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September 23, 2022

VIA EMAIL (tom.lucas@alaska.gov)

Thomas Lucas
Campaign Disclosure Coordinator
Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Room 128
Anchorage, AK 99508-4149

Re: *AkPIRG et al. v. Brett Huber et al.*, Complaint 22-01-CD
Response to Complaint by Brett Huber and Strategic Synergies, LLC

Dear Mr. Lucas:

I am responding on behalf of myself, Brett Huber, and my company, Strategic Synergies, LLC, to the baseless and completely unfounded complaint filed by the Alaska Public Interest Research Group and 907 Initiative against me, Strategic Synergies, and others. As shown below, there was no coordination or cooperation of any sort – either directly or indirectly – between me or Strategic Synergies and the Dunleavy Campaign. The complaint contains no proof or evidence whatever because, quite simply, no coordination occurred here. Accordingly, the complaint should be dismissed, and the matter closed.

I did not coordinate or cooperate in any way with the Dunleavy Campaign about the 2022 election – either directly or indirectly. Nor did Strategic Synergies, LLC, a company which I own, or A Stronger Alaska, an independent expenditure entity which supports re-electing Mike Dunleavy for Governor in 2022. On or about April 29, 2022, Strategic Synergies and I were hired by A Stronger Alaska as consultants for its independent expenditure activities in support of re-electing Governor Dunleavy.

Although Strategic Synergies had previously entered into a contract with the Governor's Office to provide consulting services completely unrelated to the 2022 campaign and election, that contract was ended or cancelled on May 31, 2022. Furthermore, while the contract was in place, Strategic Synergies and I reported to Randy Ruaro, who was project director and Governor Dunleavy's chief of staff. I did not report to or communicate about my consulting services with Tyson Gallagher, as alleged in the complaint. I certainly did not communicate, coordinate, or cooperate with Gallagher (or with anyone else in the Governor's office) about the 2022 campaign or campaign strategy. Nor did I discuss such matters with Jordan Shilling, who is running the Governor's re-election campaign.

Although I was listed as a deputy treasurer for the Dunleavy Campaign, this was purely a ministerial position so that I could lawfully accept contributions for the campaign. The fact that

the Campaign did not remove me as deputy treasurer until after I began working for A Stronger Alaska was insignificant, and merely an administrative oversight. I understand that the Campaign has many deputy treasurers. More importantly, as deputy treasurer, I was not involved in any strategy, plans, communications, or other campaign activities, and did not discuss such matters with Shilling or with anyone else at the Campaign. I merely had the ability to accept contributions for the Campaign and pass such contributions to the Campaign. In fact, I did not accept any contributions for the Campaign after October 2021, long before I began working for A Stronger Alaska. Thus, although I was still listed as a deputy treasurer, in 2022 I have not in fact performed any duties whatever relating to that role.

The remaining allegations fall into two categories:

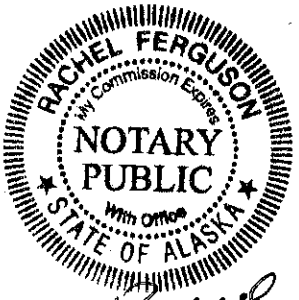
(1) They claim an alleged misuse of public money which, although also untrue, I understand is not within APOC's jurisdiction. In fact, the complainant itself concedes as much when it says it will have to file a separate complaint with the Alaska Personnel Board. As far as I can tell, the main reason for including these entirely untrue allegations here was to try to besmirch me and Strategic Synergies.

(2) They are directed at other respondents, e.g., the Dunleavy Campaign or A Stronger Alaska, and thus require no response from me.

In sum, I did not communicate with the Dunleavy Campaign or anyone in Governor Dunleavy's office about campaign strategy, plans, communications, or other campaign activities. The complaint's allegations suggesting otherwise are simply untrue, and entirely unfounded. Thus, there was no coordination or cooperation here, and no violation of any campaign finance laws.

Sincerely,

Brett Huber, Sr.



9/23/22

Brett Huber, Sr.
Strategic Synergies
200 W 34th Ave, #586
Anchorage, AK. 99503
907-312-6600

Cc: Scott Kendall (via email)