

[TAB 11]

**Complaints 26-06-CD/26-08-CD,
Alaskans for Better Elections v.
Repeal Now,
Aurora Action Network,
Advancing Alaska Action**

Presented By:

Kim Stone, Campaign Disclosure Coordinator



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Administration

ALASKA PUBLIC OFFICES COMMISSION

2221 E. Northern Lights Blvd., Rm. 128
Anchorage, AK 99508-4149
Main: 907.276.4176
Fax: 907.276.7018
www.doa.alaska.gov/apoc

TO: APOC Commissioners
DATE: August 14, 2026
FROM: APOC staff
SUBJECT: Staff Report consolidated complaints:
26-06-CD, *Alaskans for Better Elections v. Repeal Now, Aurora Action Network, Advancing Alaska Action*
26-08-CD, *Alaskans for Better Elections v. Repeal Now, Aurora Action Network*

PROCEDURAL SUMMARY

Complainant Alaskans for Better Elections (ABE) on May 28, 2026 filed complaint 26-06-CD¹ against respondents Repeal Now, Aurora Action Network (AAN), and Advancing Alaska Action, Inc. alleging violations of Alaska's campaign disclosure laws. All parties filed Answers on June 22, 2026.² On July 7, 2026, ABE filed the second, expedited complaint 26-08-CD alleging further violations against respondents Repeal Now and AAN.³ Respondents to the second complaint filed Answers on July 29, 2026.⁴

¹ [Complaint 26-06-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27937), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27937>.

² [Answer AAN 26-06-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27810), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27810>;
[Answer Repeal Now 26-06-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27925), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27925>;
[Answer Advancing Alaska Action 26-06-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27809),
<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27809>.

³ [Complaint 26-08-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27828), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27828>.

⁴ [Answer Repeal Now 26-08-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27893), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27893>;
[Answer AAN 26-08-CD](https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27892), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27892>.

The Commission consolidated the matters and denied expedited consideration but ordered APOC staff to complete a full investigation and issue a staff report to the parties by August 14, 2026.⁵

A summary of staff’s findings and recommendations to the Commission is found at the end of this report.

INTRODUCTORY BACKGROUND

Ballot Measure No. 2 – 24ESEG is “[a]n Act to repeal a nonpartisan and open top four primary election system and ranked-choice general election system, and to reestablish a partisan political primary and change necessary and related appointment procedures; reestablish special runoff elections, and repeal and amend independent expenditure (IE) group requirements.”⁶ The Alaska Division of Elections certified the original initiative proposal application for the November 2026 ballot on February 14, 2026.

Repeal Now is an APOC registered ballot proposition group whose purpose is to repeal ranked choice voting law.⁷ Prior to 24ESEG’s certification for the ballot, Repeal Now had been registered as an initiative proposal application group, with the same listed purpose.⁸ Aurora Action Network (AAN) is a Federal Election Commission (FEC) registered, independent expenditure-only political action committee (PAC), not registered with APOC but which has contributed to Repeal Now. Advancing Alaska Action, Inc.⁹ is not registered with APOC but has contributed to AAN.

⁵ [Order Consolidating 26-08-CD and 26-08-CD](#),

<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27837>; [Order Denying Expedited Consideration](#), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=27838>.

⁶ Alaska Division of Elections, Petitions and Ballot Measures, [24ESEG-Bill.pdf](#), <https://www.elections.alaska.gov/petitions/24ESEG/24ESEG-Bill.pdf>.

⁷ [Repeal Now ballot proposition group registration](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=6775&ViewType=GR>.

⁸ [Repeal Now initiative proposal application group registration](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=6567&ViewType=GR>.

⁹ “Advancing Alaska Action” and “Advancing Alaska Action, Inc.” both appear in the State of Alaska business license database. Advancing Alaska Action, Inc., respondent in this matter, is entity #10298676, a nonprofit political organization corporation formed January 23, 2025 with the mailing and physical address at 721 Depot Dr, Anchorage AK, 99501.

On May 28, 2026, ABE filed complaint 26-06-CD against Repeal Now, AAN, and Advancing Alaska Action, Inc. and on July 7, 2026 filed complaint 26-08-CD against Repeal Now and AAN, requesting expedited consideration.

In 26-06-CD, ABE alleges Repeal Now is fraudulently using an Anchorage address instead of its originally listed Wisconsin address as its “principal place of business” in its paid-for-by disclaimers to obscure the fact that most of its funds come from non-Alaskans. ABE also alleges the group inaccurately described the ballot measure it supports, failed to file a required quarterly report, failed to report the true source of a contribution received from Advancing Alaska Action, Inc., and that its reporting of contributions received from Aurora Action Network contained date and amount discrepancies. In 26-08-CD, ABE alleges Repeal Now has continued to misidentify its principal place of business and additionally has posted two videos on its YouTube channel that lack paid-for-by identifiers and that it misrepresented the identity of its third largest contributor, LOT, Inc.

Against AAN in 26-06-CD, ABE alleges similar or corresponding date and amount reporting discrepancies related to funds AAN contributed to Repeal Now. ABE also alleges AAN untruthfully changed its principal place of business to facilitate Repeal Now’s deception that its communications were paid for by Alaskans. ABE finally alleges inaccuracies in AAN’s true source reporting concerning a contribution received from Advancing Alaska Action, Inc. In 26-08-CD, ABE additionally alleges continuing violations related to AAN’s principal place of business.

Regarding Advancing Alaska Action, in 26-06-CD, ABE alleges it made a \$5,000 contribution to Repeal Now through AAN as an intermediary but that both Repeal Now and AAN incorrectly reported Advancing Alaska Action, Inc. as the true source of the contribution. ABE also alleges Advancing Alaska Action, Inc. did not file a statement of contributions form.

ABE's ALLEGATIONS IN 26-06-CD AND 26-08-CD

This report groups analysis of allegations and findings into three areas: 1) AAN's listing and Repeal Now's use of an Anchorage address in its communication disclaimers, including whether AAN or its individual true sources are the "contributor(s)" in the analysis; 2) general discrepancies between the reporting of AAN and Repeal Now; and 3) ABE's additional, separate allegations against individual respondents.

1. Whether intermediary AAN or its individual true sources are considered for purpose of determining Repeal Now's three largest contributors, and whether Repeal Now properly identified Anchorage as AAN's principal place of business

ABE emphasizes that Repeal Now originally, and for most of the group's existence, identified the Hudson, Wisconsin address of AAN's treasurer Thomas Datwyler as AAN's principal place of business to identify the address of its top contributor in its paid-for-by disclaimers. ABE alleges that at some point in April 2026, Repeal Now began fraudulently identifying Anchorage as AAN's principal place of business to obscure the fact that more than 75% of AAN's contributions come from a single, non-Alaskan individual, Jeff Yass of Pennsylvania.¹⁰

However, determining AAN's principal place of business is unnecessary unless it is first determined that AAN, rather than any of its true sources, is the "contributor" to be considered under AS 15.13.090(a)(2)(C)'s largest contributor analysis.

a) Background Facts

On March 20, 2025 Repeal Now registered with APOC as an initiative proposal group, naming Alaska resident Bethany Marcum as Treasurer.¹¹ Repeal Now's first and

¹⁰ More recently, a \$1,500,000 contribution by the individual Elon Musk changes the identity of AAN's largest donor but does not change the general analysis of this report.

¹¹ [Repeal Now initiative proposal application group registration](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=6567&ViewType=GR).

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=6567&ViewType=GR>.

second contributions came from Marcum and Alaska resident Bob Griffin.¹²

On June 6, 2025 AAN registered with the FEC as a Super PAC.¹³ AAN has since identified Marcum and Griffin as those involved in the formation, coordination, control, and decision-making of AAN.¹⁴ AAN further identifies Marcum as AAN’s Executive Director and Griffin as AAN’s Chairman.¹⁵ AAN also describes its Wisconsin-based treasurer Thomas Datwyler and Utah-based fundraising consultant Rachel Critchell as involved in the organization’s formation and decision making.¹⁶ AAN’s attorney is Derek Ross of Irvine, California.¹⁷ In its original Statement of Organization, AAN listed Datwyler’s Hudson, Wisconsin address as its own address and listed a local bank as its FEC depository.¹⁸ AAN has used the Wisconsin address in all of its AS 15.13.040(k) Statements of Contributions filings.¹⁹

According to FEC records, AAN made its first contribution of \$27,000 to Repeal Now on June 23, 2025, approximately two weeks after AAN’s organization as a Federal

¹² [Repeal Now First Quarterly Report](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=47520&ViewType=CD>. The parties refer to Mr. Griffin by the first name Bob and Robert and this report assumes the references are to the same person.

¹³ Exhibit 1, FEC Statement of Organization AAN.

¹⁴ Exhibit 2, AAN Response to APOC Request for Information, *see also* Answer AAN 26-08-CD, p. 4.

¹⁵ *Id.*

¹⁶ Exhibit 2, AAN Response to APOC Request for Information, *see also* AAN Response 26-08, p. 4.

Rachel Critchell appears to be the manager of the Ullr Group, LLC, Exhibit 3, State of Utah, Department of Commerce, Division of Corporations and Commercial Code search, *see also* [Utah Business Registration](#). FEC disbursement records show AAN has paid The Ullr Group LLC \$82,500 since June 23, 2025. Exhibit 4, FEC disbursements AAN.

¹⁷ AAN’s counsel Ross is not a member of the Alaska Bar Association but “appears in this administrative proceeding as counsel for Respondent [AAN] pursuant to Alaska RPC 5.5, as this matter arises out of and is reasonably related to his practice in the jurisdictions in which he is admitted.” *See* Answer AAN 26-08-CD, p. 8.

¹⁸ Exhibit 1, FEC Statement of Organization AAN. First Resource Bank has locations Eastern Minnesota and Western Wisconsin. [Locations & Hours - First Resource Bank](#)

¹⁹ [AAN Statement of Contributions \\$27,000](#) and [AAN Statement of Contributions \\$5,000](#) filed July 7, 2025, [AAN Statement of Contributions \\$25,000](#), [AAN Statement of Contribution \\$64,000](#), [AAN Statement of Contribution \\$15,000](#), [AAN Statement of Contributions \\$30,000](#), and [AAN Statement of Contributions \\$19,500](#), all filed November 10, 2025, [AAN Statement of Contribution \\$50,000](#) filed February 3, 2026, [AAN Statement of Contributions \\$517,250](#) filed February 12, 2026, [AAN Statement of Contributions \\$250,000](#) filed April 10, 2026, [AAN Statement of Contributions \\$100,000](#) filed April 28, 2026, [AAN Statement of Contributions \\$250,000](#) filed May 14, 2026, and [AAN Statement of Contributions \\$250,000](#) filed June 19, 2026.

PAC,²⁰ and followed with 11 more contributions to Repeal Now through June 30, 2026, totaling approximately \$845,000.²¹ FEC records reflect that Repeal Now is the only entity to whom AAN has donated.²² For purposes relevant to this matter, AAN is Repeal Now's largest contributor.

At some point after February 2026, Robert Griffin became involved as an officer with AAN. In response to APOC's request to describe the events leading to AAN's address change to Griffin's personal residence, Repeal Now and AAN offered verbatim accounts that "(d)uring the first week of April 2026, Ms. Marcum facilitated an introduction" between Datwyler and Griffin,²³ and shortly thereafter Griffin authorized the use of his personal residential address for AAN's change to Alaska.²⁴ AAN reports it has received mail, including contribution checks, at Griffin's address.²⁵

On April 7, 2026, AAN changed its address of record with the FEC to Griffin's residential address. At some point thereafter, Repeal Now began identifying Anchorage, Alaska as the principal place of business of its largest contributor – AAN – in its communication disclaimers.

b) Repeal Now's largest contributor for purposes of its paid-for-by communication disclaimers

Alaska campaign disclosure law requires all communications be "clearly identified by the words 'paid for by'" and include the name and address of the person paying for the communication.²⁶ Additionally, the paid-for-by disclaimer must identify the "principal

²⁰ Exhibit 1, FEC Statement of Organization AAN, and Exhibit 4, FEC disbursements AAN.

²¹ Exhibit 4, AAN's FEC disbursements, pp. 3-5.

²² *Id.*

²³ Exhibit 2, AAN Response to APOC Request for Information, p. 3, Exhibit 5, Repeal Now Response to APOC Request for Information, p.3 and Affidavit of Robert Griffin.

²⁴ *Id.*

²⁵ Exhibit 2, AAN Response to APOC Request for Information, p. 3.

²⁶ AS 15.13.090(a). "Communication" means an announcement or advertisement disseminated through print or broadcast media, including radio, television, cable, and satellite, the Internet, or through a mass mailing, excluding those placed by an individual or nongroup entity and costing \$500 or less and those that do not directly or indirectly identify a candidate or proposition, as that term is defined in [AS 15.13.065\(c\)](#). AS 15.13.400(3).

place of business . . . of each of the persons three largest contributors under AS 15.13.040(e)” during the 12 months preceding the communication.²⁷

A threshold inquiry, preliminary to any discussion of AAN’s principal place of business, is whether AAN, the organization, is one of Repeal Now’s top three contributors under 15.13.090(a)(2)(C) or whether Repeal Now must instead name AAN’s true sources as top contributors under the statute.

Following the statutory path that begins with AS 15.13.090:

AS 15.13.090(a)(2)(C) requires a group to identify its “three largest contributors under AS 15.13.040(e)(5),” which requires persons making independent expenditures to disclose their contributors.

Additionally, AS 15.13.040(q) directs that for purposes of .040(e)(5) – disclosing contributors – “contributor” means the true source of the funds being contributed.²⁸

AAN, critically, is not a true source; it is an intermediary that receives contributions from individual true sources.²⁹

So, while AAN as an intermediary organization has contributed the largest amount to Repeal Now, AS 15.13.040(e), via AS 15.13.040(q), directs that the relevant numbers for analysis of Repeal Now’s ranking of its top three contributors are the individual contribution amounts of AAN’s individual true sources. Under a strict application of the statute, the largest contributors to Repeal Now are AAN’s true sources, including the individuals Elon Musk and Jeffrey Yass.

However, APOC staff believes an approach that considers the contributing organization’s true sources’ contribution amounts could lead to disjointed results that were neither intended nor contemplated. An example: if an intermediary that has received

²⁷ “Contributor” as used in AS 15.13.040(e) “means the true source of the funds.” AS 15.13.040(q); AS 15.13.090(a)(1)(C).

²⁸ AS 15.13.040(q): For purposes of (b), (e), and (j) of this section, “contributor” means the true source of the funds, property, or services being contributed (emphasis added).

²⁹ “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 a legal entity who derived funds via contributions, donations, dues, or gifts is not the true source, but rather an intermediary for the true source. AS 15.13.400(19) (subject to an exception not relevant here).

several individual contributions of \$10,000 thereafter makes a single \$100 contribution to a group that has received only \$5,000 in total contributions, the group's paid-for-by disclaimer would need to identify the intermediary's \$10,000 true sources as its largest contributors – even though the receiving group took in only \$100 from that intermediary.

