

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2024		0.00
(b) Cash on Hand at Beginning of Reporting Period.....	12993.42	
(c) Total Receipts (from Line 19)	0.00	13265.96
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	12993.42	13265.96
7. Total Disbursements (from Line 31)	0.00	272.54
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	12993.42	12993.42
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

KEEP IT ALASKA

Report Covering the Period: From:

M M / D D / Y Y Y Y Y Y
10 01 2024

To:

M M / D D / Y Y Y Y Y Y
10 16 2024

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	0.00	10250.00
(ii) Unitemized	0.00	3015.96
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	0.00	13265.96
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)	0.00	13265.96
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))	0.00	13265.96
20. Total Federal Receipts (subtract Line 18(c) from Line 19)	0.00	13265.96

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures	0.00	272.54
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	0.00	272.54
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E)	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	0.00	0.00
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	0.00	272.54
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	0.00	272.54

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	0.00	13265.96
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	0.00	13265.96
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	0.00	272.54
37. Offsets to Operating Expenditures (from Line 15, page 3)	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	272.54

Image# 202410049684793571

FEC
FORM 3X

REPORT OF RECEIPTS
AND DISBURSEMENTS
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

KEEP IT ALASKA

ADDRESS (number and street) 502 6TH ST

Check if different than previously reported. (ACC) HUDSON WI 54016-1783

2. FEC IDENTIFICATION NUMBER ▼ CITY ▲ STATE ▲ ZIP CODE ▲

C C00871525

3. IS THIS REPORT NEW (N) OR AMENDED (A)

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

- April 15 Quarterly Report (Q1)
July 15 Quarterly Report (Q2)
October 15 Quarterly Report (Q3)
January 31 Year-End Report (YE)
July 31 Mid-Year Report (Non-election Year Only) (MY)
Termination Report (TER)

(b) Monthly Report Due On: Feb 20 (M2) May 20 (M5) Aug 20 (M8) Nov 20 (M11) (Non-Election Year Only)
Mar 20 (M3) Jun 20 (M6) Sep 20 (M9) Dec 20 (M12) (Non-Election Year Only)
Apr 20 (M4) Jul 20 (M7) Oct 20 (M10) Jan 31 (YE)

(c) 12-Day PRE-Election Report for the: Primary (12P) General (12G) Runoff (12R)
Convention (12C) Special (12S)

Election on in the State of

(d) 30-Day POST-Election Report for the: General (30G) Runoff (30R) Special (30S)

Election on in the State of

5. Covering Period 07 / 01 / 2024 through 09 / 30 / 2024

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer DATWYLER, THOMAS, , ,

Signature of Treasurer DATWYLER, THOMAS, , , Date 10 / 04 / 2024

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office Use Only									
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FEC FORM 3X
Rev. 05/2016

**SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS**

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

KEEP IT ALASKA

Report Covering the Period:

From:

M M / D D / Y Y Y Y Y Y
07 01 2024

To:

M M / D D / Y Y Y Y Y Y
09 30 2024

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, 2024		0.00
(b) Cash on Hand at Beginning of Reporting Period.....	12993.42	
(c) Total Receipts (from Line 19)	0.00	13265.96
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	12993.42	13265.96
7. Total Disbursements (from Line 31)	0.00	272.54
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	12993.42	12993.42
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	0.00	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

DETAILED SUMMARY PAGE of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

KEEP IT ALASKA

Report Covering the Period:

From:

M M / D D / Y Y Y Y
07 / 01 / 2024

To:

M M / D D / Y Y Y Y
09 / 30 / 2024

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	0.00	10250.00
(ii) Unitemized	0.00	3015.96
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	0.00	13265.96
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)	0.00	13265.96
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))	0.00	13265.96
20. Total Federal Receipts (subtract Line 18(c) from Line 19)	0.00	13265.96

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures	0.00	272.54
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	0.00	272.54
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E)	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	0.00	0.00
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	0.00	272.54
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	0.00	272.54

DETAILED SUMMARY PAGE
of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	0.00	13265.96
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	0.00	13265.96
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))	0.00	272.54
37. Offsets to Operating Expenditures (from Line 15, page 3).....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)	0.00	272.54

Image# 202407159659934108

FEC
FORM 3X

REPORT OF RECEIPTS
AND DISBURSEMENTS
For Other Than An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines.

12FE4M5

KEEP IT ALASKA

ADDRESS (number and street)

502 6TH ST

Check if different than previously reported. (ACC)

HUDSON

WI

54016-1783

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

C

C00871525

3. IS THIS REPORT

X

NEW (N)

OR

AMENDED (A)

4. TYPE OF REPORT

(Choose One)

(a) Quarterly Reports:

April 15
Quarterly Report (Q1)

X

July 15
Quarterly Report (Q2)

October 15
Quarterly Report (Q3)

January 31
Year-End Report (YE)

July 31 Mid-Year
Report (Non-election
Year Only) (MY)

Termination Report
(TER)

(b) Monthly
Report
Due On:

Feb 20 (M2)

May 20 (M5)

Aug 20 (M8)

Nov 20 (M11)
(Non-Election
Year Only)

Mar 20 (M3)

Jun 20 (M6)

Sep 20 (M9)

Dec 20 (M12)
(Non-Election
Year Only)

Apr 20 (M4)

Jul 20 (M7)

Oct 20 (M10)

Jan 31 (YE)

(c) 12-Day
PRE-Election
Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

M M / D D / Y Y Y Y Y Y

in the
State of

(d) 30-Day
POST-Election
Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

M M / D D / Y Y Y Y Y Y

in the
State of

5. Covering Period

04

01

2024

through

06

30

2024

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

DATWYLER, THOMAS, , ,

Signature of Treasurer

DATWYLER, THOMAS, , ,

Date

07

15

2024

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 52 U.S.C. § 30109.

Office
Use
Only

FEC FORM 3X
Rev. 05/2016

SUMMARY PAGE OF RECEIPTS AND DISBURSEMENTS

FEC Form 3X (Rev. 05/2016)

Page 2

Write or Type Committee Name

KEEP IT ALASKA

Report Covering the Period:

From:

M = M	/	D = D	/	Y = Y Y = Y Y = Y
04		01		2024

To:

M = M	/	D = D	/	Y = Y Y = Y Y = Y
06		30		2024

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. (a) Cash on Hand January 1, <div><div>Y Y Y Y</div><div>2024</div></div>		<div><div></div><div>0.00</div></div>
(b) Cash on Hand at Beginning of Reporting Period.....	<div><div></div><div>0.00</div></div>	
(c) Total Receipts (from Line 19)	<div><div></div><div>13265.96</div></div>	<div><div></div><div>13265.96</div></div>
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B).....	<div><div></div><div>13265.96</div></div>	<div><div></div><div>13265.96</div></div>
7. Total Disbursements (from Line 31).....	<div><div></div><div>272.54</div></div>	<div><div></div><div>272.54</div></div>
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	<div><div></div><div>12993.42</div></div>	<div><div></div><div>12993.42</div></div>
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	<div><div></div><div>0.00</div></div>	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	<div><div></div><div>0.00</div></div>	



