

MEMORANDUM

TO: APOC Commissioners
FROM: William J. Evans
SUBJECT: Report 22-07-CD
DATE: March 31, 2023

I. PROCEDURAL POSTURE

On November 19, 2022, Jennifer Johnston (“Complainant”) filed a complaint against Alaska Policy Partners, Inc. (“APP”).¹ The complaint alleges that APP committed several violations of AS 15.13. On January 13, 2023, APP filed its Answer denying the allegations found in the Complaint.²

II. BACKGROUND FACTS

Alaska Policy Partners Inc. (“APP”) is an Alaska non-profit corporation.³ According to APP’s attorney, APP engages in education, advocacy, and outreach efforts, and received donations without restriction on the use of such funds.⁴ Some

¹ Exhibit 1, Complaint.

² Exhibit 2, Respondent’s Answer.

³ Exhibit 3, State of Alaska, Corporations, Business & Professional Licensing, Entity Details.

⁴ Exhibit 4, Email Exchange October 19, 2022, Brandeis to APOC Staff.

of the donations received by APP were subsequently transferred from its general fund to its political activities account and used on independent expenditures.⁵

On February 16, 2022, APP registered with APOC.⁶ Months later, APP also established Alaska Policy Partners PAC (“APP PAC”) and registered with APOC on June 28, 2022.⁷ APP PAC listed its Campaign Plans to include involvement in the 2022 State Primary and General Elections.⁸

The first report of any activity by any APP entity was a 24-hour report filed by APP PAC on September 25, 2022, indicating that it had received 7 contributions on September 24, 2022.⁹ On September 27, 2022, APP PAC filed an expenditure report identifying a \$30,000 expenditure made the previous day to Seth Church.¹⁰ On October 3, APP PAC amended its report to indicate that the expenditure was made to Massey Political Consultants (“Massey”).¹¹ On October 4, 2022, APP PAC reported a \$60,000 expenditure provided to Massey.¹²

⁵ Exhibit 4, Email Exchange October 19, 2022, Brandeis to APOC Staff.

⁶ Exhibit 5, February 16, 2022, APP, Entity Registration Form.

⁷ Exhibit 6, June 28, 2022 Group Registration, APP PAC.

⁸ Id.

⁹ Exhibit 23, September 25, 2022, APP PAC 24-hour Report.

¹⁰ Exhibit 7, September 27, 2022, APP PAC Report.

¹¹ Exhibit 21, October 3, 2022, APP PAC Amended Report.

¹² Exhibit 8, October 4, 2022, APP PAC Amended Report.

After receiving and reviewing its submissions, APOC staff questioned APP PAC regarding its filings.¹³ Yuliya Temple, Treasurer for APP PAC and filer of its reports, responded the same day stating that APP registered an IE and a PAC and that, to date, the PAC had no activity.¹⁴ Temple indicated APP PAC intended to make contributions directly to candidates in the future, but had not done so yet.¹⁵ She further indicated that “[w]e have paid Massey Consulting \$110,000.”¹⁶

That same day, Jodi Taylor, listed as Director of APP, provided additional information in an email exchange with APOC Staff.¹⁷ Taylor explained that Alaska Policy Partners a C(6) entity “voted to deploy funds to the IE – a separate account.”¹⁸ She also verified the races APP was supporting and the amount of the expenditures that had been made to Massey.¹⁹

APP PAC also filed an amended report that same day indicating the information it had previously filed was being re-submitted under APP.²⁰ Contemporaneously, APP filed a report in which it listed three expenditures to Massey - \$25,000 on September 24, 2022; \$25,000 on September 26, 2022; and

¹³ Exhibit 9, October 5, 2022, email APOC Staff to APP.

¹⁴ Exhibit 10, October 5, 2022, email Temple to APOC Staff.

¹⁵ Id.

¹⁶ Id.

¹⁷ Exhibit 11, October 5, 2022, emails Taylor to APOC Staff.

¹⁸ Id.

¹⁹ Id.

²⁰ Exhibit 12, October 5, 2022, APP PAC Amended Report.

\$60,000 on October 4, 2022 – totaling \$110,000 in expenditures.²¹ The October 5 APP report listed seven contributions totaling \$68,500 to APP.²² On October 8, 2022, APP amended its report by adding four additional contributors.²³

On October 19, 2022, APP attorney, Jason Brandeis, responded to questions previously posed by APOC staff.²⁴ Brandeis explained that APP receives donations for its education, advocacy, and outreach efforts and some of those donations were transferred to APP’s political activities account and spent on independent expenditures.²⁵ Brandeis stated that the reports that had been filed for APP PAC, were in error, and should have been filed for APP.²⁶ Brandeis also addressed the issue of the “true source” of the funds used by APP for independent expenditures.²⁷ Although voicing disagreement with the position of APOC staff regarding the need to identify all contributors to APP’s general fund, Brandeis stated APP would comply and identify all contributors to its general fund.²⁸

²¹ Exhibit 13, October 5, 2022, APP Amended Report. This differed from the expenditures listed by APP PAC to Massey - \$30,000 on September 26, 2022; and \$60,000 on October 4, 2022. See Exhibit 8, October 4, 2022, APP PAC Amended Report.

²² Exhibit 13, October 5, 2022, APP Amended Report.

²³ Exhibit 14, October 8, 2022, APP Amended Report.

²⁴ Exhibit 4, October 19, 2022, Email Brandeis to APOC Staff.

²⁵ Id.

²⁶ Id.

²⁷ Id.

²⁸ Id. Brandeis also argued that APP should not be penalized for the reporting issues because the changes occasioned by Ballot Measure 2 are new and confusing for inexperienced entities.

On October 25, 2022, APP amended its report by including ten new contributions.²⁹ One of the new contributions was listed as having been received on September 17 and the other nine were listed as having been received on September 24, 2022.³⁰ APP filed an amended report on October 30, 2022, making corrections to previously provided names.³¹

On November 1, 2022, Brandeis and APOC Staff again exchanged emails regarding APP filings.³² Brandeis referred to the October 25 and October 30 reports as including all of the contributors to APP's general fund.³³ Brandeis noted, however, that there appeared to be incorrect dates regarding when some of the contributions were received and that some of the contributions listed as received on September 24, 2022 were, in fact, received in 2021.³⁴ Accordingly, on November 1, 2022, APP amended its report to change the dates of several contributions.³⁵

On December 7, 2022, APP again amended its report to provide Occupation/Employer and Director/Officer information and to correct other

²⁹ Exhibit 15, October 25, 2022, APP Amended Report.

³⁰ Id.

³¹ Exhibit 16, October 30, 2022, APP Amended Report.

³² Exhibit 17, November 1-2, 2022, Email Brandeis to APOC Staff.

³³ Id.

³⁴ Id.

³⁵ Exhibit 18, November 1, 2022, APP Amended Report.

previously provided information³⁶ The amended report also disclosed an additional \$100,000 expenditure to Massey that occurred on October 20, 2022.³⁷ The final amended report from APP was filed on January 16, 2023 and provided additional information concerning its contributors.³⁸

III. LAW AND ANALYSIS

A. APP's Potential Violations Regarding Reporting its Expenditures.

1. APP is alleged to have reported the same expenditures as APP PAC.

The Complaint alleges APP improperly reported the same expenditures for APP PAC and APP.³⁹ This issue has been acknowledged by APP in its communications with APOC Staff on October 5, 2022 and on October 19, 2022.⁴⁰ APP advised APOC Staff that it had mistakenly entered the expenditures as belonging to the PAC when in fact they were undertaken by APP.⁴¹ Accordingly,

³⁶ Exhibit 19, December 7, 2022, APP Amended Report.

³⁷ Id.

³⁸ Exhibit 20, January 16, 2023, APP Amended Report. The added information concerned Officer/Director information for a few contributors.

³⁹ Exhibit 1, Complaint, Violation 1.

⁴⁰ Exhibit 11, October 5, 2022, emails Taylor to APOC Staff; Exhibit 10, October 5, 2022, email Temple to APOC Staff; Exhibit 4, October 19, 2022, Email Brandeis to APOC Staff.

⁴¹ Id.

this investigation treats the expenditures as being made solely by APP.⁴² The mistaken report of expenditures by APP PAC did not create an independent APOC violation, it did, however, result in APP not filing its initial IE report until October 5, 2022 – one day later than required.⁴³ Notably, even if APP was given credit for the reported expenditures reported by APP PAC it would still result in APP's report being one-day late and substantially incomplete. None of the three expenditure reports made by APP PAC included the \$25,000 expenditure to Massey occurring on September 24, 2022.⁴⁴ Accordingly, this expenditure was not reported, in any form, until October 5, 2022.⁴⁵ APP's delay in filing its required expenditure reports is covered in detail in subsection 4, below.

2. APP is alleged to have made an expenditure to a company not licensed to do business in Alaska.

The Complaint alleges APP improperly made expenditures to Massey, a company not licensed to conduct business in Alaska.⁴⁶ No APOC violation is

⁴² Issues surrounding potential violations by APP PAC are not addressed in this investigation and report. There exists some evidence that APP PAC made several contributions to campaigns without filing the required APOC reports.

⁴³ APP's initial expenditure to Massey occurred on September 24, 2022, and thus its first report was due no later than October 4, 2022 pursuant to AS 15.13.110(h). This delay, however, is subsumed into a larger violation due to APP's incomplete expenditure reporting that was not remedied until December 7, 2022.

⁴⁴ Exhibit 7, September 27, 2022, APP PAC Amended Report; Exhibit 21, October 3, 2022, APP PAC Amended Report; Exhibit 8, October 4, 2022, APP PAC Amended Report.

⁴⁵ Exhibit 13, October 5, 2022, APP Amended Report.

⁴⁶ Exhibit 1, Complaint, Violation 1.

found with respect to APP making expenditures to a company not licensed to do business in Alaska. While Massey could potentially face legal scrutiny regarding any work it may have performed in Alaska, its lack of an Alaska business license does not constitute an APOC violation by APP.

3. APP failed to “Disclose in Detail” its Listed Expenditures.

The Complaint alleges that APP violated the requirements of 2 AAC 50.321(d) which requires specific information be disclosed when an expenditure is made to a business providing campaign consultation or management services (such as Massey):

If an expenditure required to be reported under (a) or (b) of this section is made to an advertising agency or to an individual or business that provides campaign consultation or management services, the report must disclose in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed, and the amount of the expenditure.⁴⁷

APP claims the requirements of 2 AAC 50.321(d) apply only apply to “candidates” and “groups.”⁴⁸ Because APP is neither a candidate nor group, it claims it is not required to “disclose in detail” its expenditures as set forth in 2 AAC 50.321(d).

⁴⁷ 2 AAC 50.321(d).

⁴⁸ Exhibit 2 Respondent’s Answer, pp. 2-3. APP’s position is based on 2 AAC 50.321(d)’s specific reference only to expenditures “required to be reported under (a) or (b) of this section...” Subsections (a) and (b) refer to expenditure reports for “candidates” and “groups.” Because APP is an entity and not either a candidate or a group, it claims 2 AAC 50.321(d) is not applicable to its expenditures to Massey.

The obligation of APP to report its expenditures stems from AS 15.13.040(d) which requires:

Every person making an independent expenditure shall make a full report of expenditures made and contributions received, upon a form prescribed by the commission, unless exempt from reporting.⁴⁹

AS 15.13.040(e) further requires APP to provide "an itemized list of all expenditures made, incurred, or authorized..."⁵⁰

The central issue, therefore, is whether APP's requirement to provide an "itemized list of all expenditures," requires it to identify the specific services that were provided by Massey or whether it is only required to identify its expenditures to Massey. For the following reasons, the investigation concludes that the expenditure reports by APP listing expenditures to Massey comply with applicable law.

At the outset, it should be noted that APP's defense that the requirements of 2 AAC 50.321(d) are not applicable to APP is well-reasoned. 2 AAC 50.321(d)'s requirements apply directly to candidates and groups and indirectly to non-group entities.⁵¹ In fact, the title of 2 AAC 50.321 specifically references "[r]eporting by a candidate, group, or nongroup entity."⁵²

⁴⁹ AS 15.13.040(d).

⁵⁰ AS 15.13.040(e)(2).

⁵¹ 2 AAC 50.321(c) requires non-group entities to file reports including the information required by "(b)(1) and (2) of this section," which places them within the ambit of 2 AAC 50.321(d).

⁵² 2 AAC 50.321.

The question, therefore, is whether by specifically addressing only “candidate(s), group(s), or nongroup entit(ies),” the code intended to allow “persons” or “entities” making independent expenditures to camouflage the actual uses of such expenditures by reporting only that an expenditure was made to a political consultant. There is little reason to suppose such an intent. In fact, there exists no rationale reason why “candidates, groups and non-group entities” would have to “disclose in detail” expenditures to political consultants while “persons” or “entities” making similar expenditures would not.

Accordingly, if this issue arose in the context of an Advisory Opinion the result could well be different. A reasonable and logical argument can be made that the requirements of 2 AAC 50.321(d) to “disclose in detail” *should* be applicable to all IE filers. APOC Staff has at times, in Advisory Opinions, extended the scope of its requirements, by analogy, into other areas not directly addressed in the Code.⁵³ For example, in AO 19-04-CD (Bags for Change), APOC Staff extended distinctions concerning “communications,” that applied to “candidates,” to ballot initiative campaigns, as well.⁵⁴

In the current situation, however, APP is facing a violation and civil penalty, and as such, should not be required to reason by analogy in order to determine the applicability of a code provision that, on its face, does not apply to

⁵³ See e.g. AO 19- 04-CD (Bags for Change), July 1, 2019, Approved by Commission, September 27, 2019, extending distinctions concerning “express communications,” “electioneering communications,” and “issue communications” regarding candidates to ballot initiative campaigns.

⁵⁴ Id.

APP. Accordingly, APP was not sufficiently placed on notice that its reports regarding expenditures to a political consultant were subject to 2 AAC 50.321(d). Accordingly, APP did not violate any existing APOC requirements with respect to the generalized description it provided of its expenditures to Massey.

4. APP was Delinquent in Reporting Its Expenditures.

APP's first expenditure was a \$25,000 expenditure to Massey made on September 24, 2022, which triggered a 10-day period in which to make its initial expenditure report.⁵⁵ This expenditure was not reported until October 5, 2022, on a form that was substantially incomplete.⁵⁶ Additionally, on October 20, 2022, APP made another \$100,000 expenditure to Massey.⁵⁷ This expenditure should have been reported no later than October 30, 2022, but it was not reported until December 7, 2022.⁵⁸ Because APP had not sufficiently complied with its first expenditure report requirement, the October 20, 2022 expenditure is simply rolled into APP's failure to provide a compliant expenditure report prior to December 7, 2022.

B. APP Failed to Provide Full Reporting Regarding its Contributors in a Timely Manner.

⁵⁵ AS 15.13.110(h).

⁵⁶ Exhibit 13, October 5, 2022, APP Amended Report. In addition to the September 24 expenditure, this report also included two other expenditures to Massey occurring on September 26 and October 4. The report failed, however, to include the required contributor information required by AS 15.13.040(e).

⁵⁷ Exhibit 19, December 7, 2022, APP Amended Report.

⁵⁸ Id.

Violations #2 and #3 in the Complaint allege APP failed to provide required information for individual and business contributors in its October 5 and October 30 reports.⁵⁹ The analysis of whether APP met the requirements for identifying contributions is, in essence, an analysis of the timeliness of APP's reporting of its contributions and as such requires a review of several of the amended reports filed by APP.⁶⁰

As a threshold issue it must be determined whether APP had an obligation to report the contributions it received to its general fund. APP has argued that it was not required to disclose such contributions because they were "donations" and did not constitute "contributions" pursuant to AS 15.13.040(4)(A).⁶¹

On September 15, 2022 APOC Staff issued an Advisory Opinion in matter AO 22-03-CD (Unite America PAC, Inc.) which addressed a nearly identical issue.⁶² In that case, APOC Staff explained that an entity using contributions to a non-segregated general fund for the purpose of making independent expenditures, was required to disclose all of the contributions to its general fund

⁵⁹ Exhibit 1, Complaint, Violations #2 and #3.

⁶⁰ Notably, the Complaint was filed on November 19, 2022 but raised issues that were not fully resolved by APP until it filed its December 7, 2022 Amended Report. Accordingly, the analysis of the allegations in the Complaint requires a review of actions occurring after the Complaint was filed in order to document the timing of the eventual compliance by APP.

⁶¹ Exhibit 2, Respondent's Answer, pp. 4-5.

⁶² AO 22-03-CD, September 15, 2022, approved with modification by commission on February 6, 2023.

(for a 24-month period prior to its first independent expenditure) as the “true source” of the expenditure funds.⁶³ APOC Staff explained:

In other words, the “true sources of the contribution” are those who gave money to the general fund out of which the \$30,000 contribution was made. Moreover, the true sources are not limited to those who gave “contributions” defined as funds provided for the purposes of influencing a candidate election in Alaska. Instead, the true sources of funds contributed to influence a candidate election in Alaska may also derive from “donations, dues, or gifts” that pass through an intermediary that does not segregate its accounts.⁶⁴

Accordingly, the “donations” provided to APP’s general fund were used to influence a candidate election are the “true source” of APP’s independent expenditures, and as such must be reported as contributions once more than \$2,000 of general funds was spent on independent expenditures.⁶⁵

APP’s counsel acknowledged, on October 19, 2022, that APP was aware of the Unite America PAC Advisory Opinion but disagreed with APOC Staff’s position.⁶⁶ Despite its disagreement, APP reported its contributions in order to come into compliance.⁶⁷ APP claims it voluntarily “overreported ” its previous donations to APP’s general fund and as such should not be penalized for its

⁶³ AO 22-03-CD, September 15, 2022, approved with modification by Commission on February 6, 2023.