APOC staff submits that Alaskans are better able to understand the source, quantity, timing, and nature of resources used to influence candidate elections when an IE group's ranking of top three contributors reflects the amount the group receives and from whom, rather than what an entity who contributes to that IE group received from that entity's own donors. And the language of AS 15.13.090 at subsection (e) – “in no case shall a person be required to identify more than three contributors under (a)(2)(C)” – conveys a distinct intent to make identifying the top three contributors a straightforward process for groups to comply with and for Alaskans to understand. The more understandable approach would require an IE group to list its top three contributors according to the amount the group itself received, rather than the amount a contributing organization received from a true source.

APOC staff believes this approach strengthens rather than weakens campaign disclosure law. By ranking its three largest contributors by the amounts it received (as opposed to the intermediary's individual true sources), the receiving group offers the public more usable information. This is particularly true where the intermediary itself is one of the top three contributors, because an intermediary's name typically is more recognizable to the public (for example, the Sierra Club or the National Rifle Association) than names of individual true sources, particularly non-resident individuals. Even where an intermediary organization is less well known, public information generally is more available on it through basic internet searching than on individual true sources who made contributions. And under APOC's online filing system, the public has more access to information concerning a listed intermediary than its individual true source contributors because intermediaries contributing to IE groups making independent expenditures in candidate elections must report under AS 15.13.040(r), whereas the intermediary's true sources may have no such reporting requirement.

Based on the above logic, APOC staff recommends the Commission find that Repeal Now's ranking of its top three contributors should reflect amounts Repeal Now received and from whom, rather than what AAN, the entity who contributed to Repeal Now, received from its own donors.

If the Commission agrees, the next inquiry is whether Repeal Now, in ranking AAN as its top contributor based upon the total amount it received from AAN, correctly listed AAN's principal place of business. If the Commission disagrees with the logic set forth above, Repeal Now's top three contributors, as of the date of this staff report, would likely be Elon Musk of Austin, Texas, Jeff Yass of Bala Cynwyd, Pennsylvania, and Timothy Mellon of Saratoga, Wyoming,³⁰ and AAN's principal place of business is no longer relevant.

c) Whether Repeal Now and AAN have improperly used an Anchorage address as AAN's principal place of business on its communication disclaimers

If the Commission agrees that AAN as an organization rather than AAN's individual true sources should be considered in the 15.13.090 ranking of Repeal Now's top three contributors, the next question concerns the identification of Anchorage, Alaska as AAN's principal place of business.

APOC staff found no Commission authority providing guidance on how to interpret or apply the principal place of business standard under AS 15.13.090.³¹ APOC staff review of Alaska legislative history also did not find substantive or meaningful guidance as to the application of principal place of business in the context of AS 15.13.090, outside of

³⁰ APOC staff has not undertaken a thorough analysis of who Repeal Now's top three contributors would be if AAN's true source contributors were considered in the analysis, but basic review of both organizations' reporting makes clear the top two contributors would be Musk and Yass, with a determination of the third largest contributor requiring further analysis.

³¹ Complainant ABE, in response to APOC staff's invitation to submit legal authority, stated it was unable to locate Commission advisory opinions or APOC orders on the issue. AAN, Repeal Now, and Advancing Alaska Action did not provide authority.

reference to its use in the federal civil court context.³² ABE, in response to APOC’s invitation to submit legal authority, similarly reviewed the legislative process behind the relevant language of AS 15.13.090, as enacted through Senate Bill 284 in 2010, and found “little was said about the phrase ‘principal place of business’ throughout the legislative process.”³³

The parties now encourage APOC to determine AAN’s principal place of business under the “nerve center” test set forth in *Hertz Corp. v. Friend*,³⁴ a standard used by federal courts to determine corporate diversity jurisdiction. Under the nerve center approach, an entity’s principal place of business is where its officers direct, control, and coordinate its activities; as AAN suggests, “where the real decisions get made.”³⁵

APOC staff declines to adopt the *Hertz* “nerve center” test as a *de facto* standard to interpret principal place of business of contributors under campaign disclosure law. Notwithstanding the common “principal place of business” verbiage, the *Hertz* test does not neatly transfer to campaign disclosure law that requires identification of contributors. AAN itself is not a corporation but rather a political organization. Similarly, many other types of contributors to Alaska campaigns including various groups and entities beyond Federal PACs, whose principal place of business must be identified under 15.13.090, are likewise not corporations, and a test created for purposes of corporate federal diversity jurisdiction has even less application.

Additionally, evidence to determine a corporation’s principal place of business under the *Hertz* test may not be readily available for a federal PAC or the different types of contributors” to which AS 15.13.090 applies. Corporations under state and federal law are subject to record keeping requirements which federal PACs are not; records that could assist in a factual determination of “where the corporation’s high-level officers direct,

³² ABE provided a review of the legislative process behind the phrase “principal place of business” contained in AS 15.13.090, as enacted through Senate Bill 284 in 2010. behind AS 15.13.090. . . and notes that “From Complainant’s initial review of the legislative history surrounding SB 284, it appears that little was said about the phrase “principal place of business” throughout the legislative process.”

³³ Exhibit 6, ABE Legal Authority submitted July 21, 2026.

³⁴ 559 U.S. 77 (2010).

³⁵ Exhibit 2, AAN Response to APOC Request for Information.

control, and coordinate the corporation’s activities”³⁶ do not exist for PACs, groups, etc. For example, applying the *Hertz* test to an Alaska corporation would be assisted by publicly available corporate information – including a corporation’s entity type, physical and mailing address, named officers and directors, and biennial reports – but the same information does not exist for a Federal PAC.

In the instant case, AAN’s FEC filings provide little or no information relevant to the *Hertz* “nerve-center” test. The sole individual named is Thomas Datwyler; while AAN identifies Datwyler as one involved in the formation, coordination, and control and decision-making of AAN (thus making his location relevant under the *Hertz* determination), it also describes Datwyler as nothing more than a “treasurer-for-hire”: a “hired compliance vendor” who “keeps AAN’s books and files its reports.”³⁷ Both AAN and Repeal Now assert that AAN’s “major decisions are made in Anchorage.”³⁸

Additionally, while encouraging the *Hertz* approach, both AAN and Repeal Now emphasize that most federal PACs, including AAN itself, have no brick-and-mortar location where they do business, making the *Hertz* consideration of a corporation’s “main headquarters” again, inapt to AS 15.13.090. AAN also argues that modern PACs operating in the digital age (including itself), typically do not own or lease office space, have geographically disperse officers and advisors, make decisions via email, phone, and video, sign contracts and manage funds remotely – and “a physical address where AAN’s officers sit around a conference table and make decisions . . . does not exist.”³⁹

Taken as true, all of these factors again reveal APOC should not adopt the *Hertz* test as the *de facto* evaluative standard to determine the principal place of business of contributors to Alaska campaigns.

For these reasons, APOC staff recommends against adopting a test developed to determine the “nerve center” of a corporate entity for purposes of corporate diversity

³⁶ *Hertz*, 559 U.S. at 80-81.

³⁷ Answer AAN 26-08-CD.

³⁸ Answer Repeal Now 26-08-CD, p.5

³⁹ Exhibit 2, AAN Response to APOC Request for Information.

jurisdiction to determine a contributor’s principal place of business for purposes of Alaska campaign disclosure law.

As Commission authority in the form of Advisory Opinions or Commission Orders do not appear to exist, and lacking guidance from the legislative process, the phrase’s application to paid-for-by rankings under AS 15.13.090 presents a novel issue.

Important, too, in this analysis is the consideration that APOC staff bears the burden of proving a violation by a preponderance of the evidence.⁴⁰ A complaint must include “a clear and concise description of fact that, if true,” would violate relevant statutes.⁴¹ The question thus becomes whether a preponderance of the evidence, based upon the facts presented in the complaint, shows AAN violated AS 15.13.090 by listing Anchorage as its principal place of business.

While not strictly applying the *Hertz* test, APOC staff considers aspects of the test that appear relevant under campaign disclosure law and which the parties themselves encourage, including where the decisions are made, where the officers are located, and physical address.

Applying the following facts:

AAN describes its purpose as “political activity in Alaska,” that its disbursements are directed “toward Alaska political campaigns and causes,” and its decisions focus on Alaska politics and electorate.⁴² FEC records reflect Repeal Now is the only organization to which AAN has contributed since AAN organized. AAN identifies its leadership as Alaska residents Marcum and Griffin and indicates they direct AAN’s financial operations, oversee FEC compliance reporting, manage its vendor relationships, control the timing and amount of wire transfers, and make decisions concerning AAN’s activities.⁴³ The change

⁴⁰ 2 AAC 50.891(d).

⁴¹ 2 AAC 50.870(b)(4).

⁴² Answer AAN 26-06-CD.

⁴³ Answer AAN 26-06-CD, p. 4. Given the ubiquity of electronic banking, the physical location of an organization’s bank is not considered a substantial factor in the analysis.

of principal place of business occurred when the second Alaska resident Griffin became an officer.⁴⁴

ABE argues AAN's use of the Wisconsin address in its statement of contributions reports under AS 15.13.040(k) demonstrates that AAN's use of the Anchorage address for AS 15.13.090(a)(2)(C) must be fraudulent. But AS 15.13.040(k) notably does not require a contributor to identify and use its principal place of business for purpose of contribution reporting in the same way that AS 15.13.090 requires it of paid-for-by disclaimers. AAN's use of separate addresses for each requirement does not, on its own, indicate fraud or necessarily demonstrate a violation of campaign disclosure law, as nothing precludes the use of different addresses for different purposes in this context.

AAN and Repeal Now appear to work together and coordinate their efforts. The organizations originated within months of each other; share their original leadership (Marcum as both Repeal Now's Treasurer and AAN's Executive Director); AAN's Marcum and Griffin made Repeal Now's first and second contributions, just weeks after Repeal Now registered; and the organizations share many of the same contributors. The organizations have responded to these APOC complaints with similar and even verbatim responses. All support that the two organizations closely associate and coordinate their efforts, with AAN funneling out-of-state contributions to Repeal Now. But these points support rather than detract from the idea that AAN's principal place of business cannot be considered Anchorage. APOC staff considers that AAN's fundraising consultant Critchell is a Utah resident and its treasurer Datwyler resides in Wisconsin but does not find these facts determinative to the inquiry.

APOC staff concludes AAN and Repeal Now have pointed to a sufficient basis for AAN to identify Anchorage as its principal place of business and for Repeal Now to identify Anchorage on its paid-for-by disclaimers. APOC staff does not find a preponderance of the evidence supports that AAN violated AS 15.13.090 by listing AAN's

⁴⁴ Complaint 26-06-CD; Exhibit 2, AAN Response to APOC Request for Information.

principal place of business as Anchorage and recommends the Commission dismiss the allegation.

2. Reporting discrepancies between AAN and Repeal Now reporting

ABE points to inconsistencies between Repeal Now's and AAN's APOC reporting, arguing that in several places the organizations' reported amounts and dates of contributions do not reconcile with each other, indicating campaign disclosure violations.

Of the discrepancies ABE alleges, Repeal Now responds directly to only one: a \$500 difference in contributions it received from AAN on July 31, 2025. Repeal Now concedes a \$500 "administrative" error in its reporting (listing \$45,000 rather than the correct \$44,500) and states it has corrected the error.⁴⁵ However, the most recent (June 17, 2026) amendment of the original August 9, 2025 IE report still reflects the incorrect \$45,000 amount. As Repeal Now has conceded the error, APOC staff recommends a finding that Repeal Now's IE report of August 9, 2025 was erroneous, with a penalty running from that date until the filing of the complaint tolled penalty accrual, and that the Commission order Repeal Now to correct the report within 10 days of the order in this matter.

ABE's remaining allegations of reporting discrepancies between AAN and Repeal Now reporting are as follows:

- a) [Against AAN and Repeal Now] "There are different dates for a sizeable contribution AAN made to Repeal Now in June 2025. At some point that month, Damien Stella contributed \$30,000 to AAN, who then in turn contributed \$27,000 to Repeal Now. But the dates of AAN's contribution to Repeal Now are not consistent."**

ABE cites the following reports in support of its allegation:

- Repeal Now reported on a July 7, 2025 IE report⁴⁶ and in its 2025 second quarterly report filed July 10, 2025⁴⁷ a contribution of \$27,000 from AAN on June 23, 2025.

⁴⁵ Answer Repeal Now 26-06-CD, p. 1.

⁴⁶ ABE Exhibit 2G to Complaint 26-06-CD.

⁴⁷ ABE Exhibit 3B to Complaint 26-06-CD.

- AAN’s FEC reports⁴⁸ indicate it received a \$6,000 contribution from Damien Stella⁴⁹ and made a \$27,000 contribution to Repeal Now⁵⁰ both on June 23, 2025.
- AAN’s July 7, 2025 Statement of Contributions discloses a \$5,000 contribution to Repeal Now on June 27, 2025 that was received from true source Stella on June 23, 2025.⁵¹
- AAN’s February 12, 2026 amended Statement of Contributions “correcting the true source donors” appears to show most or all of AAN’s contributions to Repeal Now during 2025-2026 and lists Stella as a true source of a \$6,000 contribution to AAN on June 27, 2025.⁵²
- AAN’s April 10, 2026 Statement of Contributions shows contributions to Repeal Now of \$250,000 on April 8, 2026, with Stella listed as true source of a June 27, 2025 contribution of \$6,000.⁵³
- AAN’s April 28, 2026 Statement of Contributions shows contributions to Repeal Now of \$100,000 on April 27, 2026, with Stella listed as true source of a June 27, 2025 contribution of \$6,000.⁵⁴
- AAN’s May 14, 2026 Statement of Contributions shows contributions to Repeal Now of \$350,000 on April May 13, 2026, with Stella listed as true source of a June 27, 2025 contribution of \$6,000.⁵⁵

From ABE’s extremely limited argument on this issue, and after review of those reports ABE cites in support, APOC staff understands ABE’s allegation to be that Stella contributed a total of \$30,000⁵⁶ to Repeal Now, through AAN, through five *separate*

⁴⁸ Exhibit 7, FEC contributions AAN.

⁴⁹ ABE Exhibit 4D to Complaint 26-06-CD.

⁵⁰ ABE Exhibit 2G to Complaint 26-06-CD.

⁵¹ ABE Exhibit 5A to Complaint 26-06-CD.

⁵² ABE exhibit 5H to Complaint 26-06-CD.

⁵³ ABE exhibit 5I to Complaint 26-06-CD.

⁵⁴ ABE exhibit 5J to Complaint 26-06-CD.

⁵⁵ ABE exhibit 5K to Complaint 26-06-CD.

⁵⁶ APOC staff believes the intended sum may be \$29,000 rather than \$30,000, based upon the listed reporting.

contributions (\$5,000 on June 23, 2025 and four more contributions of \$6,000 on June 27, 2025) rather than as single transaction.

