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Attorney for Defendants

Robert Griffin, Allen Vezey, Trevor Shaw, Families of the Last Frontier, and Alaska Free Market Coalition,

Plaintiffs,

V.

Richard Stillie, Jr., in his official capacity
as chair of the Alaska Public Offices
Commission, *et al.*,

Defendants,

and

Alaskans for Better Elections, Inc.,

Intervenor-Defendant.

Case No.: 3:22-cv-00077-SLG

STATE DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

“Alaska has a long history of regulating political influence and campaign finance.”¹ At times “public confidence and trust in the integrity of the legislature [has been] ‘disturbingly low.’”² This led the Alaska Legislature to overhaul Alaska’s campaign finance laws in 1996 to “‘restore the public’s trust in the electoral process and to foster good government.’”³ The legislature—and the voters via ballot initiatives—have continued to refine the laws since then.⁴ In 2010, the legislature updated the laws to conform with *Citizens United v. Federal Election Commission*, which favored disclosures over the more restrictive solution of contribution limits.⁵ The most recent relevant changes became effective in February 2021 after Alaska voters enacted Ballot Measure 2.

In this lawsuit, the plaintiffs challenge some campaign finance provisions enacted recently by that initiative and others enacted earlier by the legislature that have been enforced by the Alaska Public Offices Commission (APOC) for years. The challenged provisions are not contribution or expenditure limits, but rather the less restrictive option approved by the Supreme Court: disclosure and disclaimer laws, which—as the Court explained in *Citizens United*—“‘impose no ceiling on campaign-related activities,’ and

¹ *Alaska Right to Life Comm. v. Miles*, 441 F.3d 773, 777 (9th Cir. 2006).

² *Id.* (quoting *State v. Alaska Civil Liberties Union*, 978 P.2d 597, 602 (Alaska 1999); *see also* 1996 Alaska Sess. Laws ch. 48, § 1(a)(3)).

³ *Miles*, 441 F.3d at 778 (quoting 1996 Alaska Sess. Laws ch. 48, § 1(b)).

⁴ *E.g.*, 2002 Alaska Sess. Laws, Third Special Sess., ch. 1; 2003 Alaska Sess. Laws ch. 108; 2006 Primary Election Ballot Meas. 1; 2008 Alaska Sess. Laws ch. 106.

⁵ 558 U.S. 310 (2010); 2010 Alaska Sess. Laws ch. 36.

‘do not prevent anyone from speaking.’”⁶ Such provisions enhance the political marketplace of ideas by supplying voters with more (not less) information. Indeed, as the Ninth Circuit recently observed in this very case: “‘Sunlight,’ the Supreme Court has recognized, is ‘the best of disinfectants’ in elections.”⁷

The State moves for summary judgment on all counts. The fundamental flaw in the plaintiffs’ case is this: as demonstrated by the long line of cases upholding political disclosure and disclaimer laws,⁸ there is no constitutional right to anonymous political spending. Because Alaska’s disclosure and disclaimer laws are in line with this unchanged precedent⁹ and because the Supreme Court has made “facial challenges hard to win” even in First Amendment cases,¹⁰ the State defendants respectfully request summary judgment in their favor on all counts.

⁶ 558 U.S. at 366 (quoting *Buckley*, 424 U.S. at 64, and *McConnell*, 540 U.S. at 201 (internal punctuation omitted)).

⁷ *Smith v. Helzer*, 95 F.4th 1207, 1211 (9th Cir. 2024) (citing *Buckley v. Valeo*, 424 U.S. 1, 67 (1976)).

⁸ See *Buckley v. Valeo*, 424 U.S. 1, 75-76 (1976); *McConnell v. Fed. Election Comm’n*, 540 U.S. 93, 196-98 (2003); *Citizens United*, 558 U.S. at 368-71.

⁹ See *Gaspee Project v. Mederos*, 13 F.4th 79, 82 (1st Cir. 2021) (upholding a Rhode Island statute requiring the disclosure of donations over \$1,000 and top-donor disclaimers); *cert. denied*, 2022 WL 1205841 (U.S. Apr. 25, 2022).

¹⁰ *Moody v. NetChoice, LLC*, 603 U.S. 707, 723 (2024).

FACTUAL BACKGROUND

I. Alaska's disclosure and disclaimer laws

After *Citizens United*, the Alaska Legislature made several relevant changes to Alaska's campaign finance regime.¹¹ The law previously excluded corporations and labor unions from making "independent expenditures" in candidate elections.¹² In *Citizens United*, the Supreme Court held that "the Government may regulate corporate political speech through disclaimer and disclosure requirements, but it may not suppress that speech altogether."¹³ In response, Alaska changed course. Rather than prohibiting speech, Alaska followed the path blessed by the Supreme Court and began relying more heavily on disclaimer and disclosure requirements to further its significant interests.¹⁴

First, the Alaska Legislature modified the disclaimers required on political communications under AS 15.13.090. Since 1974, Alaska has required a "paid for by" disclaimer for all communications intended to influence the election of a candidate.¹⁵

¹¹ 558 U.S. 310 (2010).

¹² See AS 15.13.135(a) (2009); AS 15.13.400(8), (11), (13) (2009).

¹³ *Citizens United*, 558 U.S. at 319.

¹⁴ See *id.* at 369 ("The Court has explained that disclosure is a less restrictive alternative to more comprehensive regulations of speech."); *McCutcheon v. Fed. Election Comm'n*, 572 U.S. 185, 223 (2014) ("[D]isclosure often represents a less restrictive alternative to flat bans on certain types or quantities of speech.").