This committee has qualified as a multicandidate committee. (see FEC FORM 1M)

For further information, contact the Federal Election Commission at 800-424-9530 or visit www.fec.gov

DETAILED SUMMARY PAGE
of Receipts

FEC Form 3X (Rev. 05/2016)

Page 3

Write or Type Committee Name

KEEP IT ALASKA

Report Covering the Period: From:

M M / D D / Y Y Y Y
04 01 2024

To:

M M / D D / Y Y Y Y
06 30 2024

I. Receipts	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
11. Contributions (other than loans) From:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A).....	10250.00	10250.00
(ii) Unitemized	3015.96	3015.96
(iii) TOTAL (add Lines 11(a)(i) and (ii)).....▶	13265.96	13265.96
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contributions (add Lines 11(a)(iii), (b), and (c)) (Carry Totals to Line 33, page 5)	13265.96	13265.96
12. Transfers From Affiliated/Other Party Committees.....	0.00	0.00
13. All Loans Received	0.00	0.00
14. Loan Repayments Received.....	0.00	0.00
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.) (Carry Totals to Line 37, page 5).....	0.00	0.00
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees.....	0.00	0.00
17. Other Federal Receipts (Dividends, Interest, etc.).....	0.00	0.00
18. Transfers from Non-Federal and Levin Funds		
(a) Non-Federal Account (from Schedule H3)	0.00	0.00
(b) Levin Funds (from Schedule H5)	0.00	0.00
(c) Total Transfers (add 18(a) and 18(b))..	0.00	0.00
19. Total Receipts (add Lines 11(d), 12, 13, 14, 15, 16, 17, and 18(c))	13265.96	13265.96
20. Total Federal Receipts (subtract Line 18(c) from Line 19)	13265.96	13265.96

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 4

II. Disbursements	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
21. Operating Expenditures:		
(a) Allocated Federal/Non-Federal Activity (from Schedule H4)		
(i) Federal Share	0.00	0.00
(ii) Non-Federal Share.....	0.00	0.00
(b) Other Federal Operating Expenditures	272.54	272.54
(c) Total Operating Expenditures (add 21(a)(i), (a)(ii), and (b))	272.54	272.54
22. Transfers to Affiliated/Other Party Committees.....	0.00	0.00
23. Contributions to Federal Candidates/Committees and Other Political Committees.....	0.00	0.00
24. Independent Expenditures (use Schedule E)	0.00	0.00
25. Coordinated Party Expenditures (52 U.S.C. § 30116(d)) (use Schedule F).....	0.00	0.00
26. Loan Repayments Made.....	0.00	0.00
27. Loans Made.....	0.00	0.00
28. Refunds of Contributions To:		
(a) Individuals/Persons Other Than Political Committees	0.00	0.00
(b) Political Party Committees	0.00	0.00
(c) Other Political Committees (such as PACs).....	0.00	0.00
(d) Total Contribution Refunds (add Lines 28(a), (b), and (c)).....	0.00	0.00
29. Other Disbursements (Including Non-Federal Donations).....	0.00	0.00
30. Federal Election Activity (52 U.S.C. § 30101(20))		
(a) Allocated Federal Election Activity (from Schedule H6)		
(i) Federal Share	0.00	0.00
(ii) "Levin" Share.....	0.00	0.00
(b) Federal Election Activity Paid Entirely With Federal Funds	0.00	0.00
(c) Total Federal Election Activity (add Lines 30(a)(i), 30(a)(ii) and 30(b))	0.00	0.00
31. Total Disbursements (add Lines 21(c), 22, 23, 24, 25, 26, 27, 28(d), 29 and 30(c))..	272.54	272.54
32. Total Federal Disbursements (subtract Line 21(a)(ii) and Line 30(a)(ii) from Line 31).....	272.54	272.54

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3X (Rev. 05/2016)

Page 5

III. Net Contributions/ Operating Expenditures	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
33. Total Contributions (other than loans) (from Line 11(d), page 3)	13265.96	13265.96
34. Total Contribution Refunds (from Line 28(d))	0.00	0.00
35. Net Contributions (other than loans) (subtract Line 34 from Line 33)	13265.96	13265.96
36. Total Federal Operating Expenditures (add Line 21(a)(i) and Line 21(b))▶	272.54	272.54
37. Offsets to Operating Expenditures (from Line 15, page 3).....	0.00	0.00
38. Net Operating Expenditures (subtract Line 37 from Line 36)▶	272.54	272.54

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 6 OF 13

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

KEEP IT ALASKA

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

A. BAKER, MICHAEL, , ,

Mailing Address 3314 BUSH DRIVE

City
HIGHLANDState
ILZip Code
62249FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
SLEEP CENTERS OF ALASKAOccupation (for Individual)
PRESIDENT

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 08 / 2024**Transaction ID : A4AEA5AFEC CAB43A2A3**

Amount of Each Receipt this Period

500.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

B. BLOMFIELD, ADAM, , ,

Mailing Address 3420 NORTH SHOTE DR

City
ANCHORAGEState
AKZip Code
99502FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
RETIREDOccupation (for Individual)
RETIRED

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

250.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 24 / 2024**Transaction ID : AD794E089FBE0424F9A2**

Amount of Each Receipt this Period

250.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

C. BOTSON, JOHN & RACHEL, , ,

Mailing Address 5771 HERITAGE HEIGHTS DRIVE

City
ANCHORAGEState
AKZip Code
99516FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
OPAOccupation (for Individual)
PHYSICIAN

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

1000.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 25 / 2024**Transaction ID : A373D21745DC84D9E8BB**

Amount of Each Receipt this Period

1000.00

☐ Memo Item**SUBTOTAL** of Receipts This Page (optional)..... ►

1750.00

TOTAL This Period (last page this line number only)..... ►

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 7 OF 13

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

KEEP IT ALASKA

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

A. BRADLEY, BERNADETTE, , ,

Mailing Address P.O BOX 110003

City
ANCHORAGEState
AKZip Code
99511FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
RETIREDOccupation (for Individual)
RETIRED

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 06 / 2024**Transaction ID : A8051A8B0F4454F97A14**

Amount of Each Receipt this Period

500.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

B. DENNIS, MICHEAL, , ,

Mailing Address 3145 NUGGET LANE

City
ANCHORAGEState
AKZip Code
99516FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
CHI OF ALASKA INCOccupation (for Individual)
INSURANCE

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 26 / 2024**Transaction ID : A3A18315BDFB14484A08**