Repeal Now does not respond directly to the allegation, but cites in-person guidance from APOC staff “to list all true source donors to Aurora Action Network” in its reporting, “even when the true source contribution amounts don’t match up with contribution amounts being reported.”⁵⁷ Repeal Now argues that its subsequent reporting amendments reflect all AAN true source donor names as AAN provided, and Repeal Now’s reporting therefore is consistent with APOC guidance and “moots the alleged discrepancies” of ABE’s complaint.

AAN did not respond to the allegation individually but broadly maintains it has no duty to correct “any variance between Repeal Now’s records and AAN’s.”⁵⁸

Based upon ABE’s limited argument in support of its allegation and the lack of specific response from parties AAN and Repeal Now, APOC staff finds ABE has provided some evidence of possible reporting inaccuracies but is unable to determine whether violations have occurred. APOC staff recommends the Commission continue this allegation of the complaint to allow ABE the option to clarify its allegation and thereafter allow AAN and Repeal Now to amend its responses, if needed.

- b. [Against Repeal Now] “Repeal Now has repeatedly post-dated “true source” contributions. Specifically, there are at least seven (7) instances where Repeal Now is claiming to have received funds from a true source on one day, while at the same time claiming that the “true source” did not contribute the underlying funds until after the date of the reported contribution. This post-dating has the effect of falsely attributing donors as the true source of funds in clear violation of Alaska law.”⁵⁹**

In support of this allegation, ABE points to two Repeal Now IE reports. Repeal Now filed the first IE report August 9, 2025⁶⁰ reflecting an AAN contribution of \$45,000 that Repeal now received on July 31, 2025 but where AAN did not itself receive the true source

⁵⁷ Answer Repeal Now 26-06-CD, p. 3.

⁵⁸ Answer AAN 26-06-CD, p. 4.

⁵⁹ ABE Complaint 26-06-CD, p. 22.

⁶⁰ ABE Exhibit 2J and 2L to Complaint 26-06-CD.

contributions until after that date. Next, a September 13, 2025 Repeal Now IE report reflects an AAN contribution made to Repeal Now of \$30,000 on August 29, 2025, but where AAN did not itself receive the true source contributions until after Repeal Now reported receiving the funds.

APOC staff finds ABE’s allegation substantiated by a preponderance of the evidence and recommends the Commission find Repeal Now’s reports for these dates were erroneous. APOC staff further recommends the Commission order Repeal Now to correct the reports within 10 days of its order in this matter, working with AAN as needed to ensure their reports are consistent.

- c. [Against AAN and Repeal Now] “There are different amounts for a sizeable contribution that AAN made to Repeal now on October 20, 2025. The \$5,000 discrepancy should be accounted for, and corrected by one or both entities if necessary. Moreover, Repeal Now failed to include this sizable contribution – no matter its size – on any independent expenditure 15-6 form.”**

In support of its allegation, ABE cites Repeal Now’s fourth quarterly report filed January 10, 2026 which shows a \$15,000 contribution from AAN received by Repeal Now on October 20, 2025,⁶¹ AAN’s FEC report which reflects a \$15,000 contribution to Repeal Now made on October 20, 2025,⁶² and an AAN amended statement of contributions report submitted November 10, 2025 reporting a \$15,000 contribution to Repeal Now made on October 20, 2025 with true sources Albert Haynes and Leon Chandler.⁶³

Based on the ABE’s citations to these documents and minimal argument, a \$5,000 discrepancy is not apparent and APOC staff does not find by a preponderance of evidence that the reporting is erroneous.

On ABE’s second allegation, APOC staff does not see disclosure of the October 20, 2025 contribution on the next IE report (October 22, 2025) Repeal Now filed after it

⁶¹ ABE Exhibit 3D to Complaint 26-06-CD.

⁶² ABE Exhibit 4E to Complaint 26-06-CD.

⁶³ ABE Exhibit 5E to Complaint 26-06-CD.

received the contribution and recommends the Commission find a violation on this basis and order Repeal Now to amend that report.

- d. [Against AAN and Repeal Now] ABE points out that AAN’s largest contributor is Jeff Yass, an individual who contributed multiple thousands of dollars to AAN, funds which AAN passed directly to Repeal Now. ABE alleges: “The amounts and dates of some of Jeff Yass’s sizable contributions are in conflict, and which means they cannot both be true.”⁶⁴**

ABE asks APOC to reconcile “these discrepancies” by subpoenaing banking records or other documentation “to establish the correct amounts and dates for these significant transactions.”⁶⁵

A complaint must include “a clear and concise description of facts that, if true,” would violate relevant statutes.⁶⁶ ABE’s only description of facts, however, is its conclusory statement that Repeal Now’s and AAN’s reporting on Yass is “in conflict,” along with the submission of over 200 pages of APOC reports that do not specifically reference or highlight any particular information contained within them. On this basis, APOC staff does not find a preponderance of evidence supports violations by Repeal Now and AAN and recommends the Commission dismiss this allegation.⁶⁷

⁶⁴ ABE Complaint 26-06-CD, p. 15, p. 23.

⁶⁵ *Id.*

⁶⁶ 2 AAC 50.870(b)(4).

⁶⁷ 2 AAC 50.891(d).

3. Separate allegations remaining against each respondent

On the remaining allegations of complaint 26-06-CD and 26-08-CD, APOC staff finds as follows:

- a. True source reporting: Advancing Alaska Action, Inc. was not required to file a statement of contributions but both Repeal Now and AAN must provide accurate true source information concerning Advancing Alaska Action Inc.’s contribution**

ABE alleges violations of true source disclosure requirements concerning a \$5,000 contribution made by Advancing Alaska Action, Inc. to AAN, and AAN’s subsequent contribution of the \$5,000 to Repeal Alaska.⁶⁸

First, against Advancing Alaska Action, Inc. ABE highlights that the entity never filed a statement of contributions report relating to its \$5,000 contribution to AAN. However, the reporting requirement of AS 15.13.040(k) is imposed on an organization contributing to a ballot measure group because it is serving as an intermediary; it is not imposed on the “true sources” (in this situation, Advancing Alaska Action, Inc.) but rather upon the organization transmitting the funds to a ballot measure group – AAN.⁶⁹ Advancing Alaska Action, Inc. had no duty to file a 15-5 statement of contributions and APOC staff recommends no finding of violation against it.

Next, campaign disclosure law required Repeal Now under AS 15.13.040(e), AS 15.13.110(h), and AS 15.13.390(a)(1) and AAN under AS 15.13.040(r) and AS 15.13.390(a)(3) to identify contributor Advancing Alaska Action, Inc.’s true sources. Both Repeal Now and AAN concede they are required to report true source contributors, but both deny any duty to report *correct* information in their APOC reporting. Repeal Now states it “cannot be held responsible for any inaccuracies or incompleteness”⁷⁰ in AAN’s

⁶⁸ [AAN Statement of Contributions \\$517,250](#) filed February 12, 2026.

⁶⁹ See AS 15.13.040(k), [AO 24-04-CD 907 Initiative](#), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=26260>.

⁷⁰ Answer Repeal Now 26-06-CD, p. 2.

statements, and AAN similarly argues that it had no obligation “to look behind a contributor’s representation” of its funding sources.⁷¹

Implicit in the statutory duty to report information is a duty to report *correct* information.⁷² Campaign disclosure law’s enforcement mechanism of civil penalties apply not only where a reporter fails to report information but also where that information is incomplete (failing to report true sources) or incorrect (reporting there were no true sources).⁷³ A person who fails to file a “properly completed” report is subject to various civil penalties.⁷⁴ Specific to true source reporting, AS 15.13.390 imposes on those who misreport or fail to disclose the true source of a contribution in violation of AS 15.13.040(r) a penalty up to the amount of the contribution it misreported or failed to disclose.⁷⁵

Repeal Now and AAN’s position that neither can be held responsible for reporting incomplete or incorrect true source information is a difficult argument to make under these circumstances, where the true source they both reported, by name alone – Advancing Alaska Action, Inc. – put both parties on notice of the possibility the organization was not a true source, and where a basic internet search of “Advancing Alaska Action, Inc” would have confirmed that it is an Alaska nonprofit corporation for which both organizations were required to report its true sources.⁷⁶

APOC staff finds by a preponderance of the evidence that AAN and Repeal Now misreported or failed to disclose the true source(s) of Advancing Alaska Action Inc.’s \$5,000 contribution. Staff recommends the Commission order both organizations to report

⁷¹ Answer AAN 26-06-CD, pp. 5-6.

⁷² AS 15.13.040(c): “The report . . . *shall be certified as correct* by the group’s treasurer” (*emphasis added*).

⁷³ 2 AAC 50.855 and .865 speak penalty assessment and mitigation where a filer has committed errors within reports, which would be superfluous under the argument that a filer has no duty to file a correct report. *See generally* 2 AAC 50.855 (outlining assessment of civil penalties against a person responsible for filing a report under AS 15.13 that is incomplete; civil penalties “for an error in a . . . report required under AS 15.13”) 2 AAC 50.865 (referencing “erroneous” reports and “incomplete” reports and reports with “missing or incomplete information.”)

⁷⁴ AS 15.13.390(a)(1).

⁷⁵ AS 15.13.390(a)(3).

⁷⁶ Exhibit 8, State of Alaska entity details, Advancing Alaska Action, Inc. Articles of Incorporation, Domestic Nonprofit Corporation Initial Biennial Report, [Division of Corporations, Business and Professional Licensing](https://www.commerce.alaska.gov/cbp/main/search/entities), <https://www.commerce.alaska.gov/cbp/main/search/entities>.

the true source(s) of any contribution(s) received from Advancing Alaska Action, Inc. within 10 days of the Commission order in this matter.

ABE also alleges a true source reporting violation based upon AAN's listing of a Saratoga, "AK" address for a \$50,000 contribution of "billionaire Timothy Mellon."⁷⁷ In response, AAN concedes a typographical error in listing Alaska rather than the correct state of Wyoming and advises that it has corrected the report. APOC staff finds this to be a *de minimis* error and does not recommend a civil penalty, particularly given the error was likely obvious to anyone initially viewing the report and without question available through basic internet searching of the contributor by name.

b. ABE's remaining allegations of 26-08-CD relating to Repeal Now's paid-for-by disclaimers

ABE's allegations in 26-08-CD concerning Repeal Now's continuing use of the Anchorage address in its paid-for-by disclaimers are mostly mooted by APOC staff's recommendation that the action does not violate campaign disclosure law.

An allegation of 26-08-CD that remains in controversy relates to Repeal Now's paid-for-by disclaimers on two videos that ABE alleges and Repeal Now does not refute were posted on Repeal Now's YouTube channel.⁷⁸ Specifically, ABE alleges "Repeal Now's most recent video ad does not include *any* required disclaimer *at all*."⁷⁹

The videos were formerly accessed through Repeal Now's YouTube channel homepage.⁸⁰ On the top middle of the channel homepage, directly adjacent to the logo and directly underneath the bolded slogan "Yes! End ranked choice voting in Alaska!," is text

⁷⁷ Complaint 26-06-CD, p. 11.

⁷⁸ [Yes! End ranked choice voting in Alaska! - YouTube](#), last accessed August 4, 2026, *see also* Exhibit 9, screen shot of channel homepage.

⁷⁹ ABE Complaint and Exhibits 26-08-CD, p. 13 (*emphasis in original*). While the body of the complaint references a video "ad" in the singular, its footnote references exhibits 17D and 17E, two separate videos.

⁸⁰ Repeal Now agreed to temporarily remove the two videos in question until the Commission has reached the merits of this matter.

with a live “more” link, which brings a pop-up message containing the paid-for-by message containing the top three contributors.⁸¹

The Commission has previously determined that a paid-for-by identifier on a Facebook profile page puts the viewer on notice that the page they are viewing contains political messages, and that having that identifier obviates the need to have a separate paid-for-by identifier on each post.⁸² It is reasonable to apply the same logic to a YouTube channel homepage; 2 AAC 50.306, relating to the identification of political communication, refers broadly to a group’s “electronic social media” in its requirement that the paid-for-by be electronically linked, and APOC staff considers a YouTube channel to fall within this categorization.⁸³ By including a homepage link to its paid-for-by disclaimer, Repeal Now met AS 15.13.090 communication disclaimer requirements and APOC staff recommends ABE’s allegation be dismissed.

c. Repeal Now’s misidentification of contributor LOT, Inc. in an IE report

A final allegation ABE raises in 26-08-CD alleges Repeal Now incorrectly lists “LOT, Inc.” as its third largest contributor in its paid-for-by disclaimers but identifies the contributor as “Jim Lot Turner” in its APOC reporting.⁸⁴ In response, Repeal Now confirms the true source of the contribution was LOT, Inc., as correctly listed on its communication disclaimers, but concedes its reporting in its IE report incorrectly identified “Jim Lot Turner” as the contributor.⁸⁵

⁸¹ [Yes! End ranked choice voting in Alaska! - YouTube](#), last accessed August 4, 2026, *see also* Exhibit 9, screen shot of channel homepage.

⁸² [Final Order 18-04-CD Rivas v. Vasquez](#),

<https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=15936>, *citing* AO 10-09-CD, [AO 10-09-CD Gara](#), <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=4844>, pp.

⁸³ AS 2 AAC 50.306 Identification of political communication. (d) A political communication by electronic media, including a candidate's or group's website, electronic mail, electronic social media, or other electronic methods capable of transmitting a political communication, must include or be electronically linked to information required by [AS 15.13.090](#)(a) and (c). The cost of political communications by electronic media must be reported as a campaign expense under [2 AAC 50.321](#).

⁸⁴ Complaint 26-08-CD, p. 12, citing Repeal Now’s April 30, 2026 Independent Expenditure report filed April 30, 2026 and Mr. Turner’s statement of contribution filed April 21, 2026.

⁸⁵ [Independent expenditure Repeal Now](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7528&ViewType=IE>, filed April 30, 2026.

04/11/2026	Type: Individual Name: Jim Lot Turner P.O. Box 1567 Palmer, Alaska 99645	Occupation: Business Owner Employer: Self Alaska	\$10,000.00
Contributor is True Source			

In support, Repeal Now provides as documentation a copy of the contribution check from LOT, Inc. and a contribution form identifying the corporate contribution from the business.⁸⁶ APOC staff agrees that the IE report filed April 30, 2026 was erroneous. Repeal Now states in its Answer that it has corrected the contributor information; however, two amended versions filed June 17, 2026 both still reflect the inaccurate “Jim Lot Turner” as the contributor and not the business.

In light of the closeness of the reported names, and that the contributor is identified as a business owner of the same name, and the unlikelihood that the information created confusion among the public as to the contributor, APOC staff recommends the Commission find this error does not rise to the level of a campaign disclosure violation but order Repeal Now to correct the IE report within 10 days of the order in this matter.

d. Repeal Now should file quarterly reports for 2026 until its 30-day general election report is due October 5, 2026

ABE alleges Repeal Now failed to timely file its first quarterly report for 2026.