¹⁵ 1974 Alaska Sess. Laws ch. 76, § 1 ("All advertisements, billboards, handbills, paid-for television and radio announcements and other communications intended to influence the election of a candidate shall be signed or identified by the words 'paid for by' followed by the name and address of the candidate or campaign treasurer of the candidate or group on whose behalf the communication appears.").

In 2010, the legislature added more requirements and extended these provisions to corporations and labor unions by using the word “person,” which includes them.¹⁶ As of the 2010 legislation, the disclaimer must include the person’s address or principal place of business; and, where applicable, (1) the principal officer’s name and title; (2) the name, city, and state of residence or principal place of business of the top three contributors; and (3) a statement that the principal officer approved the communication.¹⁷ Where applicable, disclaimers must also state that the ad is “not authorized, paid for, or approved by the candidate.”¹⁸ Videos must include both written and audio disclaimers.¹⁹

Second, the Alaska Legislature amended the disclosure requirements for independent expenditures to require corporations and labor unions to provide source information as well as information about expenditures.²⁰ Existing laws requiring reporting the source of funds used for expenditures did not extend to those entities.²¹ So in the 2010 legislation expanding the disclaimers, the legislature closed this loophole by amending AS 15.13.040(d) to provide that “[e]very person making an independent expenditure” must “make a full report of expenditures made and contributions

¹⁶ 2010 Alaska Session Laws ch. 36, §§ 13-14; AS 15.13.400(14) (2010).

¹⁷ AS 15.13.090(a), (f) (2010); *see also* 2010 Alaska Sess. Laws ch. 36, §§ 13-14, 17.

¹⁸ AS 15.13.135(b) (2010).

¹⁹ AS 15.13.090(c)-(d). The audio component may simplify the disclaimer by omitting the top contributors’ city and state. AS 15.13.090(d).

²⁰ 2010 Alaska Sess. Laws ch. 36, § 4.

²¹ *See* AS 15.13.040(a)-(b), (d)-(e), (j) (2009); AS 15.13.400(14) (2009).

received.”²² The report must include, among other things, the date of the contribution, the contributor’s name and address, and (if applicable) the names and addresses of officers and directors.²³ Generally, a report must be filed with APOC no later than ten days after an expenditure.²⁴ The timeframe shortens as an election approaches—an expenditure over \$250 within nine days of an election must be reported within 24 hours.²⁵

After ten years of on-the-ground experience with these provisions, Alaska voters enacted Ballot Measure 2 to close gaps and require more information about independent expenditures.²⁶ The plaintiffs challenge three aspects of this new law along with the pre-existing disclaimer requirements.

First, the plaintiffs challenge the donor disclosure requirement. [Dkt. 40 at 17-18] After Ballot Measure 2, any donor who contributes \$2,000 or more in a calendar year to an entity that made independent expenditures in candidate elections in the current or previous election cycle or is likely to do so in the current election cycle must report within 24 hours.²⁷ A person who delays reporting is subject to a civil penalty of up to \$1,000 a day for each day of delinquency.²⁸

²² 2010 Alaska Sess. Laws ch. 36, § 3.

²³ AS 15.13.040(e); *see* 2010 Alaska Sess. Laws ch. 36, § 4.

²⁴ AS 15.13.110(h).

²⁵ *Id.*

²⁶ 2020 Alaska Laws Initiative Meas. 2, § 3.

²⁷ AS 15.13.040(r).

²⁸ AS 15.13.390(a)(2).

Second, the plaintiffs challenge the disclaimer requirements. [Dkt. 40 at 18-20] In addition to the pre-existing top-three-donor and stand-by-your ad-disclaimers, Ballot Measure 2 added that an ad by an entity receiving most of its funding from outside Alaska must declare that if the communication is in print or video.²⁹ An entity that leaves out the required disclaimer is subject to a civil penalty of up to \$50 a day.³⁰

Third, the plaintiffs challenge Ballot Measure 2's requirement that disclosures include the "true source" of the money used for independent expenditures.³¹ [Dkt. 40 at 20-21] The "true source" is the "person or legal entity whose contribution is funded from wages, investment income, inheritance, or revenue generated from selling goods or services."³² The "true source" can also be an entity that got the funds through "contributions, donations, dues, or gifts" if those were "less than \$2,000 per person per year."³³ A violator is subject to a civil penalty of up to the contribution amount or, for intentional violations, up to three times the contribution amount.³⁴

²⁹ AS 15.13.090(g). The out-of-state funding disclaimer requirement does not apply to ads that have only an audio component.

³⁰ AS 15.13.390(a)(4).

³¹ See AS 15.13.040 & AS 15.13.110(k) (requiring reporting of "true source").

³² See AS 15.13.400(19) (defining "true source").

³³ See *id.*

³⁴ AS 15.13.390(a)(3).

