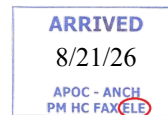


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Attorney for Aurora Action Network

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Alaskans for Better Elections,	)	
	)	
Complainant,	)	
	)	
vs.	)	Case No. 26-06/26-08-CD
	)	
Repeal Now, Aurora Action Network,	)	
Advancing Alaska Action,	)	
	)	
Respondents.	)	

PREHEARING MEMORANDUM

Respondent Aurora Action Network (“AAN”), by and through undersigned counsel, hereby files its Prehearing Memorandum pursuant to the Commission’s Notice of Hearing and Procedural Order dated August 11, 2026.

I. RESPONSE TO STAFF REPORT

A. Address and Principal Place of Business

AAN agrees with the Staff Report’s recommendation that the Commission find no violation of AS 15.13.090 based on Repeal Now’s identification of Anchorage, Alaska as AAN’s principal place of business, and joins that recommendation in full. The Staff Report correctly concluded that AAN and Repeal Now pointed to a sufficient basis for that identification and that

a preponderance of the evidence does not support a violation. AAN respectfully requests the Commission adopt the Staff Report's recommendation and dismiss this allegation as to AAN. (Staff Report at pp. 13–14.)

B. True Source of Advancing Alaska Action, Inc.'s \$5,000 Contribution

Whether Alaska law imposes an affirmative duty to verify a contributor's own representation of its true source status remains an open question, and AAN does not concede that any such duty exists. However, in order to resolve this matter, AAN does not contest the Staff Report's recommended finding that AAN failed to accurately identify the true source of a \$5,000 contribution received from Advancing Alaska Action, Inc., or its recommended penalty of \$1,250. (Staff Report at pp. 19–21, 27, 29.)

C. Contribution from Damien Stella

The Staff Report identifies a reporting pattern concerning a contribution from Damien Stella that it was unable to resolve on the present record, and recommends the Commission continue this allegation to allow Complainant the opportunity to clarify it. AAN provides the following explanation so the Commission and Complainant have it in advance of any further proceedings. (Staff Report at pp. 14–16, 26.)

Damien Stella made a single \$6,000 contribution to AAN. AAN's July 7, 2025 Statement of Contributions initially misreported that contribution as \$5,000, an error later corrected to the accurate \$6,000 figure. The contribution then appears again on AAN's February 12, April 10, April 28, and May 14, 2026 Statement of Contributions filings not because Mr. Stella made additional contributions, but because APOC directed AAN, in guidance provided in late 2025, to report the complete cumulative list of true source contributors on every Statement of Contributions tied to a new transfer to Repeal Now, not only the contributors new since the prior filing. Repeal Now has identified the same guidance in its own answer to this complaint. (Staff Report at p. 16.) AAN's Statement of Contributions filings and AAN's FEC filings are consistent, both reflecting a single \$6,000 contribution from Mr. Stella.

AAN respectfully requests the Commission find no violation as to this allegation.

D. Timothy Mellon Address Error

AAN agrees with the Staff Report's recommendation that AAN's listing of an incorrect state for contributor Timothy Mellon was a de minimis, corrected error not warranting a civil penalty, and requests the Commission adopt that recommendation. (Staff Report at pp. 21, 27.)

II. WITNESSES

AAN will not call any witnesses to testify.

III. EXHIBITS

AAN will not introduce any exhibits.

IV. CONCLUSION

For the foregoing reasons, AAN respectfully requests the Commission adopt the Staff Report's recommendations dismissing the principal place of business allegation and the Timothy Mellon allegation as to AAN, enter the Staff Report's recommended \$1,250 penalty on the Advancing Alaska Action, Inc. true source allegation without further contest from AAN, and find no violation on the Damien Stella allegation in light of the explanation provided above.

DATED this 21st day of August, 2026.

ROSS POLITICAL LAW, APC
Attorney for Aurora Action Network



By:
Derek H. Ross

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 21st day of August, 2026, a true and correct copy of the foregoing was served on the following via electronic delivery:

Alaskans for Better Elections

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Repeal Now

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