On March 20, 2025, prior to initiative proposal’s certification for ballot, Repeal Now registered as an initiative proposal group listing its purpose to repeal ranked choice voting law.⁸⁷ Prior to the certification for ballot on December 31, 2025, Repeal Now filed quarterly reports under AS 15.13.110(g); its most recently filed quarterly report for 2025 Fourth Quarter and filed January 10, 2026.⁸⁸

⁸⁶ Exhibit 10, Repeal Now check and contribution form from LOT, Inc.

⁸⁷ [Repeal Now initiative proposal application group registration](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=6567&ViewType=GR),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=6567&ViewType=GR>.

⁸⁸ [Repeal Now fourth quarterly report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=48483&ViewType=CD),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=48483&ViewType=CD>.

A ballot group is required to continue filing quarterly reports after certification “until reports are due under (a) and (b)” of AS 15.13.110.⁸⁹ APOC staff advice explained this requirement in a January 5, 2026 email to Repeal Now (attached by Repeal Now as an exhibit to its complaint response): “Until those reports become due, *you will still file quarterly reports*. [AS 15.13.110(g)]”⁹⁰ Repeal Now apparently understood this direction to mean it should “ceas[e] to file quarterly reports”⁹¹ rather than to continue filing them until AS 15.13.110 reports became due.⁹² However, because Repeal Now switched its registration to that of a ballot proposal group, and selected both the primary and general elections in its campaign plans, APOC’s online filing system generated corresponding AS 15.13.110 reporting requirements, and removed future quarterly “reporting expectations,” which likely led to confusion. In its response to this complaint, Repeal Now indicated its willingness to comply with APOC direction concerning the reports, and it should file quarterly reports until the time its 30-day report for the general election is due on October 5, 2026. In light of the above and additionally considering that all of the information contained in the missing quarterly reports was available through Repeal Now’s independent expenditure reports, APOC staff recommends no penalty against Repeal Now for failing to file 2026 quarterly reports.

⁸⁹ AS 15.13.110(g) An initiative committee, person, group, or nongroup entity receiving contributions exceeding \$500 or making expenditures exceeding \$500 in a calendar year in support of or in opposition to an initiative on the ballot in a statewide election or an initiative proposal application filed with the lieutenant governor under [AS 15.45.020](#) shall file a report within 10 days after the end of each calendar quarter on the contributions received and expenditures made during the preceding calendar quarter **until reports are due under (a) and (b) of this section** (emphasis added). If the report is a first report, it must cover the period beginning on the day an initiative proposal application is filed under [AS 15.45.020](#) and ending three days before the due date of the report.

⁹⁰ Answer Repeal Now 26-06-CD, Attachment 2 (*emphasis added*).

⁹¹ Answer Repeal Now 26-06-CD, p. 3.

⁹² Repeal Now filed a 30-day report on July 20, 2026, corresponding to the state primary election, although the group’s first AS 15.13.110(a) report is not due until October 5, 2026, corresponding to the state general election.

e. Repeal Now’s reporting misidentified ballot measure 24ESEG

ABE alleges that while Repeal Now supports 24ESEG, the group has inaccurately identified the initiative proposal and ballot measure throughout its APOC reporting by instead using the name of the previous elections ballot initiative (22AKHE) or by describing support for either ballot measure “2” or “3.”⁹³ APOC staff has reviewed Repeal Now’s reporting and finds the IE reports that incorrectly identified it are largely consistent with ABE’s allegations.

In its response to this complaint, Repeal Now concedes it incorrectly identified the ballot measure and advises that it has since amended its reporting to correctly reflect its support for ballot measure 24ESEG. APOC staff finds Repeal Now’s above listed reports misidentified the initiative proposal until correction but recommends the Commission find this error does not rise to the level of a campaign disclosure violation as 24ESEG was at all relevant times the only ballot measure concerning repeal efforts and the misidentification was unlikely to have mislead the public.

SUMMARY OF STAFF FINDINGS AND RECOMMENDATIONS

1. To determine its three largest contributors for its paid-for-by disclaimer, Repeal Now should consider its top three contributors according to the amount Repeal Now received from the contributing organization (AAN) rather than the individual contributions of AAN’s true sources.
2. A preponderance of the evidence does not show AAN or Repeal Now violated AS 15.13.090 by listing Anchorage as AAN’s principal place of business and APOC staff recommends the Commission dismiss the allegation.
3. APOC staff recommends a finding that Repeal Now’s independent expenditure report of August 9, 2025 was erroneous and that the Commission order Repeal Now to correct the report within 10 days of the order in this matter.

⁹³ ABE Complaint 26-06-CD, p. 5.

4. APOC staff finds ABE has provided some evidence of reporting deficiencies relating to the contributions of Damien Stella but is unable to determine whether violations have occurred. APOC staff recommends the Commission continue this allegation of the complaint to give ABE the option to clarify its allegation and thereafter allow AAN and Repeal Now to amend its responses, if needed.

5. Two of Repeal Now's IE reports identified the date it received contributions from AAN as prior to the date AAN received the funds from its own donors. APOC staff recommends the Commission find Repeal Now's reports for these dates were erroneous and order it to correct the reports within 10 days of its order in this matter, working with AAN as needed to ensure their organizations' reports are consistent.

6. APOC staff does not find by a preponderance of evidence that a \$5,000 discrepancy exists between Repeal Now's and AAN's reporting relating to an October 20, 2025 contribution and recommends the Commission dismiss the allegation.

7. As APOC staff cannot find Repeal Now's disclosure of an October 20, 2025 contribution of \$15,000 on an IE report following Repeal Now's receipt of the contribution, it finds the allegation is supported by a preponderance of the evidence and recommends the Commission order Repeal Now to amend its reporting.

8. Respondent Advancing Alaska Action, Inc. had no duty to file a 15-5 statement of contributions for its \$5,000 contribution to AAN, which AAN thereafter contributed to Repeal Now, and APOC staff recommends no finding of violation against Advancing Alaska Action, Inc.

9. Alaska campaign disclosure law required both Repeal Now and AAN to correctly identify the true sources of Advancing Alaska Action Inc.'s \$5,000 contribution. As both organizations failed to identify or erroneously identified the true source contributor(s), APOC staff recommends the Commission find both organizations in violation of campaign disclosure law and order both organizations to report the true source(s) of any contribution(s) received from Advancing Alaska Action within 10 days of the Commission order in this matter.

10. AAN misidentified the home state of contributor Timothy Mellon on its IE report but APOC staff does not recommend a finding of violation.
11. By including a link to its paid-for-by disclaimer on its YouTube channel homepage, Repeal Now met AS 15.13.090 requirements and APOC staff recommends the Commission dismiss ABE's allegation of missing communication disclaimers.
12. APOC staff finds Repeal Now, on an IE report, identified a contribution from the business LOT, Inc. as from Jim Lot Turner, the business owner, but recommends the Commission find this error does not rise to the level of a campaign disclosure violation. APOC staff recommends the Commission order Repeal Now to correct the report within 10 days of the order in this matter.
13. APOC staff recommends no penalty against Repeal Now for failing to file its first 2026 quarterly report but requires Repeal Now to file quarterly reports until its 30-day general election report is due.
14. APOC staff finds Repeal Now's reports misidentified the initiative proposal until Repeal Now amended its reports when this complaint was filed, but recommends the Commission find this error does not rise to the level of a campaign disclosure violation, as 24ESEG was at all relevant times the only ballot measure concerning repeal efforts and the misidentification was unlikely to have mislead the public.

MAXIMUM POTENTIAL CIVIL PENALTIES

Against AAN, for failing to identify or erroneously identifying the true source(s) of a \$5,000 contribution⁹⁴ from Advancing Alaska Action, the maximum civil penalty is assessed under AS 15.13.390(a)(3) and results in a penalty of “not more than the amount of the contribution that is the subject of the misreporting or failure to disclose”: **\$5,000**.

Against **Repeal Now**, the following maximum civil penalties apply:

- For the erroneous IE report filed August 9, 2025 and showing a \$500 error, the maximum civil penalty is assessed at \$50 per day under AS 15.13.390(a) and results

⁹⁴ [AAN Statement of Contributions](#),

<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=5543&ViewType=SC>.

in a penalty of **\$14,600**, reflecting 292 days from the filing of the erroneous report until the complaint filing tolled the penalty accrual [August 9, 2025 to May 28, 2026].

- For the IE reports that erroneously showed Repeal Now received contributions before they were received by the intermediary AAN, any penalty will be assessed after Repeal Now and AAN amend their reports as necessary to comport with the Commission order in this matter.
- For the erroneous IE report filed October 22, 2025 that failed to include a \$15,000 contribution Repeal Now received October 20, 2025, the maximum civil penalty is assessed at \$50 per day under AS 15.13.390(a) and results in a penalty of **\$4,000**, reflecting 80 days from the filing of the erroneous report until Repeal Now disclosed the contribution on its fourth quarterly report on January 10, 2026 [October 22, 2025 to January 10, 2026].
- For failing to identify or erroneously identifying the true source(s) of a \$5,000 contribution from Advancing Alaska Action, received through intermediary AAN, the maximum civil penalty is assessed at \$50 per day under AS 15.13.390(a)(1) and results in a penalty of **\$250**, reflecting 5 days from the filing of the erroneous report⁹⁵ until the complaint filing tolled the penalty accrual [May 23, 2026 to May 28, 2026].

The above noted maximum civil penalties against Repeal Now total **\$18,850**.

MITIGATION CRITERIA

When staff assesses penalties, the starting point for calculating those penalties is 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

⁹⁵ [Repeal Now IE report](https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7546&ViewType=IE),
<https://aws.state.ak.us/ApocReports/Common/View.aspx?ID=7546&ViewType=IE>.

available reductions. From there, regulations at 2 AAC 50.865 outline additional mitigating factors APOC may consider for other reductions in assessed penalties.

AAN's reporting violation is assessed at 50% of the maximum under 2 AAC 50.855(b)(2)(C)(i) as this was AAN's first election cycle, and results in a staff assessment of \$2,500. For mitigating factors, under 2 AAC 50.865(a)(1)(B), a civil penalty assessment may be additionally reduced by up to 50% if the person required to file is "an inexperienced filer," which includes a person engaged in a first election cycle.⁹⁶ As AAN was engaged in its first election cycle, APOC staff recommends application of this mitigation factor which results in a final penalty of **\$1,250**.

Repeal Now's violations are assessed at 50% of the maximum under 2 AAC 50.855(b)(2)(C)(i) as this was Repeal Now's first election cycle, and results in a staff assessment of \$9,425. For mitigating factors, under 2 AAC 50.865(a)(1)(B), a civil penalty assessment may be additionally reduced by up to 50% if the person required to file is "an inexperienced filer," which includes a person engaged in a first election cycle.⁹⁷ As Repeal Now was engaged in its first election cycle, APOC staff recommends application of this mitigation factor which reduces the penalty to \$4,712.50. APOC staff recommends further reduction pursuant to 2 AAC 50.865(b)(5), which allows a civil penalty to be reduced by a percentage greater than 50 percent or waived entirely, as the largest portion (\$14,600) of Repeal Now's maximum assessed penalty total (\$18,850) relates to a \$500 error and thus is significantly out of proportion to the degree of harm. APOC staff therefore recommends the \$4,712.50 be reduced by 90% to **\$471.25**.

⁹⁶ 2 AAC 50.865(a)(1)(B).

⁹⁷ 2 AAC 50.865(a)(1)(B).

CERTIFICATE OF SERVICE: I hereby certify that on this date, I caused a true and correct copy of the foregoing to be delivered to via email only to:	
Alaskas for Better Elections Samuel Gottstein Scott Kendall	sam@cashiongilmore.com scott@cashiongilmore.com
Repeal Now Judy Eledge Cheryl Frasca Bethany Marcum Craig Richards Julie Pack	jnortoneledge@gmail.com cfrascaak@gmail.com bethanymarcum@gmail.com crichards@pioneerlawllc.com jpack@pioneerlawllc.com
Aurora Action Network Thomas Datwyler Derek Ross	compliance@acapteam.com tcdatwyler@gmail.com derek@rosspoliticallaw.com
Advancing Alaska Action Richard Moses	rmoses@BHB.com

Cari Rousselle

08/15/2026

Signature

Date

FEC FORM 1

STATEMENT OF ORGANIZATION

FILING FEC-1894823

1. AURORA ACTION NETWORK

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

2. Date: 06/06/2025

3. FEC Committee ID #: C00907584

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

FIRST RESOURCE BANK
7449 VILLAGE DRIVE
LINO LAKES, Minnesota 55014

Signed: THOMAS DATWYLER

Date Signed: 06/06/2025

(End FEC FORM 1)

Generated Sat Aug 1 13:58:42 2026



July 29, 2026

VIA EMAIL AT kim.stone@alaska.gov

Kim Stone
Campaign Disclosure Coordinator
Alaska Public Offices Commissioner
Anchorage, Alaska 99508

Re: Aurora Action Network Response to APOC Request for Information

Dear Ms. Stone:

This Firm represent Aurora Action Network (“AAN”). In response to your requests for information, AAN states as follows:

(As used below, “the Anchorage address” refers to 11790 Cange Street, Anchorage, Alaska, 99516)

1) Please list the individuals involved in the formation, coordination, control, and decision-making of AAN and their individual places of residence.

Answer:

Bethany Marcum, AAN Executive Director, Alaska
Bob Griffin, AAN Chairman, Alaska
Thomas Datwyler, AAN Treasurer, Wisconsin
Rachel Critchell, AAN Fundraising Consultant, Utah

2) Please describe any activities performed at the Anchorage address relating to AAN.

Answer:

11790 Cange Street, Anchorage, Alaska 99516 is the personal residence of Robert Griffin, AAN’s Chair. As described in Mr. Griffin’s declaration, which is being submitted herewith, Mr. Griffin advises AAN on its mission, political spending, and fundraising activities in Alaska, and has authorized AAN’s use of his address as AAN’s address of record.

The premise underlying this interrogatory — and indeed much of Complainant’s argument — is that a political committee’s principal place of business must be a physical location where its decision-makers gather to conduct business. That premise is outdated and inconsistent with how modern

political organizations actually operate. AAN has no physical office. It does not own or lease any commercial space anywhere — not in Alaska, not in Wisconsin, not anywhere. This is not unusual. The vast majority of federal Super PACs operating in 2026 have no dedicated office space. Their officers, vendors, and advisors are geographically dispersed. Their decisions are made via email, phone calls, and video conferences. Their contracts are signed electronically. Their funds are managed remotely. The notion that a political committee's principal place of business must be a place where people physically sit in the same room and conduct business reflects a pre-digital understanding of organizational activity that bears no relationship to how these entities actually function. To the extent Complainant is searching for a physical address where AAN's officers sit around a conference table and make decisions, that address does not exist — and its absence is not evidence that AAN's nerve center is in Wisconsin. It is evidence that AAN, like most modern Super PACs, operates in the digital age. In that context, Mr. Griffin's Anchorage address is as accurate a designation as any, and more accurate than most, because it is in Alaska, where AAN's Executive Director operates, where its Chair is located, and where the decisions that define AAN's political activity are made.