II. The amended complaint

The plaintiffs originally included five individuals (two of whom later withdrew)³⁵ who alleged that they sometimes donate over \$2,000 to organizations that make independent expenditures. [Dkt. 40 at 2-3] The plaintiffs also include two independent expenditure groups, Families of the Last Frontier and Alaska Free Market Coalition. [Dkt. 40 at 3] Families of the Last Frontier gets donations from outside Alaska, sometimes exceeding half of its revenue. [Dkt. 40 at 3] The plaintiffs claim that the challenged disclosure and disclaimer laws are overly burdensome. [Dkt. 40 at 7, 10, & 11]

After the State filed a motion to dismiss in May 2022, the plaintiffs amended their complaint. [Dkt. 40] The State renewed its motion in July 2022, but the plaintiffs' intervening interlocutory appeal led this Court to deny the motion without prejudice. [Dkt. 47, 61] In March 2024, the Ninth Circuit affirmed this Court's denial of a preliminary injunction, and the Supreme Court denied certiorari. [Dkt. 59, 62]

The amended complaint includes three counts and seeks declaratory and injunctive relief. [Dkt. 1 at 11-14; Dkt. 40 at 17-22] The claims are facial challenges under 42 U.S.C. § 1983 and the First Amendment:

1. Count I challenges the requirement that donors disclose contributions over \$2,000 to an independent expenditure entity within 24 hours.

[Dkt. 40 at 17-18]

³⁵ See Dkt. 104, 107.

2. Count II challenges the on-ad disclaimer requirements. [Dkt. 40 at 18-20]
3. Count III challenges the requirement that disclosures include the “true source” of funds used for independent expenditures. [Dkt. 40 at 20-21]

LEGAL STANDARD

Summary judgment is appropriate where “there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.”³⁶ Although the Court will view facts and inferences in the light most favorable to the nonmoving party, the nonmoving party must offer some “concrete evidence from which a reasonable” factfinder “could return a verdict in his favor.”³⁷

Also critical here is these plaintiffs’ deliberate choice to bring only a “disfavored” facial challenge rather than an as-applied challenge that could have provided a factual context.³⁸ [See Dkt. 39 at 17 (stating that “[t]his is a facial challenge,” “not an as-applied challenge”)] As the Ninth Circuit noted, facial challenges “are the most difficult to mount successfully.”³⁹ This pleading choice thus “comes at a cost.”⁴⁰ Because facial challenges “‘often rest on speculation’ about the law’s coverage and its future enforcement,” the

³⁶ Fed. R. Civ. P. 56(a).

³⁷ *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 256 (1986).

³⁸ *Wash. State Grange v. Wash. State Republican Party*, 552 U.S. 442, 450 (2008) (labeling facial challenges “disfavored”).

³⁹ *Smith*, 95 F.4th at 1214 (quoting *City of Los Angeles v. Patel*, 576 U.S. 409, 415 (2015)).

⁴⁰ *Moody v. NetChoice, LLC*, 603 U.S. 707, 723 (2024).

Supreme Court has made them “hard to win.”⁴¹ The Court “cannot consider ‘hypothetical’ or ‘imaginary’ cases to sustain a facial challenge,” and the plaintiffs must show that “a substantial number of the applications” of the law “are unconstitutional in relation to the law’s ‘plainly legitimate sweep.’”⁴² The “unconstitutional applications must be realistic, not fanciful, and their number must be substantially disproportionate to the statute’s lawful sweep.”⁴³ Otherwise, “courts must handle unconstitutional applications as they usually do—case-by-case.”⁴⁴

ARGUMENT

Independent expenditures (and donations funding them) are already unlimited—the plaintiffs now want them both unlimited *and* secret. But the constitution does not guarantee a right to secret political funding. On the contrary, disclosure is “a reasonable and minimally restrictive method of furthering First Amendment values by opening the basic processes of our federal election system to public view.”⁴⁵

⁴¹ *Id.* (quoting *Wash. State Grange*, 552 U.S. at 450); *see also id.* at 745 (Barrett, J., concurring) (noting “the dangers of bringing a facial challenge”); *id.* at 748 (Jackson, J., concurring) (noting that “plaintiffs bringing a facial challenge must clear a high bar”); *id.* at 752 (Thomas, J., concurring) (opining that “[f]acial challenges are fundamentally at odds with Article III”); *id.* at 777-78 (Alito, J., concurring) (explaining that facial challenges are “strongly disfavored” and “strain the limits of the federal courts’ constitutional authority”).

⁴² *Smith*, 95 F.4th at 1218 (cleaned up).

⁴³ *United States v. Hansen*, 599 U.S. 762, 770 (2023).

⁴⁴ *Id.*

⁴⁵ *Buckley*, 424 U.S. at 67, 82.

Alaska’s disclosure and disclaimer requirements are not unusual, nor do they stretch the well-established boundaries of campaign finance law. Federal courts have upheld disclosure laws for decades—indeed, they praise such laws as a less burdensome alternative to limiting speech.⁴⁶ As the Supreme Court explained in *Citizens United*, “[d]isclaimer and disclosure requirements may burden the ability to speak, but they ‘impose no ceiling on campaign-related activities,’ and ‘do not prevent anyone from speaking.’”⁴⁷ The Court should follow the lead set by the First Circuit in *Gaspee Project v. Mederos* and reject these challenges.⁴⁸ The plaintiffs have no First Amendment right to anonymous political spending in candidate elections.

I. Count I: The donor disclosure law facially satisfies exacting scrutiny.

Count I challenges the disclosure requirement for a donor who contributes \$2,000 or more in a calendar year to an entity that recently made independent expenditures in candidate elections or is likely to in the current election cycle.⁴⁹

⁴⁶ *Citizens United*, 558 U.S. at 369 (“The Court has explained that disclosure is a less restrictive alternative to more comprehensive regulations of speech.”); *McCutcheon*, 572 U.S. at 223 (“[D]isclosure often represents a less restrictive alternative to flat bans on certain types or quantities of speech.”); *Ctr. for Individual Freedom v. Madigan*, 697 F.3d 464, 470 (7th Cir. 2012) (“Of the federal courts of appeals that have decided these cases, every one has upheld the disclosure regulations against the facial attacks.”).