⁶⁴ Id. (Internal footnotes omitted.).

⁶⁵ AS 15.13.110(k).

⁶⁶ Exhibit 4, October 19, 2022, Email Exchange, Brandeis and APOC Staff.

⁶⁷ Exhibit 4, October 19, 2022, Email Exchange, Brandeis and APOC Staff.

willingness to “voluntarily comply” with APOC Staff’s interpretation of AS 15.13.400(4)(A)(i-iii).⁶⁸ Having established the obligation of APP to report the contributions to its general fund it must then be determined whether APP complied with this reporting requirement.

AS 15.13.040(e), establishes the requirement that APP report its contributors, including their name and address and if an individual, their principal occupation and employer if such contributions were used for an expenditure.⁶⁹ If the contribution was from a business, APP was required to list each officer and director of the business as well as their addresses.⁷⁰ This report was required to be filed within 10-days of making an expenditure.⁷¹ In addition, however, AS 15.13.110(k) required APP to report “true source” contributions *within 24-hours of receipt*.⁷²

The triggering event for APP’s requirement to report its contributors was its first expenditure to Massey on September 24, 2022.⁷³ At that point, APP was required to report its contributors on a 24-hour report on September 25, 2022,

⁶⁸ Exhibit 2, Respondent’s Answer, pp. 7-8. Presuming that APP fully reported all its contributions to its general fund, it is evident that the vast majority of its general fund was used for independent expenditures. APP reported a total of \$268,900 in contributions and \$210,000 in independent expenditures, accordingly, it cannot be said that APP significantly “overreported” its contributions.

⁶⁹ AS 15.13.040(e)(5)(A).

⁷⁰ AS 15.13.040(e)(5)(B).

⁷¹ AS 15.13.110(h).

⁷² AS 15.13.110(K).

⁷³ Exhibit 13, October 5, 2022, APP Amended Report.

pursuant to AS 15.13.110(k).⁷⁴ In addition, APP was required to file an expenditure report pursuant to AS 15.30.040(e) and AS 15.13.110(h) within 10-days of its September 24, 2022, expenditure. Both reports would be required to include all contributions to APP's general fund for a 24-month period prior to its required reports.⁷⁵ APP failed to timely comply with either requirement.

APP provided no 24-hour report listing the contributions it received prior to its September 24, 2022, expenditure.⁷⁶ APP's first report providing any contribution information occurred on October 5, 2022.⁷⁷ This report included three expenditures made to Massey and contained information for seven contributors.⁷⁸

⁷⁴ APP appears to have been aware of this requirement based on the action of APP PAC. APP PAC filed a 24-hour report on September 25, 2022 (See Exhibit 23) one day after receiving seven contributions.

⁷⁵ AO 22-03-CD, September 15, 2022, approved with modification by commission on February 6, 2023.

⁷⁶ Even if APP were given credit for the information contained in APP PAC's September 25, 2022, 24-hour report, it would still be in violation of AS 15.13.110(k) because there were at least 10 contributions that APP received prior to, or on, September 24, 2022, that were not listed on the APP PAC 24-hour report.

⁷⁷ Exhibit 13, October 5, 2022, APP Amended Report.

⁷⁸ Exhibit 13, October 5, 2022, APP Amended Report. The information provided for the seven contributors contained inaccurate dates for the contributions and did not provide all of the required information for each contributor. Alaska law requires that every person making an independent expenditure to provide the principal occupation and employer for an individual contributor and the name and address of each officer and director for any contributor that is not an individual. AS 15.13.040(e)(5)(A)-(B). APP struggled through its several amended reports to provide the required Occupation/Employer and Director/Officer information for several contributors.

Subsequently, it was determined that this October 5, 2022, report was both inaccurate and significantly incomplete.

The full extent of the contributions received by APP prior to October 5, 2022, was revealed in APP's Amended Report on November 1, 2022, which established that APP had, in fact, received 17 contributions on, or prior to, September 24, 2022.⁷⁹ The November 1, 2022 Amended Report, while correcting the dates for the contributions, continued to provided incomplete Occupation/Employer and Officer/Director information for several of the contributors and as such was still not a fully compliant report for purposes of AS 15.13.040(e).⁸⁰ By providing the correct dates, names and contributors in the November 1 Amended Report, APP did comply with the requirements of AS 15.13.110(k) as of that date.

The chart included as Exhibit 22, shows each of the 17 contributions received by APP prior to October 5, 2022 which should have been fully reported by APP in a 24-hour report on September 25, 2022 and an expenditure report on October 4, 2022.⁸¹ The chart also shows the date on which the contribution was first reported by APP and the date on which complete information for the contributor was provided thus satisfying APP's AS 15.13.040(e) requirement.⁸²

⁷⁹ Exhibit 18, November 1, 2022, APP Amended Report.

⁸⁰ Exhibit 18, November 1, 2022, APP Amended Report.

⁸¹ Exhibit 22, Chart of Contributions prior to October 5, 2022.

⁸² Exhibit 22, Chart of Contributions prior to October 5, 2022.

By November 1, 2022, APP had identified all of its contributors, the correct date for the contributions, and provided addresses for each contributor.⁸³ For fourteen of the identified contributors, however, no Occupation/Employer or Officer/Director information was provided.⁸⁴ This was substantially remedied on December 7, 2022 when APP provided the missing information for all but two of its contributors.⁸⁵ Based on this, APP was 64 days delinquent in reporting its contributors pursuant to AS 15.13.040(e) (October 4 – December 27, 2022). In addition, APP was 37 days delinquent in meeting its obligation under AS 15.13.110(k) to report its true source contributors within 24-hours (September 25 – November 1, 2022).

APP received only four contributions after October 5, 2022. Two contributions were received on October 6, 2022, and were reported on October 8, 2022.⁸⁶ Based on AS 15.13.110(k) these two contributions should have been reported within 24-hours and thus should have been reported no later than October 7, 2022. Two contributions were received on October 12, 2022, and were not reported until November 1, 2022.⁸⁷ Because APP had not yet complied with

⁸³ Exhibit 18, November 1, 2022, APP Amended Report.

⁸⁴ Id.

⁸⁵ Exhibit 19, December 7, 2022, APP Amended Report. For one of the contributions (from Samson Electric) APP did not provide Director/Officer information until January 16, 2023. For the other contribution (from Alaskan Eco Tours), APP has never provided the Director/Officer information.

⁸⁶ Exhibit 14, October 8 APP Amended Report.

⁸⁷ Exhibit 18, November 1, 2022, APP Amended Report. At the time of reporting on November 1, 2022, the information provided for these contributions was incomplete as

AS 15.13.110(k) regarding the contributions it had received prior to September 24, 2022, these subsequent violations are rolled into APP's overall failure to timely comply with AS 15.13.110(k).

C. APP Is Alleged to Have Received Contributions Prior to Registering with APOC

Violation #4 of the Complaint alleges APP reported having received \$80,000 in contributions in 2021 prior to its registration with APOC.⁸⁸ The complaint further alleges APP failed to meet filing deadlines for January and March 2022 contributions that it received.⁸⁹ This allegation is without merit. Even though APP received contributions to its general fund in 2021 and early 2022, it did not incur a reporting requirement until it first used such funds for an independent expenditure, which did not occur until September 24, 2021.⁹⁰

D. APP Is Alleged to Have Failed to Report Expenditures for Mailers Sent in Late October or Early November 2022.

The Complaint alleges APP failed to submit a report for expenditures used for design, printing and postage for mailers distributed during the week prior to

it did not contain Occupation/Employer and Director/Officer information. The information regarding one of the contributions was never fully reported as APP failed to provide addresses for the Officers/Directors. See Exhibit 20, January 16, 2023, APP Amended Report.

⁸⁸ Exhibit 1, Complaint, Violation #4.

⁸⁹ Exhibit 1, Complaint, Violation #4.

⁹⁰ AS 15.13.110(H)and (k).

the election.⁹¹ The essence of this allegation is in reality subsumed within the Complaint's Violation #1 which alleges that APP failed to "disclose in detail" its expenditures to Massey.⁹²

It is unclear from APP's disclosure of \$210,000 in expenditures to Massey, what the expenditures were specifically used for. Because neither "persons" nor "entities" are included within the requirements of 2 AAC 50.321(d) to disclose in detail the services provided by political consultants, APP had no obligation to provide such information.

This allegation, however, identifies the real world problems associated with 2 AAC 50.321(d) not applying to "persons" or "entities." It does not serve the purpose of the election disclosure laws for certain entities, such as APP in this case, to be able to essentially hide the specific uses of its expenditures from the public.

IV. CONCLUSION

This investigation concludes that APP committed the following APOC violations with respect to its reporting of its expenditures and contributions:

- 1. APP violated AS 15.13.040(e) by failing to provide a complete expenditure report in a timely manner. An expenditure report was due on October 4, 2022 and was not fully reported until December 27, 2022. The maximum civil penalty for this violation is \$50 per day. APP's report was 64 days late. Accordingly, the maximum civil penalty for this violation is \$3,200.**

⁹¹ Exhibit 1, Complaint, Violation #5.

⁹² Exhibit 1, Complaint, Violation #1.

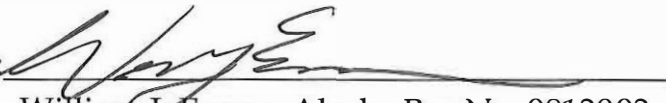
2. APP violated AS 15.13.110(k) by failing to report its true source contributions within 24-hours. APP did not comply with this requirement until it filed its November 1, 2022, Amended Report. The maximum civil penalty for this offense is \$50 per day. APP was 37 days delinquent in meeting this requirement resulting in a maximum civil penalty of \$1,850.

Accordingly, the investigation establishes a maximum civil penalty of \$5,050 for both violations. The investigator recommends that this maximum penalty be reduced by 50% pursuant to 2 AAC 50.865 as APP can be classified as an "inexperienced filer."⁹³ APP has cooperated with APOC Staff, and it appears that the main reason for APP's violations stem from its inexperience. Accordingly, the investigator recommends a civil penalty of \$2,525.

RESPECTFULLY SUBMITTED this 31st day of March, 2023 at Anchorage, Alaska.

SEDOR, WENDLANDT, EVANS & FILIPPI, LLC
Attorneys for Respondent

By:



William J. Evans, Alaska Bar No. 9812092

⁹³ 2 AAC 50.865(a)(1)(b).

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was emailed hand delivered and/or sent via certified mail this 3rd day of April 2023 to:

Jason Brandeis
Birch, Horton Bittner & Cherot
510 L Street, Suite 700
Anchorage, Alaska 99501
jbrandeis@bhb.com

Jennifer Johnston
1109 Hideaway Lake Dr.
Anchorage, Alaska 99507
jennifer@hikealaska.com

 /s/William J. Evans.
Certification signature



Alaska Public Offices Commission



COMPLAINT

FILING A COMPLAINT <i>To be accepted, complaint must include</i>	APOC LAWS ALLEGEDLY VIOLATED <i>Specify section of law or regulation</i>		APOC case name/number/date
1. Complainant's name + contact info 2. Respondent's name + contact info 3. Laws, regulations allegedly violated 4. Description of allegations 5. Basis of knowledge of alleged facts 6. Documentation to support allegations 7. Notarized signature of the complainant 8. Proof that complaint and all supporting documents were served on respondent	Campaign Disclosure Law Public Official Financial Disclosure Legislative Financial Disclosure Lobbying Regulation	<input checked="" type="checkbox"/> AS 15.13 <input type="checkbox"/> 2 AAC 50.250-405 <input type="checkbox"/> AS 39.50 <input type="checkbox"/> 2 AAC 50.680-799 <input type="checkbox"/> AS 24.60 <input type="checkbox"/> 2 AAC 50.880-799 <input type="checkbox"/> AS 24.45 <input type="checkbox"/> 2 AAC 50.550-590	NOV 21 2022

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

<input type="checkbox"/> APOC <input checked="" type="checkbox"/> Person <input type="checkbox"/> Party <input type="checkbox"/> Group	COMPLAINANT	<input type="checkbox"/> Person <input type="checkbox"/> Party <input checked="" type="checkbox"/> Group	RESPONDENT <i>Person or group allegedly violating law</i>
	Jennifer Johnston		Alaska Policy Partners, Inc.
Address City / Zip	11090 Hideaway Lake Dr Anchorage, AK 99507	Address City / Zip	7926 Old Seward Hwy Suite A-8 Anchorage, AK 99518
Phone/Fax	907-727-1087 (phone)	Phone/Fax	907-341-7513
E-mail	Jennifer@hikealaska.com	E-mail	trevor@alaskapolicypartners.com

COMPLAINANT'S REPRESENTATIVE		RESPONDENT'S REPRESENTATIVE	
<i>If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info</i>			
Name/Title		Name/Title	
Address		Address	
Phone/Fax		Phone/Fax	
E-mail		E-mail	

DESCRIPTION or SUMMARY of ALLEGED VIOLATION	Use extra pages if needed	<input checked="" type="checkbox"/> SUPPORTING DOCUMENTS -- DESCRIBE:
See attached.		

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

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

Signature: *[Signature]* Title: _____ Date: 11/21/22
 Subscribed and sworn to or affirmed by me at 12:45 PM on November 21, 2022

Signature: *[Signature]* Title: _____

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



APOC ANCHORAGE 2231 E. NORTHERN LIGHTS #120 ANCHORAGE, AK 99501 907-276-4176 / FAX 907-376-7018 TOLL-FREE 800-470-4176 WEB: http://alaska.gov/apoc	APOC JUNEAU 210 MAIN STREET #500 P.O. BOX 110222 JUNEAU, AK 99811 465-3863 / FAX 465-3832 APOC FORMS: http://alaska.gov/apoc/forms_all.html	APOC COMPLAINT PROCESS; 2 AAC 60.450 - 470 FILING COMPLAINTS: 2 AAC 50.870 ANSWERING COMPLAINTS: 2 AAC 50.870 APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870 INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891 RULES for REQUESTING EXPEDITED CONSIDERATION: AS 15.380(e) APOC LAWS: http://alaska.gov/apoc/apoclaws.html
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Description of Alleged Violations by Alaska Policy Partners, Inc.

Violation #1

Its October 5, 2022 IE report includes three expenditures totaling \$110,000 to Massey Political Consulting for "general campaign consulting, digital advertising, opposition research, and targeted mailers."

One of these expenditures (10/4/2022 to Massey Political Consulting for \$60,000 appears to be the same expenditure reported by the registered group "Alaska Policy Partners PAC" on October 4. The PAC's October 4 report uses an Anchorage address for the business, while the October 5 report uses a Salt Lake City, Utah address. Massey Political Consulting is not licensed to do business in Alaska. Which report is incorrect?

The entity's October 5 report failed to comply with 2 AAC 50.32.1. (d) which requires that if an "expenditure . . . is made to an advertising agency or to an individual or business that provides campaign consultation or management services, the report must disclose in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed, and the amount of the expenditure."

Violation #2

Its October 5, 2022 IE report includes 7 contributions totaling \$68,500. The report fails to provide occupation/employer information for individuals or officer/directors information for business contributors as required by APOC.

One of the contributors, Alaskan Eco Tours LLC, is not a licensed business in Alaska, so the actual source of the contribution is unknown.

Violation #3

Its October 30, 2022 IE report includes 14 new contributions totaling \$196,900. For 10 of the 17 contributions, the report fails to provide occupation/employer information for contributions by individuals or officer/director information for contributions by businesses.

Violation #4

The amended IE report dated November 1, 2022 (that amended the October 6, October 8, October 25, and October 30 reports) the date of six contributions totaling \$100,500 were amended to report that four contributions were received in 2021; one in January 2022; and one in March 2022.

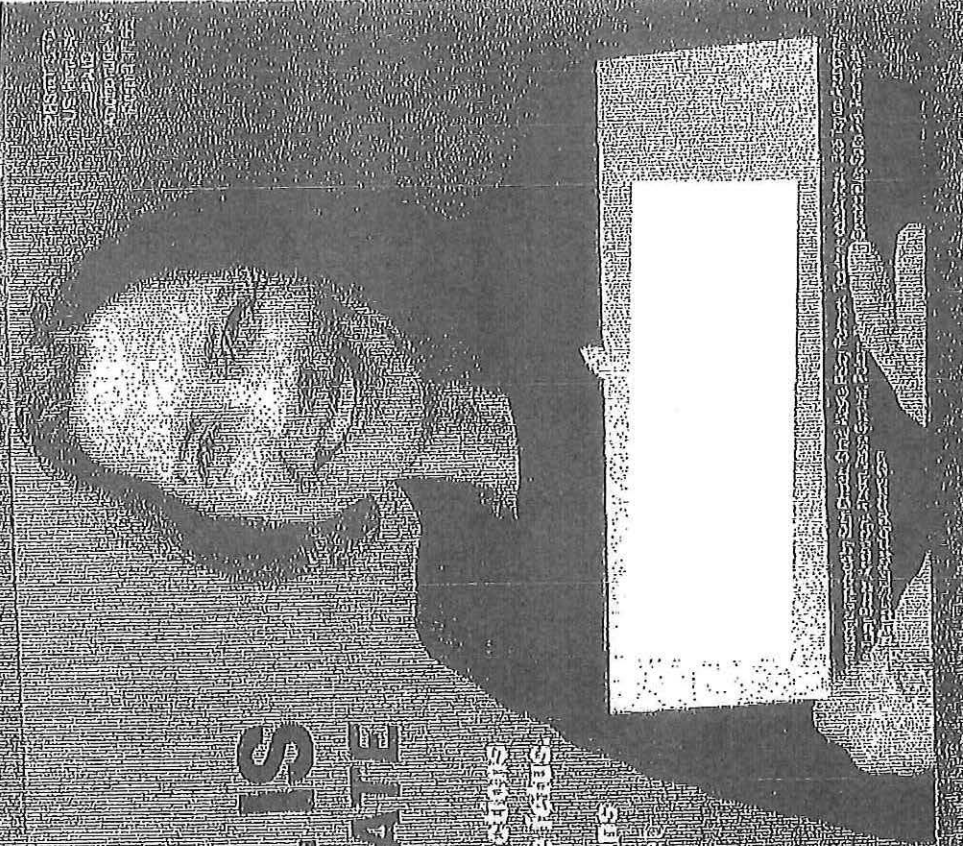
The group was not registered with APOC in 2021 at the time it received \$80,000 in contributions; it also failed to report these contributions for 2021 as required by AS 15.13.110. It also missed the reporting deadlines for the January and March 2022 contributions (during which it still wasn't registered).