3) Please provide a descriptive list of individual pieces of correspondence AAN has received, with dates of receipt, at the Anchorage address.

Answer:

AAN objects to this interrogatory on the grounds that it seeks information regarding correspondence received at the personal residence of a private individual, Robert Griffin, and that compelling disclosure of a descriptive list of personal correspondence received at a private residence, including dates of receipt, constitutes an unwarranted invasion of Mr. Griffin's personal privacy. AAN further objects to this interrogatory as disproportionate to the needs of this proceeding.

AAN also objects to this interrogatory as premised on a legally irrelevant factual inquiry. Whether AAN has received correspondence at its designated mailing address has no bearing on the validity of that designation. FEC Form 1 requires a committee to designate a mailing address — an address where the committee is authorized to receive mail. It does not require that mail have been received there as a precondition to the designation's validity, any more than a post office box must have received mail before it constitutes a valid mailing address. AAN is authorized to receive mail at 11790 Cange Street, Anchorage, Alaska 99516. That authorization is what makes it a valid mailing address, not the volume or frequency of correspondence actually received there.

Moreover, this interrogatory is internally inconsistent with Complainant's own legal theory. Complainant has urged the Commission to evaluate AAN's address under the nerve center test articulated in *Hertz Corp. v. Friend*, 559 U.S. 77 (2010), rather than a simple mailing address standard. Under the nerve center test, the relevant inquiry is where an entity's officers direct, control, and coordinate its activities — not whether correspondence has been received at a particular address. Mail receipt has no bearing on the nerve center test. Complainant cannot simultaneously argue that AAN's address should be evaluated under the nerve center standard and demand a list of mail received at that address as if mail receipt were legally significant. It is not — under either standard.

AAN also notes that Mr. Datwyler provides bookkeeping and treasury services to dozens of federal, state, and local political committees across the country, many of which use his Hudson, Wisconsin address as a matter of administrative convenience. Under Complainant's theory — that a political committee's principal place of business is wherever its treasurer happens to live — every one of those committees would have its principal place of business in Hudson, Wisconsin, regardless of where its officers operate, where its decisions are made, or where its political activity is directed. That result is not only absurd on its face, it is flatly inconsistent with the nerve center test. Complainant itself has urged the Commission to adopt. The nerve center test exists precisely to look past administrative conveniences like a treasurer's address and identify where an entity's business is actually conducted. For AAN, that is Alaska.

Subject to and without waiving these objections, AAN states that it does not receive much mail given most business is conducted electronically. And it has received multiple pieces of correspondence at the Anchorage address, including contribution checks mailed there. AAN is not, however, in a position to provide a descriptive list of individual pieces of correspondence with dates of receipt. Political committees do not typically catalog their incoming mail with the specificity this interrogatory contemplates. Rather AAN can say accurately it does not receive much mail including at the Anchorage address, but nonetheless some mail has been received there.

4) On Federal Election Commission reports, AAN designated a Hudson, WI address on its 2025 mid-year, 2025 year-end, and April 2026 quarterly reports. Please describe the facts or events leading to AAN's change in address in its July 2026 report to the Anchorage address.

Answer:

AAN respectfully notes that the interrogatory references a "July 2026 report," but the first FEC filing reflecting AAN's Anchorage address of record was an amended Statement of Organization (Form 1) filed with the Federal Election Commission on April 7, 2026. AAN assumes the interrogatory is directed at that filing and responds accordingly.

Beginning in February 2026, Robert Griffin, began conversations with Bethany Marcum about coming on board with AAN. Those conversations included discussion of AAN establishing a more meaningful Alaska presence, in part as a result of AAN having previously been assessed a civil penalty by APOC in connection with its statement of contribution reporting. During the last week of March 2026, Ms. Marcum contacted AAN's treasurer, Thomas Datwyler, and raised the possibility of AAN changing its address to an Alaska address. During the first week of April 2026, Ms. Marcum facilitated an introduction between Mr. Datwyler and Mr. Griffin, including providing Mr. Griffin's Anchorage address for use as AAN's address of record. Mr. Griffin authorized the use of his address in connection with his role as Chair. Shortly thereafter, Mr. Datwyler filed the amended FEC Statement of Organization reflecting the Anchorage address, which became effective upon filing.

5) Please identify the property owner of the Anchorage address, describe the primary use of the address, and describe the property owner(s)' involvement, if any, with AAN.

Answer:

See response to Interrogatory No. 2.

6) Please detail election-related activities AAN engages in other than contributing to Repeal Now.

Answer:

In addition to contributing to Repeal Now, AAN engages in fundraising activities in support of its Alaska political mission, including raising funds from donors for deployment in Alaska political efforts. AAN also funds and supports get-out-the-vote ("GOTV") efforts in Alaska.

7) Please describe with corresponding dates any and all communications between AAN and Repeal Now concerning AAN's address.

Answer:

See response to Interrogatory No. 4.

9) Please provide a legal standard relating to Repeal Now's duty as the receiving group to correctly report contributor information from its contributor AAN.

Answer:

AAN is not aware of any provision of Alaska law that imposes an independent duty on a receiving group to investigate or verify the accuracy of contributor information provided to it by a contributing entity. AS 15.13.040(e) requires a group to include in its communications a disclosure of its three largest contributors, including their city and state of residence or principal place of business. That requirement is satisfied by reference to the contributor's reported address — the address the contributor has designated as its address of record.

In this case, AAN's address of record with the Federal Election Commission is 11790 Cange Street, Anchorage, Alaska 99516, as reflected in AAN's amended FEC Statement of Organization filed April 7, 2026. Repeal Now accurately reported that address. AAN is not aware of any legal basis for imposing on Repeal Now a duty to look behind AAN's designated address of record and substitute its own judgment about where AAN's principal place of business is located.

To the extent the Commission is considering whether Repeal Now had an independent obligation to investigate AAN's address, AAN respectfully submits that no such obligation exists under Alaska law, and that imposing one would create an unworkable standard requiring recipient groups to conduct due diligence on the internal operations of every contributing entity — a burden that has no support in the text of AS 15.13 and that would be inconsistent with the structure of Alaska's

campaign finance disclosure regime, which places the disclosure obligation on the contributing entity rather than the recipient.

Respectfully,

ROSS POLITICAL LAW, APC

A handwritten signature in blue ink, appearing to read 'DHR', with a long horizontal stroke extending to the right.

Derek H. Ross

Counsel for Aurora Action Network

DECLARATION OF ROBERT GRIFFIN

I, Robert Griffin, declare as follows:

1. I am a resident of Anchorage, Alaska, and make this declaration based on my personal knowledge.
2. I serve as Chair of Aurora Action Network ("AAN"), a federally registered political action committee. In that capacity, I advise AAN on matters relating to its mission, political spending, and fundraising activities in Alaska.
3. AAN's activities are directed toward political activity in Alaska. As Chair, I provide advice and counsel regarding AAN's Alaska-focused efforts, including the issues and campaigns AAN supports and the manner in which AAN engages with Alaska's political landscape.
4. In connection with my role as Chair, I have authorized AAN to use my residential address—11790 Cange Street, Anchorage, Alaska 99516—as AAN's address of record. This address reflects AAN's meaningful connection to Alaska, where its political activity is directed and where I, as its Chair, am located.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, 2026, at Anchorage, Alaska.



Robert Griffin

Chair, Aurora Action Network

ENTITY INFORMATION

ENTITY INFORMATION

Entity Name:

ULLR GROUP LLC, THE

Entity Number:

12224763-0160

Entity Type:

Domestic Limited Liability Company

Entity Subtype:

Limited Liability Company

Profession:

N/A

Formation Date:

03/22/2021

Entity Status:

Active

Renew By Date:

03/31/2027

Entity Status Details:

Current

Last Renewed Date:

02/23/2026

Give Feedback

Status Updated On:

02/23/2026

REGISTERED AGENT INFORMATION**Name:**

Rachel Critchell

Street Address:

722 E 900 S, SALT LAKE CITY, UT, 84105, USA

Last Updated:

9/13/2024 9:22:44 PM

PRINCIPAL INFORMATION

Title	Name	Address	Last Updated
Manager	Rachel Critchell	722 E 900 S, SALT LAKE CITY, UT, 84105, USA	09/13/2024

Page 1 of 1, records 1 to 1 of 1

Give Feedback

ADDRESS INFORMATION**Physical Address:**

722 E 900 S, Salt Lake City, UT, 84105, USA

Updated Date:

9/13/2024 8:42:59 PM

Mailing Address:**Updated Date:**[Print](#)[Filing History](#)[Name History](#)[Mergers/Conversions](#)[Associated DBAs](#)



Federal Election Commission
UNITED STATES - of - AMERICA

[Home](#) [/] > [Campaign finance data](#) > [Committee profiles](#) > AURORA ACTION NETWORK

AURORA ACTION NETWORK

ACTIVE - QUARTERLY

SUPER PAC (INDEPENDENT EXPENDITURE-ONLY) - UNAUTHORIZED

ID: C00907584

REGISTRATION DATE: JUNE 06, 2025

Spending

TWO-YEAR PERIOD

2025-2026

Total disbursements

[Filter all disbursements](#)
[/data/disbursements/?committee_id=C00907584&two_year_transaction_period=2026]

\$944,682.60

spent in total disbursements by this committee from **January 01, 2025 to June 30, 2026**.

See the [financial summary](#) for a breakdown of each type of disbursement.

Newly filed summary data may not appear for up to 48 hours.

Independent expenditures

[Filter this data](#)
[/[data/independent-expenditures/?q_spender=C00907584&min_date=01-01-2025&max_date=12-31-2026&data_type=processed&is_notice=false](#)]

This tab shows spending that this committee has made in support of or opposition to a candidate. None of the funds are directly given to or spent by the candidate.

Coverage dates: 01/01/2025 to
06/30/2026

We don't have **independent expenditures** for 2025–2026.

This can be because:

- The committee has not made any independent expenditures.
- We're still processing the data. Try looking for [raw versions of committee filings](#) [/[data/filings/?data_type=efiling](#)]. Raw files are only available for electronic filers.
- The filing deadline hasn't passed yet.

Think this result is a mistake or have questions?

Send us more information in the feedback box or [contact us](#) [/[contact/](#)].

These totals are drawn from quarterly, monthly and semi-annual reports. 24- and 48-Hour Reports of independent expenditures aren't included.

Disbursements

[Filter this data](#)
[/data/disbursements/?committee_id=C00907584&two_year_transaction_period=2026]

GROUP BY:

All transactions
Recipient name
Recipient committee ID

Coverage dates: 01/01/2025 to
06/30/2026

Export

Recipient	Recipient state	Description	Date	Amount
ANEDOT	LA	CREDIT CARD FEES	06/25/2026	\$80.30
SAME DAY PROCESSING	WI	COMPLIANCE CONSULTING	06/12/2026	\$750.00
ADVANCING ALASKA ACTION INC	UT	CONTRIBUTION REFUND	06/09/2026	\$5,000.00
THE ULLR GROUP	UT	FUNDRAISING CONSULTING	06/01/2026	\$7,500.00
ANEDOT	LA	CREDIT CARD FEES	05/31/2026	\$40.30
REPEAL NOW	AK	DONATION	05/13/2026	\$250,000.00
ANEDOT	LA	CREDIT CARD FEES	04/30/2026	\$562.40
SAME DAY PROCESSING	WI	COMPLIANCE CONSULTING	04/28/2026	\$20.00
REPEAL NOW	AK	DONATION	04/27/2026	\$100,000.00
REPEAL NOW	AK	DONATION	04/07/2026	\$250,000.00

Recipient	Recipient state	Description	Date	Amount
SAME DAY PROCESSING	WI	COMPLIANCE CONSULTING	04/06/2026	\$215.00
THE ULLR GROUP	UT	FUNDRAISING CONSULTING	04/01/2026	\$35,000.00
REPEAL NOW	AK	DONATION	02/02/2026	\$50,000.00
SAME DAY PROCESSING	WI	COMPLIANCE CONSULTING	01/05/2026	\$690.00
ALASKA PUBLIC OFFICES COMMISSION	AK	FILING FEES	12/09/2025	\$1,750.00
THE ULLR GROUP	UT	FUNDRAISING CONSULTING	11/03/2025	\$26,000.00
FIRST RESOURCE BANK	MN	BANK FEES	11/03/2025	\$17.00
REPEAL NOW	AK	DONATION	10/20/2025	\$15,000.00
ANEDOT	LA	CREDIT CARD FEES	10/20/2025	\$40.60
TAYLOR, TREG	AK	REFUND OF CONTRIBUTIONS	10/17/2025	\$4,500.00
THE ULLR GROUP	UT	FUNDRAISING CONSULTING	10/01/2025	\$10,000.00
SAME DAY PROCESSING	WI	COMPLIANCE CONSULTING	09/30/2025	\$465.00
REPEAL NOW	AK	DONATION	09/15/2025	\$64,000.00
ANEDOT	LA	CREDIT CARD FEES	09/15/2025	\$40.30

Recipient	Recipient state	Description	Date	Amount
THE ULLR GROUP	UT	FUNDRAISING CONSULTING	09/03/2025	\$1,000.00
ANEDOT	LA	CREDIT CARD FEES	08/30/2025	\$500.90
REPEAL NOW	AK	DONATION	08/29/2025	\$30,000.00
ANEDOT	LA	CREDIT CARD FEES	08/06/2025	\$200.30
REPEAL NOW	AK	DONATION	07/31/2025	\$19,500.00
REPEAL NOW	AK	DONATION	07/31/2025	\$25,000.00
ANEDOT	LA	CREDIT CARD FEES	07/31/2025	\$220.60
ANEDOT	LA	CREDIT CARD FEES	07/26/2025	\$800.90
REPEAL NOW	AK	DONATION	07/11/2025	\$10,000.00
THE ULLR GROUP	UT	FUNDRAISING CONSULTING	07/01/2025	\$3,000.00
REPEAL NOW	AK	DONATION	06/30/2025	\$5,000.00
SAME DAY PROCESSING	WI	COMPLIANCE CONSULTING	06/25/2025	\$500.00
REPEAL NOW	AK	DONATION	06/23/2025	\$27,000.00

Results per page:

Showing 1 to 37 of 37 entries



Pioneer Law, LLC
810 N Street, Suite 100
Anchorage, Alaska 99501
www.pioneerlawllc.com
(907) 306-9978



Craig Richards
crichards@pioneerlawllc.com

Julie Pack
jpack@pioneerlawllc.com

Dustin Elsberry
delsberry@pioneerlawllc.com

July 29, 2026

Kim Stone
Campaign Disclosure Coordinator
Alaska Public Offices Commissioner
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, Alaska 99508-4149
VIA EMAIL: kim.stone@alaska.gov

Re: Repeal Now Response to July 17, 2026 Request for Information

Dear Ms. Stone:

We represent Repeal Now, respondent in consolidated Alaska Public Offices Commission (“APOC”) matters 26-06-CD/26-08-CD.