⁴⁷ 558 U.S. at 366 (quoting *Buckley*, 424 U.S. at 64, and *McConnell*, 540 U.S. at 201 (internal punctuation omitted)).

⁴⁸ *Gaspee Project*, 13 F.4th at 82; *cert. denied*, 2022 WL 1205841 (U.S. Apr. 25, 2022).

⁴⁹ *See* AS 15.13.040(r).

To justify burdening First Amendment rights, disclosure laws must survive “exacting scrutiny,” which requires (1) a “sufficiently important governmental interest” and (2) “that the disclosure requirement be narrowly tailored to the interest it promotes.”⁵⁰ This is not as rigorous as strict scrutiny’s “least restrictive means” test—instead, it falls somewhere between strict and intermediate scrutiny.⁵¹

The Ninth Circuit has already held that the State’s interest in an informed electorate satisfies the first prong.⁵² As the First Circuit explained in *Gaspee Project*, the Supreme Court recognized this interest as supporting disclosure laws in *Buckley*, *McConnell*, and *Citizens United*.⁵³ In *Buckley*, the Court reasoned that disclosure of independent expenditures “helps voters to define more of the candidates’ constituencies.”⁵⁴ In *McConnell*, the Court observed that “independent groups were running election-related advertisements ‘while hiding behind dubious and misleading names,’” meaning disclosure would “help citizens ‘make informed choices in the political

⁵⁰ *AFPF*, 594 U.S. at 611; *No on E v. Chiu*, 85 F.4th 493, 503 (9th Cir. 2023) (applying exacting scrutiny to disclosures and disclaimers). In *Citizens United*, the Court described the standard as calling for “a ‘substantial relation’ between the disclosure requirement and [the government] interest.” 558 U.S. at 366-67. The Supreme Court has not yet applied the newer *AFPF* formulation to a campaign finance disclosure law, but the laws here survive under either formulation.

⁵¹ *AFPF*, 594 U.S. at 608-10.

⁵² *Smith*, 95 F.4th at 1215; *see also Buckley*, 424 U.S. at 14-15 (“In a republic where the people are sovereign, the ability of the citizenry to make informed choices among candidates for office is essential.”).

⁵³ 13 F.4th at 87.

⁵⁴ 424 U.S. at 81.

marketplace.”⁵⁵ Then in *Citizens United*, the Court reaffirmed that “the public has an interest in knowing who is speaking about a candidate shortly before an election.”⁵⁶

This informational interest is not weak, but rather—in the Ninth Circuit’s view—“vital,” “important and well-recognized,” and “only likely to increase” in magnitude.⁵⁷ Indeed, “[a]ccess to reliable information becomes even more important as more speakers, more speech—and thus more spending—enter the marketplace, which is precisely what has occurred in recent years.”⁵⁸ Informing the electorate “is vital to the efficient functioning of the marketplace of ideas, and thus to advancing the democratic objectives underlying the First Amendment,” and disclosure laws “help ensure that voters have the facts they need to evaluate the various messages competing for their attention.”⁵⁹ The First Circuit has similarly noted that in the current age, citizens “rely ever more on a message’s source as a proxy for reliability and a barometer of political spin.”⁶⁰

⁵⁵ *Citizens United*, 558 U.S. at 367 (quoting *McConnell*, 540 U.S. at 196-97).

⁵⁶ *Id.* at 368 & 369; *see also First Nat’l Bank v. Bellotti*, 435 U.S. 765, 792 n.32 (1978) (“Identification of the source of advertising may be required as a means of disclosure, so that the people will be able to evaluate the arguments to which they are being subjected.”).

⁵⁷ *Human Life of Wash., Inc. v. Brumsickle*, 624 F.3d 990, 1005-08 (9th Cir. 2010).

⁵⁸ *Id.* at 1007.

⁵⁹ *Id.* at 1005.

⁶⁰ *Nat’l Org. for Marriage v. McKee*, 649 F.3d 34, 57 (1st Cir. 2011).

The first prong of exacting scrutiny is doubly satisfied here because in addition to informing voters, disclosure laws “deter actual corruption and avoid the appearance of corruption by exposing large contributions and expenditures to the light of publicity.”⁶¹ Although the Supreme Court has said that anti-corruption or regulatory avoidance interests do not justify *banning* or *limiting* independent expenditures,⁶² these interests still justify *elucidating* them. The holding that such expenditures are non-corrupting rests on the premise that they are not coordinated with candidates.⁶³ This premise rests in turn on an assumption that the public and regulators know who is doing what. If funders remain in the shadows, the public cannot be assured that nothing corrupt is happening—or even that money spent on elections does not originate from prohibited foreign sources.⁶⁴

Turning to the second part of exacting scrutiny, the donor disclosure law is narrowly tailored to further these important governmental interests. Several features of

⁶¹ *Buckley*, 424 U.S. at 67 (“Congress could reasonably conclude that full disclosure during an election campaign tends ‘to prevent the corrupt use of money to affect elections.’”); *see also* *McCutcheon*, 572 U.S. at 224 (“Today, given the Internet, disclosure offers much more robust protections against corruption.”).