Violation #5

The group sent out political mailers late in October/early November 2022 (see Exhibit A; this mailer arrived around November 3, 2022).

The group failed to submit an IE report for expenditures for the mailings design, printing, postage on a 7-day or 24-hour report.

Exhibit A



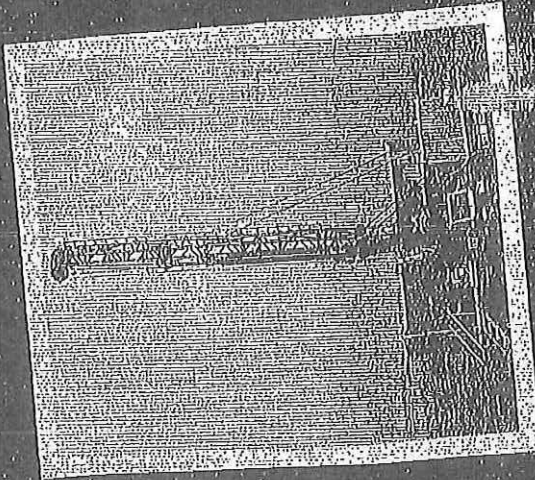
CATHY GIESEL IS THE PRO-LIFE CANDIDATE

Giesel sponsored SF 24, which placed restrictions on abortions and prioritized the health of the fetus.

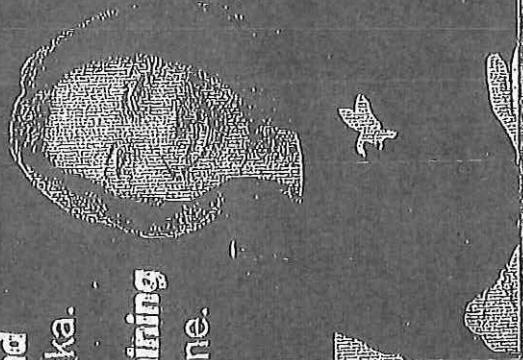
She will continue to support broad restrictions on abortions if elected in November. Giesel's abortion bill was a key part of this session.

Exhibit 1


"We must move forward with a gas pipeline project" - Cathy Giessel



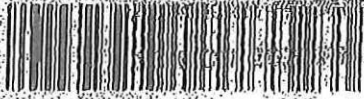
- Giessel supports **lowering taxes for oil and gas companies** that want to develop Alaska.
- If elected she **will continue to support mining and development** projects like Pebble Mine.



BRING DEVELOPMENT TO ALASKA
ELECT CATHY GIESEL!

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<input type="checkbox"/> Complete Items 1, 2, and 3. <input type="checkbox"/> Print your name and address on the reverse so that we can return the card to you. <input type="checkbox"/> Attach this card to the back of the mail piece, or on the front if space permits.	A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee <i>[Handwritten Signature]</i>
1. Article Addressed to: <i>Alaska Policy Builders Inc</i> <i>2926 61st St. Ste 100</i> <i>AK-8</i> <i>Anchorage, AK 99518</i>  9690 9402 7759 2152 7606 23	B. Received by (Printed Name) <input type="checkbox"/> Date of Delivery <i>Timothy A. Banta</i> <i>11/18/22</i>
2. Article Number (Transfer from service label) 7022 2410 0003 4075 7428	D. Is delivery address different from Item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No 3. Service Type <input type="checkbox"/> Priority Mail Express <input type="checkbox"/> Adult Signature <input type="checkbox"/> Registered Mail <input type="checkbox"/> Adult Signature Restricted Delivery <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Certified Mail <input type="checkbox"/> Signature Confirmation <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Signature Confirmation Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Signature Confirmation Restricted Delivery
(For use by USPS only) 75020 PBN 7600-02-000-0058 Domestic Delivery Only	

USPS TRACKING #



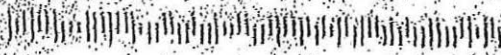
9590 9802 2259 2352 7606 23

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Anchorage AK 99507





Jason Brandeis
Birch Horton Bittner & Cherot
510 L Street, Suite 700
Anchorage, Alaska 99501
jbrandeis@bhb.com
Telephone 907.276.1550
Facsimile 907.276.3680
Counsel for Respondent

BEFORE THE ALASKA PUBLIC OFFICES COMMISSION

Jennifer Johnston,
Complainant,
v.
Alaska Policy Partners, Inc.,
Respondent.

Case No. 22-07-CD

ANSWER

Respondent Alaska Policy Partners, Inc. ("APP"), through counsel and pursuant to 2 AAC 50.880(a)(1), hereby files its answer to the above-captioned complaint ("Complaint").

VIOLATION 1

In its alleged "Violation #1," Complainant raises two issues: (1) a question about the proper address for a political consulting company; and (2) an alleged violation of 2 AAC 50.321(d).

With respect to Complainant's question about the business address for Massey Political Consulting, Inc. ("MPC"), this question does not meet the requirements of 2 AAC 50.870(b)(4) because it does not state a "clear and concise description of facts that, if true, would violate a provision of AS 15.13, AS 24.45, AS 24.60.200 – 24.60.260, AS

39.50, or this chapter." Pursuant to 2 AAC 50.880(c)(3), APP objects to this section of the Complaint "as so indefinite or uncertain that the respondent cannot prepare a defense." Notwithstanding the foregoing, APP understands MPC to be a Utah-based company, as reported on its original October 5, 2022 Independent Expenditure ("IE") Report.

Complainant also states that "Massey Political Consulting is not licensed to do business in Alaska." This statement does not meet the requirements of 2 AAC 50.870(b)(4) because it does not state a "clear and concise description of facts that, if true, would violate a provision of AS 15.13, AS 24.45, AS 24.60.200 – 24.60.260, AS 39.50, or this chapter." Further, any allegations regarding the business license status of MPC in this paragraph are directed at a person or entity other than APP. Accordingly, pursuant to 2 AAC 50.880(c)(3), APP objects to this section of the Complaint "as so indefinite or uncertain that the respondent cannot prepare a defense." To the extent any further response is required, APP lacks sufficient information to admit or deny the allegations. APP has no knowledge of the true business license status of MPC and therefore can neither confirm nor deny the business license status of MPC. However, APP denies that the lack of a current State of Alaska business license affects the disclosure of APP's expenditure to MPC.

Regarding the allegation that APP's October 5, 2022 IE Report failed to comply with 2 AAC 50.321(d), Complainant's legal analysis is incorrect and APP denies this allegation. This statement similarly does not meet the requirements of 2 AAC 50.870(b)(4) because it does not state a "clear and concise description of facts that, if true, would violate a provision of AS 15.13, AS 24.45, AS 24.60.200 – 24.60.260, AS 39.50, or this chapter." 2 AAC 50.321(d) applies only to candidates and groups. APP is a registered

entity, not a candidate or group, and therefore is not subject to the requirements of 2 AAC 50.321(d).

When drafting this unfounded allegation, Complainant omitted the crucial first section of 2 AAC 50.321(d), making the regulation appear to apply more broadly than it actually does. The full text of the regulation states:

"If an expenditure required to be reported under (a) or (b) of this section is made to an advertising agency or to an individual or business that provides campaign consultation or management services, the report must disclose in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed, and the amount of the expenditure."

2 AAC 50.321(d) (emphasis added). In the Complaint, the underlined and italicized portion of the regulation was removed and replaced with an ellipsis.

Following Complainant's re-write of the regulation, it would appear to apply to APP. But when read in full, it is clear that 2 AAC 50.321(d) does not apply to APP: 2 AAC 50.321(d) references 2 AAC 50.321(a), which requires *candidates* to provide certain information related to expenditures, and 2 AAC 50.321(b), which requires *groups* to provide certain information related to expenditures. APP is neither a candidate nor a group—APP is a registered *entity*. Accordingly, APP is not required to "disclose in detail all services rendered, including the name of each business from which campaign goods or services were purchased or subcontracted or media advertising placed, and the amount of the expenditure." APP's disclosure of MPC as the recipient of its expenditure is sufficient. However, in the alternative, if this regulation did apply to APP, APP believes the IE Reports for the MPC expenditure still satisfies the requirements of 2 AAC 50.321(d).

Regarding the remaining allegations in this section, APP admits that it reported three expenditures to MPC totaling \$110,000.00 on an October 5, 2022 IE Report. Regarding similar or overlapping expenditures reported by Alaska Policy Partners PAC ("APP PAC"), after consultation with APOC Staff, it was determined that APP PAC's IE Reports were filed in error and were amended to remove any MPC expenditures. The MPC expenditures were then listed on APP's IE Reports.

VIOLATION 2

In its alleged "Violation #2," Complainant raises two issues: (1) failure to provide certain identifying information for seven contributions reported on October 5, 2022; and (2) lack of a business license for one of APP's contributors.

To the extent the seven entries listed in the Contributions section of the October 5, 2022 IE Report were "contributions" as defined in AS 15.13.400(4)(4)(A)(i-iii), APP denies that the October 5, 2022 IE Report did not include Officer/Director or Occupation/Employer information for those seven contributors. Complainant ignores APP's amended IE Report, filed on the same date, which provided Occupation/Employer information for three of the seven listed contributors: Lucy Bauer, Jason Clark, and Fred Vreeman. Since those corrections were made on the same date, Complainant's allegation is factually inaccurate. Additionally, APP later further amended the IE Report on December 7, 2022 to include Officer/Director information for A&A Roofing Co., Inc. and Alcan Builders, Inc.

To the extent the seven entries listed in the Contributions section of the amended October 5, 2022 IE Report include donations to APP that were not "contributions" as defined in AS 15.13.400(4)(4)(A)(i-iii), APP denies that it failed to

provide any required information to APOC with respect to such donations. Complainant has not identified any statute or regulation that requires APP, as a nonprofit corporation registered as an entity, to disclose Officer/Director or Occupation/Employer information for non-contribution donations to the nonprofit corporation. Further argument on this point is provided below, in response to alleged Violation 3 and alleged Violation 4.

Regarding the allegations in the paragraph concerning the business license status of "Alaskan Eco Tours LLC" ("One of the contributors, Alaskan Eco Tours LLC, is not a licensed business in Alaska."), this statement does not meet the requirements of 2 AAC 50.870(b)(4) because it does not state a "clear and concise description of facts that, if true, would violate a provision of AS 15.13, AS 24.45, AS 24.60.200 – 24.60.260, AS 39.50, or this chapter." Further, any allegations regarding the business license status of "Alaskan Eco Tours LLC" in this paragraph are directed at a person or entity other than APP. APP lacks sufficient information to admit or deny the allegations. APP has no knowledge of the true business license status of "Alaskan Eco Tours LLC" and therefore can neither confirm nor deny the business license status of this entity. However, APP denies that the existence or lack of a current State of Alaska business license affects the disclosure of the true source of the contribution. The business license status of "Alaskan Eco Tours LLC" has no bearing on APP's reporting compliance.

APP further denies the allegation that the actual source of the "Alaskan Eco Tours LLC" contribution is unknown. APP acknowledges that a typographical or transcription error was made when reporting the contribution from this entity, which may have caused confusion. The registered name of the business according to the State of Alaska Division of Corporations, Business, and Professional Licensing's searchable online database is

"Alaskan Ecotours LLC," entity #10114930. However, in APP's IE Report, the word "Ecotours" is broken out into two words: "Eco Tours." Such a minor transcription error does not prevent the public from learning information about this entity. Searching for either spelling of "Alaskan Eco Tours" or "Alaskan Ecotours" in the State database will bring up the entity details for Alaskan Ecotours, entity #10114930.

VIOLATION 3

In its alleged "Violation #3," Complainant states that APP's October 30, 2022 amended IE Report included "14 new contributions" and "For 10 of the 17 contributions, the report failed to provide" sufficient information. APP believes Complainant intended to state that "For 10 of the 14 contributions" incomplete information was provided. APP denies this allegation, either in its original, or in its re-stated form.

This allegation omits important mitigating factors. Complainant ignores that for one of the contribution sources, Lucy Bauer, their occupation and employer had been previously disclosed on APP's October 5, 2022 IE Report. Complainant also fails to note that several contributions identified as lacking sufficient information included multiple contributions from the same people (two from Joanna Taylor (one misspelled "Tayler" and later corrected) and two from Kristie Bobcock). Thus, while the total new entries reported on October 30 without occupation or employer information appeared at first glance to be 10, after adjusting for the previously disclosed occupation/employer and multiple entries for the same people, only seven sources without such information were listed on that IE

Report. And of those seven, all but one was corrected on APP's December 7, 2022 amended IE Report.¹

APP further disputes that all of the new contributions listed on the October 30 IE Report were "contributions" as defined by AS 15.13.400(4)(4)(A)(i-iii). On information and belief, several of these "contributions" were donations to APP's general fund, received prior to APP registering with APOC,² and made without the specific intention that the donations would be used to influence the outcome of an election. Complainant has not identified any statute or regulation that requires APP, as a nonprofit corporation registered as an entity, to record and report the Officer/Director or Occupation/Employer information for non-contribution donations to a nonprofit corporation.

APP previously informed APOC of its position that the donations received in 2021 were not "contributions" under the statute, but were instead donations to APP's general fund that were not required to be reported. However, in an October 19, 2022 email from APP's undersigned counsel to APOC, APP explained that it would voluntarily "over-report" all previous donations to the organization's general fund in order to comply with APOC's interpretation of the new post-Ballot Measure 2 contribution reporting

¹ On December 7, 2022, Occupation/employer information was provided for Bobcock, Erickson Taylor, Hall, Udelhoven (corrected from corporate source to individual), and Church. At the time of this filing, the only source from the 14 "new" contributions listed on the October 30, 2022 report that is missing information is Arctic Management Alaska Inc., a corporation whose officers and directors are publicly available from another source. Complainant believes this omission will be corrected in the near future.

² In its amended IE Report filed on November 1, 2022, APP corrected previous reporting errors and revised the dates for nine of the "new" contributions included on the October 30 IE Report: Bobcock (9/17/22 corrected to 11/12/21 and 9/24/22 corrected to 1/26/22); Erickson (9/24/22 corrected to 10/12/22); Arctic Management Waste (9/24/22 corrected to 10/12/22); Bauer (9/24/22 corrected to 9/19/22); Hall (9/24/22 corrected to 12/16/21); Udelhoven (9/24/22 corrected to 12/16/21); Taylor (9/24/22 corrected to 11/12/21); and Church (9/24/22 corrected to 3/14/22).

requirements, thereby treating such previous non-reportable donations as contributions for APOC reporting purposes:

“Based on these questions and the draft advisory opinion recently issued for Unite America PAC, we understand APOC Staff's position to be that independent expenditures made from an entity's general fund trigger the true source reporting requirement—and further, in such cases, the true source is all of the donors who contributed to that general fund, regardless of whether those donations were intended to influence the outcome of an Alaska state election or to support an entity's overall mission.

APP disagrees with this position and does not think that general fund funds that were donated for purposes other than influencing the outcome of an election are “contributions” as that term is defined in AS 15.13.400(4)(4)(A)(i-iii), because they were not made for the express purpose of influencing the nomination or election of a candidate, influencing a ballot proposition or question, or supporting or opposing an initiative proposal application. However, to come into immediate compliance with APOC Staff's interpretation of AS 15.13.110(k), APP will promptly amend its previously-filed 15-6 forms as follows: because APP transferred funds from its general fund to its political activities account for purposes of making independent expenditures, APP will include all of the donors who contributed to its general fund since the entity was formed in September, 2021 through the date of the reported independent expenditures.”

APP should not now be penalized for its willingness to voluntarily comply with APOC Staff's interpretation of AS 15.13.400(4)(4)(A)(i-iii), which transforms non-reportable general fund donations into reportable contributions after the fact.

VIOLATION 4

In its alleged “Violation #4,” Complainant raises three issues: (1) APP was not registered with APOC at the time it received \$80,000 in contributions in 2021; (2) APP did not report those contributions in 2021 as required by AS 15.13.110; and (3) APP “missed the reporting deadlines” for contributions made in January and March of 2022.