In response to your requests for information, Repeal Now responds as follows:

8) Please describe with corresponding dates any and all communications between AAN and Repeal Now concerning AAN’s address.

A: Bethany Marcum is the Treasurer of Repeal Now. She was also involved in the formation of the Aurora Action Network (“AAN”) in June 2025 and has been AAN’s Executive Director since that time. Early in 2026, Ms. Marcum had roughly two conversations with AAN Treasurer Thomas Datwyler related to AAN looking for an additional representative in Alaska to be involved with AAN. Several possible Alaskans were suggested by Ms. Marcum and were discussed, including Bob Griffin, who later became AAN’s Chair. AAN having an Alaska address did not come up at that time.

During the last week of March, 2026, Ms. Marcum contacted AAN Treasurer Thomas Datwyler and requested AAN to change its address to an Alaska address. Repeal Now’s Chairperson Judy Eledge was aware that a change of address was being considered, but she was not involved in the decision to make the change to Mr. Griffin’s address. During the first week of April, Ms. Marcum facilitated an introduction to Mr. Griffin for him to be the new point of contact and address for AAN, including providing AAN his address. Shortly thereafter, AAN’s Treasurer was contacted and it was confirmed the FEC address change had been filed. Perhaps a week after that, Ms. Marcum contacted AAN’s Treasurer to ask if there was an effective date, and was told the address change had become effective when filed. Repeal Now representatives had no

other communications with AAN about AAN's address until the first complaint was filed in 26-06-CD.

Thus, Repeal Now does not dispute that the address change was brought forward by Ms. Marcum, who has a role in both organizations, and that Ms. Marcum introduced Mr. Griffin and his address to AAN.

9) Please provide a legal standard relating to Repeal Now's duty as the receiving group to correctly report contributor information from its contributor AAN.

A: Nothing in AS 15.13.040(r) nor AS 15.13.400(19) makes Repeal Now responsible for deficiencies, if any, in the information provided by another: AS 15.13.040(r) places the burden on "the reporting contributor" to "report and certify the true sources of the contribution" and reiterates that it is the "contributor" who "is also required to provide the identity of the true source to the recipient of the contribution." Consistent with this language, 2 AAC 50.258(a) imposes the prohibition on the contributor from "using the name of another, or a third-party conduit to obscure" the origin of the funds. Additionally, APOC AO 26-01-CD, *Moses for the Organization*, is an APOC staff opinion discussing an organization's requirements to "report itself" under the new true source requirements. Further, the Ninth Circuit has specifically recognized that the "contributor will always be in a better position . . . to both identify the true source of its own contribution and quickly report it." *Smith v. Helzer*, 95 F.4th 1207, 1216 (9th Cir.) (2024) (emphasis in original).

Sincerely,

/s/

Craig Richards



BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

ALASKANS FOR BETTER
ELECTIONS,

Complainant,

vs.

REPEAL NOW, AURORA ACTION
NETWORK, and ADVANCING
ALASKA ACTION,

Respondents.

Case No. 26-06-CD
26-08-CD
(Consolidated)

LEGAL AUTHORITY

I. Introduction

Complainant Alaskans for Better Elections, by and through counsel, hereby provides its response to APOC Staff's letter dated July 14, 2026, inviting Complainant and Respondents to submit legal authority on the phrase "principal place of business" as it is used in AS 15.13.090.

In short, Complainant agrees with Respondent Aurora Action Network that APOC should look to, apply, and adopt the "nerve center" test articulated by the United States Supreme Court in *Hertz Corp. v. Friend*.¹ But unlike Aurora Action Network, and consistent with Alaska legislative history and case law, Complainant disagrees that

¹ See *Hertz Corp. v. Friend*, 559 U.S. 77 (2010); see also Aurora Action Network's Response at 3 (June 22, 2026).

Aurora Action Network’s principal place of business is a recently-identified residential mailing address in Anchorage, Alaska.

II. Legislative History

The phrase “principal place of business” contained in AS 15.13.090, which applies to persons other than an individual, was enacted in 2010 through Senate Bill 284 (“SB 284”). Although some aspects of SB 284 changed throughout the legislative process, the phrase “principal place of business” never did, and the legislation ultimately passed both the State House and Senate unanimously.²

The Alaska legislature enacted SB 284 in reaction to *Citizens United v. FEC*, which recognized the First Amendment right of corporations to give unlimited sums of money to independent expenditure organizations.³ Because *Citizens United* also recognized the important governmental interest in laws that require disclaimers and disclosures, the legislature moved quickly to close any loopholes that might have otherwise concealed the source of election spending from corporations in advance of the 2010 election.⁴ Moreover, as an Attorney General opinion authored by then-Attorney General (and current U.S. Senator) Daniel S. Sullivan noted at the time, “it would be constitutional to extend the requirements of AS 15.13.090” “to clarify how corporations

² See 2010 House Journal 2515; 2010 Senate Journal 2525.

³ See generally *Citizens United v. FEC*, 558 U.S. 310 (2010).

⁴ See Sponsor Statement: Senate Bill 284 Campaign Expenditures (Mar. 8, 2010) (Attachment A).

or labor unions must identify themselves when exercising their right to make independent expenditures in an election.”⁵

Throughout the legislative process, legislators on both sides of the aisle wanted to ensure that there would be transparency about who would be paying for election communications. For example, in an exchange about who would be considered “the principal officer approving the communication” with Senator Hollis French — who carried SB 284 on behalf of the Senate Judiciary Committee — Senator (and future Lieutenant Governor) Kevin Meyer stated that “full disclosure is always the best route.”⁶

From Complainant’s initial review of the legislative history surrounding SB 284, it appears that little was said about the phrase “principal place of business” throughout the legislative process. But an exchange between Senators French and Meyer illustrated that source of the funds — i.e., which corporate entity made the decision to contribute funds — mattered. In that exchange, Senator French explained that it would come down to whoever “rules that particular domain,” and that a different person would be responsible for those campaign funds depending on if the money came from “Exxon

⁵ See Memorandum from Daniel S. Sullivan, Attorney General, to Mike Nizich, Chief of Staff, Office of the Governor, Analysis of *Citizens United v. Federal Election Commission* and its Impact on Alaska Campaign Finance Laws at 7 (Feb. 19, 2010) (Attachment B).

⁶ See Hearing on S.B. 284 Before the S. State Affs. Comm., 26th Leg., 2d Sess. at 9:44:17-:21 (Mar. 2, 2010) [hereinafter Senators French and Meyer], *available at* <https://www.akleg.gov/basis/Meeting/Detail?Meeting=SSTA%202010-03-02%2009:00:00>.

Alaska,” “Exxon USA,” or “Exxon Global.”⁷ This understanding and explanation suggests that the legislature intended for APOC to consider the same general “nerve center” test that had recently been adopted by the U.S. Supreme Court in *Hertz*.

III. APOC Advisory Opinions and Orders on Complaints

In the limited time provided, counsel for Complainant could not find any prior advisory opinions or APOC orders on complaints that concern how “principal place of business” is defined for purposes of AS 15.13.090.

IV. Case Law

Counsel for Complainant is not aware of any other case which has considered the phrase “principal place of business” specifically in the context of AS 15.13.090. But there are at least two cases that could prove useful to APOC as it grapples with the question.

First, in *Brooks Range Petroleum Corp. v. Shearer*, the Alaska Supreme Court recognized that determining a disputed “principal place of business” for purposes of bringing a lawsuit in the proper venue is a factual question.⁸ And in that context, the *Brooks Range Petroleum* Court explained that “significant,” “substantial,” and “material” “events or omissions” help a fact finder determine where a “principal place of business”

⁷ See, e.g., Senators French and Meyer at 9:41:00-:43:55.

⁸ See *Brooks Range Petroleum Corp. v. Shearer*, 425 P.3d 65, 70-71 (Alaska 2018); see also *id.* at 69 (“The parties dispute the location of BRPC’s principal place of business: Shearer’s complaint asserted that it was on the ‘North Slope, Alaska,’ but BRPC responded that it was in Anchorage.”).

may be.⁹ Although *Brooks Range Petroleum* only considered the meaning of that phrase with respect to venue, which is not at issue here, the case can and should nevertheless be considered by APOC as support for the proposition that APOC will need to make a factual determination as to where Aurora Action Network’s principal place of business is located.

Second, and perhaps more importantly, the U.S. Supreme Court adopted the “nerve center” test in *Hertz*.¹⁰ In *Hertz*, a unanimous Court held that “the phrase ‘principal place of business’ refers to the place where the corporation’s high level officers direct, control, and coordinate the corporation’s activities.”¹¹ As the Court explained, “[t]he word ‘principal’ requires us to pick out the ‘main, prominent’ or ‘leading’ place.”¹² The Court also stated that “[a] corporation’s ‘nerve center,’ usually its main headquarters, is a single place,” and that “[t]he public often (though not always) considers it the corporation’s main place of business.”¹³ So even in “hard cases” where “some corporations may divide their command,” the *Hertz* Court’s “nerve center” “test nonetheless points courts in a single direction, toward the center of overall direction, control, and coordination.”¹⁴

⁹ See *id.* at 78.

¹⁰ See *Hertz*, 559 U.S. at 80-81.

¹¹ *Id.* at 80; see *id.* at 92-93.

¹² *Id.* at 93 (quotation omitted).

¹³ *Id.*

¹⁴ *Id.* at 95-96.

Relevant here, the *Hertz* Court also explicitly rejected the competing “business activity” test, in part “because corporations come in many different forms, involve many different kinds of business activities, and locate offices and plants for different reasons in different ways in different regions.”¹⁵ Indeed, the Court rejected the notion that a principal place of business should be determined by “measuring the total amount of business activities that the corporation conducts” in a particular State relative to another.¹⁶ “For example, if the bulk of a company’s business activities visible to the public take place in New Jersey, while its top officers direct those activities just across the river in New York, the ‘principal place of business’ is New York.”¹⁷ And the Court explicitly cautioned against finding a principal place of business based on “nothing more than a mail drop box, a bare office with a computer, or the location of an annual executive retreat,” even if such an address is claimed on “the mere filing of a form” with a federal agency.¹⁸

By applying *Hertz*, APOC would need much more information about Aurora Action Network’s activities before it could determine that its “nerve center” is actually in Anchorage, Alaska, and not another city or State. Because Aurora Action Network

¹⁵ *See id.* at 90.

¹⁶ *See id.* at 93.

¹⁷ *Id.* at 96.

¹⁸ *Id.* at 97; *see also id.* (“[C]ourts should instead take as the ‘nerve center’ the place of actual direction, control, and coordination, in the absence of such manipulation.”).

appears to exist for the sole purpose of receiving and sending money, determining *who* makes the decisions for how its money is both received *and* disbursed — and *where* that person is located — is the critical question for APOC to resolve. It is therefore also important where Aurora Action Network’s bank account is located, and who is or has been a signer on that account. To that end, understanding who Aurora Action Network’s officers are could be illuminating. And of course, consistent with *Hertz*, APOC should reject any attempts at “manipulation” of Aurora Action Network’s “principal place of business” based on “the mere filing of a form,” “a mail drop box,” or “the bulk of a company’s business activities visible to the public.”¹⁹

V. Conclusion

Consistent with Aurora Action Network’s suggestion, and the limited legislative history surrounding AS 15.13.090, APOC should adopt the “nerve center” test articulated by the U.S. Supreme Court in *Hertz* for determining an entities’ “principal place of business.” Once it does so, APOC should conclude that Aurora Action Network’s principal place of business cannot be the residential address in Anchorage, Alaska.

¹⁹ *See id.* at 96-97.

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

DATE: July 21, 2026

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

CERTIFICATE OF SERVICE

I hereby certify that a copy of the
foregoing was served via email
on July 21, 2026, to the following:

Repeal Now
cfrascaak@gmail.com
jnortoneledge@gmail.com
bethanymarcum@gmail.com
crichards@pioneerlawllc.com
jpack@pioneerlawllc.com

Aurora Action Network
tcdatwyler@gmail.com
compliance@acapteam.com
derek@rosspoliticallaw.com

Advancing Alaska Action
rmoses@BHB.com

Alaska Public Offices Commission
heather.hebdon@alaska.gov
kim.stone@alaska.gov

CASHION GILMORE & LINDEMUTH

By: /s/ Todd Cowles

Alaska State Legislature

Senator Hollis French, Chair

State Capitol, Room 417
Juneau, Alaska 99801
Phone: (907) 465-3892
Fax: (907) 465-6595

**Committee Members:**

Senator Bill Wielechowski
Senator Dennis Egan
Senator Lesil McGuire
Senator John Coghill

Senate Judiciary Committee

Sponsor Statement: Senate Bill 284 Campaign Expenditures

In the wake of the recent U.S. Supreme Court ruling, *Citizens United v. Federal Election Commission*, the Senate Judiciary Committee has worked to determine the changes to Alaska's elections laws that will be needed. Corporations and labor unions have been banned from participating in Alaska's elections prior to this ruling. This means many of Alaska's laws regarding disclosure and disclaimers simply do not apply to corporations and labor unions making independent expenditures to support or oppose specific candidates in elections.

Testimony from Legislative Legal Services attorneys and from the Alaska Department of Law indicated that changes would be needed to Alaska's campaign laws, and this bill was subsequently drafted to address the concerns raised by the attorneys and by committee members.

Senate Bill 284 amends state election laws to clarify that corporations and labor unions are covered by all applicable reporting requirements. It expands communication identification requirements to ensure accurate reporting of top contributors, to require the approval of the content by the principal officer of the corporation or union, and to require statements in each communication that its content has not been authorized or approved by the candidate. It also speeds reporting requirements for communications expenditures in the last nine days of the election so that expenditures over \$250 must be reported within 24 hours.

Recent opinion surveys show broad disapproval by Americans across party lines for the decision reached by the U.S. Supreme Court. In order to retain Alaskans' trust in our system it is vital that legislation be passed this year to ensure that corporations and labor unions spending money to influence elections are at least required to disclose it in a timely fashion. I urge you to support Senate Bill 284.

MEMORANDUM

STATE OF ALASKA

DEPARTMENT OF LAW

TO: Mike Nizich
Chief of Staff
Office of the Governor

DATE: February 19, 2010

FROM: Daniel S. Sullivan
Attorney General

SUBJECT: Analysis of *Citizens United v. Federal Election Commission* and its Impact on Alaska Campaign Finance Laws

The following is our response to your request for an analysis of the United States Supreme Court's decision in *Citizens United v. Federal Election Commission* 558 U.S. ___, --- S.Ct. ---- (2010) and how that decision impacts Alaska's campaign finance laws. The ruling affects the balance between a government's interest in ensuring transparent and fair elections and the First Amendment rights of organizations, such as corporations and labor unions, to engage in political speech. In this memorandum we will describe the holding of the case as well as its direct and indirect effects on Alaska law.

I. Summary

Our analysis addresses two main points. First, under *Citizens United*, Alaska may not prohibit political speech by corporations and labor unions altogether.¹ As a result, our laws prohibiting independent expenditures by corporations and labor unions in a candidate election are likely unconstitutional.