⁶² *See Citizens United*, 558 U.S. at 357.

⁶³ *See SpeechNow.org v. Fed. Election Comm’n*, 599 F.3d 686, 693 (D.C. Cir. 2010) (explaining that “[t]he independence of independent expenditures was a central consideration in the Court’s decision” in *Citizens United*).

⁶⁴ *See* AS 15.13.068; *cf. SpeechNow.org*, 599 F.3d at 698 (“[R]equiring disclosure of such information deters and helps expose violations of other campaign finance restrictions, such as those barring contributions from foreign corporations or individuals.”); Douglas M. Spencer, *Corporations As Conduits: A Cautionary Note About Regulating Hypotheticals*, 47 Stetson L. Rev. 225, 242 (2018) (noting the “very real possibility that foreigners could be influencing our elections without our knowledge”).

the law keep it from being overbroad. For one thing, small contributions need not be disclosed—only significant ones: \$2,000 or more.⁶⁵ This is twice as high as the threshold for the disclosures upheld in *Citizens United*⁶⁶ and by the First Circuit in *Gaspee Project*.⁶⁷ For another thing, disclosure is triggered only by a “contribution” to an entity that makes “independent expenditures” in candidate elections, so the definitions of “expenditure” and “contribution”—and the law’s application only to candidate elections—further narrow the coverage.⁶⁸ An “expenditure” here means spending money “for the purpose of . . . influencing the nomination or election of a candidate.”⁶⁹ A definitional carve-out tailors this to exclude an “issues communication,” which identifies a candidate but “addresses an issue of national, state, or local political importance and does not support or oppose a candidate for election to public office.”⁷⁰

⁶⁵ AS 15.13.040(r); cf. *Ctr. for Arizona Pol’y Inc. v. Arizona Sec’y of State*, 560 P.3d 923, 938 (Ariz. Ct. App. 2024), review granted (May 6, 2025) (“The larger dollar amounts more narrowly tailor the Act by removing the disclosure burden on ordinary citizens who make modest campaign contributions . . .”).

⁶⁶ See *Citizens United*, 558 U.S. at 366-67; 52 U.S.C. § 30104(f)(2)(F) (requiring disclosure to identify contributors over \$1,000).

⁶⁷ See *Gaspee Project*, 13 F.4th at 88. Relatedly, the First Circuit upheld laws covering far smaller amounts. *Nat’l Org. for Marriage*, 649 F.3d at 58 (concluding that donor disclosure requirements were narrowly tailored when they “require[ed] disclosure only of . . . identifying information for any contributors who have given more than \$50 to the PAC to support or oppose a candidate or campaign”).

⁶⁸ AS 15.13.040(r).

⁶⁹ AS 15.13.400(7) (defining “expenditure”).

⁷⁰ AS 15.13.400(7)(C) & (13). Close to an election, issue ads could become “electioneering communications,” which are “expenditures.” AS 15.13.400(6) & (7)(C).

The disclosure law does not contain an explicit “opt out” provision for donors who do not want their money used to make such expenditures, but the freedom to opt out is inherent in the definition of “contribution,” which is a donation “that is made for the purpose of . . . influencing the nomination or election of a candidate.”⁷¹ If a donor gives money with no such purpose, that is not a reportable “contribution.” Donors and recipients can avoid the need to report donations that are not for independent expenditures by simply making their intentions clear to one another: the donor can tell the recipient that her money should not be used for this purpose, and the recipient can place the money in an account that will not be used for this purpose.⁷² Indeed, an entity that makes independent expenditures already must maintain a “political activities account” for those expenditures, so it can simply put the donor’s funds in a different account.⁷³

⁷¹ AS 15.13.400(4)(A)(i).

⁷² APOC has approved two advisory opinions about segregating funds to avoid unnecessary disclosures. *See* AO 21-11-CD, *The Alaska Center*, <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=23802>; AO 22-01-CD, *The Elias Law Group on behalf of “The Organization,”* <https://aws.state.ak.us/ApocReports/Paper/Download.aspx?ID=23803>. *Cf. Americans for Prosperity v. Meyer*, 724 F. Supp. 3d 858, 880 (D. Ariz. 2024) (“[W]hen donors choose not to avoid disclosure, the Act requires disclosure of undoubtedly accurate information regarding who is funding campaign media spending.”).

⁷³ *See* AS 15.13.052.

The disclosure law is further tailored by a temporal limitation: it applies only to contributions to an entity that made independent expenditures in the current or previous election cycle, or “that the contributor knows or has reason to know is likely to make independent expenditures” in the current cycle.⁷⁴ Although not every group that made independent expenditures in the last election cycle will do so this cycle, this does not make the law overbroad as the plaintiffs assert. [Dkt. 40 at 18] If the law covered only entities that had *already* made expenditures this cycle, many relevant contributions would be missed: an entity could amass a secret war chest and delay reporting by beginning expenditures at the last minute, leaving voters to sort through disclosures after the election. Disclosing contributions to entities *likely* to make expenditures—because they have done so recently—is thus reasonable. And contrary to the plaintiffs’ assertion, an entity that is amassing funds for independent expenditures *is* “actively engaged in campaign activity” even if it has not yet made expenditures this cycle. [Dkt. 40 at 18] Any entity that is amassing funds for non-political purposes—even if it previously made political expenditures—can avoid reporting by segregating funds, because donations segregated from such activity are not reportable “contributions.” The organizational plaintiffs acknowledge this undisputed reality. [Exs. A at 11; B at 9-10]

⁷⁴ AS 15.13.040(r).