Regarding Complainant's statement that APP was not registered with APOC in April 2021, Complainant incorrectly refers to APP as the “group” and does not specify the

particular statute or regulation that allegedly required APP to register with APOC in April 2021. APP is unaware of any such requirement. This statement does not meet the requirements of 2 AAC 50.870(b)(4) because it does not state a "clear and concise description of facts that, if true, would violate a provision of AS 15.13, AS 24.45, AS 24.60.200–24.60.260, AS 39.50, or this chapter." APP registered as an entity with APOC on February 16, 2022, pursuant to AS 15.13.050(a), which requires each person other than an individual (e.g., a nonprofit corporation such as APP³) to register before making an expenditure in support of or in opposition to a candidate, ballot proposition or question, or initiative proposal application. APP did not report any independent expenditures prior to registration in February 2022, and is therefore compliant with APOC registration requirements.

Regarding Complainant's allegation that APP did not report contributions received in 2021 during the year 2021 as required by AS 15.13.110, Complainant does not specify the subsection of this statute that allegedly required APP to report these contributions in

³ APP was formed on September 21, 2021, when Articles of Incorporation for a Domestic Nonprofit Corporation were filed in its name with the Alaska Department of Commerce, Community, and Economic Development Division of Corporations, Business, and Professional Licensing. In that filing, APP's stated purpose is:

"A. To operate exclusively for charitable, scientific, literary, or educational purposes. Operational activities shall include, but not be limited to, receiving, holding and using contributions for the purposes of said corporation. B. To form an alliance of businesses and individuals to promote free market policies in social and civic venues and to support other charitable, scientific, literary, or educational institutions or programs serving the people of Alaska. C. To have and to exercise general powers specified in AS 10.20.011, as now in force or afterwards amended. D. Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on by a charitable organization exempt from federal income tax under Section 501(c)(6) of the Internal Revenue Code of 1986. E. Any other lawful purpose."

See "Articles of Incorporation, available for Alaska Policy Partners, Inc., available at <https://www.commerce.alaska.gov/cbp/main/Search/EntityDetail/10174262>.

2021. Therefore, pursuant to 2 AAC 50.880(c)(3), APP objects to this allegation as being so indefinite or uncertain that APP cannot prepare a defense. However, to the extent a response is required, APP denies this allegation and denies that there is any statutory requirement requiring donations it received in 2021 to be reported to APOC.

Further on this point, as explained above in response to "Violation #3," APP previously informed APOC of its belief that any donations received in 2021 were not "contributions" as defined by AS 15.13.400(4)(4)(A)(i-iii), but instead were donations to APP's general fund that were not intended to be used to influence the outcome of an election and were therefore not required to be reported to APOC as contributions—there is no statute or regulation requiring a nonprofit to record the occupation/employer or officer/director information from a general fund donor who does not make a "contribution."

APP subsequently voluntarily obtained and disclosed information about its prior donors, but there was no legal requirement that it obtain that information or report it beforehand. Indeed, the allegations in the Complaint underscore the problem inherent with a broad interpretation of post-Ballot Measure 2 reporting statutes: nonprofits that receive donations before they register as entities may have those donations viewed as "contributions," thereby unintentionally running afoul of APOC regulations unless they gather all identifying information from their donors on the front end, even if at the time they are not legally required to do so.

Regarding the allegation that APP "missed the reporting deadlines for contributions made in January and March 2022 contributions (during which it still wasn't registered)," Complainant does not specify the statute or regulation that allegedly required APP to report these contributions, nor does Complainant identify the alleged deadlines that were

missed. Therefore, under 2 AAC 50.880(c)(3), APP objects to this allegation as being so indefinite or uncertain that APP cannot prepare a defense. However, to the extent a response is required, APP denies this allegation for the reasons stated above regarding the nature of the donations received by APP (they were not "contributions" as defined by statute and therefore did not have to be reported). APP further denies Complainant's assertion that donations received in March 2022 were received during a period when APP was not registered—APP registered as an entity with APOC in February 2022. Regardless, this assertion does not carry any legal relevance, as Complainant has not identified a violation of any statute or regulation that prohibits APP from receiving donations or contributions prior to registering as an entity with APOC.

VIOLATION 5

APP denies the allegations listed under "Violation #5." Complainant alleges that APP (again incorrectly referred to as a "group" rather than as an "entity") failed to report expenditures related to political advertisements mailed on behalf of APP "late in October/early November 2022."

Complainant does not provide any evidence that APP directly spent funds on design, printing, or postage for these mailers. On information and belief, APP hired Massey Political Consulting, Inc. ("MPC") to provide various campaign-related services and MPC paid for the design, printing, and postage for the mailers as part of the services it provided to APP (these services included general campaign consulting, digital advertising, conducting opposition research, and sending targeted mailers). Accordingly, APP properly reported these expenditures on its IE Reports with the following explanations:

"Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski."⁴

Because APP itself did not expend additional funds for the mailers beyond the reported expenditure to MPC, APP had no further disclosure requirements, and was not required to file additional 7-day or 24-hour reports related to the mailers.

CONCLUSION AND LIMITATION ON POTENTIAL PENALTIES
APPLICABLE TO ALL ALLEGATIONS

For the foregoing reasons, APOC should find Complainant's allegations are without merit and should dismiss the Complaint. In the alternative, if APOC determines in any instance that APP filed late, or made any error in a registration, statement, or report required under AS 15.13, APOC may note the violation, but may not assess any financial penalty for the following reasons:

- (a) Pursuant to 2 AAC 50.855(b)(2)(A)(i), APOC may not assess a penalty against APP for violations of the statutes or regulations referenced in the complaint because APP is a "first-time filer," having formed in September 2021, registered with APOC in February 2022, and did not make expenditures or otherwise participate in any election prior to the 2022 Statewide General Election.
- (b) Pursuant to 2 AAC 50.855(b)(2)(A)(iv), APOC may not assess a penalty regarding allegations in the complaint related to statements of contributions because any

⁴ For clarity and the avoidance of doubt, APP notes that Exhibit A includes mailers related to the campaign of Senator Cathy Giessel, which were intended to support of her opponent, Roger Holland.

such error was APP's first error, and any missing contributions were reported within 30 days after the due date for the statement of contributions.

(c) Pursuant to 2 AAC 50.855(b)(2)(A)(v), APOC may not assess a penalty regarding allegations in the complaint related to an independent expenditure report because any reporting error was APP's first error, and was not related to a report required to be filed within 24 hours.

Additionally, if APOC finds cause to impose a penalty against APP related to the accusations in the Complaint concerning incomplete filings of any type, under 2 AAC 50.855(b)(3)(A), APOC may not assess a penalty because any missing or incomplete information was readily available to the public through another forum.

If, however, APOC finds cause to impose a penalty against APP related to the accusations in the Complaint that fall outside of the prohibitions on penalty assessment under 2 AAC 50.855(b)(2)(A) and 2 AAC 50.855(b)(3)(A) identified above, then under 2 AAC 50.855(b)(2)(B)(i)-(ii), APOC must calculate any such penalty as 25% of the maximum penalty allowed because the election cycle was APP's first election cycle, the report was APP's first late-filed report, and APP self-reported the missing information to APOC Staff and disclosed the information to the public within seven days after the date of self-reporting.

If, however, APOC finds cause to impose a penalty against APP related to the accusations in the Complaint that fall outside of the prohibitions on penalty assessment under 2 AAC 50.855(b)(2)(A), 2 AAC 50.855(b)(3)(A), or the reduced penalty assessment required under 2 AAC 50.855(b)(2)(B) identified above, then under 2 AAC

50.855(b)(2)(C)(i), APOC must calculate any such penalty as 50% of the maximum penalty allowed because the election cycle was APP's first election cycle.

If, however, APOC finds cause to impose a penalty against APP related to the accusations in the Complaint concerning incomplete filings of any types under 2 AAC 50.855(b)(3)(B), APOC must reduce the penalty to 50% of the maximum penalty if any missing or incomplete information was not readily available to the public through another forum, because the incomplete report was the first alleged violation against APP.

Finally, APP notes that if APOC finds cause to impose a penalty against APP related to any of the accusations in the Complaint, mitigating factors contained in 2 AAC 50.865 are present and should be considered.

DATED this 13TH day of JANUARY, 2023.

BIRCH HORTON BITTNER & CHEROT

By: /s/ Jason Brandeis
Jason Brandeis, ABA #0405009

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 13th day of JANUARY, 2023, a true and correct copy of the foregoing was served on the following in the manner indicated:

Alaska Public Offices Commission:

APOC@alaska.gov

- U.S. Mail
- Facsimile
- Electronic Delivery
- Hand Delivery

Complainant:

Jennifer Johnston

Jennifer@HikeAlaska.com

APOC Staff:

Heather Hebdon, APOC Executive

Director

Heather.Hebdon@alaska.gov

Thomas Lucas, Campaign Disclosure

Coordinator

Tom.Lucas@alaska.gov

Morgan Griffin, Assistant Attorney General

Morgan.Griffin@alaska.gov

BIRCH HORTON BITTNER & CHEROT

By: /s/ Ashley Logan
Ashley Logan

Details

ENTITY DETAILS

Name(s)

Type	Name
Legal Name	Alaska Policy Partners, Inc.

Entity Type: Nonprofit Corporation

Entity #: 10174262

Status: Good Standing

AK Formed Date: 9/21/2021

Duration/Expiration: Perpetual

Home State: ALASKA

Next Biennial Report Due: 7/2/2023

Entity Mailing Address: 7926 OLD SEWARD HWY STE A-8, ANCHORAGE, AK 99518

Entity Physical Address: 7926 OLD SEWARD HWY STE A-8, ANCHORAGE, AK 99518

Registered Agent

Agent Name: HOLMES, WEDDLE & BARCOTT, A PROFESSIONAL CORPORATION

Registered Mailing Address: 701 W 8TH AVE STE 700, ANCHORAGE, AK 99501-3408

Registered Physical Address: 701 W 8TH AVE STE 700, ANCHORAGE, AK 99501-3408

Officials

Show Former

AK Entity #	Name	Titles	Owned
	James Udelhoven	Director	
	Jared Murdoch	Director	
	Jason Clark	Director, Treasurer	
	MARY BARR	Secretary	
	Rick Taylor	Director	
	Robert Yun	Director, Vice President	
	Seth Church	Director, President	
	Wade Erickson	Director	

Filed Documents

Date Filed	Type	Filing	Certificate
9/21/2021	Creation Filing	Click to View	Click to View
3/18/2022	Initial Report	Click to View	
10/26/2022	Change of Officials	Click to View	

3/31/23, 10:17 AM

Division of Corporations, Business and Professional Licensing

Date Filed
11/25/2022

Type
Change of Officials

Filing Certificate
[Click to View](#)

[Close Details](#)

[Print Friendly Version](#)

Hebdon, Heather R (DOA)

From: Jason Brandeis <jbrandeis@BHB.com>
Sent: Wednesday, October 19, 2022 4:38 PM
To: Lucas, Tom R (DOA)
Cc: Hebdon, Heather R (DOA)
Subject: Alaska Policy Partners

Follow Up Flag: Flag for follow up
Flag Status: Flagged

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

Tom:

I am writing on behalf of Alaska Policy Partners Inc. (APP). This message follows email inquiries APOC sent to Alaska Policy Partners on October 5 and October 6, 2022.

APP is a nonprofit corporation with a broad mission statement. Its purpose, according to its corporate filings with the State of Alaska, is:

A. To operate exclusively for charitable, scientific, literary, or educational purposes. Operational activities shall include, but not be limited to, receiving, holding and using contributions for the purposes of said corporation. B. To form an alliance of businesses and individuals to promote free market policies in social and civic venues and to support other charitable, scientific, literary, or educational institutions or programs serving the people of Alaska. C. To have and to exercise general powers specified in AS 10.20.011, as now in force or afterwards amended. D. Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on by a charitable organization exempt from federal income tax under Section 501(c)(6) of the Internal Revenue Code of 1986. E. Any other lawful purpose.

To fulfill its corporate purpose, APP engages in education, advocacy, and outreach efforts, and received donations without restriction on what it could use those funds for. Some of those donations were transferred to its political activities account and spent on independent expenditures. Initially, those donations (including donations from businesses) were reported as contributions and expenditures for Alaska Policy Partners PAC (APP PAC), and that sparked concern at APOC about whether APP PAC would be contributing directly to candidates. As clarified in an email exchange between you and Yulia Temple on October 6, Alaska Policy Partners PAC has not yet been active in this election, has not yet made any contributions to candidates, and has not made independent expenditures. The reports filed for APP PAC should have been filed on behalf of APP, a registered entity that makes independent expenditures, and not APP PAC. This error has been corrected.

Below is a summary of the issues that relate to APP.

APP's True Source Reporting

The last communications you had with APP indicated that you still had some questions about the reported "true source" of APP's contributions. From your emails on October 6:

- "Nevertheless, based on what Jodi has told us, it appears that the entity used general funds to pay for the expenditures listed on the IE report – in that case, the contributors you have listed would not be the true sources. It is not clear to us how the Entity determined that the 7 persons you listed as the true sources on the

24 hour true source report (and the IE report) were chosen if the Entity simply used general funds. Please advise.”

- How does the Entity raise its “general funds”? I presume it is from contributions it receives as opposed to selling goods or services?

Based on these questions and the draft advisory opinion recently issued for Unite America PAC, we understand APOC Staff’s position to be that independent expenditures made from an entity’s general fund trigger the true source reporting requirement—and further, in such cases, the true source is all of the donors who contributed to that general fund, regardless of whether those donations were intended to influence the outcome of an Alaska state election or to support an entity’s overall mission.

APP disagrees with this position and does not think that general fund funds that were donated for purposes other than influencing the outcome of an election are “contributions” as that term is defined in AS 15.13.400(4)(A)(I-III), because they were not made for the express purpose of influencing the nomination or election of a candidate, influencing a ballot proposition or question, or supporting or opposing an initiative proposal application. However, to come into immediate compliance with APOC Staff’s interpretation of AS 15.13.110(k), APP will promptly amend its previously-filed 15-6 forms as follows: because APP transferred funds from its general fund to its political activities account for purposes of making independent expenditures, APP will include all of the donors who contributed to its general fund since the entity was formed in September, 2021 through the date of the reported independent expenditures.

Additionally, going forward, APP will revise its internal practices such that any future donations intended to influence the outcome of an Alaska election will not go into the organization’s general fund. Such donations will instead be donated directly to the entity’s political activities account pursuant to the guidance in the newly-enacted 2 AAC 50.270(e) and would be disclosed as the “true source” of future contributions when such disclosure reports are required.

If APOC is considering any possible penalty against APP for late filing or an error in reporting, APP believes no penalty should be imposed. The reporting requirement changes under Ballot Measure 2 are new and confusing for inexperienced entities. APP acted quickly to remedy the problems and has disclosed all donors. APP also qualifies as a “first-time filer,” which precludes assessment of any penalty under 2 AAC 50.855(b)(2)(A)(i).

APP’s Donors

The other issue raised in APOC’s correspondence with APP concerned APP’s donors and their responsibility to file corresponding reports of their contributions under AS 15.13.040(r) within 24 hours of making contributions, leaving them subject to a potential penalty. Here, APP argues on behalf of its donors that no penalty should be applied to any of them under these circumstances.

There are several reasons why no penalties should be assessed: first, as explained above, any funds that APP received from its donors that were not expressly for the purpose of influencing the outcome of an election are not “contributions” and therefore do not trigger the 24-hour reporting requirement under AS 15.13.040(r). This is a quirk of considering all general fund donations to be contributions—there can be no corresponding requirement on an individual donor to report a contribution when a donation to an entity was not made for the purpose of influencing the outcome of an election. Requiring that could turn every nonprofit donation into a reportable contribution. So while an entity’s future decision to use general fund money for an IE may trigger certain reporting requirements for the entity, that does not put a corresponding requirement on the donor at the time of a non-election influencing donation. Next, to the extent that any donations to APP could be considered contributions as defined by AS 15.13.400, no fines or penalties should be assessed against any of APP’s contributors here because (1) APOC regulations do not allow any fine to be assessed for a late filing against a “first-time filer;” and (2) if the filer is not a first-time filer, but this was their first error, and the contribution was otherwise reported by the recipient, then no fine may be assessed pursuant to 2 AAC 50.855(b)(2)(iv). Here, APP believes all of its donors would either be considered “first-time filers” under the new Ballot

Measure 2 requirements, or this was their first error under the new Ballot Measure 2 requirements and the contribution will be reported by the recipient this week.

Now that it has some experience with the post-Ballot Measure 2 reporting world, APP would also like to note some practical considerations that APOC should be aware of concerning AS 15.13.040(r). The 24-hour reporting requirement for contributors is new and catches a lot of people by surprise. The filing process is also complicated, as navigating the MyAlaska website and the APOC reporting system are confusing for most people, but especially problematic for the elderly or anyone not tech-savvy. 2 AAC 50.816(c)(1) does allow a filer to request an exemption from the electronic filing requirement, but it requires that the exemption request include a copy of the statement or form the person seeks to file by non-electronic means. To our knowledge, the Form 15-5 Statement of Contributions does not appear to be readily available on the APOC website. APP therefore requests a printable copy of the Form 15-5 that it can provide to future contributors who may need to request an electronic filing exemption.

As a more long-term solution, to ease the burden on contributors, and to minimize the time APOC Staff has to spend providing guidance to filers, APP suggests that APOC Staff request that the commission relax its electronic-filing regulation with respect to 24-hour contributor reports and accept paper filings in addition to electronic filings, pursuant to its authority under 2 AAC 50.816.

Thank you for your time and attention. Please let me know if you have any questions or if APOC requires any additional information from APP.