Second, Alaska's laws regarding contributions to candidates, coordinated expenditures, disclaimers, and disclosures are not directly affected by *Citizens United*. Alaska's laws continue to regulate corporate and labor union political speech through disclaimer and disclosure requirements. However, some disclaimer and disclosure laws that provide specific standards for reporting and identification of expenditures do not currently apply to corporations and labor unions.

II. *Citizens United v. Federal Election Commission*

On January 21, 2010, the United States Supreme Court issued its opinion in *Citizens United v. Federal Election Commission*.² The Court's main holding was that

¹ See 558 U.S. ___, at 2, --- S.Ct. ---- (2010).

² 558 U.S. ___, --- S.Ct. ---- (2010).

“the Government may regulate corporate political speech through disclaimer and disclosure requirements, but it may not suppress that speech altogether.”³ The particular federal law reviewed by the Court, part of the Bipartisan Campaign Reform Act of 2002,⁴ prohibited corporations and unions from using their general treasury funds to make independent expenditures for speech that is an electioneering communication or for speech that expressly advocates the election or defeat of a candidate.⁵ The Court held that this prohibition on corporate and labor union speech violated the First Amendment to the United States Constitution. Because the First Amendment applies to states as well as the federal government, the ruling not only strikes down the federal requirement, it also calls into question similar provisions enacted by the State of Alaska.⁶

The Court further ruled that the disclosure and disclaimer laws under the Bipartisan Campaign Reform Act are justified to provide the electorate with information about the sources of election-related spending and that disclosure assists citizens in making informed choices in the marketplace of political ideas.⁷

³ *Id.* at 1-2.

⁴ 2 U.S.C. § 441b (2000).

⁵ 2 U.S.C. § 441b(b)(2) prohibited corporations and labor unions from using general treasury funds to make expenditures on electioneering communications, which include broadcast, cable, or satellite communications that refer to a clearly identified candidate for federal office and are made within 30 days of a primary or 60 days of a general election. 2 U.S.C. § 434(f)(3)(A); 11 CFR § 100.29(a)(2)(2009).

⁶ See *Gitlow v. New York*, 268 U.S. 652, 666, 45 S.Ct. 625, 630 (1925) (freedom of speech protected by the First Amendment from abridgment by Congress is among the fundamental personal rights protected by the due process clause of the Fourteenth Amendment from impairment by the States); see also *Near v. Minnesota*, 283 U.S. 697, 51 S.Ct. 625 (1931); *DeJonge v. Oregon*, 299 U.S. 353, 57 S.Ct. 255 (1937).

⁷ 558 U.S. ___, at 51-2 (citing *Buckley v. Valeo*, 424 U.S. 1, 66, 96 S.Ct. 612, 657 (1976) (*per curiam*)). Under federal law, televised electioneering communications funded by anyone other than a candidate must include a disclaimer describing the entity responsible for the content of the ad. The required statement must be made in a clearly spoken manner and displayed on the screen in a clearly readable manner for at least four seconds. It must state that the communication is not authorized by any candidate or candidate’s committee and it must display the name and address of the person or group that funded the advertisement. *Id.* (citing 2 U.S.C. § 441d(a)(2)).

III. The Direct and Indirect Impacts of *Citizens United* on Alaska Laws

A. Overview

Alaska campaign finance laws regulate a majority of state elections, the ballot proposition process, lobbying, and the judicial retention process.⁸ These laws regulate the conduct of candidates, political parties, individuals, lobbyists, corporations, labor unions, groups, and other entities. Both state and federal campaign finance laws make several important distinctions with respect to the application of such laws. For instance, Alaska campaign finance laws distinguish “contributions” from “expenditures.” A contribution is basically a purchase, payment, or deposit rendered directly to a candidate or political party.⁹ An expenditure is defined broadly to include several activities which are not direct contributions to candidates. Expenditures include direct payments for services but also include various communications.¹⁰ An “independent expenditure” is a type of expenditure but is more limited in that it is made without any coordination with a candidate.¹¹

Another important distinction is between disclosures and disclaimers. Certain campaign finance laws mandate public reporting of expenditures made. In campaign finance jurisprudence, these laws are referred to as disclosure laws. When a campaign finance law requires an identification to be placed on a communication, courts and campaign finance law commentators broadly refer to this as a disclaimer law. The Alaska Public Offices Commission enforces the legality of contributions and expenditures and also ensures that individuals and entities are properly disclosing and disclaiming their conduct as it relates to an election.¹²

⁸ See AS 15.13.010(a)(1)-(2)(describing scope of AS 15.13, entitled State Election Campaigns).

⁹ See AS 15.13.400(4)(A).

¹⁰ An expenditure is defined, in relevant part, as “a purchase or a transfer of money or anything of value, or promise or agreement to purchase or transfer money or anything of value, incurred or made for the purpose of...influencing...[the outcome of an election].” Expenditures also include “express communications” and “electioneering communications.” AS 15.13.400(6).

¹¹ An independent expenditure “means an expenditure that is made without the direct or indirect consultation or cooperation with, or at the suggestion or the request of, or with the prior consent of, a candidate, a candidate’s campaign treasurer or deputy campaign treasurer, or another person acting as a principal or agent of the candidate.” AS 15.13.400(10).

¹² See generally AS 15.13.010(b); AS 15.13.400(1); AS 15.13.400(8), (11), (13)-(15); AS 15.13.030.

Citizens United directly implicates one key aspect of Alaska's campaign finance laws: Alaska's prohibition on independent expenditures by corporations or labor unions in candidate elections.¹³ The decision does not directly call into question the constitutionality of any other contribution, expenditure, disclaimer or disclosure law. For example, Alaska's prohibition on direct contributions to candidates by corporations and labor unions is unaffected.¹⁴ Candidates and their agents are still prohibited from accepting contributions from corporations and labor unions.¹⁵ A corporation or labor union still may not directly or indirectly consult or cooperate with candidates or their agents when making an expenditure.¹⁶ Individuals are still limited to contributing \$500 per year to a candidate, and \$5,000 per year to a political party,¹⁷ and corporations and labor unions must continue to follow disclosure laws whenever applicable.¹⁸ The current statutes and regulations that require that an independent expenditure in a candidate election be reported within 10 days will be applicable to a corporation or labor union that makes such an expenditure.¹⁹ There must be some identification of corporations or labor

¹³ See AS 15.13.067; AS 15.13.135(a).

¹⁴ See AS 15.13.065(a); AS 15.13.074(a).

¹⁵ AS 15.13.072(a)(1).

¹⁶ AS 15.13.400(10). 2 AAC 50.270 provides guidance as to what constitutes an independent expenditure. Where an expenditure is based on information provided by the candidate or an agent of a group or nongroup entity, it is not an independent expenditure. An expenditure is not an independent expenditure if it is made based on data from a candidate's, group's, or nongroup entity's pollster or campaign consultant or any other person who receives compensation or reimbursement from the campaign. Solicitations to a candidate, group, or nongroup entity, or an expenditure made to finance distribution of campaign material provided by the candidate or his agents are not independent expenditures.

¹⁷ AS 15.13.070(b)(1)-(2).

¹⁸ See AS 15.13.400(14); AS 01.10.060. Because the relevant statutes define "person" to include a corporation or labor union, statutes and regulations that cover a "person" apply to any corporation or union making an independent expenditure in a candidate election.

¹⁹ AS 15.13.040(d) states that "every individual, person, nongroup entity, or group making an expenditure shall make a full report of expenditures, upon a form prescribed by the commission, unless exempt from reporting." AS 15.13.040(e) states that "the report required under (d) must contain the name, address, principal occupation, and employer of the individual filing the report, and an itemized list of expenditures. The report shall be filed with the commission no later than 10 days after the expenditure is made." The reporting requirement of AS 15.13.040(d) and (e) applies to all "persons"

unions making an independent expenditure as they are subject to the requirement that such independent expenditures may not be made anonymously.²⁰

B. Alaska's Prohibition on Expenditures – AS 15.13.067 and AS 15.13.135(a)

Citizens United likely invalidates AS 15.13.067 and AS 15.13.135(a) in their current form. Under AS 15.13.067, expenditures in candidate elections may only be made by candidates, individuals, groups, and nongroup entities. Under AS 15.13.135(a), “independent expenditures” in candidate elections may only be made by individuals, groups and nongroup entities. Because labor unions and corporations do not fall within the definitions of individual, group, or non-group entity,²¹ AS 15.13.067 and AS 15.13.135(a) prohibit corporations and labor unions from making any expenditures in candidate elections. Alaska law defines expenditure broadly to include activities which are political speech.²² After *Citizens United*, these specific prohibitions will not likely pass constitutional muster.

who make an expenditure. A person is defined to include corporations and unions. AS 15.13.400(14); AS 01.10.060.

Alaska regulations likewise require reporting of all independent expenditures. 2 AAC 50.270(c) provides that “a person making an independent expenditure must disclose the following on an independent expenditure report under AS 15.13.040 (d) and (e): (1) the date of the expenditure; (2) the amount of the expenditure; (3) the check number, if the expenditure is paid by check; (4) the name and address of the payee; (5) a description of items or services purchased; (6) identification of the candidate or ballot proposition the expenditure was intended to influence; (7) a statement as to whether the expenditure was intended to support or oppose the candidate or ballot proposition.”

²⁰ AS 15.13.084 states that “a person may not make an expenditure anonymously,” unless the expenditure is made by an individual acting independently and the expenditure is made for a billboard or sign, or printed material other than an advertisement in a newspaper or other periodical.

²¹ AS 15.13.400(8), (11), (13).

²² Specifically, Alaska law prohibits corporations and labor unions from making express communications, electioneering communications, and any payment made to influence the outcome of a candidate election. AS 15.13.400(6)(A)(i);(C); *see also* AS 15.13.400(5), (7). Other parts of the expenditure definition do not implicate political speech. For example, expenditures include purchases made for the purpose of a political party or direct payment of personal services rendered to a candidate or political party. *See, e.g.*, AS 15.13.400(6)(A)(ii)-(iii).

Accordingly, we recommend that these two statutes be amended to conform to the holding of *Citizens United* in order to clarify the extent to which corporations and labor unions may make independent expenditures.

C. Disclosure of Expenditures – AS 15.13.040(d) and (e)

The Supreme Court in *Citizens United* specifically upheld laws requiring the disclosure of independent expenditures. The Court found that the disclosure laws assisted the electorate in making informed choices in the marketplace of political ideas.²³ Accordingly, *Citizens United* does not suggest that Alaska's disclosure laws are in any way unconstitutional. Alaska Statute 15.13.040(d) and (e) is a disclosure law that broadly applies to corporations and labor unions making independent expenditures in a candidate election. It provides that any person making any expenditure must report the expenditure within 10 days. Because corporations and unions are deemed to be "persons" under Alaska law, this requirement applies to them as well.²⁴ Thus, the requirement to disclose is written broadly enough to require disclosure of expenditures made by corporations and labor unions.

D. Disclaimers For Communications – AS 15.13.084; AS 15.13.090; and AS 15.13.135(b)(2)

Citizens United upheld federal disclaimer laws.²⁵ Thus, the decision does not suggest that Alaska's disclaimer laws suffer from any constitutional infirmity. Alaska Statute 15.13.090 is a disclaimer law requiring certain communications to be identified by the words "paid for by" followed by the name of the candidate, group or nongroup entity paying for the communication. Alaska Statute 15.13.135(b)(2) is a disclaimer law which requires that certain independent expenditures contain a disclaimer that they are not authorized or paid for by a candidate. However, because corporations and labor unions were not permitted to make any expenditures in a candidate election, these specific statutes were not written to apply to them, and only refer to individuals, groups, and nongroup entities.

Corporations and labor unions are nevertheless subject to AS 15.13.084 which prohibits independent expenditures in a candidate election from being made

²³ 558 U.S. at 51-2 (citing *Buckley*, 424 U.S. at 66, 96 S.Ct. at 657).

²⁴ See *supra* note 18. Cf 2 AAC 50.270(c) (reporting of independent expenditures applies to "persons," and thus to corporations and labor unions). Additionally, "persons," including corporations and labor unions, are required to preserve their expenditure records for up to 6 years after the expenditure is made. AS 15.13.111.

²⁵ 558 U.S. at 51-2 (citing *Buckley v. Valeo*, 424 U.S. at 66, 96 S.Ct. at 657).

anonymously; thus some identification is required.²⁶ This prohibition is very general and it is unclear how a corporation or labor union must identify itself when making the expenditure. This may create uncertainty among corporations and labor unions about how to proceed with speech protected under *Citizens United*. Therefore, consideration should be given to amending AS 15.13.084 to clarify how corporations or labor unions must identify themselves when exercising their right to make independent expenditures in an election. As discussed above, it would be constitutional to extend the requirements of AS 15.13.090 and AS 15.13.135(b)(2) to corporations and labor unions.

E. Other Reporting and Disclosure Issues – AS 15.13.110 and AS 15.13.086(2)

As stated above, *Citizens United* did not invalidate disclosure or disclaimer laws,²⁷ and Alaska statutes currently require all persons making independent expenditures to report those expenditures to The Alaska Public Offices Commission within 10 days.²⁸ However, policy makers should consider whether other forms of disclosure for corporations and labor unions making independent expenditures in candidate elections are appropriate. For example, under AS 15.13.110, groups, nongroup entities, and candidates must file reports for election-related activity 30 days before an election, seven days before an election, and at year's end. The reporting requirements under AS 15.13.110 do not apply to "persons" and thus corporations and labor unions, like individuals, are exempt. Because corporations and labor unions were not allowed to make independent expenditures when this statutory scheme was created, we do not believe the drafters had corporations and unions in mind when this requirement was imposed only on candidates, groups and nongroup entities.

In addition to reporting expenditures, AS 15.13.110 requires groups,²⁹ nongroup entities,³⁰ and candidates³¹ to include information regarding the source of all contributions in these reports. Under current Alaska law, corporations and labor unions would be required to report only their expenditures.³² But as there is currently no Alaska

²⁶ AS 15.13.084, prohibits all "persons" from making anonymous expenditures and expenditures using a fictitious name or the name of another. As explained above, corporations and labor unions are persons under the law.

²⁷ 558 U.S. at 51-2.

²⁸ AS 15.13.040(d)-(e).

²⁹ AS 15.13.400(8).

³⁰ AS 15.13.400(13).

³¹ AS 15.13.400(1).

³² AS 15.13.040(d)-(e).

law that requires a corporation or labor union to report the source of funds used to make expenditures, corporations and labor unions could receive funds for the purpose of making an independent expenditure in a candidate election. This situation was not contemplated at the time these reporting statutes were enacted due to the prohibition on expenditures by corporations or labor unions in candidate elections.

Additionally, while candidate contributions exceeding \$250 made within nine days of the election must be reported to The Alaska Public Offices Commission within 24 hours of receipt by the candidate,³³ under current law, an independent expenditure made within 10 days of a candidate election does not have to be reported until after the election.³⁴ The latter timeline now likely applies to corporations and labor unions making independent expenditures in candidate elections after *Citizens United*.