Alaska’s disclosure law thus stands in contrast to the overbroad ones the Supreme Court disapproved in *Shelton* and *Americans for Prosperity Found. (AFPF)*, both of which required vastly more disclosure than needed.⁷⁵ In *Shelton*, Arkansas required teachers to disclose every organization to which they belonged or contributed.⁷⁶ Although the Court acknowledged “the right of a State to investigate the competence and fitness of those whom it hires to teach in its schools,” the statute covered “every conceivable kind of associational tie,” many of which “could have no possible bearing upon the teacher’s occupational competence or fitness.”⁷⁷ Similarly in *AFPF*, the Court saw a “dramatic mismatch” between the up-front, across-the-board disclosures that California required from charities and the state interest in policing charity fraud, because the information was never used to initiate investigations and only became marginally useful in a handful of cases each year after complaints were filed.⁷⁸ Unlike that law—which “cast[] a dragnet” for information that was rarely used—all or nearly all of Alaska’s required donor disclosures directly serve the interest in informing voters about election spending.⁷⁹

⁷⁵ *Shelton v. Tucker*, 364 U.S. 479 (1960); *AFPF v. Bonta*, 594 U.S. 595 (2021).

⁷⁶ 364 U.S. at 480.

⁷⁷ *Id.* at 485, 488.

⁷⁸ 594 U.S. at 612.

⁷⁹ *Id.* at 614; *cf. Rio Grande Found. v. Oliver*, 727 F. Supp. 3d 988, 1010 (D.N.M. 2024), *aff’d*, 154 F.4th 1213 (10th Cir. 2025) (“[H]ere, it is undisputed that the independent expenditure reports are public and accessible in searchable format on the internet. . . . Consequently, the record shows, unlike in [*AFPF*], that the State is using the disclosures to enhance its asserted interest.”)

In their amended complaint, the plaintiffs call the donor disclosure law “overly burdensome” and offer some reasons why they believe it is not narrowly tailored. Dkt. 40 at 17-18. But the law is narrowly tailored, as just explained. And it is not burdensome: the required form is simple and may be completed online—a task no more difficult than writing a \$2,000 check. [See Dkt. 130] Online reporting uses the same easy-to-create “myAlaska” account that most Alaskans already use to apply for their Permanent Fund Dividend payments. [Id. at ¶¶2-5] A donor need not “retain a campaign finance attorney” to do this as the plaintiffs have suggested. [Dkt. 18-1 at 9] The Seventh Circuit has recognized that a “simple, one-page form” is a “minimally burdensome regulatory requirement . . . reasonably tailored to the public’s informational interest.”⁸⁰

The plaintiffs have offered no evidence that compliance is hard. [Dkt. 40 at 7-8, 17-18] When asked to identify actual donors who struggled or to specify how compliance is difficult, the plaintiffs could not. [Exs. A at 2-3; B at 2-3; D at 2-3; E at 1-2; F at 2-3; G at 6, 9; H at 2-6; I at 4-10; J at 14-16] The most they could say was that donors might not like it. For example, Al Vezey called filling out forms an “undesirable experience,” but he managed to do it. [Ex. I at 7, 5-6] He couldn’t articulate what part of the process was confusing—rather, he just dislikes forms he considers unnecessary. [Id. at 5-10] Bob Griffin called reporting “a little bit of a hassle,” but had not realized he could use myAlaska, which he acknowledged would “simplify things.” [Ex. H at 2-6] Trevor Shaw

⁸⁰ See *Wis. Right to Life, Inc. v. Barland*, 751 F.3d 804, 843 & 841 (7th Cir. 2014); see also *Yamada v. Snipes*, 786 F.3d 1182, 1195 (9th Cir. 2015) (concluding that registration and reporting requirements were not unduly onerous).

never even tried to comply—he just stopped making contributions. [Ex. G at 6] If merely disliking compliance made a law an unconstitutional burden, no law could pass exacting scrutiny. The Ninth Circuit observed, at the preliminary injunction stage, that there was “nothing in the record to indicate that compliance with the reporting structure has been overly burdensome.”⁸¹ The same remains true now.

The plaintiffs argue that the donor disclosure law is unduly “repetitive” because recipients must also report contributions. [Dkt. 40 at 17-18] But the two halves of the law work together to provide voters complete, accurate, real-time information about the sources of money funding independent expenditures. The donor is the one who can trace the “true source” of the donor’s funds, so the law reasonably obligates the donor to provide and certify the truth of this information.⁸² Placing this obligation solely on the recipient would lead to incomplete or inaccurate reporting of true sources.⁸³

The plaintiffs further claim that the law “could have been more narrowly tailored by excusing individual donors” because individuals can be presumed to be the true sources of their contributions. [Dkt. 40 at 17-18] But requiring all contributors and recipients to report to APOC ensures that no transactions are missed and that the truth of the information is certified by those who know it. Plus, reporting is easy for an individual

⁸¹ *Smith*, 95 F.4th at 1217.

⁸² *See* AS 15.13.400(19) (defining “true source”).