Sincerely,
Jason Brandeis



Jason Brandeis
Senior Counsel
Birch Horton Blittner & Cherot
510 L Street, Suite 700 | Anchorage AK 99501
Tel. 907.263.7243
jbrandeis@BHB.com | www.birchhorton.com | Blo

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ENTITY REGISTRATION FORM

AMENDED

COMPLETED

Submission Date: **02/16/2022**Filer First Name: **Trevor**

Filer Middle Name (Optional):

Filer Last Name: **Jepsen**Filer's Title with Entity: **Operations and Communications Manager**

ENTITY INFORMATION

Election Year: **2022**Entity Name: **Alaska Policy Partners, Inc.**

Abbreviation:

Purpose: **To form an alliance of businesses and individuals to promote free market policies in social and civic venues and to support other charitable, scientific, literary, or educational institutions or programs serving the people of Alaska.**State Initiative Support/Oppose: **Yes (Involvement)**Entity Mailing Address: **7926 Old Seward Hwy Suite A-8**City, State Zip: **Anchorage, Alaska 99518**

CONTACT

Name: **Trevor Jepsen**Address: **7926 Old Seward Hwy Suite A-8**City, State Zip: **Anchorage, Alaska 99518**Phone: **9073417513**E-mail: **trevor@alaskapolicypartners.com**

Fax (Optional): Did Not Report

OFFICERS AND DIRECTORS

Name	Address	Title
Jodi Taylor	13910 Jarvi Drive Anchorage , Alaska 99515	Director
Jesse Sumner	454 W Sunflower Circle Wasilla, Alaska 99654	President of the Board
Seth Church	336 Slater Drive Fairbanks, Alaska 99701	Director

BANK ACCOUNT / POLITICAL ACTIVITIES ACCOUNT

Name of Bank: **Wells Fargo Bank**Bank Address: **1351 Huffman Rd****Exhibit 5**

City, State Zip: Anchorage , Alaska 99515

GROUP REGISTRATION FORM

COMPLETED

Submission Date: **06/28/2022**
 Filer First Name: **YULIYA**
 Filer Middle Name (Optional):
 Filer Last Name: **Jordan**
 Filer's Title with Group: **Treasurer**

GROUP INFORMATION

Previously Registered: **No**
 Election Year: **2022**
 Group Name: **Alaska Policy Partners PAC**
 Abbreviation: **APP**
 Purpose: **APP works to form an alliance of businesses and individuals to promote free market policies in social and civic venues and to support other charitable, scientific, literary or educational institutions or programs serving the people of Alaska**
 Group Type: **PAC**
 Group Mailing Address: **7926 Old Seward Hwy., Suite A-8**
 City, State Zip: **Anchorage, Alaska 99518**
 Additional Email Addresses to Notify: **sumnjjes@gmail.com;jodiltaylor@gmail.com**

CHAIR

Name: **Jesse Sumner**
 Address: **7926 Old Seward Hwy. #8**
 City, State Zip: **Anchorage, Alaska 99518**
 Phone: **9077157388**
 E-mail: **sumnjjes@gmail.com**
 Fax (Optional): Did Not Report

TREASURER

Name: **Yuliya Jordan**
 Address: **2006 North Rush Cir**
 City, State Zip: **Palmer, Alaska 99645**
 Phone: **9072500524**
 E-mail: **yuliya.jordan@outlook.com**
 Fax (Optional): Did Not Report

DEPUTY TREASURERS / CO-CHAIRS

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

Exhibit 6

TYPE OF GROUP

MEMBER OR EMPLOYEE PAC (Political Action Committee)

PAC Name: **Alaska Policy Forum**

PAC Type: **Other**

PAC Other Type Description: **nonprofit**

CAMPAIGN PLANS

Election Type	Election	Municipality
State General	2022 - State General	
State Primary	2022 - State Primary	

BANK ACCOUNT / CAMPAIGN DEPOSITORY

Name of Bank: **Wells Fargo**

Bank Address: **301 W NORTHERN LIGHTS BLVD STE 100**

City, State Zip: **Anchorage, Alaska 99503**

INDEPENDENT EXPENDITURES FORM 13-6

AMENDED

COMPLETED

Submission Date: **09/27/2022**

FILER INFORMATION

Filer First Name: **Yuliya**
Filer Middle Name:
Filer Last Name: **Jordan**
Filer Full Address: **2006 North Rush Cir
PALMER, Alaska 99645**
Filer Occupation: **Enterprise Contract Administrator**
Filer Employer: **GCI Communication Corp.**
Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**
Election Year: **2022**
Report Type: **Twenty-four Hour**
Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners PAC**
Type of Business or Organization: **Registered Group**
Address: **7926 Old Seward Hwy., Suite A-8**
City: **Anchorage**
State: **Alaska**
99518
Country: **United States**
Business/Other Entity Contact Person: **Yuliya Jordan**
Contact E-mail: **yuliya.jordan@outlook.com**
Contact Phone: **9072500524**

ELECTION INFORMATION

Election: **Anchorage Municipal Election**

OFFICERS

Name	Full Address	Title
Jesse Sumner	7926 Old Seward Hwy. #8 Anchorage, Alaska 99518	Chair
Yuliya Jordan	2006 North Rush Cir Palmer, Alaska 99645	Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/26/2022	Seth Church, Officer 7926 Old Seward Hwy., suiteA-8 Anchorage, Alaska 99518	Electronic Funds Transfer	SUPPORT: 2022 - Joe Wright Election: Anchorage Municipal Election Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers	\$30,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
No Contributions / Nothing to Report			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	1
Total of paid Expenditures:	\$30,000.00
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report:	0
Total of Contributions Reported with this Report:	\$0.00
Cumulative Contribution Amounts:	\$0.00
Number of Officers:	2
Number of Debts Reported with this Report:	0
Total of Debts Incurred but not yet paid:	\$0.00

Exhibit 7

INDEPENDENT EXPENDITURES FORM 15-6

AMENDED

COMPLETED

Submission Date: **10/04/2022**

FILER INFORMATION

Filer First Name: **Yuliya**

Filer Middle Name:

Filer Last Name: **Jordan**Filer Full Address: **2006 North Rush Cir
Palmer, Alaska 99645**Filer Occupation: **Enterprise Contract Administrator**Filer Employer: **GCI Communication Corp.**Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**Election Year: **2022**Report Type: **Twenty-four Hour**Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partner's PAC**Type of Business or Organization: **Registered Group**Address: **7926 Old Seward Hwy., Suite A-8**City: **Anchorage**State: **Alaska****99518**Country: **United States**Business/Other Entity Contact Person: **Yuliya Jordan**Contact E-mail: **yuliya.jordan@outlook.com**Contact Phone: **9072500524**

ELECTION INFORMATION

Election: **Anchorage Municipal Election**

OFFICERS

Name	Full Address	Title
Jesse Sumner	7926 Old Seward Hwy. #8 Anchorage, Alaska 99518	Chair
Yuliya Jordan	2006 North Rush Cir Palmer, Alaska 99645	Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
10/04/2022	Massey Political Consulting 7926 Old Seward Hwy., suite A-8 Anchorage, Alaska 99518	Electronic Funds Transfer	SUPPORT: 2022 - Joe Wright Election: Anchorage Municipal Election Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers	\$60,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
No Contributions / Nothing to Report			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 1	
Total of paid Expenditures:	\$60,000.00
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report: 0	
Total of Contributions Reported with this Report:	\$0.00
Cumulative Contribution Amounts:	\$0.00
Number of Officers: 2	
Number of Debts Reported with this Report: 0	
Total of Debts Incurred but not yet paid:	\$0.00

Exhibit 8

Please see my submission under APP Entity. I will amend and add some missing info (occupation/employer) tomorrow. Please let me know if I need to make any other changes.

Thank you

Yuliya [redacted] Independent Expenditures Form APP.pdf

From: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Sent: Wednesday, October 5, 2022 10:29 AM
To: yuliya.jordan@outlook.com <yuliya.jordan@outlook.com>; sumnjes@gmail.com <sumnjes@gmail.com>; jodliltaylor@gmail.com <jodliltaylor@gmail.com>
Cc: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>; Lucas, Tom R (DOA) <tom.lucas@alaska.gov>
Subject: Alaska Policy Partners PAC - Independent Expenditure Filings

Good morning Alaska Policy Partners PAC,

APOC staff has reviewed two recently filed independent expenditure filings for Alaska Policy Partners PAC. One, an amendment disclosing an expenditure of \$30,000, filed October 3 and the other disclosing an expenditure of \$60,000 filed October 4. In both, you have disclosed expenditures that indicate support for Joe Wright in the 2022 Anchorage Municipal Election, an election that was held in April this year and has since passed. Although Mr. Wright had indicated an intent to run in that election, ultimately he was not a candidate in the Anchorage election. Similarly, although he also filed for the state election, he has since withdrawn and is no longer running as a candidate for state senate.

Additionally, your reports, to date, have only disclosed \$68,500 in contributions. So, it is unclear whether your October 4 filing was intended to amend your October 3 amendment, in order to correct the amount of the expenditure, or whether it is a new expenditure of an additional \$60,000, in which case it appears it also requires you disclose additional contributions that have not yet been reported (AS 15.13.040(e), see also, AS 15.13.110(k)).

Further, in reviewing your registration, you have indicated Alaska Policy Partners is a PAC. A PAC, unlike an independent expenditure group, is subject to certain prohibitions, namely it cannot solicit and receive contributions from businesses (AS 15.13.074(f)). This is problematic since Alaska Policy Partners PAC has reported receiving the majority of its disclosed contributions from business entities. Additionally, it appears you have also registered Alaska Policy Partners, Inc., a business entity that appears to share the same purpose of the PAC, as well as several its officers.

Finally, although Alaska Policy Partners PAC filed a 24 Hour True Source Report disclosing contributors and certifying them as true sources, it does not appear that any

of your contributors filed the corresponding report required under AS 15.13.040(r) leaving them subject to a \$1,000/day penalty. AS 15.13.390(a)(2).

At this point, it is not clear what exactly Alaska Policy Partners PAC and Alaska Policy Partners, Inc.'s intentions are. Based on all of the filings, it appears to staff that you may have intended to create an independent expenditure group, but because that is not clear, we ask that you please respond:

1. Which candidate(s) is Alaska Policy Partners PAC supporting?
2. Which election(s) is Alaska Policy Partners PAC participating in?
3. Does Alaska Policy Partners PAC intend to make any contributions directly to candidates?
4. Does Alaska Policy Partners PAC intend to engage in anything other than independent expenditures (uncoordinated with any candidate)?
5. Are the two recently filed IE reports accurate in that Alaska Policy Partners PAC has incurred a debt of \$90,000 to Massey Consulting?
6. Are Alaska Policy Partners PAC and Alaska Policy Partners, Inc. associated, and if so, how?

We are hopeful that your responses will help staff to guide you in your efforts to participate and to do so compliantly. Thank you for your prompt attention.

Best,

Heather R. Hebdon
Executive Director

Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, Alaska 99508
Phone: (907) 276-4176
Fax: (907) 276-7018

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2221 E. Northern Lights Blvd., Rm. 128

Anchorage, Alaska 99508

Phone: (907) 276-4176

Fax: (907) 276-7018

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

From: Yuliya Temple <yuliya.temple@gmail.com>
Sent: Wednesday, October 5, 2022 1:49 PM
To: Lucas, Tom R (DOA) <tom.lucas@alaska.gov>
Subject: have questions, please call me

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

Good morning Alaska Policy Partners PAC,

APOC staff has reviewed two recently filed Independent expenditure filings for Alaska Policy Partners PAC. One, an amendment disclosing an expenditure of \$30,000, filed October 3 and the other disclosing an expenditure of \$60,000 filed October 4. In both, you have disclosed expenditures that indicate support for Joe Wright in the 2022 Anchorage Municipal Election, an election that was held in April this year and has since passed. Although Mr. Wright had indicated an intent to run in that election, ultimately he was not a candidate in the Anchorage election. Similarly, although he also filed for the state election, he has since withdrawn and is no longer running as a candidate for state senate.

Additionally, your reports, to date, have only disclosed \$68,500 in contributions. So, it is unclear whether your October 4 filing was intended to amend your October 3 amendment, in order to correct the amount of the expenditure, or whether it is a new expenditure of an additional \$60,000, in which case it appears it also requires you disclose additional contributions that have not yet been reported (AS 15.13.040(e), *see also*, AS 15.13.110(k)).

Further, in reviewing your registration, you have indicated Alaska Policy Partners is a PAC. A PAC, unlike an independent expenditure group, is subject to certain prohibitions, namely it cannot solicit and receive contributions from businesses (AS 15.13.074(f)). This is problematic since Alaska Policy Partners PAC has reported receiving the majority of its disclosed contributions from business entities. Additionally, it appears you have also registered Alaska Policy Partners, Inc., a business entity that appears to share the same purpose of the PAC, as well as several its officers.

Our registration was for an IE and a PAC. Both were supposed to be set up. To date, the PAC has done nothing.

Finally, although Alaska Policy Partners PAC filed a 24 Hour True Source Report disclosing contributors and certifying them as true sources, it does not appear that any of your contributors filed the corresponding report required under AS 15.13.040(r) leaving them subject to a \$1,000/day penalty. AS 15.13.390(a)(2).

Is this the 15-5 form? I understood you were doing that for each contributor. Is there an addition form we need to fill out?

At this point, it is not clear what exactly Alaska Policy Partners PAC and Alaska Policy Partners, Inc.'s intentions are. Based on all of the filings, it appears to staff that you may have intended to create an independent expenditure group, but because that is not clear, we ask that you please respond:

1. Which candidate(s) is Alaska Policy Partners PAC supporting? We sent the IE sheet over, I understood you were going to ask Tom how to show the multiple candidates. The IE is not coordinating with any candidate and is engaging in several candidate races.
2. Which election(s) is Alaska Policy Partners PAC participating in? We have not engaged in anything with the PAC yet.
3. Does Alaska Policy Partners PAC intend to make any contributions directly to candidates? Yes.
4. Does Alaska Policy Partners PAC intend to engage in anything other than independent expenditures (uncoordinated with any candidate)? The PAC does intend to make PAC contributions directly to candidates.
5. Are the two recently filed IE reports accurate in that Alaska Policy Partners PAC has incurred a debt of \$90,000 to Massey Consulting? We have paid Massey Consulting \$110,000.00

6. Are Alaska Policy Partners PAC and Alaska Policy Partners, Inc. associated, and if so, how?
Alaska Policy Partners has an IE and an PAC registered with APOC.

We are hopeful that your responses will help staff to guide you in your efforts to participate and to do so compliantly. Thank you for your prompt attention.

Best,

Heather R. Hebdon

Executive Director

Alaska Public Offices Commission

Hebdon, Heather R (DOA)

From: Jodi Taylor <joditaylor@gmail.com>
Sent: Wednesday, October 5, 2022 7:42 PM
To: Hebdon, Heather R (DOA)
Cc: Yuliya Jordan; Sumnjes; Lucas, Tom R (DOA)
Subject: Re: Alaska Policy Partners PAC - Independent Expenditure Filings
Attachments: image001.gif

Heather,

Please see below inline.

Yuliya spoke to Tom and said she will follow up again tomorrow.

Thanks,

Jodi

On Wed, Oct 5, 2022, 3:37 PM Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov> wrote:

Thank you, Jodi,

I appreciate your getting back to us so quickly. Tom and I will take a look at all of this and get back to you with next steps as soon as we can. I did take a moment to review your website and it appears you are expressly soliciting contributions to each entity – the PAC and the IE Entity. I have a few more follow up questions that I hope you can respond to.

- Has the PAC received any donations, to date?

The IE and PAC webpages have not received any donations and we have not advertised them. All contributions have been through the Alaska Policy Partners. We intend to use those landing pages but haven't done anything with them yet.

- You'd indicated that the board had voted to move forward with spending plans and that is what triggered your first true source reporting disclosing the \$68,500 in contributions. That report lists all of those itemized contributions as being received on 9/24. But if I understood correctly, 9/24 is the date the board voted to use the funds for IEs and not the date the contributions were received, is that correct?

Our c6, which has funds, voted to deploy funds to the IE - a separate account. Funds were reported to match the IE efforts as they are contracted.

-
- Why do the expenditures made to Massey Consulting indicate the same address as both the Entity and the PAC?

The mailing address for the Entity and PAC is the same. We have done nothing with the PAC.

-

As to your fundraising for the entity that is engaging in IEs, along with the entity's true source reporting requirements, contributors who give more than \$2,000 must also file a Statement of Contributions report certifying the true sources of the contribution within 24 hours of contributing. You may wish to review these [FAQs](#) for further information about the new requirements enacted under Ballot Measure 2.

If we do need to report further than the 15-5 form, we do have some people who cannot file online and would need a paper copy form. We will await instructions.

In any event, I will be in touch soon with further instructions.

Best,

Heather

From: Jodi Taylor <jodiltaylor@gmail.com>
Sent: Wednesday, October 5, 2022 1:55 PM
To: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Cc: yuliya.jordan@outlook.com; sumnjies@gmail.com; Lucas, Tom R (DOA) <tom.lucas@alaska.gov>
Subject: Re: Alaska Policy Partners PAC- Independent Expenditure Filings

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

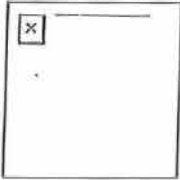
Heather,

Please see inline to your questions below.