F. Independent Expenditures by Foreign Corporations

Federal law currently prohibits expenditures made by foreign nationals and foreign corporations in state elections.³⁵ *Citizens United* did not invalidate this law, nor did it decide whether the federal government has a compelling interest in preventing foreign individuals or associations from influencing our nation's political process.³⁶ Alaska law does not have a corresponding prohibition on expenditures made by foreign nationals or foreign corporations in our elections.³⁷

IV. Conclusion

Citizens United has had both direct and indirect impacts on Alaska campaign financing laws. We recommend that those laws directly impacted by the ruling, the prohibition on expenditures by corporations and labor unions, be amended to provide more clarity to Alaskans. We also identify, for your consideration, other areas of law regulating expenditures that were indirectly impacted by this decision.

³³ AS 15.13.110(b).

³⁴ See AS 15.13.040(d)-(e).

³⁵ 2 U.S.C. § 441e prohibits any foreign national, including any foreign associations such as foreign corporations, from spending funds in connection with any state or local election in the United States.

³⁶ 558 U.S. ___, at 47 citing 2 U.S.C. § 441(e).

³⁷ Because Alaska law currently restricts all expenditures, Alaska statutes do not differentiate between foreign and domestic corporations. AS 15.13.400(14); AS 01.10.060.



Federal Election Commission
UNITED STATES - of - AMERICA

[Home](#) [/] > [Campaign finance data](#) > [Committee profiles](#) > AURORA ACTION NETWORK

AURORA ACTION NETWORK

ACTIVE - QUARTERLY

SUPER PAC (INDEPENDENT EXPENDITURE-ONLY) - UNAUTHORIZED

ID: C00907584

REGISTRATION DATE: JUNE 06, 2025

Raising

TWO-YEAR PERIOD

2025-2026

Total receipts

[Filter all receipts](#)

[\[/data/receipts/?two_year_transaction_period=2026&committee_id=C00907584\]](/data/receipts/?two_year_transaction_period=2026&committee_id=C00907584)

\$1,259,250.00

raised in total receipts by this committee from **January 01, 2025 to June 30, 2026.**

See the [financial summary](#) for a breakdown of each type of receipt.

Newly filed summary data may not appear for up to 48 hours.

Individual contributions

[Filter this data](#)
[/data/individual-contributions/?committee_id=C00907584&two_year_transaction_period=2026]

GROUP BY:

All transactions
State
Size
Employer
Occupation

Coverage dates: 01/01/2025 to
06/30/2026

Export

Contributor name	Contributor state	Receipt date	Amount
QUACKENBUSH, BLAKE	AK	06/25/2026	\$2,000.00
RESTORATION OF AMERICA PAC	FL	06/17/2026	\$250,000.00
HINGER, CRISTIN	AK	06/02/2026	\$2,000.00
HILDEBRAND, JEFFERY	TX	05/21/2026	\$25,000.00
SYREN, CRYSTAL	AK	05/20/2026	\$1,000.00
SIMPSON, PAULETTE	AK	05/20/2026	\$1,000.00
GETTYS, APRIL	AK	05/20/2026	\$1,000.00
MELLON, TIMOTHY	WY	05/06/2026	\$50,000.00
NICHOLS, LES	AK	05/05/2026	\$1,000.00
SOLBERG, VIKKI	AK	04/24/2026	\$2,500.00
OVERSTREET, CAROLYN	AK	04/22/2026	\$2,500.00
NATURAL PANTRY INC	AK	04/22/2026	\$2,500.00

Contributor name	Contributor state	Receipt date	Amount
ERICKSON, WADE	AK	04/22/2026	\$2,500.00
ECKMANN, MARTIN	AK	04/22/2026	\$3,000.00
BISHOP, DEENA	AK	04/22/2026	\$2,500.00
ALASKA QUALITY CARE LLC	AK	04/22/2026	\$2,500.00
SWINNEY, STEVE	AK	04/17/2026	\$2,000.00
MILLER, DAVID	AK	04/14/2026	\$1,000.00
CAMPBELL, EMMA	AK	04/13/2026	\$500.00
STURGEON, JOHN	AK	04/10/2026	\$2,000.00
SAMSON, MICHAEL	AK	04/08/2026	\$2,500.00
NOLTE, JOHN	AK	04/07/2026	\$5,000.00
REILLY, PATRICK	AK	04/03/2026	\$500.00
REILLY, APRIL	AK	04/03/2026	\$500.00
YASS, JEFF	PA	03/16/2026	\$350,000.00
ENGLISH, STANLEY	AK	03/10/2026	\$20,000.00
MILLER, ANDY	TN	11/04/2025	\$10,000.00
ADVANCING ALASKA ACTION INC	UT	10/21/2025	\$5,000.00
DINDINGER, ROBERT	WA	10/20/2025	\$500.00
BINKLEY, JOHN	AK	10/16/2025	\$10,000.00
UCHYTIL, MARIA	AK	10/10/2025	\$500.00
UIHLEIN, ELIZABETH	IL	10/08/2025	\$10,000.00

Contributor name	Contributor state	Receipt date	Amount
YASS, JEFF	PA	10/06/2025	\$225,000.00
BOYLES, RHONDA P.	AZ	09/22/2025	\$1,000.00
YASS, JEFF	PA	09/12/2025	\$100,000.00
HAYNES, ALBERT A.	AK	09/09/2025	\$10,000.00
JOHNSON, JK GINGER	AK	09/01/2025	\$1,000.00
SIMPSON, PAULETTE	AK	08/29/2025	\$500.00
CRUZ, DAVID	AK	08/29/2025	\$10,000.00
SAMSON, MICHAEL	AK	08/26/2025	\$1,000.00
COLLIGAN, STEPHEN	AK	08/21/2025	\$2,000.00
MACKINNON, NEIL	AK	08/20/2025	\$500.00
HYAK MINING COMPANY, INC.	AK	08/20/2025	\$750.00
OPERATING, FURIE	AK	08/14/2025	\$10,000.00
ARMSTRONG, WILLIAM	CO	08/14/2025	\$10,000.00
MICHEL, KAREN A.	AK	08/06/2025	\$1,000.00
GILLIS, MEL	AK	08/06/2025	\$1,500.00
CRUZ, DAVID	AK	08/06/2025	\$10,000.00
CHANDLER, LEON	AK	08/06/2025	\$5,000.00
UDELHOVEN, JAMES	AK	07/31/2025	\$15,000.00
TAYLOR, TREG	AK	07/31/2025	\$4,500.00
MINDER, JOHN	AK	07/31/2025	\$1,000.00

Contributor name	Contributor state	Receipt date	Amount
ENGLISH, STANLEY	AK	07/31/2025	\$10,000.00
FIELDS, JAMES	AK	07/26/2025	\$10,000.00
GOHR, ED	AK	07/17/2025	\$5,000.00
BRINGMANN, SCOTT	AK	07/16/2025	\$5,000.00
FRONTIER SUPPLY INC.	AK	07/03/2025	\$10,000.00
STELLA, DAMIEN	AK	06/23/2025	\$6,000.00
RYDIN, MICHAEL	TX	06/20/2025	\$30,000.00

Results per page:

Showing 1 to 59 of 59 entries



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	ADVANCING ALASKA ACTION, Inc.

Entity Type: Nonprofit Corporation

Entity #: 10298676

Status: Good Standing

AK Formed Date: 1/23/2025

Duration/Expiration: Perpetual

Home State: ALASKA

Next Biennial Report Due: 7/2/2027

Entity Mailing Address: 721 DEPOT DR, ANCHORAGE, AK 99501

Entity Physical Address: 721 DEPOT DR, STE. 700, ANCHORAGE, AK 99501

Registered Agent

Agent Name: United States Corporation Agents, Inc.

Registered Physical Address: 721 DEPOT DR, ANCHORAGE, AK 99501

Registered Mailing Address: 721 DEPOT DR, ANCHORAGE, AK 99501

Officials

☐ Show Former

AK Entity #	Name	Titles	Owned
	Ann Riggs	Director, Vice President	
	Leon Barbachano	Director, President	
	Sandra Lempke	Director, Secretary, Treasurer	

Filed Documents

Date Filed	Type	Filing	Certificate
1/23/2025	Creation Filing	Click to View	Click to View
9/25/2025	Initial Report	Click to View	

Copyright © State of Alaska · [Department of Commerce, Community, and Economic Development](#) · [Contact Us](#)



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 #: 10298676
Date Filed: 01/23/2025
State of Alaska, DCCED

FOR DIVISION USE ONLY

Articles of Incorporation

Domestic Nonprofit Corporation

Web-1/23/2025 10:59:55 AM

1 - Entity Name

Legal Name: ADVANCING ALASKA ACTION, Inc.

2 - Purpose

Operate exclusively for charitable, scientific, literary, or educational purposes. Operational activities shall include, but not limited to receiving, holding, and using contributions for the purposes of said corporation. Have and exercise general powers specified in Alaska Statute 10.20.011, as now in force or afterwards amended. Notwithstanding any other provision of these articles, the Corporation shall not carry on any other activities not permitted to be carried on (a) by a charitable organization exempt from federal income tax under Section 501(c)(4) of the Internal Revenue Code of 1986. No part of the net earnings of the corporation shall inure to the benefit of or be distributable to its trustees, officers, or other private persons except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in these Articles. Includes any lawful purpose.

3 - NAICS Code

813940 - POLITICAL ORGANIZATIONS

4 - Registered Agent

Name: United States Corporation Agents, Inc.

Mailing Address: 721 DEPOT DR, Anchorage, AK 99501

Physical Address: 721 DEPOT DR, Anchorage, AK 99501

5 - Entity Addresses

Mailing Address: 721 DEPOT DR, Anchorage, AK 99501

Physical Address: 721 DEPOT DR, Ste. 700, Anchorage, AK 99501

6 - Officials

Name	Address	% Owned	Titles
Keolani Bailey	703 Beard Ave. , Honolulu, HI 96818		Director
John Morris	PO Box 91313, Anchorage, AK 99509		Director
Leon Barbachano	424 West Founders Blvd., Saratoga Springs, UT 84045		Director
John Morris			Incorporator
Leon Barbachano			Incorporator
Keolani Bailey			Incorporator

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 Incorporator(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: Stacey C Stone



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 #: 10298676
Date Filed: 09/25/2025
State of Alaska, DCCED

FOR DIVISION USE ONLY

Domestic Nonprofit Corporation

Initial Biennial Report

Entity Name: ADVANCING ALASKA ACTION, Inc.

Entity Number: 10298676

Home Country: UNITED STATES

Home State/Prov.: ALASKA

Physical Address: 721 DEPOT DR, STE. 700, ANCHORAGE,
AK 99501

Mailing Address: 721 DEPOT DR, ANCHORAGE, AK 99501

Registered Agent information cannot be changed on this form. Per Alaska Statutes, to update or change the Registered Agent information this entity must submit the Statement of Change form for this entity type along with its filing fee.

Name: United States Corporation Agents, Inc.

Physical Address: 721 DEPOT DR, ANCHORAGE, AK 99501

Mailing Address: 721 DEPOT DR, ANCHORAGE, AK 99501

Officials: The following is a complete list of officials who will be on record as a result of this filing.

- **Provide all officials and required information. Use only the titles provided.**
- **Four (4) Mandatory Officers, who must be individuals:** this entity must have a President, Vice-President, Secretary, and Treasurer. Two or more offices may be held by the same individual, except the offices of President and Secretary cannot be the same individual.
- **Three (3) Mandatory Directors, who must be individuals.** The number of directors must be at least three (3).

Full Legal Name	Complete Mailing Address	Assistant Secretary	Assistant Treasurer	Director	President	Secretary	Treasurer	Vice President
Ann Riggs	PO Box 1432, Palmer, AK 99645			X				X
Leon Barbachano	424 West Founders Blvd, Saratoga Springs, UT 84045			X	X			
Sandra Lempke	2844 Seafarer Lp, Anchorage, AK 99516			X		X	X	

If necessary, attach a list of additional officers on a separate 8.5 X 11 sheet of paper.

NAICS Code: 813940 - POLITICAL ORGANIZATIONS

New NAICS Code (optional):

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: Grayson Massey

← ↻ https://www.youtube.com/@YesEndRCV

YouTube

Yes end ranked choice voting in alaska

× 🔍 🎤 + Create 🔔

Home

Shorts

Subscriptions

You



Yes! End ranked choice voting in Alaska!

@YesEndRCV • 27 subscribers • 4 videos

Vote YES to end the MESS of ranked choice voting in Alaska. Yes on 2 on November 3! ...more

Subscribe

Videos Shorts 🔍



Less Complicated Is Better

485K views • 1 month ago



Vote YES to Repeal Ranked Choice Voting in Alaska

814K views • 1 month ago



Repeal Ranked Choice Voting in Alaska

912K views • 2 months ago

← ↻ 🔒 https://www.youtube.com/@YesEndRCV

YouTube

Yes end ranked choice voting in alaska

Home

Shorts

Subscriptions

You

Videos

Shorts

Search

YES YES YES! 2

END RANKED CHOICE VOTING

Less Complicated Is Better

485K views • 1 month ago

Yes! End ranked choice voting in Alaska!

Description

Vote YES to end the MESS of ranked choice voting in Alaska. Yes on 2 on November 3! This communication was paid for by Repeal Now, PO Box 240382, Anchorage AK 99524. Judy Eledge, Chair, approves this message. Top contributors are Aurora Action Network, Anchorage AK; Kyle Bates, Anchorage AK; LOT Inc, Palmer AK.

More info

www.youtube.com/@YesEndRCV

Joined May 4, 2026

27 subscribers

4 videos

2,154,741 views

Share channel

Report user

YES YES YES! 2

END RANKED CHOICE VOTING

Ranked Choice Voting in Alaska

2 months ago

Repeal Now

To support the repeal of Alaska's 2020 ballot measure 2

- ☒ I commit support of \$10,000
☐ I commit support of \$5,000
☐ I commit support of \$2,500
☐ Please contact me to discuss further

My contribution is:

Please Send me rack cards, that I can pass out to my customers.

☒ Corporate

1. Business name: LOT Inc
2. Mailing address: PO Box 1567, Palmer, AK 99645
3. Corporate Officers' Name, Title
 1. Jim L Turner President / Sec / Treasurer / Sole Shareholder
 2. _____
 3. _____

LOT INC DBA: TURNERS CORNER JIM LOT TURNER, PRESIDENT PH. 907-745-6161 PO BOX 1567 PALMER, AK 99645		First National Bank ALASKA www.FNBAlaska.com 89-6/1252		60934
DATE: <u>4/10/2026</u>				
PAY TO THE ORDER OF: <u>Repeal Now</u>				\$ <u>10,000</u> ⁰⁰ / ₁₀₀
<u>Four thousand + 00/100</u>				DOLLARS
<u>Donation - Political</u>				
THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED				
⑈060934⑈ ⑆125200060⑆ 1810 895 1⑈				