Amount of Each Receipt this Period

500.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

C. DUNHAM, THOMAS, , ,

Mailing Address 16905 OLENA POINTE CIR

City
ANCHORAGEState
AKZip Code
99516FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
CHERIAN LLPOccupation (for Individual)
ATTORNEY

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 04 / 2024**Transaction ID : A5F813848899D42BEA1B**

Amount of Each Receipt this Period

500.00

☐ Memo Item**SUBTOTAL** of Receipts This Page (optional)..... ►

1500.00

TOTAL This Period (last page this line number only)..... ►

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 8 OF 13

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

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NAME OF COMMITTEE (In Full)

KEEP IT ALASKA

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

A. EDWARDS, SUSAN, , ,

Mailing Address 13627 VASILI DR

City
EAGLE RIVERState
AKZip Code
99577FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
RETIREDOccupation (for Individual)
RETIRED

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
05 / 03 / 2024

Transaction ID : ACBBFBD4AD54C4A32962

Amount of Each Receipt this Period

500.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

B. HIPPLER, ALLEN, , ,

Mailing Address 6730 CROOKED TREE CIRCLE

City
ANCHORAGEState
AKZip Code
99507FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
TNHAOccupation (for Individual)
CFO

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

250.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 10 / 2024

Transaction ID : A7692B05D11C143CB903

Amount of Each Receipt this Period

250.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

C. HULTQUIST, DAVID, , ,

Mailing Address 3420 E 112TH AVE

City
ANCHORAGEState
AKZip Code
99516FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
HULTQUIST HOMES INCOccupation (for Individual)
OWNER

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

1000.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 04 / 2024

Transaction ID : A7C5C1CDA87DF461BBBE

Amount of Each Receipt this Period

1000.00

☐ Memo Item

SUBTOTAL of Receipts This Page (optional)..... ►

1750.00

TOTAL This Period (last page this line number only)..... ►

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 9 OF 13

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

KEEP IT ALASKA

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

A. MYERS, SCOTT, , ,

Mailing Address PO BOX 771381

City
EAGLE RIVERState
AKZip Code
99577FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
REMAX DYNAMIC PROPERTIESOccupation (for Individual)
REAL ESTATE BROKER

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

250.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 24 / 2024**Transaction ID : A1B942E95A41B410C9E2**

Amount of Each Receipt this Period

250.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

B. OBERTS, ED, , ,

Mailing Address PO BOX 551

City
SOLDOTNAState
AKZip Code
99669FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
SELFOccupation (for Individual)
REAL ESTATE SALES

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

250.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 05 / 2024**Transaction ID : A198388E8074A4710AB6**

Amount of Each Receipt this Period

250.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

C. ROBBINS, MIKE, , ,

Mailing Address P.O.BOX 220149

City
ANCHORAGEState
AKZip Code
99523FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
ACDAOccupation (for Individual)
EXECUTIVE DIRECTOR

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 05 / 2024**Transaction ID : A42C958C29678471FB04**

Amount of Each Receipt this Period

500.00

☐ Memo Item**SUBTOTAL** of Receipts This Page (optional)..... ►

1000.00

TOTAL This Period (last page this line number only)..... ►

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 10 OF 13

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

KEEP IT ALASKA

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

A. ROONEY, TIM, , ,

Mailing Address 6222 GREEN TREE CIRCLE

City
ANCHORAGEState
AKZip Code
99507FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
RETIREDOccupation (for Individual)
RETIRED

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

250.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 17 / 2024**Transaction ID : A68B10EA2881749A2A83**

Amount of Each Receipt this Period

250.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

B. SAMUELS, RALPH, , ,

Mailing Address 11404 DISCOVERY PARK DRIVE

City
ANCHORAGEState
AKZip Code
99515FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
HOLLAND AMERICAOccupation (for Individual)
VP

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
05 / 01 / 2024**Transaction ID : AAB55F609C31A44AC852**

Amount of Each Receipt this Period

500.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

C. SANDSTROM, JERRY, , ,

Mailing Address 1801 BLUEGRASS CIRCLE

City
ANCHORAGEState
AKZip Code
99502FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
ENSTAR NATURAL GAS COMPANYOccupation (for Individual)
SURVEYOR

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 05 / 2024**Transaction ID : AABC6EF2EBCBE4F87B80**

Amount of Each Receipt this Period

500.00

☐ Memo Item**SUBTOTAL** of Receipts This Page (optional)..... ►

1250.00

TOTAL This Period (last page this line number only)..... ►

SCHEDULE A (FEC Form 3X)
ITEMIZED RECEIPTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 11 OF 13

<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 12
<input type="checkbox"/> 13	<input type="checkbox"/> 14	<input type="checkbox"/> 15	<input type="checkbox"/> 16
<input type="checkbox"/> 17			

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NAME OF COMMITTEE (In Full)

KEEP IT ALASKA

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

A. SHUMWAY, DAVID, , ,

Mailing Address 11484 DISCOVERY HEIGHTS CIRCLE

City
ANCHORAGEState
AKZip Code
99515FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
AMC ENGINEERSOccupation (for Individual)
MECHANICAL ENGINEER

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

1000.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 05 / 2024**Transaction ID : A56456572411D4942A3C**

Amount of Each Receipt this Period

1000.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

B. SIMPSON, BETH, , ,

Mailing Address P O BOX 112342

City
ANCHORAGEState
AKZip Code
99511FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
KELLER WILLIAMS REALTY ALASKA GROUPOccupation (for Individual)
REALTOR

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

500.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 18 / 2024**Transaction ID : A0CE436C604C449DF8E8**

Amount of Each Receipt this Period

500.00

☐ Memo Item

Full Name of Individual (Last, First, Middle Initial) or Full Organization Name

C. STINSON, LAWRENCE, , ,

Mailing Address 11475 MOONRISE RIDGE PL

City
ANCHORAGEState
AKZip Code
99516FEC ID number of contributing
federal political committee.

C

Name of Employer (for Individual)
RETIREDOccupation (for Individual)
RETIRED

Receipt For:

☐ Primary ☐ General
☐ Other (specify) ▼

Aggregate Year-to-Date ▼

1000.00

Date of Receipt

M M / D D / Y Y Y Y Y Y
04 / 04 / 2024**Transaction ID : A2C1651F985954514A2B**

Amount of Each Receipt this Period

1000.00

☐ Memo Item**SUBTOTAL** of Receipts This Page (optional)..... ►

2500.00

TOTAL This Period (last page this line number only)..... ►

SCHEDULE B (FEC Form 3X)
ITEMIZED DISBURSEMENTSUse separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 13 OF 13

<input checked="checked" type="checkbox"/> 21b	<input type="checkbox"/> 22	<input type="checkbox"/> 23	<input type="checkbox"/> 26	<input type="checkbox"/> 27
<input type="checkbox"/> 28a	<input type="checkbox"/> 28b	<input type="checkbox"/> 28c	<input type="checkbox"/> 29	<input type="checkbox"/> 30b