Thank you,

Jodi Taylor

On Wed, Oct 5, 2022 at 12:00 PM Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov> wrote:



Good morning Alaska Policy Partners PAC,

APOC staff has reviewed two recently filed independent expenditure filings for Alaska Policy Partners PAC. One, an amendment disclosing an expenditure of \$30,000, filed October 3 and the other disclosing an expenditure of \$60,000 filed October 4. In both, you have disclosed expenditures that indicate support for Joe Wright in the 2022 Anchorage Municipal Election, an election that was held in April this year and has since passed. Although Mr. Wright had indicated an intent to run in that election, ultimately he was not a candidate in the Anchorage election. Similarly, although he also filed for the state election, he has since withdrawn and is no longer running as a candidate for state senate.

Additionally, your reports, to date, have only disclosed \$68,500 in contributions. So, it is unclear whether your October 4 filing was intended to amend your October 3 amendment, in order to correct the amount of the expenditure, or whether it is a new expenditure of an additional \$60,000, in which case it appears it also requires you disclose additional contributions that have not yet been reported (AS 15.13.040(e), *see also*, AS 15.13.110(k)).

Further, in reviewing your registration, you have indicated Alaska Policy Partners is a PAC. A PAC, unlike an Independent expenditure group, is subject to certain prohibitions, namely it cannot solicit and receive contributions from businesses (AS 15.13.074(f)). This is problematic since Alaska Policy Partners PAC has reported receiving the majority of its disclosed contributions from business entities. Additionally, it appears you have also registered Alaska

Policy Partners, Inc., a business entity that appears to share the same purpose of the PAC, as well as several its officers.

Finally, although Alaska Policy Partners PAC filed a 24 Hour True Source Report disclosing contributors and certifying them as true sources, it does not appear that any of your contributors filed the corresponding report required under AS 15.13.040(r) leaving them subject to a \$1,000/day penalty. AS 15.13.390(a)(2).

At this point, it is not clear what exactly Alaska Policy Partners PAC and Alaska Policy Partners, Inc.'s intentions are. Based on all of the filings, it appears to staff that you may have intended to create an independent expenditure group, but because that is not clear, we ask that you please respond:

1. Which candidate(s) is Alaska Policy Partners PAC supporting? The PAC has not engaged to date. When the IE first filed, it is supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson, Frank Tomaszewski, and Forest Wolfe. We just added Kathy Hensley and Stanley Wright. We may also engage with Ron Gillam and Jay McDonald but have not done so at this time, how would we add them at a later date?
2. Which election(s) is Alaska Policy Partners PAC participating in? Currently, the 2022 state legislative election cycle.
3. Does Alaska Policy Partners PAC intend to make any contributions directly to candidates? PAC does intend to send \$1,000 checks to candidates but has not done so yet.
4. Does Alaska Policy Partners PAC intend to engage in anything other than independent expenditures (uncoordinated with any candidate)? The PAC does intend to send checks.
5. Are the two recently filed IE reports accurate in that Alaska Policy Partners PAC has incurred a debt of \$90,000 to Massey Consulting? IE has invoices for Massey Consulting of \$30,000 Sept 23 (they amended to \$50,000 due to our bank wire limits) and then \$60,000 Oct 4th. We wired funds to Massey of \$25,000, \$25,000 and yesterday \$60,000.
6. Are Alaska Policy Partners PAC and Alaska Policy Partners, Inc. associated, and if so, how? Alaska Policy Partners is a c6 that has decided to engage in this election cycle with an IE and PAC.

We are hopeful that your responses will help staff to guide you in your efforts to participate and to do so compliantly. Thank you for your prompt attention.

Best,

Heather R. Hebdon

Executive Director

Alaska Public Offices Commission

2221 E. Northern Lights Blvd., Rm. 128

Anchorage, Alaska 99508

Phone: (907) 276-4176

Fax: (907) 276-7018

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INDEPENDENT EXPENDITURES FORM 15-6

AMENDMENT

Amendment Description: **Re-submitted under APP Entity**

COMPLETED

Submission Date: **10/05/2022**

FILER INFORMATION

Filer First Name: **YULIYA**

Filer Middle Name:

Filer Last Name: **Jordan**Filer Full Address: **2006 North Rush Cir
Palmer, Alaska 99645**Filer Occupation: **Enterprise Contract Administrator**Filer Employer: **GCI Communication Corp.**Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**Election Year: **-1**Report Type: **Twenty-four Hour**Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners PAC**Type of Business or Organization: **Registered Group**Address: **7926 Old Seward Hwy., Suite A-8**City: **Anchorage**State: **Alaska****99518**Country: **United States**Business/Other Entity Contact Person: **Yuliya Jordan**Contact E-mail: **yuliya.jordan@outlook.com**Contact Phone: **9072500524**

ELECTION INFORMATION

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

OFFICERS

Name	Full Address	Title
Jesse Sumner	7926 Old Seward Hwy. #8 Anchorage, Alaska 99518	Chair
Yuliya Jordan	2006 North Rush Cir Palmer, Alaska 99645	Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
No Expenditures / Nothing to Report				

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
No Contributions / Nothing to Report			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	0
Total of paid Expenditures:	\$0.00
Previous Contributions:	
\$0.00	
Number of Contributions Reported with this Report:	0
Total of Contributions Reported with this Report:	\$0.00
Cumulative Contribution Amounts:	\$0.00
Number of Officers: 2	
Number of Debts Reported with this Report: 0	
Total of Debts Incurred but not yet paid:	\$0.00

INDEPENDENT EXPENDITURES FORM 15-6

AMENDED

AMENDMENT #1

Amendment Description: **Add missing information**

COMPLETED

Submission Date: **10/05/2022**

FILER INFORMATION

Filer First Name: **YULIYA**

Filer Middle Name:

Filer Last Name: **Jordan**

Filer Full Address: **2006 North Rush Cir
Palmer, Alaska 99645**

Filer Occupation: **Enterprise Contract Administrator**

Filer Employer: **GCI Communication Corp.**

Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**

Election Year: **2022**

Report Type: **Twenty-four Hour**

Filer Type: **Other**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners, Inc.**

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

Address: **7926 Old Seward Hwy Suite A-8**

City: **Anchorage**

State: **Alaska**

99518

Country: **United States**

Business/Other Entity Contact Person: **Trevor Jepsen**

Contact E-mail: **trevor@alaskapolicypartners.com**

Contact Phone: **9073417513**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Exhibit 13

Name	Full Address	Title
Jodi Taylor	13910 Jarvi Drive Anchorage , Alaska 99515	Director
Jesse Sumner	454 W Sunflower Circle Wasilla, Alaska 99654	President of the Board
Seth Church	336 Slater Drive Fairbanks, Alaska 99701	Director

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/24/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
09/26/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
10/04/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$60,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount						
09/24/2022	Type: Other Name: A&A Roofing Co., Inc. PO Box70314 Fairbanks, Alaska 99707	Officers / Directors	\$5,000.00						
		<table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>		Name	Full Address	Title	No Officers / Nothing to Report		
		Name		Full Address	Title				
No Officers / Nothing to Report									
Contributor is True Source									
09/24/2022	Type: Other Name: Alaskan Eco ToursLLC 1554 Scenic loop Fairbanks, Alaska 99709	Officers / Directors	\$22,000.00						
		<table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>		Name	Full Address	Title	No Officers / Nothing to Report		
		Name		Full Address	Title				
No Officers / Nothing to Report									
Contributor is True Source									
09/24/2022	Type: Other Name: Alcan Builders Inc. PO Box 70752 Fairbanks, Alaska 99707	Officers / Directors	\$5,000.00						
		<table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>		Name	Full Address	Title	No Officers / Nothing to Report		
		Name		Full Address	Title				
No Officers / Nothing to Report									
Contributor is True Source									
09/24/2022	Type: Individual Name: Bauer, Lucy PO Box 111587 Anchorage, Alaska 99511	Occupation: Owner Employer: AK Quality Care , Alaska	\$25,000.00						
Contributor is True Source									
09/24/2022	Type: Individual Name: Clark, Jason 3790 Schacht Street Fairbanks, Alaska 99701	Occupation: Owner Employer: A Team Pacific Roofing , Alaska	\$3,500.00						
Contributor is True Source									
09/24/2022	Type: Other Name: Samson Electric Inc. 3125 N Van Hom Road Fairbanks, Alaska 99701	Officers / Directors	\$5,000.00						
		<table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>		Name	Full Address	Title	No Officers / Nothing to Report		
		Name		Full Address	Title				
No Officers / Nothing to Report									
Contributor is True Source									
09/24/2022	Type: Individual Name: Vreeman, Fred 1554 Scentic Loop Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired , Alaska	\$3,000.00						
Contributor is True Source									

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 3	
Total of paid Expenditures:	\$110,000.00
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report: 7	
Total of Contributions Reported with this Report:	\$68,500.00
Cumulative Contribution Amounts:	\$68,500.00
Number of Officers: 3	
Number of Debts Reported with this Report: 0	
Total of Debts Incurred but not yet paid:	\$0.00

INDEPENDENT EXPENDITURES FORM 15-6

AMENDED

AMENDMENT

Amendment Description: **add additional contributors**

COMPLETED

Submission Date: **10/08/2022**

FILER INFORMATION

Filer First Name: **YULIYA**

Filer Middle Name:

Filer Last Name: **Jordan**

Filer Full Address: **2006 North Rush Cir
Palmer, Alaska 99645**

Filer Occupation: **Enterprise Contract Administrator**

Filer Employer: **GCI Communication Corp.**

Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**

Election Year: **2022**

Report Type: **Ten Day**

Filer Type: **Other**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners, Inc.**

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

Address: **7926 Old Seward Hwy Suite A-8**

City: **Anchorage**

State: **Alaska**

99518

Country: **United States**

Business/Other Entity Contact Person: **Trevor Jepsen**

Contact E-mail: **trevor@alaskapolicypartners.com**

Contact Phone: **9073417513**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Jodi Taylor	13910 Jarvi Drive Anchorage , Alaska 99515	Director
Jesse Sumner	454 W Sunflower Circle Wasilla, Alaska 99654	President of the Board
Seth Church	336 Slater Drive Fairbanks, Alaska 99701	Director

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/24/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
09/26/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
10/04/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$60,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount						
09/24/2022	Type: Other Name: A&A Roofing Co., Inc. PO Box 70314 Fairbanks, Alaska 99707	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$5,000.00
Name	Full Address	Title							
No Officers / Nothing to Report									
09/24/2022	Type: Other Name: Alaskan Eco Tours LLC 1554 Scenic loop Fairbanks, Alaska 99709	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$22,000.00
Name	Full Address	Title							
No Officers / Nothing to Report									
09/24/2022	Type: Other Name: Alcan Builders Inc. PO Box 70752 Fairbanks, Alaska 99707	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$5,000.00
Name	Full Address	Title							
No Officers / Nothing to Report									
09/24/2022	Type: Individual Name: Bauer, Lucy PO Box 111587 Anchorage, Alaska 99511	Occupation: Owner Employer: AK Quality Care , Alaska	\$25,000.00						
09/24/2022	Type: Individual Name: Clark, Jason 3790 Schacht Street Fairbanks, Alaska 99701	Occupation: Owner Employer: A Team Pacific Roofing , Alaska	\$3,500.00						
09/24/2022	Type: Other Name: Samson Electric Inc. 3125 N Van Hom Road Fairbanks, Alaska 99701	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$5,000.00
Name	Full Address	Title							
No Officers / Nothing to Report									
09/24/2022	Type: Individual Name: Vreeman, Fred 1554 Scenic Loop Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired , Alaska	\$3,000.00						
09/24/2022	Type: Individual Name: David Cuddy 1900 Stanford Drive Anchorage, Alaska 99508	Occupation: Retired Employer: Retired , Alaska	\$400.00						
09/24/2022	Type: Individual Name: David Hale PO Box 73848 Fairbanks, Alaska 99707	Occupation: President Employer: Hale & Associates Inc , Alaska	\$1,000.00						
10/06/2022	Type: Individual Name: Robert D Yundt II 1165 E Westpoint Drive Wasilla, Alaska 99654	Occupation: Real Estate Developer Employer: Self Employed , Alaska	\$10,000.00						

Exhibit 14

Contribution Date	Contributor	Details	Amount
10/06/2022	Type: Individual Name: Jesse Sumner PO Box 872992 Wasilla, Alaska 99687	Occupation: President Employer: Sumner Company , Alaska	\$25,000.00

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 3	
Total of paid Expenditures:	\$110,000.00
Previous Contributions: \$0.00	
Number of Contributions Reported with this Report: 11	
Total of Contributions Reported with this Report:	\$104,900.00
Cumulative Contribution Amounts:	\$104,900.00
Number of Officers: 3	
Number of Debts Reported with this Report: 0	
Total of Debts Incurred but not yet paid:	\$0.00

INDEPENDENT EXPENDITURES FORM 15-6

AMENDED

AMENDMENT

Amendment Description: **add contributions**

COMPLETED

Submission Date: **10/25/2022**

FILER INFORMATION

Filer First Name: **YULIYA**

Filer Middle Name:

Filer Last Name: **Jordan**

Filer Full Address: **2006 North Rush Cir
Palmer, Alaska 99645**

Filer Occupation: **Enterprise Contract Administrator**

Filer Employer: **GCI Communication Corp.**

Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**

Election Year: **2022**

Report Type: **Ten Day**

Filer Type: **Other**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners, Inc.**

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

Address: **7926 Old Seward Hwy Suite A-8**

City: **Anchorage**

State: **Alaska**

99518

Country: **United States**

Business/Other Entity Contact Person: **Trevor Jepsen**

Contact E-mail: **trevor@alaskapolicypartners.com**

Contact Phone: **9073417513**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Exhibit 15

Name	Full Address	Title
Jodi Taylor	13910 Jarvi Drive Anchorage , Alaska 99515	Director
Jesse Sumner	454 W Sunflower Circle Wasilla, Alaska 99654	President of the Board
Seth Church	336 Slater Drive Fairbanks, Alaska 99701	Director

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/24/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
09/26/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
10/04/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$60,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
09/17/2022	Type: Individual Name: Bobcock Kristie PO Box 910 Kenai, Alaska 99611	Occupation: NA Employer: NA , Alaska	\$15,000.00
09/24/2022	Type: Individual Name: Erickson Wade 8535 E stormy hill cir. Wasilla, Alaska 99654	Occupation: NA Employer: NA , Alaska	\$25,000.00
09/24/2022	Type: Individual Name: Arctic Management Alaska 1150 S Colony Way Suite 3, PMB 226 Palmer, Alaska 99645	Occupation: NA Employer: NA , Alaska	\$20,000.00
09/24/2022	Type: Individual Name: Tayler Joanna 13910 Jarvi Dr. Anchorage, Alaska 99515	Occupation: NA Employer: NA , Alaska	\$14,000.00
09/24/2022	Type: Individual Name: Lucy Bauer PO Box 11587 Anchorage, Alaska 99511	Occupation: NA Employer: NA , Alaska	\$1,000.00
09/24/2022	Type: Individual Name: Seth Church 1285 Great View Ln Fairbanks, Alaska 99712	Occupation: NA Employer: NA , Alaska	\$12,500.00
09/24/2022	Type: Individual Name: Bobcock Kristie PO Box 810 Kenai, Alaska 99611	Occupation: NA Employer: NA , Alaska	\$8,000.00
09/24/2022	Type: Individual Name: Hall Robert PO Box 871906 Wasilla, Alaska 99687	Occupation: NA Employer: NA , Alaska	\$25,000.00
09/24/2022	Type: Individual Name: Udelhoven Oilfield 164 E 33rd ave. Anchorage , Alaska 99618	Occupation: NA Employer: NA , Alaska	\$25,000.00
09/24/2022	Type: Individual Name: Taylor Joanna 13910 Jarvi Dr. Anchorage, Alaska 99515	Occupation: NA Employer: NA , Alaska	\$15,000.00

Exhibit 15

Contribution Date	Contributor	Details	Amount						
09/24/2022	Type: Other Name: A&A Roofing Co., Inc. PO Box 70314 Fairbanks, Alaska 99707	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$5,000.00
Name	Full Address	Title							
No Officers / Nothing to Report									
09/24/2022	Type: Other Name: Alaskan Eco Tours LLC 1554 Scenic loop Fairbanks, Alaska 99709	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$22,000.00
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Name	Full Address	Title							
No Officers / Nothing to Report									
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09/24/2022	Type: Individual Name: Clark, Jason 3790 Schacht Street Fairbanks, Alaska 99701	Occupation: Owner Employer: A Team Pacific Roofing , Alaska	\$7,000.00						
09/24/2022	Type: Other Name: Samson Electric Inc. 3125 N Van Horn Road Fairbanks, Alaska 99701	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$5,000.00
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09/24/2022	Type: Individual Name: David Cuddy 1900 Stanford Drive Anchorage, Alaska 99508	Occupation: Retired Employer: Retired , Alaska	\$400.00						
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Contribution Date	Contributor	Details	Amount
10/06/2022	Type: Individual Name: Robert D Yundt II 1165 E Westpoint Drive Wasilla, Alaska 99654	Occupation: Real Estate Developer Employer: Self Employed , Alaska	\$10,000.00
10/06/2022	Type: Individual Name: Jesse Sumner PO Box 872992 Wasilla, Alaska 99687	Occupation: President Employer: Sumber Company , Alaska	\$25,000.00

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	3	
Total of paid Expenditures:	\$110,000.00	
Previous Contributions:		\$0.00
Number of Contributions Reported with this Report:	21	
Total of Contributions Reported with this Report:	\$268,900.00	
Cumulative Contribution Amounts:	\$268,900.00	
Number of Officers:		3
Number of Debts Reported with this Report:	0	
Total of Debts Incurred but not yet paid:	\$0.00	