⁸³ Although AS 15.13.040(r) requires donors to tell independent expenditure groups their true sources, only the donor disclosures to APOC require donors to certify the truth under penalties alongside the definition of “true source.”

who is the true source. [See Dkt. 130] Because exacting scrutiny does not require a law to be the “least restrictive means” to advance the State’s interests,⁸⁴ simply identifying minor possible adjustments does not defeat the law.⁸⁵

Next, the plaintiffs claim that the law “could have been more narrowly tailored by excusing intermediate organizations that already report their donations to APOC or a federal election entity.” [Dkt. 40 at 18] But different reports differ in their timeframes, requirements, and where and how they are publicly accessible to voters.⁸⁶ The plaintiffs have not identified other reports that adequately serve the State’s interest. When asked to do so, they referred generally to the court filings in this lawsuit or the recipient disclosure laws discussed above. [Exs. A at 8-9; B at 6-8; D at 8-9; E at 4; F at 7-8] In any event, if a given donor already reports contributions under other laws, doing so under this straightforward donor disclosure law is not a significant added compliance burden.

⁸⁴ See *AFPF*, 594 U.S. at 608.

⁸⁵ Cf. *Boone Cnty. Republican Party Exec. Comm. v. Wallace*, 132 F.4th 406, 428 (6th Cir. 2025) (noting that the “least restrictive means” is not required and concluding, in a preliminary injunction appeal, that plaintiffs were not likely to succeed on the merits of their challenge to a campaign finance disclosure law); *Meyer*, 724 F. Supp. at 874 (“Plaintiffs repeatedly ignore [the exacting scrutiny] standard and point out alternatives to the Act they believe would have been better. That is not the test.”).

⁸⁶ For example, independent expenditure reports to APOC are generally due ten days after an expenditure. See AS 15.13.110(h); AS 15.13.040(e). Federal reports occur on a different timeframe, do not include true sources, and are not available on APOC’s website. See 52 U.S.C. § 30104(b)(3), (a)(4).

Finally, although the plaintiffs purport to object to overlapping disclosure requirements, [Dkt. 40 at 17-18] their true objection seems to be not that contributions must be disclosed *repeatedly*, but rather that they must be disclosed *at all*: they allege that public disclosure of their political spending is “in conflict with their principles” and “may lead to reprisals against them and their business interests in the current climate of cancel culture.” [Dkt. 40 at 7] But they do not have a constitutional right to remain anonymous absent much more specific allegations not made here.⁸⁷

And their litigation choices make their “cancel culture” concerns irrelevant. Because they have not challenged the recipient disclosure law, striking down donor disclosure would not shield names from publicity. In other words, their observation that the law requires recipients to report the same information is a double-edged sword. Although it provides their basis for arguing that the law is “duplicative” and thus insufficiently tailored, it also cuts any privacy or “cancel culture” concerns out of the analysis. The only purported burden this suit could alleviate would be the need for donors to file reports themselves—not the public disclosure of their names.

⁸⁷ See *infra* pg. 36-38.

Any speculation that APOC will apply the law too broadly—or that problematic cases might arise at the margins⁸⁸—cannot sustain this facial challenge, which requires showing that a “substantial number of its applications are unconstitutional, judged in relation to the statute’s plainly legitimate sweep.”⁸⁹ Because there is no genuine issue of material fact about whether the law is facially unconstitutional, the Court should grant the State summary judgment on Count I. [Dkt. 40 at 17-18]

II. Count II: The disclaimer laws facially satisfy exacting scrutiny.

Count II challenges the disclaimer provisions requiring that campaign ads provide information to voters about who funded them.⁹⁰

A. Strict scrutiny does not apply to disclaimers.

To begin with, the plaintiffs are mistaken that strict scrutiny applies here. [Dkt. 40 at 19] The Supreme Court applied exacting scrutiny to both disclosures and disclaimers in *Citizens United*⁹¹ even though the plaintiff advocated strict scrutiny on the theory that disclaimers constitute “compelled speech” or “content-based restrictions on political

⁸⁸ The Ninth Circuit partial dissent suggested that donors without internet access could have trouble. *Smith*, 95 F.4th at 1232 (Forrest, J., concurring in part and dissenting in part). The plaintiffs produced no evidence of donors who can make \$2,000 contributions to independent expenditure groups but cannot report due to lack of internet access. [Exs. A at 3, 10; B at 3, 9; D at 3, 10-11; E at 2, 5; F at 3] Nor should the Court assume that APOC would enforce the law harshly against such a hypothetical donor.

⁸⁹ *AFPF*, 594 U.S. at 615.

⁹⁰ *See* AS 15.13.090(a)-(g).

⁹¹ *See Citizens United*, 558 U.S. at 366.

speech.”⁹² The Ninth Circuit recognizes *Citizens United* as the controlling law on political disclaimers,⁹³ as it confirmed in this very case.⁹⁴

Not only did the Supreme Court decline to apply strict scrutiny in *Citizens United*, but it also upheld the challenged disclaimer law, recognizing that disclaimers “provid[e] the electorate with information,” “insure that the voters are fully informed about the person or group who is speaking,” and “[a]t the very least . . . avoid confusion by making clear that the ads are not funded by a candidate or political party.”⁹⁵ The Court dismissed the concern—similar to the plaintiffs’ here—that disclaimers “decrease[d] both the quantity and effectiveness of the group’s speech by forcing it to devote four seconds of each advertisement to the spoken disclaimer.”⁹⁶ The Court was also unpersuaded that the disclaimers would “distort the message” of the group’s ads.⁹⁷ In *Yamada v. Snipes*, the Ninth Circuit relied on *Citizens United* to uphold political disclaimers.⁹⁸

⁹² See Br. for Appellant 43-44, *Citizens United*, 558 U.S. 310 (No. 08-205), 2009 WL 61467 (arguing that “oral and written disclaimers” are “content-based restrictions on political speech” and “compelled speech” subject to strict scrutiny).