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NAME OF COMMITTEE (In Full)

KEEP IT ALASKA

Full Name (Last, First, Middle Initial)

A. ANEDOT

Mailing Address 1340 POYDRAS ST STE 1770

Date of Disbursement

M M M	/	D D D	/	Y Y Y Y Y Y
04		24		2024

City
NEW ORLEANSState
LAZip Code
70112-5204

FEC Identification Number

C**Transaction ID : B8C2CA9FB0**

Amount of Each Disbursement this Period

248.02

Purpose of Disbursement

CREDIT CARD FEES

001

Category/
Type

Candidate Name

Office Sought:

<input type="checkbox"/> House
<input type="checkbox"/> Senate
<input type="checkbox"/> President

Disbursement For:

<input type="checkbox"/> Primary	<input type="checkbox"/> General
<input type="checkbox"/> Other (specify) ▼	

State:

District:

☐ Memo Item

Full Name (Last, First, Middle Initial)

B. ANEDOT

Mailing Address 1340 POYDRAS ST STE 1770

Date of Disbursement

M M M	/	D D D	/	Y Y Y Y Y Y
04		26		2024

City
NEW ORLEANSState
LAZip Code
70112-5204

FEC Identification Number

C**Transaction ID : BA2F32E92B;**

Amount of Each Disbursement this Period

12.60

Purpose of Disbursement

CREDIT CARD FEES

001

Category/
Type

Candidate Name

Office Sought:

<input type="checkbox"/> House
<input type="checkbox"/> Senate
<input type="checkbox"/> President

Disbursement For:

<input type="checkbox"/> Primary	<input type="checkbox"/> General
<input type="checkbox"/> Other (specify)	

State:

District:

☐ Memo Item

Full Name (Last, First, Middle Initial)

C. ANEDOT

Mailing Address 1340 POYDRAS ST STE 1770

Date of Disbursement

M M M	/	D D D	/	Y Y Y Y Y Y
05		02		2024

City
NEW ORLEANSState
LAZip Code
70112-5204

FEC Identification Number

C**Transaction ID : B26997A80F**

Amount of Each Disbursement this Period

1.92

Purpose of Disbursement

CREDIT CARD FEES

001

Category/
Type

Candidate Name

Office Sought:

<input type="checkbox"/> House
<input type="checkbox"/> Senate
<input type="checkbox"/> President

Disbursement For:

<input type="checkbox"/> Primary	<input type="checkbox"/> General
<input type="checkbox"/> Other (specify) ▼	

State:

District:

☐ Memo Item**SUBTOTAL** of Disbursements This Page (optional).....▶

262.54

TOTAL This Period (last page this line number only).....▶

262.54

GROUP REGISTRATION FORM

AMENDED

COMPLETED

Submission Date: **09/05/2024**
Filer First Name: **JOHN**
Filer Middle Name (Optional): **R**
Filer Last Name: **CARR**
Filer's Title with Group: **Chairman**

GROUP INFORMATION

Previously Registered: **No**
Election Year: **2024**
Group Name: **Alaskans for Common Sense**
Abbreviation: **ACS**
Purpose: **To help elect candidates whose values align with our core principle of having common sense in our Government Leadership.**
Group Type: **Independent Expenditure**
Group Mailing Address: **4401 East Country Fair Drive**
City, State Zip: **Wasilla, Alaska 99654**
Additional Email Addresses to Notify:

CHAIR

Name: **John R Carr**
Address: **4401 East Country Fair Drive Wasilla, Alaska 99654**
City, State Zip: **Wasilla, Alaska 99654**
Phone: **907-355-0752**
E-mail: **richcarr@mtaonline.net**
Fax (Optional): **Did Not Report**

TREASURER

Name: **JOHN R CARR**
Address: **4401 East Country Fair Drive**
City, State Zip: **Wasilla, Alaska 99654**
Phone: **907-355-0752**
E-mail: **richcarr@mtaonline.net**

Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
No Deputy Treasurers / Co-chairs / Nothing to Report		

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

More than 1/3 of total spending going to the following candidate(s).

Robert Yundt

Jubilee Underwood

CAMPAIGN PLANS

Election Type	Election	Municipality
State General	2024 - State General	

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Northrim Bank**

Bank Address: **850 E Usa Cir.**

City, State Zip: **Wasilla, Alaska 99654**

GROUP REGISTRATION FORM

AMENDMENT

Amendment Description: Amending Clerical Addition

COMPLETED

Submission Date: **11/07/2024**
Filer First Name: **JOHN**
Filer Middle Name (Optional): **R**
Filer Last Name: **CARR**
Filer's Title with Group: **Chairman**

GROUP INFORMATION

Previously Registered: **No**
Election Year: **2024**
Group Name: **Alaska Voter Coalition**
Abbreviation: **ACS**
Purpose: **To help elect candidates whose values align with our core principle of having common sense in our Government Leadership.**
Group Type: **Independent Expenditure**
Group Mailing Address: **4401 East Country Fair Drive**
City, State Zip: **Wasilla, Alaska 99654**
Additional Email Addresses to Notify:

CHAIR

Name: **John R Carr**
Address: **4401 East Country Fair Drive Wasilla, Alaska 99654**
City, State Zip: **Wasilla, Alaska 99654**
Phone: **907-355-0752**
E-mail: **richcarr@mtaonline.net**
Fax (Optional): **Did Not Report**

TREASURER

Name: **JOHN R CARR**
Address: **4401 East Country Fair Drive**
City, State Zip: **Wasilla, Alaska 99654**
Phone: **907-355-0752**

E-mail: **richcarr@mtaonline.net**

Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
No Deputy Treasurers / Co-chairs / Nothing to Report		

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

More than 1/3 of total spending going to the following candidate(s).

Jubilee Underwood, Ron Bernier

Thomas Bergey

CAMPAIGN PLANS

Election Type	Election	Municipality
State General	2024 - State General	

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Northrim Bank**

Bank Address: **850 E Usa Cir.**

City, State Zip: **Wasilla, Alaska 99654**

GROUP REGISTRATION FORM**AMENDMENT****Amendment Description: Amending Clerical Addition****COMPLETED**

Submission Date: **11/07/2024**
Filer First Name: **JOHN**
Filer Middle Name (Optional): **R**
Filer Last Name: **CARR**
Filer's Title with Group: **Chairman**

GROUP INFORMATION

Previously Registered: **No**
Election Year: **2024**
Group Name: **Alaska Voter Coalition**
Abbreviation: **ACS**
Purpose: **To help elect candidates whose values align with our core principle of having common sense in our Government Leadership.**
Group Type: **Independent Expenditure**
Group Mailing Address: **4401 East Country Fair Drive**
City, State Zip: **Wasilla, Alaska 99654**
Additional Email Addresses to Notify:

CHAIR

Name: **John R Carr**
Address: **4401 East Country Fair Drive Wasilla, Alaska 99654**
City, State Zip: **Wasilla, Alaska 99654**
Phone: **907-355-0752**
E-mail: **richcarr@mtaonline.net**
Fax (Optional): **Did Not Report**

TREASURER

Name: **JOHN R CARR**
Address: **4401 East Country Fair Drive**
City, State Zip: **Wasilla, Alaska 99654**
Phone: **907-355-0752**

E-mail: **richcarr@mtaonline.net**

Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
No Deputy Treasurers / Co-chairs / Nothing to Report		

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

More than 1/3 of total spending going to the following candidate(s).