INDEPENDENT EXPENDITURES FORM 15-6

AMENDED

AMENDMENT

Amendment Description: **make names correction**

COMPLETED

Submission Date: **10/30/2022**

FILER INFORMATION

Filer First Name: **YULIYA**
Filer Middle Name:
Filer Last Name: **Jordan**
Filer Full Address: **2006 North Rush Cir
Palmer, Alaska 99645**
Filer Occupation: **Enterprise Contract Administrator**
Filer Employer: **GCI Communication Corp.**
Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**
Election Year: **2022**
Report Type: **Ten Day**
Filer Type: **Other**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners, Inc.**
Type of Business or Organization: **Registered Entity**
Address: **7926 Old Seward Hwy Suite A-8**
City: **Anchorage**
State: **Alaska**
99518
Country: **United States**
Business/Other Entity Contact Person: **Trevor Jepsen**
Contact E-mail: **trevor@alaskapolicypartners.com**
Contact Phone: **9073417513**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Exhibit 16

Name	Full Address	Title
Jodi Taylor	13910 Jarvi Drive Anchorage , Alaska 99515	Director
Jesse Sumner	454 W Sunflower Circle Wasilla, Alaska 99654	President of the Board
Seth Church	336 Slater Drive Fairbanks, Alaska 99701	Director

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/24/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
09/26/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
10/04/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$60,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount									
09/17/2022	Type: Individual Name: Bobcock Kristie PO Box 910 Kenai, Alaska 99611	Occupation: NA Employer: NA , Alaska	\$15,000.00									
09/24/2022	Type: Individual Name: Erickson Wade 8535 E stormy hill cir. Wasilla, Alaska 99654	Occupation: NA Employer: NA , Alaska	\$25,000.00									
09/24/2022	Type: Individual Name: Arctic Management Alaska, Inc. 1150 S Colony Way Suite 3, PMB 226 Palmer, Alaska 99645	Occupation: NA Employer: NA , Alaska	\$20,000.00									
09/24/2022	Type: Individual Name: Tayler Joanna 13910 Jarvi Dr. Anchorage, Alaska 99515	Occupation: NA Employer: NA , Alaska	\$14,000.00									
09/24/2022	Type: Individual Name: Lucy Bauer PO Box 11587 Anchorage, Alaska 99511	Occupation: NA Employer: NA , Alaska	\$1,000.00									
09/24/2022	Type: Individual Name: Seth Church 1285 Great View Ln Fairbanks, Alaska 99712	Occupation: NA Employer: NA , Alaska	\$12,500.00									
09/24/2022	Type: Individual Name: Bobcock Kristie PO Box 810 Kenai, Alaska 99611	Occupation: NA Employer: NA , Alaska	\$8,000.00									
09/24/2022	Type: Individual Name: Hall Robert PO Box 871906 Wasilla, Alaska 99687	Occupation: NA Employer: NA , Alaska	\$25,000.00									
09/24/2022	Type: Other Name: Udelhoven Oilfield System Services, Inc. 164 E 33rd ave. Anchorage , Alaska 99618	<table border="1"> <thead> <tr> <th colspan="3">Officers / Directors</th> </tr> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Officers / Directors			Name	Full Address	Title	No Officers / Nothing to Report			\$25,000.00
Officers / Directors												
Name	Full Address	Title										
No Officers / Nothing to Report												

Contribution Date	Contributor	Details	Amount						
09/24/2022	Type: Individual Name: Taylor Joanna 13910 Jarvi Dr. Anchorage, Alaska 99515	Occupation: NA Employer: NA , Alaska	\$15,000.00						
09/24/2022	Type: Other Name: A&A Roofing Co., Inc. PO Box 70314 Fairbanks, Alaska 99707	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$5,000.00
Name	Full Address	Title							
No Officers / Nothing to Report									
09/24/2022	Type: Other Name: Alaskan Eco Tours LLC 1554 Scenic loop Fairbanks, Alaska 99709	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$22,000.00
Name	Full Address	Title							
No Officers / Nothing to Report									
09/24/2022	Type: Other Name: Alcan Builders Inc. PO Box 70752 Fairbanks, Alaska 99707	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$5,000.00
Name	Full Address	Title							
No Officers / Nothing to Report									
09/24/2022	Type: Individual Name: Bauer, Lucy PO Box 111587 Anchorage, Alaska 99511	Occupation: Owner Employer: AK Quality Care , Alaska	\$25,000.00						
09/24/2022	Type: Individual Name: Clark, Jason 3790 Schacht Street Fairbanks, Alaska 99701	Occupation: Owner Employer: A Team Pacific Roofing , Alaska	\$7,000.00						
09/24/2022	Type: Other Name: Samson Electric Inc. 3125 N Van Hom Road Fairbanks, Alaska 99701	Officers / Directors <table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Name	Full Address	Title	No Officers / Nothing to Report			\$5,000.00
Name	Full Address	Title							
No Officers / Nothing to Report									
09/24/2022	Type: Individual Name: Vreeman, Fred 1554 Scentic Loop Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired , Alaska	\$3,000.00						
09/24/2022	Type: Individual Name: David Cuddy 1900 Stanford Drive Anchorage, Alaska 99508	Occupation: Retired Employer: Retired , Alaska	\$400.00						

Contribution Date	Contributor	Details	Amount
09/24/2022	Type: Individual Name: David Hale PO Box 73848 Fairbanks, Alaska 99707	Occupation: President Employer: Hale & Associates Inc , Alaska	\$1,000.00
10/06/2022	Type: Individual Name: Robert D Yundt II 1165 E Westpoint Drive Wasilla, Alaska 99654	Occupation: Real Estate Developer Employer: Self Employed , Alaska	\$10,000.00
10/06/2022	Type: Individual Name: Jesse Sumner PO Box 872992 Wasilla, Alaska 99687	Occupation: President Employer: Sumber Company , Alaska	\$25,000.00

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	3
Total of paid Expenditures:	\$110,000.00
<hr/>	
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report:	21
Total of Contributions Reported with this Report:	\$268,900.00
Cumulative Contribution Amounts:	\$268,900.00
<hr/>	
Number of Officers: 3	
<hr/>	
Number of Debts Reported with this Report:	0
Total of Debts Incurred but not yet paid:	\$0.00

Hebdon, Heather R (DOA)

From: Jason Brandeis <jbrandeis@BHB.com>
Sent: Wednesday, November 2, 2022 12:41 PM
To: Lucas, Tom R (DOA)
Cc: Hebdon, Heather R (DOA)
Subject: RE: Alaska Policy Partners

Tom-

APP filed another amended report last night which revised the contribution dates.

From: Jason Brandeis
Sent: Tuesday, November 1, 2022 12:15 PM
To: Lucas, Tom R (DOA) <tom.lucas@alaska.gov>
Cc: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Subject: RE: Alaska Policy Partners

Tom,

Thanks for following up. I see that APP filed an amended IE report on 10/25 (attached) that includes all of their contributors. They amended that on 10/30 to fix some names and other minor errors (companies were inadvertently listed as individuals). But I see now that they may have listed some incorrect dates—some of the contributions listed as being received on 9/24/22 were received in 2021. However, my understanding is that the listed identities and amounts of contributions are correct.

I will reach out to APP and see if we can get this corrected today.

Thanks,
Jason

From: Lucas, Tom R (DOA) <tom.lucas@alaska.gov>
Sent: Monday, October 31, 2022 5:50 PM
To: Jason Brandeis <jbrandeis@BHB.com>
Cc: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Subject: RE: Alaska Policy Partners

External Email Address

Jason,

Just circling back. I still do not see an amended report that shows all contributors to the general fund since the entity's inception in September 2021.

Thomas R. Lucas
Campaign Disclosure Coordinator

Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128

Anchorage, Alaska 99508
Phone: (907) 276-4176
Fax: (907) 276-7018

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

From: Lucas, Tom R (DOA)
Sent: Monday, October 24, 2022 3:00 PM
To: Jason Brandeis <jbrandeis@BHB.com>
Cc: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Subject: RE: Alaska Policy Partners

Jason,

I apologize for not getting back to you sooner.

You state that your client was going to amend its 15-6 forms to show all true sources of its general fund, but I do not see that such an amendment was actually filed. Once the corrections are filed, we can move forward with a discussion concerning civil penalties.

Thomas R. Lucas
Campaign Disclosure Coordinator

Alaska Public Offices Commission
2221 E. Northern Lights Blvd., Rm. 128
Anchorage, Alaska 99508
Phone: (907) 276-4176
Fax: (907) 276-7018

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

From: Jason Brandeis <jbrandeis@BHB.com>
Sent: Wednesday, October 19, 2022 4:38 PM
To: Lucas, Tom R (DOA) <tom.lucas@alaska.gov>
Cc: Hebdon, Heather R (DOA) <heather.hebdon@alaska.gov>
Subject: Alaska Policy Partners

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

INDEPENDENT EXPENDITURES FORM 15-6

AMENDED

AMENDMENT

Amendment Description: **change contribution dates**

COMPLETED

Submission Date: **11/01/2022**

FILER INFORMATION

Filer First Name: **YULIYA**

Filer Middle Name:

Filer Last Name: **Jordan**Filer Full Address: **2006 North Rush Cir
Palmer, Alaska 99645**Filer Occupation: **Enterprise Contract Administrator**Filer Employer: **GCI Communication Corp.**Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**Election Year: **2022**Report Type: **Ten Day**Filer Type: **Other**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners, Inc.**Type of Business or Organization: **Registered Entity**Address: **7926 Old Seward Hwy Suite A-8**City: **Anchorage**State: **Alaska****99518**Country: **United States**Business/Other Entity Contact Person: **Trevor Jepsen**Contact E-mail: **trevor@alaskapolicypartners.com**Contact Phone: **9073417513**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Jodi Taylor	13910 Jarvi Drive Anchorage , Alaska 99515	Director
Jesse Sumner	454 W Sunflower Circle Wasilla, Alaska 99654	President of the Board
Seth Church	336 Slater Drive Fairbanks, Alaska 99701	Director

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/24/2022	Massey Political Consulting 336 Slater Drive Fairbanks, Alaska 99701	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
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CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount									
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11/12/2021	Type: Individual Name: Taylor Joanna 13910 Jarvi Dr. Anchorage, Alaska 99515	Occupation: NA Employer: NA , Alaska	\$15,000.00									
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Contribution Date	Contributor	Details	Amount						
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09/24/2022	Type: Individual Name: David Cuddy 1900 Stanford Drive Anchorage, Alaska 99508	Occupation: Retired Employer: Retired , Alaska	\$400.00						
09/24/2022	Type: Individual Name: David Hale PO Box 73848 Fairbanks, Alaska 99707	Occupation: President Employer: Hale & Associates Inc , Alaska	\$1,000.00						
10/06/2022	Type: Individual Name: Robert D Yundt II 1165 E Westpoint Drive Wasilla, Alaska 99654	Occupation: Real Estate Developer Employer: Self Employed , Alaska	\$10,000.00						

Contribution Date	Contributor	Details	Amount						
10/06/2022	Type: Individual Name: Jesse Sumner PO Box 872992 Wasilla, Alaska 99687	Occupation: President Employer: Sumner Company , Alaska	\$25,000.00						
10/12/2022	Type: Individual Name: Erickson Wade 8535 E stormy hill cir. Wasilla, Alaska 99654	Occupation: NA Employer: NA , Alaska	\$25,000.00						
10/12/2022	Type: Other Name: Arctic Management Alaska, Inc. 1150 S Colony Way Suite 3, PMB 226 Palmer, Alaska 99645	Officers / Directors	\$20,000.00						
		<table border="1"> <thead> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3" style="text-align: center;">No Officers / Nothing to Report</td> </tr> </tbody> </table>		Name	Full Address	Title	No Officers / Nothing to Report		
Name		Full Address		Title					
No Officers / Nothing to Report									

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report: 3	
Total of paid Expenditures:	\$110,000.00
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report: 21	
Total of Contributions Reported with this Report:	\$268,900.00
Cumulative Contribution Amounts:	\$268,900.00
Number of Officers: 3	
Number of Debts Reported with this Report: 0	
Total of Debts Incurred but not yet paid:	\$0.00

INDEPENDENT EXPENDITURES FORM 15-6

AMENDED

AMENDMENT

Amendment Description: **Add occupation/employer information**

COMPLETED

Submission Date: **12/07/2022**

FILER INFORMATION

Filer First Name: **YULIYA**
 Filer Middle Name:
 Filer Last Name: **Jordan**
 Filer Full Address: **2006 North Rush Cir
 Palmer, Alaska 99645**
 Filer Occupation: **Enterprise Contract Administrator**
 Filer Employer: **GCI Communication Corp.**
 Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**
 Election Year: **2022**
 Report Type: **Ten Day**
 Filer Type: **Other**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners, Inc.**
 Type of Business or Organization: **Registered Entity**
 Address: **7926 Old Seward Hwy Suite A-8**
 City: **Anchorage**
 State: **Alaska**
99518
 Country: **United States**
 Business/Other Entity Contact Person: **Seth Church**
 Contact E-mail: **seth.church5@gmail.com**
 Contact Phone: **17015007188**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Rob Yundt II	1165 E WestPoint Dr Wasilla, Alaska 99654	President of the Board
Seth Church	336 Slater Drive Fairbanks, Alaska 99701	Director

Exhibit 19

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/24/2022	Massey Political Consulting PO Box 522052 Salt Lake City, Utah 84152	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
09/26/2022	Massey Political Consulting PO Box 522052 Salt Lake City, Utah 84152	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
10/04/2022	Massey Political Consulting PO Box 522052 Salt Lake City, Utah 84152	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$60,000.00
10/20/2022	Massey Political Consulting PO Box 522052 Salt Lake City, Utah 84152	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$100,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
11/12/2021	Type: Individual Name: Bobcock Kristie PO Box 910 Kenai, Alaska 99611	Occupation: Insurance Employer: Self-employed , Alaska	\$15,000.00
11/12/2021	Type: Individual Name: Taylor Joanna 13910 Jarvi Dr. Anchorage, Alaska 99515	Occupation: Investor Employer: Self-employed , Alaska	\$15,000.00

Contribution Date	Contributor	Details	Amount															
12/16/2021	Type: Individual Name: Hall Robert PO Box 871906 Wasilla, Alaska 99687	Occupation: Sales Employer: Self-employed , Alaska	\$25,000.00															
12/16/2021	Type: Individual Name: Jim Udelhoven 164 E 33rd ave. Anchorage, Alaska 99618	Occupation: President Employer: Udelhoven Oilfield System Services, Inc. , Alaska	\$25,000.00															
01/26/2022	Type: Individual Name: Bobcock Kristie PO Box 810 Kenai, Alaska 99611	Occupation: Insurance Employer: Self-employed , Alaska	\$8,000.00															
03/14/2022	Type: Individual Name: Seth Church 1285 Great View Ln Fairbanks, Alaska 99712	Occupation: Construction Employer: Self-employed , Alaska	\$12,500.00															
09/19/2022	Type: Individual Name: Lucy Bauer PO Box 11587 Anchorage, Alaska 99511	Occupation: NA Employer: NA , Alaska	\$1,000.00															
09/24/2022	Type: Individual Name: Taylor Joanna 13910 Jarvi Dr. Anchorage, Alaska 99515	Occupation: Investor Employer: Self Employed , Alaska	\$14,000.00															
09/24/2022	Type: Other Name: A&A Roofing Co., Inc. PO Box 70314 Fairbanks, Alaska 99707	<table border="1"> <thead> <tr> <th colspan="3">Officers / Directors</th> </tr> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td>Charles Wieggers</td> <td>458 Shannon Dr., Fairbanks, Ak, 99701</td> <td>Director/President</td> </tr> <tr> <td>Scott Sluka</td> <td>925 Aspen St., Ap A, Fairbanks, AK, 99709</td> <td>Director/Vice President</td> </tr> <tr> <td>Ryan Tipton</td> <td>PO Box 72681, Fairbanks, AK, 99707</td> <td>Director/Corporate Secretary</td> </tr> </tbody> </table>	Officers / Directors			Name	Full Address	Title	Charles Wieggers	458 Shannon Dr., Fairbanks, Ak, 99701	Director/President	Scott Sluka	925 Aspen St., Ap A, Fairbanks, AK, 99709	Director/Vice President	Ryan Tipton	PO Box 72681, Fairbanks, AK, 99707	Director/Corporate Secretary	\$5,000.00
Officers / Directors																		
Name	Full Address	Title																
Charles Wieggers	458 Shannon Dr., Fairbanks, Ak, 99701	Director/President																
Scott Sluka	925 Aspen St., Ap A, Fairbanks, AK, 99709	Director/Vice President																
Ryan Tipton	PO Box 72681, Fairbanks, AK, 99707	Director/Corporate Secretary																
Contributor is True Source																		
09/24/2022	Type: Other Name: Alaskan Eco Tours LLC 1554 Scenic loop Fairbanks, Alaska 99709	<table border="1"> <thead> <tr> <th colspan="3">Officers / Directors</th> </tr> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td colspan="3">No Officers / Nothing to Report</td> </tr> </tbody> </table>	Officers / Directors			Name	Full Address	Title	No Officers / Nothing to Report			\$22,000.00						
Officers / Directors																		
Name	Full Address	Title																
No Officers / Nothing to Report																		