Jubilee Underwood, Ron Bernier

Thomas Bergey

CAMPAIGN PLANS

Election Type	Election	Municipality
State General	2024 - State General	

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Northrim Bank**

Bank Address: **850 E Usa Cir.**

City, State Zip: **Wasilla, Alaska 99654**

GROUP REGISTRATION FORM

AMENDED

COMPLETED

Submission Date: **04/01/2024**

Filer First Name: **Joel**

Filer Middle Name (Optional): **Christopher**

Filer Last Name: **Borgquist**

Filer's Title with Group: **Chairman**

GROUP INFORMATION

Previously Registered: **No**

Election Year: **2024**

Group Name: **Keep It Alaska**

Abbreviation:

Purpose: **Independent expenditures supporting/opposing state and local candidates, causes, and ballot measures**

Group Type: **Independent Expenditure**

Group Mailing Address: **555 Metro Pl N**

City, State Zip: **Dublin, Ohio 43017**

Additional Email Addresses to Notify: **joel@reddirtcampaigns.com**

CHAIR

Name: **Joel Borgquist**

Address: **18730 Mills Bay Drive**

City, State Zip: **Eagle River, Alaska 99577**

Phone: **8088929813**

E-mail: **joel@borgquist.org**

Fax (Optional): **Did Not Report**

TREASURER

Name: **Tom Datwyler**

Address: **555 Metro Pl N**

City, State Zip: **Dublin, Ohio 43017**

Phone: **7153388544**

E-mail: **tcdatwyler@gmail.com**

Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
No Deputy Treasurers / Co-chairs / Nothing to Report		

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

CAMPAIGN PLANS

Election Type	Election	Municipality
Anchorage Municipal	2024 - Anchorage Municipal Election	Anchorage, City and Borough
State General	2024 - State General	
State Primary	2024 - State Primary	

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Chain Bridge Bank, N.A.**

Bank Address: **1445-A Laughlin Avenue**

City, State Zip: **McLean, Virginia 22101**

GROUP REGISTRATION FORM

AMENDED

AMENDMENT

Amendment Description: Updates

COMPLETED

Submission Date: **04/12/2024**

Filer First Name: **Joel**

Filer Middle Name (Optional):

Filer Last Name: **Borgquist**

Filer's Title with Group: **Chairman**

GROUP INFORMATION

Previously Registered: **No**

Election Year: **2024**

Group Name: **Keep It Alaska**

Abbreviation:

Purpose: **Independent expenditures supporting/opposing state and local candidates, causes, and ballot measures**

Group Type: **Independent Expenditure**

Group Mailing Address: **PO Box 772081**

City, State Zip: **Eagle River, Alaska 99577**

Additional Email Addresses to Notify: **chair@keepitalaska.org**

CHAIR

Name: **Joel Borgquist**

Address: **18730 Mills Bay Drive**

City, State Zip: **Eagle River, Alaska 99577**

Phone: **8088929813**

E-mail: **chair@keepitalaska.org**

Fax (Optional): **Did Not Report**

TREASURER

Name: **Tom Datwyler**

Address: **555 Metro Pl N**

City, State Zip: **Dublin, Ohio 43017**

Phone: **7153388544**

E-mail: **tcdatwyler@gmail.com**

Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
No Deputy Treasurers / Co-chairs / Nothing to Report		

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

CAMPAIGN PLANS

Election Type	Election	Municipality
Anchorage Municipal	2024 - Anchorage Municipal Election	Anchorage, City and Borough
State General	2024 - State General	
State Primary	2024 - State Primary	

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Chain Bridge Bank, N.A.**

Bank Address: **1445-A Laughlin Avenue**

City, State Zip: **McLean, Virginia 22101**

GROUP REGISTRATION FORM

AMENDMENT

Amendment Description: Updates

COMPLETED

Submission Date: **04/12/2024**
Filer First Name: **Joel**
Filer Middle Name (Optional):
Filer Last Name: **Borgquist**
Filer's Title with Group: **Chairman**

GROUP INFORMATION

Previously Registered: **No**
Election Year: **2024**
Group Name: **Keep It Alaska**
Abbreviation:
Purpose: **Independent expenditures supporting/opposing state and local candidates, causes, and ballot measures**
Group Type: **Independent Expenditure**
Group Mailing Address: **PO Box 772081**
City, State Zip: **Eagle River, Alaska 99577**
Additional Email Addresses to Notify: **chair@keepitalaska.org**

CHAIR

Name: **Joel Borgquist**
Address: **18730 Mills Bay Drive**
City, State Zip: **Eagle River, Alaska 99577**
Phone: **8088929813**
E-mail: **chair@keepitalaska.org**
Fax (Optional): **Did Not Report**

TREASURER

Name: **Tom Datwyler**
Address: **555 Metro Pl N**
City, State Zip: **Dublin, Ohio 43017**
Phone: **7153388544**

E-mail: **tedatwyler@gmail.com**

Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
No Deputy Treasurers / Co-chairs / Nothing to Report		

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

CAMPAIGN PLANS

Election Type	Election	Municipality
Municipal Runoff	2024 - Anchorage Municipal Runoff	Anchorage, City and Borough
State General	2024 - State General	
State Primary	2024 - State Primary	

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Northrim Bank**

Bank Address: **P.O. Box 241489**

City, State Zip: **Anchorage, Alaska 99524**

GROUP REGISTRATION FORM

AMENDMENT

Amendment Description: Updates

COMPLETED

Submission Date: **04/12/2024**
Filer First Name: **Joel**
Filer Middle Name (Optional):
Filer Last Name: **Borgquist**
Filer's Title with Group: **Chairman**

GROUP INFORMATION

Previously Registered: **No**
Election Year: **2024**
Group Name: **Keep It Alaska**
Abbreviation:
Purpose: **Independent expenditures supporting/opposing state and local candidates, causes, and ballot measures**
Group Type: **Independent Expenditure**
Group Mailing Address: **PO Box 772081**
City, State Zip: **Eagle River, Alaska 99577**
Additional Email Addresses to Notify: **chair@keepitalaska.org**

CHAIR

Name: **Joel Borgquist**
Address: **18730 Mills Bay Drive**
City, State Zip: **Eagle River, Alaska 99577**
Phone: **8088929813**
E-mail: **chair@keepitalaska.org**
Fax (Optional): **Did Not Report**

TREASURER

Name: **Tom Datwyler**
Address: **555 Metro Pl N**
City, State Zip: **Dublin, Ohio 43017**
Phone: **7153388544**

E-mail: **tedatwyler@gmail.com**

Fax (Optional): **Did Not Report**

DEPUTY TREASURERS / CO-CHAIRS

Name	Address	Title
No Deputy Treasurers / Co-chairs / Nothing to Report		

TYPE OF GROUP

INDEPENDENT EXPENDITURE GROUP

CAMPAIGN PLANS

Election Type	Election	Municipality
Municipal Runoff	2024 - Anchorage Municipal Runoff	Anchorage, City and Borough
State General	2024 - State General	
State Primary	2024 - State Primary	

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Northrim Bank**

Bank Address: **P.O. Box 241489**

City, State Zip: **Anchorage, Alaska 99524**

**FEC
FORM 1****STATEMENT OF
ORGANIZATION**

Office Use Only

1. NAME OF COMMITTEE (in full) ☐ (Check if name is changed) Example: If typing, type over the lines.

12FE4M5

KEEP IT ALASKA

ADDRESS (number and street)

502 6TH STREET

☐ (Check if address is changed)

HUDSON

CITY ▲

WI

STATE ▲

54016

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

☐ (Check if address is changed)

COMPLIANCE@AXCAPTEAM.COM

Optional Second E-Mail Address

TCDATWYLER@GMAIL.COM

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐ (Check if address is changed)

2. DATE

MM / DD / YYYY
02 / 29 / 2024

3. FEC IDENTIFICATION NUMBER ►

C C00871525

4. IS THIS STATEMENT ☒ NEW (N) OR ☐ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer DATWYLER, THOMAS, , ,

Signature of Treasurer DATWYLER, THOMAS, , ,

Date

MM / DD / YYYY
02 / 29 / 2024

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 52 U.S.C. §30109.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100

FEC FORM 1
(Revised 06/2012)**Exhibit 1**
Page 65 of 71

5. TYPE OF COMMITTEE:

Candidate Committee:

- (a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of
CandidateCandidate
Party AffiliationOffice
Sought:☐ House☐ Senate☐ President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of
Candidate**Party Committee:**

- (d) ☐ This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

☐ Corporation☐ Corporation w/o Capital Stock☐ Labor Organization☐ Membership Organization☐ Trade Association☐ Cooperative☐ In addition, this committee is a Lobbyist/Registrant PAC.

- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

☐ In addition, this committee is a Lobbyist/Registrant PAC.☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

- (g) ☒ This committee is an independent expenditure-only political committee (Super PAC).

☐ In addition, this committee is a Lobbyist/Registrant PAC.

- (h) ☐ This committee is a political committee with both contribution and non-contribution accounts (Hybrid PAC).

☐ In addition, this committee is a Lobbyist/Registrant PAC.**Joint Fundraising Representative:**

- (i) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (j) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1. 2. C C

Write or Type Committee Name

KEEP IT ALASKA

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

NONE

Mailing Address

CITY ▲

STATE ▲

ZIP CODE ▲

Relationship: ☐ Connected Organization ☐ Affiliated Organization ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

DATWYLER, THOMAS, , ,

Mailing Address

502 6TH STREET

HUDSON

WI

54016

CITY ▲

STATE ▲

ZIP CODE ▲

Title or Position ▼

CUSTODIAN OF RECORDS

Telephone number

202

866

8229

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name
of Treasurer

DATWYLER, THOMAS, , ,

Mailing Address

502 6TH STREET

HUDSON

WI

54016

CITY ▲

STATE ▲

ZIP CODE ▲

Title or Position ▼

TREASURER

Telephone number

202

866

8229

Full Name of
Designated
Agent

Mailing Address

Title or Position ▼

Telephone number

9. **Banks or Other Depositories:** List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

CHAIN BRIDGE BANK

Mailing Address

1445A LAUGHLIN AVE

MCLEAN

VA

22101

CITY ▲

STATE ▲

ZIP CODE ▲

Name of Bank, Depository, etc.

Mailing Address

CITY ▲

STATE ▲

ZIP CODE ▲



THE STATE
of ALASKA

Department of Commerce, Community, and Economic Development
Division of Corporations, Business, and Professional Licensing
PO Box 110806, Juneau, AK 99811-0806
(907) 465-2550 • Email: corporations@alaska.gov
Website: corporations.alaska.gov

AK Entity #: 10255101
Date Filed: 12/29/2023
State of Alaska, DCCED

FOR DIVISION USE ONLY

Certificate of Registration

Foreign Limited Liability Company

Web-12/29/2023 2:32:50 PM

1 - Entity Name

Legal Name: Red Dirt Campaigns, LLC

2 - Home State

State of domicile (home state): HAWAII, UNITED STATES

Date of Incorporation: 1/17/2023

The entity is in good standing in the state of domicile.

3 - Duration

The duration of the entity is perpetual.

4 - Purpose

Political consulting and any lawful business.

5 - NAICS Code

541611 - ADMINISTRATIVE MANAGEMENT AND GENERAL MANAGEMENT CONSULTING SERVICES

6 - Registered Agent

Name: Joel Borgquist

Mailing Address: 18730 Mills Bay Drive, AK, AK 99577

Physical Address: 18730 Mills Bay Drive, AK, AK 99577

7 - Entity Addresses

Mailing Address: 18730 Mills Bay Drive, AK, AK 99577

Physical Address: 18730 Mills Bay Drive, AK, AK 99577

8 - Management

The limited liability company is managed by a manager.

9 - Officials

Name	Address	% Owned	Titles
Joel Borgquist	18730 Mills Bay Drive, AK, AK 99577	80	Manager, Member

Name of person completing this online application

This form is for use by the named entity only. Only persons who are authorized by the above Official(s) of the named entity may make changes to it. If you proceed to make changes to this form or any information on it, you will be certifying under penalty of perjury that you are authorized to make those changes, and that everything on the form is true and correct. In addition, persons who file documents with the commissioner that are known to the person to be false in material respects are guilty of a class A misdemeanor. Continuation means you have read this and understand it.