Contribution Date	Contributor	Details			Amount
09/24/2022	Type: Other Name: Alcan Builders Inc. PO Box 70752 Fairbanks, Alaska 99707	Officers / Directors			\$5,000.00
		Name	Full Address	Title	
		Jeffrey Alling	PO Box 70752, Fairbanks, AK 99707	Director/President	
		Alling/Padgett Family Trust	1376 Valley Dr., North Pole, AK, 99705	Shareholder	
		Matthew Brockman	8470 Bawkey Rd., Clare, MI 48617	Shareholder/Secretary	
		Shane Malone	po Box 71898, Fairbanks, AK 99707	Shareholder/Treasurer	
Contributor is True Source					
09/24/2022	Type: Individual Name: Bauer, Lucy PO Box 111587 Anchorage, Alaska 99511	Occupation: Owner Employer: AK Quality Care , Alaska			\$25,000.00
09/24/2022	Type: Individual Name: Clark, Jason 3790 Schacht Street Fairbanks, Alaska 99701	Occupation: Owner Employer: A Team Pacific Roofing , Alaska			\$7,000.00
09/24/2022	Type: Other Name: Samson Electric Inc. 3125 N Van Horn Road Fairbanks, Alaska 99701	Officers / Directors			\$5,000.00
		Name	Full Address	Title	
		No Officers / Nothing to Report			
09/24/2022	Type: Individual Name: Vreeman, Fred 1554 Scentic Loop Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired , Alaska			\$3,000.00
09/24/2022	Type: Individual Name: David Cuddy 1900 Stanford Drive Anchorage, Alaska 99508	Occupation: Retired Employer: Retired , Alaska			\$400.00
09/24/2022	Type: Individual Name: David Hale PO Box 73848 Fairbanks, Alaska 99707	Occupation: President Employer: Hale & Associates Inc , Alaska			\$1,000.00

Contribution Date	Contributor	Details	Amount		
10/06/2022	Type: Individual Name: Robert D Yundt II 1165 E Westpoint Drive Wasilla, Alaska 99654	Occupation: Real Estate Developer Employer: Self Employed , Alaska	\$10,000.00		
10/06/2022	Type: Individual Name: Jesse Sumner PO Box 872992 Wasilla, Alaska 99687	Occupation: President Employer: Sumner Company , Alaska	\$25,000.00		
10/12/2022	Type: Individual Name: Erickson Wade 8535 E stormy hill cir. Wasilla, Alaska 99654	Occupation: Self-employed Employer: Self-employed , Alaska	\$25,000.00		
10/12/2022	Type: Other Name: Arctic Management Alaska, Inc. 1150 S Colony Way Suite 3, PMB 226 Palmer, Alaska 99645	Officers / Directors	\$20,000.00		
		Name		Full Address	Title
		No Officers / Nothing to Report			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	4
Total of paid Expenditures:	\$210,000.00
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report:	21
Total of Contributions Reported with this Report:	\$268,900.00
Cumulative Contribution Amounts:	\$268,900.00
Number of Officers:	2
Number of Debts Reported with this Report:	0
Total of Debts Incurred but not yet paid:	\$0.00

INDEPENDENT EXPENDITURES FORM 15-6

AMENDMENT

Amendment Description: **edit donors information**

COMPLETED

Submission Date: **01/16/2023**

FILER INFORMATION

Filer First Name: **YULIYA**
 Filer Middle Name:
 Filer Last Name: **Jordan**
 Filer Full Address: **2006 North Rush Cir
 Palmer, Alaska 99645**
 Filer Occupation: **Enterprise Contract Administrator**
 Filer Employer: **GCI Communication Corp.**
 Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**
 Election Year: **2022**
 Report Type: **Ten Day**
 Filer Type: **Other**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners, Inc.**
 Type of Business or Organization: **Registered Entity**
 Address: **7926 Old Seward Hwy Suite A-8**
 City: **Anchorage**
 State: **Alaska**
99518
 Country: **United States**
 Business/Other Entity Contact Person: **Seth Church**
 Contact E-mail: **seth.church5@gmail.com**
 Contact Phone: **17015007188**

ELECTION INFORMATION

Election: **State General**

OFFICERS

Name	Full Address	Title
Rob Yundt II	1165 E WestPoint Dr Wasilla, Alaska 99654	President of the Board
Seth Church	336 Slater Drive Fairbanks, Alaska 99701	Director

EXPENDITURES

Exhibit 20

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/24/2022	Massey Political Consulting PO Box 522052 Salt Lake City, Utah 84152	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
09/26/2022	Massey Political Consulting PO Box 522052 Salt Lake City, Utah 84152	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$25,000.00
10/04/2022	Massey Political Consulting PO Box 522052 Salt Lake City, Utah 84152	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$60,000.00
10/20/2022	Massey Political Consulting PO Box 522052 Salt Lake City, Utah 84152	Electronic Funds Transfer	SUPPORT: 2022 - Forrest Wolfe Election: State General Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers APP supporting: Roger Holland, Jim Matherly, Ken McCarty, Jeremy Bynum, David Nelson and Frank Tomaszewski	\$100,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
11/12/2021	Type: Individual Name: Bobcock Kristie PO Box 910 Kenai, Alaska 99611	Occupation: Insurance Employer: Self-employed , Alaska	\$15,000.00
11/12/2021	Type: Individual Name: Taylor Joanna 13910 Jarvi Dr. Anchorage, Alaska 99515	Occupation: Investor Employer: Self-employed , Alaska	\$15,000.00
12/16/2021	Type: Individual Name: Hall Robert PO Box 871906 Wasilla, Alaska 99687	Occupation: Sales Employer: Self-employed , Alaska	\$25,000.00

Exhibit 20

Contribution Date	Contributor	Details	Amount		
12/16/2021	Type: Individual Name: Jim Udelhoven 164 E 33rd ave. Anchorage, Alaska 99618	Occupation: President Employer: Udelhoven Oilfield System Services, Inc. , Alaska	\$25,000.00		
01/26/2022	Type: Individual Name: Bobcock Kristie PO Box 810 Kenai, Alaska 99611	Occupation: Insurance Employer: Self-employed , Alaska	\$8,000.00		
03/14/2022	Type: Individual Name: Seth Church 1285 Great View Ln Fairbanks, Alaska 99712	Occupation: Construction Employer: Self-employed , Alaska	\$12,500.00		
09/19/2022	Type: Individual Name: Lucy Bauer PO Box 11587 Anchorage, Alaska 99511	Occupation: NA Employer: NA , Alaska	\$1,000.00		
09/24/2022	Type: Individual Name: Taylor Joanna 13910 Jarvi Dr. Anchorage, Alaska 99515	Occupation: Investor Employer: Self Employed , Alaska	\$14,000.00		
09/24/2022	Type: Other Name: A&A Roofing Co., Inc. PO Box 70314 Fairbanks, Alaska 99707	Officers / Directors		\$5,000.00	
		Name	Full Address		Title
		Charles Wiegiers	458 SHannon Dr., Fairbanks, Ak, 99701		Director/President
		Scott Sluka	925 Aspen St., Ap A, Fairbanks, AK, 99709		Director/Vice President
		Ryan Tipton	PO Box 72681, Fairbanks, AK, 99707	Director/Corporate Secretary	
Contributor is True Source					
09/24/2022	Type: Other Name: Alaskan Eco Tours LLC 1554 Scenic loop Fairbanks, Alaska 99709	Officers / Directors		\$22,000.00	
		Name	Full Address		Title
		No Officers / Nothing to Report			

Contribution Date	Contributor	Details			Amount
09/24/2022	Type: Other Name: Alcan Builders Inc. PO Box 70752 Fairbanks, Alaska 99707	Officers / Directors			\$5,000.00
		Name	Full Address	Title	
		Jeffrey Alling	PO Box 70752, Fairbanks, AK 99707	Director/President	
		Alling/Padgett Family Trust	1376 Valley Dr., North Pole, AK, 99705	Shareholder	
		Matthew Brockman	8470 Bawkey Rd., Clare, MI 48617	Shareholder/Secretary	
		Shane Malone	po Box 71898, Fairbanks, AK 99707	Shareholder/Treasurer	
Contributor is True Source					
09/24/2022	Type: Individual Name: Bauer, Lucy PO Box 111587 Anchorage, Alaska 99511	Occupation: Owner Employer: AK Quality Care , Alaska			\$25,000.00
09/24/2022	Type: Individual Name: Clark, Jason 3790 Schacht Street Fairbanks, Alaska 99701	Occupation: Owner Employer: A Team Pacific Roofing , Alaska			\$7,000.00
09/24/2022	Type: Other Name: Samson Electric Inc. 3125 N Van Horn Road Fairbanks, Alaska 99701	Officers / Directors			\$5,000.00
		Name	Full Address	Title	
		Anthony Samson	168 Shenandoah Drive, Fairbanks, AK, 99712	President	
		Gregory Roads	12641 Rya Road, Anchorage, AK, 99513	Vide President	
		Micahel Samson	2031 Van Horn Ct., Fairbanks, AK, 99701	Secretary	
		Sylvia Samson	2031 Van Horn Ct., Fairbanks, AK, 99701	Treasurer	
09/24/2022	Type: Individual Name: Vreeman, Fred 1554 Scentic Loop Fairbanks, Alaska 99709	Occupation: Retired Employer: Retired , Alaska			\$3,000.00
09/24/2022	Type: Individual Name: David Cuddy 1900 Stanford Drive Anchorage, Alaska 99508	Occupation: Retired Employer: Retired , Alaska			\$400.00
09/24/2022	Type: Individual Name: David Hale PO Box 73848 Fairbanks, Alaska 99707	Occupation: President Employer: Hale & Associates Inc , Alaska			\$1,000.00

Exhibit 20

Contribution Date	Contributor	Details	Amount												
10/06/2022	Type: Individual Name: Robert D Yundt II 1165 E Westpoint Drive Wasilla, Alaska 99654	Occupation: Real Estate Developer Employer: Self Employed , Alaska	\$10,000.00												
10/06/2022	Type: Individual Name: Jesse Sumner PO Box 872992 Wasilla, Alaska 99687	Occupation: President Employer: Sumner Company , Alaska	\$25,000.00												
10/12/2022	Type: Individual Name: Erickson Wade 8535 E stormy hill cir. Wasilla, Alaska 99654	Occupation: Self-employed Employer: Self-employed , Alaska	\$25,000.00												
10/12/2022	Type: Other Name: Arctic Management Alaska, Inc. 1150 S Colony Way Suite 3, PMB 226 Palmer, Alaska 99645	<table border="1"> <thead> <tr> <th colspan="3">Officers / Directors</th> </tr> <tr> <th>Name</th> <th>Full Address</th> <th>Title</th> </tr> </thead> <tbody> <tr> <td>Emma Campbell</td> <td></td> <td>Secretary, Treasurer</td> </tr> <tr> <td>Walter Campbell</td> <td></td> <td>Director, President, Shareholder</td> </tr> </tbody> </table>	Officers / Directors			Name	Full Address	Title	Emma Campbell		Secretary, Treasurer	Walter Campbell		Director, President, Shareholder	\$20,000.00
Officers / Directors															
Name	Full Address	Title													
Emma Campbell		Secretary, Treasurer													
Walter Campbell		Director, President, Shareholder													

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	4
Total of paid Expenditures:	\$210,000.00
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report:	21
Total of Contributions Reported with this Report:	\$268,900.00
Cumulative Contribution Amounts:	\$268,900.00
Number of Officers: 2	
Number of Debts Reported with this Report:	0
Total of Debts Incurred but not yet paid:	\$0.00

INDEPENDENT EXPENDITURES FORM UJ-6

AMENDED

AMENDMENT

Amendment Description: **To correct the payee name.**

COMPLETED

Submission Date: **10/03/2022**

FILER INFORMATION

Filer First Name: **YULIYA**
Filer Middle Name:
Filer Last Name: **Jordan**
Filer Full Address: **2006 North Rush Cir
PALMER, Alaska 99645**
Filer Occupation: **Enterprise Contract Administrator**
Filer Employer: **GCI Communication Corp.**
Filer's Title with Other Entity: **Treasurer**

REPORT INFORMATION

Report Year: **2022**
Election Year: **2022**
Report Type: **Twenty-four Hour**
Filer Type: **Registered Group**

BUSINESS/OTHER ENTITY INFORMATION

Business/Other Entity Name: **Alaska Policy Partners PAC**
Type of Business or Organization: **Registered Group**
Address: **7926 Old Seward Hwy., Suite A-8**
City: **Anchorage**
State: **Alaska**
99518
Country: **United States**
Business/Other Entity Contact Person: **Yuliya Jordan**
Contact E-mail: **yuliya.jordan@outlook.com**
Contact Phone: **9072500524**

ELECTION INFORMATION

Election: **Anchorage Municipal Election**

OFFICERS

Name	Full Address	Title
Jesse Sumner	7926 Old Seward Hwy. #8 Anchorage, Alaska 99518	Chair
Yuliya Jordan	2006 North Rush Cir Palmer, Alaska 99645	Treasurer

EXPENDITURES

Date	Recipient	Payment Type	Candidate / Proposition	Amount
09/26/2022	Massey Political Consulting 7926 Old Seward Hwy., suite A-8 Anchorage, Alaska 99518	Electronic Funds Transfer	SUPPORT: 2022 - Joe Wright Election: Anchorage Municipal Election Alaska Policy Partners, Inc ("APP") has retained Massey Political Consulting "MPC" to provide the following services: • General Campaign Consulting • Digital Advertising • Opposition Research • Targeted Mailers	\$30,000.00

CONTRIBUTIONS

Contribution Date	Contributor	Details	Amount
No Contributions / Nothing to Report			

DEBTS

Date	Recipient	Candidate / Proposition	Amount
No Debts / Nothing to Report			

REPORT SUMMARY

Number of Expenditures Reported with this Report:	1
Total of paid Expenditures:	\$30,000.00
Previous Contributions:	\$0.00
Number of Contributions Reported with this Report:	0
Total of Contributions Reported with this Report:	\$0.00
Cumulative Contribution Amounts:	\$0.00
Number of Officers: 2	
Number of Debts Reported with this Report:	0
Total of Debts Incurred but not yet paid:	\$0.00

Name	Contribution Date	Amount	Date 1 st Reported	Complete Information Provided
Kristie Bobcock ¹	11/12/21	\$15k	10/25/22	12/7/22
Joanna Taylor	11/12/21	\$15k	10/25/22	12/7/22
Robert Hall	12/16/21	\$25k	10/25/22	12/7/22
Jim Udelhoven	12/16/21	\$25k	12/7/21	12/7/22
Kristie Bobcock	1/26/22	\$8k	10/25/22	12/7/22
Seth Church	3/14/22	\$12.5k	10/25/22	12/7/22
Lucy Bauer	9/19/22	\$1k	10/25/22	10/25/22
Joanna Taylor	9/24/22	\$14k	11/1/22	12/7/22
AAA Roofing Co.	9/24/22	\$5k	10/5/22	12/7/22
Alaskan Eco Tours	9/24/22	\$22k	10/5/22	N/A ²
Alcan Builders	9/24/22	\$5k	10/5/22	12/7/22
Lucy Bauer	9/24/22	\$25k	10/5/22	10/5/22
Jason Clark	9/24/22	\$7k	10/25/22 ³	10/25/22
Samson Electric	9/24/22	\$5k	10/5/22	1/16/23
Fred Vreeman	9/24/22	\$3k	10/5/22	10/5/22
David Cuddy	9/24/22	\$400	10/8/22	10/8/22
David Hale	9/24/22	\$1k	10/8/22	10/8/22

¹ Most likely meant to be Kristie Babcock.

² APP has never provided Director/Officer Information for this contributor.

³ A \$3,500 contribution from Clark was reported on 10/5/22. This contribution was changed to a \$7,000 contribution on the October 25 Amended Report.

CAMPAIGN DISCLOSURE FORM

AMENDED
TWENTY-FOUR HOUR TRUE SOURCES REPORT
COMPLETED

Submission Date: 09/25/2022
 Filer First Name: YULIYA
 Filer Middle Name:
 Filer Last Name: Jordan
 Filer's Title: Treasurer
 Report Type: 24 Hour Report - Entity/IE Group

GROUP INFORMATION

Group Name: 2022 - Alaska Policy Partners PAC
 Group Abbreviation: APP
 Group Address: 7926 Old Seward Hwy., Suite A-8
 City, State Zip: Anchorage, Alaska 99518

REPORT INFORMATION

Election Year: 2022
 Election: State General
 Report Type: 24 Hour Report - Entity/IE Group
 Reporting Period: From // Through //

INCOME

Date Received	Payment Method	Contributor	Details	Amount
09/24/2022	Check 068118	A&A Roofing Co., Inc. Alaska	Occupation: Employer: Description:	\$5,000.00
Contributor is True Source				
09/24/2022	Check 220	Alaskan Eco Tours LLC Alaska	Occupation: Employer: Description:	\$22,000.00
Contributor is True Source				
09/24/2022	Check 7150	Alcan Builders Inc. Alaska	Occupation: Employer: Description:	\$5,000.00
Contributor is True Source				
09/24/2022	Check 176	Bauer, Lucy Alaska	Occupation: Employer: Description:	\$25,000.00
Contributor is True Source				
09/24/2022	Cash	Clark, Jason Alaska	Occupation: Employer: Description:	\$3,500.00
Contributor is True Source				
09/24/2022	Check 107214	Sanson Electric Inc. Alaska	Occupation: Employer: Description:	\$5,000.00
Contributor is True Source				

3/31/23, 11:20 AM

CampaignDisclosure (Amended)

Date Received	Payment Method	Contributor	Details	Amount
09/24/2022	Check 4079	Vreeman, Janet , Alaska	Occupation: Employer: Description:	\$3,000.00
Contributor Is True Source				
			Income Total:	\$68,500.00