Name: Joel Borgquist

9589 0710 5270 1970 5474 17

U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

Earle River, AK 99577

Certified Mail Fee

\$4.85

\$

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$ \$4.10
- ☐ Return Receipt (electronic) \$ \$0.00
- ☐ Certified Mail Restricted Delivery \$ \$0.00
- ☐ Adult Signature Required \$ \$0.00
- ☐ Adult Signature Restricted Delivery \$ \$0.00

Postage

\$2.87

\$

Total Postage and Fees

\$11.82

\$

Sent To

Joel Borgquist
Street and Apt. No., or PO Box No.
18730 Mills Bay Dr
City, State, ZIP+4®
Earle River, AK 99577

PS Form 3800, January 2023 PSN 7530-02-000-9047

See Reverse for Instructions





Department of Commerce, Community, and Economic Development
**CORPORATIONS, BUSINESS & PROFESSIONAL
LICENSING**

State of Alaska / Commerce / Corporations, Business, and Professional Licensing / Search & Database Download /
Corporations / Entity Details

ENTITY DETAILS

Name(s)

Type	Name
Legal Name	Red Dirt Campaigns, LLC

Entity Type: Limited Liability Company

Entity #: 10255101

Status: Good Standing

AK Formed Date: 12/29/2023

Duration/Expiration: Perpetual

Home State: ALASKA

Next Biennial Report Due: 1/2/2027

Entity Mailing Address: 18730 MILLS BAY DR, EAGLE RIVER, AK 99577

Entity Physical Address: 18730 MILLS BAY DR, EAGLE RIVER, AK 99577

Registered Agent

Agent Name: Joel Borgquist

Registered Mailing Address: 18730 MILLS BAY DR, EAGLE RIVER, AK 99577

Registered Physical Address: 18730 MILLS BAY DR, EAGLE RIVER, AK 99577

Officials

☐ Show Former (None on file)

AK Entity #	Name	Titles	Owned
	Joel Borgquist	Manager, Member	80.00

Filed Documents

Date Filed	Type	Filing	Certificate
12/29/2023	Creation Filing	Click to View	Click to View
1/09/2024	Domestication	Click to View	Click to View
4/04/2024	Initial Report	Click to View	
12/31/2024	Biennial Report	Click to View	

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FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-1760904

1. KEEP IT ALASKA

502 6TH STREET
HUDSON, WI 54016
Email: COMPLIANCE@AXCAPTEAM.COM;TCDATWYLER@GMAIL.COM

2. Date: 02/29/2024

3. FEC Committee ID #: C00871525

This committee is an independent expenditure-only political committee (Super PAC).

Affiliated Committees/Organizations

NONE
, _____

Custodian of Records:

THOMAS DATWYLER
502 6TH STREET
HUDSON, WI 54016
Title: CUSTODIAN OF RECORDS
Phone # (202) 866-8229

Treasurer:

THOMAS DATWYLER
502 6TH STREET
HUDSON, Wisconsin 54016
Title: TREASURER
Phone # (202) 866-8229

Designated Agent(s):

Banks or Depositories

CHAIN BRIDGE BANK
1445A LAUGHLIN AVE
MCLEAN, Virginia 22101

Signed: THOMAS DATWYLER

Date Signed: 02/29/2024


(End FEC FORM 1)

Generated Tue Jul 29 14:53:41 2025

Federal Election Commission (800) 424-9530 In Washington (202) 694-1100
For the hearing impaired, TTY (202) 219-3336 Send comments and suggestions about this site to: webmanager@fec.gov.

Whitlock, John G (DOA)

From: joel borgquist.org <joel@borgquist.org>
Sent: Thursday, April 11, 2024 9:42 PM
To: Whitlock, John G (DOA); joel@reddirtcampaigns.com
Cc: Chung, Dyane (DOA); Hebdon, Heather R (DOA); Sargent, Mike David (DOA)
Subject: Re: Your call earlier to APOC (Keep it Alaska)

 **CAUTION:** This email originated from outside the State of Alaska mail system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi John,

Thanks for getting back to me. I have a few follow up questions.

1. Which statute prohibits candidates from being present at IE Group fundraisers/events? I couldn't find anything specific that would cover that. (Also, see freedom of association below, which covers the freedom to gather and for individuals to attend such gatherings).
2. The statute regarding the 1/3 contributions was unclear about the timeframe. Is that in a given election cycle or a shorter or longer time period?
3. With no way of guaranteeing future donations, how does one meet the 1/3 statute if they spend in any race but then expected donations do not materialize as planned for other races that were anticipated to be greater OR if they anticipate the earlier races being 1/3 or more but then receive greater donations than expected that push later races above the threshold? Some clarity would be much appreciated.
4. How does the 1/3 group naming statute align with the freedom of association in the US Constitution, whereas no group or individual can be compelled to associate with another group or individual? The US Government provides some excellent resources regarding this issue, including Congress (https://constitution.congress.gov/browse/essay/amdt1-8-1/ALDE_00013139/). The first paragraph, fourth to last paragraph, and second to last paragraph are very clear that we do not have to associate with any person or group against our will, particularly as it relates to political expression. The citations in each paragraph take you to specific US Supreme Court cases and US Law. Whereas IE Groups are specifically legally established by the First Amendment, it seems clear that Supreme Court rulings regarding freedom of association under the First Amendment must be respected. Can you give me some more clarity?

Thanks, again!

- Joel

Joel Borgquist
Chairman, Keep It Alaska

From: Whitlock, John G (DOA)
Sent: Thursday, April 11, 2024 3:16 PM
To: joel@reddirtcampaigns.com ; joel borgquist.org

Cc: Chung, Dyane (DOA) ; Hebdon, Heather R (DOA) ; Sargent, Mike David (DOA)

Subject: RE: Your call earlier to APOC (Keep it Alaska)

Hello Mr. Borgquist,

Thanks for reaching out to us via phone earlier in the day. I wanted to follow up with you regarding some of your questions via email.

1. Generally, an IE group supporting a candidate may not coordinate activities, including fundraisers, with the candidate. If you have more questions regarding specific activities, it would be helpful to have those in writing so that we may ensure a thorough response.
2. Additionally, it appears that you have amended your registration to indicate that more than 33 1/3 of your group's spending will be in support of Dave Bronson. Please note that under AS 15.13.050(b), you must include the candidate's name in your group's name. This statute is enclosed below my signature line.

Again, do not hesitate to reach out if you have any questions.

Thanks,

John Grover Whitlock

Paralegal

Alaska Public Offices Commission

2221 E. Northern Lights Blvd., Rm. 128

Anchorage, Alaska 99508

Phone: (907) 276-4176

Fax: (907) 276-7018

CONFIDENTIALITY NOTICE: This communication with its content and any attachments may contain confidential and/or legally privileged information. It is solely for the use of the intended recipient(s). Unauthorized interception, review, use, or disclosure is prohibited and may violate applicable laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

Sec. 15.13.050. Registration before expenditure.

(a) Before making an expenditure in support of or in opposition to a candidate or before making an expenditure in support of or in opposition to a ballot proposition or question or to an initiative proposal application filed with the lieutenant governor under AS 15.45.020, each person other than an individual shall register, on forms provided by the commission, with the commission.

(b) If a group intends to support only one candidate or to contribute to or expend on behalf of one candidate 33 1/3 percent or more of its funds, the name of the candidate shall be a part of the name of the group. If the group intends to oppose only one candidate or to contribute its funds in opposition to or make expenditures in opposition to a candidate, the group's name must clearly state that it opposes that candidate by using a word such as "opposes," "opposing," "in opposition to," or "against" in the group's name. Promptly upon receiving the registration, the commission shall notify the candidate of the group's organization and intent. A candidate may register more than one group to support the Revised May 2021 11 candidate; however, multiple groups controlled by a single candidate shall be treated as a single group for purposes of the contribution limit in AS 15.13.070 (b)(1).

(c) If a group intends to make more than 50 percent of its contributions or expenditures in support of or in opposition to a single initiative on the ballot, the title or common name of the initiative must be a part of the name of the group. If the group intends to make more than 50 percent of its contributions or expenditures in opposition to a single initiative on the ballot, the group's name must clearly state that the group opposes that initiative by using a word such as "opposes," "opposing," "in opposition to," or "against" in the group's name.

Who should be
our Mayor?

Ballots to be sent April 30!
VOTE by May 14

**Suzanne
LaFrance**



Career Politician

Spearheaded masking laws
Propped up by outside money
Anti-law enforcement

OVERRULED the construction of
Anchorage's homeless center!

Mayor 
Dave Bronson



Public Servant

Keeps Anchorage free and open
Backed by Alaskans
Supports law enforcement

Reduced crime and is
addressing the homeless crisis!

OR

Paid for by Keep It Alaska. Approved by Keep It Alaska Chairman Joel Borgquist. All individual donors live in Alaska!
The largest contributors are NAME (CITY), NAME (CITY), NAME (CITY)
PO Box 772081, Eagle River, AK 99577

Stone, Kim S (DOA)

From: Hebdon, Heather R (DOA)
Sent: Wednesday, April 17, 2024 2:44 PM
To: Whitlock, John G (DOA)
Subject: RE: Your call earlier to APOC (Keep it Alaska)

Mr. Borgquist,

Thank you for your patience with our response. The Commission has previously considered many questions about the activities of IE groups, such as Keep It Alaska. Shortly after the *Citizens United* decision, the Commission approved [AO 12-09-CD](#), which, it seems, would provide guidance relevant to most of your questions.

1. Which statute prohibits candidates from being present at IE Group fundraisers/events?

There is not a specific statute, per se, that prohibits the candidate's attendance. However, as you are aware, independent expenditure groups are prohibited from making expenditures that are coordinated with a candidate. At the time of your question, your group's registration reflected an intent to focus a significant portion of its spending on the election of Dave Bronson so it is not clear how the expenses related to a fundraiser in which Mayor Bronson would attend as a guest speaker to raise funds on behalf of Keep It Alaska, would be made without coordinating with him.

2. The statute regarding the 1/3 contributions was unclear about the timeframe. Is that in a given election cycle or a shorter or longer time period?

This isn't specifically defined in the statute, but is based on a group's intended activities. See also AO 12-09-CD and [14-17-CD](#).

3. With no way of guaranteeing future donations, how does one meet the 1/3 statute if they spend in any race but then expected donations do not materialize as planned for other races that were anticipated to be greater OR if they anticipate the earlier races being 1/3 or more but then receive greater donations than expected that push later races above the threshold? Some clarity would be much appreciated.

Again, the statute is based on the group's intended activities and if you are able to provide more specific information about the group's planned activities, staff may be able to provide further guidance. See also AO 12-09-CD.

4. How does the 1/3 group naming statute align with the freedom of association in the US Constitution, whereas no group or individual can be compelled to associate with another group or individual? The US Government provides some excellent resources regarding this issue, including Congress (https://constitution.congress.gov/browse/essay/amdt1-8-1/ALDE_00013139/). The first paragraph, fourth to last paragraph, and second to last paragraph are very clear that we do not have to associate with any person or group against our will, particularly as it relates to political expression. The citations in each paragraph take you to specific US Supreme Court cases and US Law. Whereas IE Groups are specifically legally established by the First Amendment, it seems clear that Supreme Court rulings regarding freedom of association under the First Amendment must be respected. Can you give me some more clarity?

We understand your concerns, but constitutional questions such as this are likely better addressed to the lawmakers within the Alaska Legislature. As a state agency, it is our responsibility to enforce the laws as dictated by the legislature.

As to your questions about the mailer, staff has reviewed the content and notes the following:

- [AS 15.13.090\(a\)\(2\)\(C\)](#) requires identifying by Name, City, and State, Keep It Alaska's top 3 contributors.
- If Keep It Alaska is an outside-funded entity as defined under [AS 15.13.400\(15\)](#), then [AS 15.13.090\(g\)](#) may apply ["a majority of contributions to Keep It Alaska came from outside the state of Alaska"]. While your example mailer states "all individual donors live in Alaska!" it is not clear whether this is intended for purposes of .090(g)

and without any understanding of Keep It Alaska's sources of funding, whether it might substantially satisfy the requirements of .090(g).

- [AS 15.13.135](#) also requires the following statement be placed in the communication: "This NOTICE TO VOTERS is required by Alaska law. (I/we) certify that this (mailing/literature/advertisement) is not authorized, paid for, or approved by the candidate."
- Provided the photos used were not obtained through any coordination with the candidates, it would not appear to run afoul of our statutes or regulations.

From: Joel Borgquist
Sent: Tuesday, April 16, 2024 8:56 AM
To: Whitlock, John G (DOA)
Cc: Chung, Dyane (DOA) ; Sargent, Mike David (DOA) ; Hebdon, Heather R (DOA)
Subject: Re: Your call earlier to APOC (Keep it Alaska)

Some people who received this message don't often get email from chair@keepitalaska.org. [Learn why this is important](#)

Hi John,

While we await your response, can you or one of your colleagues at APOC respond to the following items on the attached tester piece. As this is a tester for our first communication, we want to ensure that we are meeting all laws and guidelines. We will replicate the tester in our other communications.

In particular, can you respond on the:

- Communication disclaimer at the bottom of the tester
- Whether the photos obtained on the internet used in the tester would violate any statutes or APOC guidelines
- Any other item that we may not be aware of

Thank you!

- Joel

Joel Borgquist
Chairman, Keep It Alaska

From: Joel Borgquist <chair@keepitalaska.org>
Sent: Tuesday, April 16, 2024 8:47 AM
To: Whitlock, John G (DOA) <john.whitlock@alaska.gov>
Cc: Chung, Dyane (DOA) <dyane.chung@alaska.gov>; Sargent, Mike David (DOA) <mike.sargent@alaska.gov>; Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Subject: Re: Your call earlier to APOC (Keep it Alaska)

Hi John,

Unfortunately, due to the delay in hearing back on whether supported candidates can attend our fundraising events without facing repercussions, we were forced to cancel our fundraiser to support Dave Bronson's race.

Timely responses on urgent questions are essential when ballots are a mere two weeks from being mailed and we are trying to exercise our First Amendment Rights without facing negative political, legal, and financial consequences that would result from an APOC finding against us and/or the candidate we are supporting.