⁹³ See *Yamada*, 786 F.3d at 1202.

⁹⁴ *Smith*, 95 F.4th at 1214-15; *No on E*, 85 F.4th at 503.

⁹⁵ 558 U.S. at 368 (internal quotation marks and citations omitted).

⁹⁶ *Id.*

⁹⁷ See Br. for Appellant 50, *Citizens United*, 558 U.S. 310 (No. 08-205).

⁹⁸ 786 F.3d at 1203.

The Supreme Court’s decision in *National Institute of Family & Life Advocates v. Becerra* (*NIFLA*) is not to the contrary.⁹⁹ [Dkt. 40 at 19] Requiring political ads to list top funding sources is nothing like making pro-life groups tell clients how to get abortions.¹⁰⁰ And *NIFLA* did not even discuss, much less overrule, *Citizens United* on disclaimers.

B. The top-donor disclaimer is narrowly tailored.

Count II challenges the requirement—in place since 2010—that ads include a “paid for by” disclaimer indicating the entity responsible, its city and principal place of business, and its top three contributors.¹⁰¹

When it comes to political ads, as the Supreme Court has recognized, disclosing funding prevents entities from “hiding behind dubious and misleading names” like “‘Citizens for Better Medicare’ (funded by the pharmaceutical industry)” while trying to influence the outcome of elections.¹⁰² Voters “are entrusted with the responsibility for judging and evaluating the relative merits of conflicting arguments. They may consider, in making their judgment, the source and credibility of the advocate.”¹⁰³ Knowing who is funding political ads helps voters “make informed decisions and give proper weight to different speakers and messages.”¹⁰⁴ And as the Ninth Circuit has observed, “[c]ase law

⁹⁹ 585 U.S. 755 (2018).

¹⁰⁰ *See id.* at 766.

¹⁰¹ *See* AS 15.13.090(a)-(e).

¹⁰² *McConnell*, 540 U.S. at 196-97 (quoting district court decision).

¹⁰³ *Human Life*, 624 F.3d at 994 (quoting *Bellotti*, 435 U.S. at 791-92).

¹⁰⁴ *Citizens United*, 558 U.S. at 371.

and scholarly research support the proposition that, because of its instant accessibility, an on-advertisement disclaimer is a more effective method of informing voters than a disclosure that voters must seek out.”¹⁰⁵

In *No on E v. Chiu*, the Ninth Circuit concluded that plaintiffs were unlikely to succeed on their challenge to a San Francisco on-ad disclaimer law more extensive than Alaska’s—it required listing not just the top three donors, but also the top donors to the top donors.¹⁰⁶ The Ninth Circuit rejected the argument that such disclaimers would “cause confusion” because the listed donors “may not have any position on the issue that the ad is addressing” or “may not have known that their donation would be used to promote those views.”¹⁰⁷ The court observed that cases upholding disclosure and disclaimer requirements “emphasize that the laws at issue further the governmental interest in revealing the source of campaign funding, not ensuring that every donor agrees with every aspect of the message.”¹⁰⁸ The court also disagreed that the informational interest was outweighed by alleged “hesitation on the part of donors” to contribute if their names would be disclosed.¹⁰⁹

¹⁰⁵ *No on E*, 85 F.4th at 509.

¹⁰⁶ *Id.* at 511.

¹⁰⁷ *Id.* at 506.

¹⁰⁸ *Id.*; see also *Meyer*, 724 F. Supp. at 877 (“While the Act and all other disclosure laws may sometimes reveal donors that disagree with particular positions adopted by a covered person, that does not mean the disclosure law is unconstitutional.”).

¹⁰⁹ *No on E*, 85 F.4th at 508-09.

Similarly, the First Circuit in *Gaspee Project* affirmed the dismissal of challenges to a top-five donor disclaimer, rejecting the same arguments raised here.¹¹⁰ Those plaintiffs argued that having an on-ad disclaimer “serves no informational interest and is essentially redundant of the disclosure requirement,” but the First Circuit explained that “on-ad donor information is a more efficient tool for a member of the public” that “provides an instantaneous heuristic by which to evaluate generic or uninformative speaker names,” and that it “may be more effective in generating discourse that facilitates the ability of the public to make informed choices in the specialized electoral context.”¹¹¹ The plaintiffs argued that the disclaimer “furnishes potentially irrelevant information,” but the court explained that “even though the degree of relevancy may vary, the identification of top donors is relevant in all cases.”¹¹² The plaintiffs argued that the disclaimer “might mislead a viewer either as to the makeup of a speaker’s contributor base or as to a donor’s endorsement of the message,” or “elicit threats or harassment,” but the court noted that “the on-ad donor disclaimer is subject to the same off-ramps that apply to the disclosure requirement.”¹¹³ Similarly here, as explained above, donors and entities making independent expenditures can avoid the need to disclose donations (and

¹¹⁰ *Gaspee Project*, 13 F.4th at 90-92.

¹¹¹ *Id.* at 91.

¹¹² *Id.*

¹¹³ *Id.* at 92.

the corresponding need to include donors' names in disclaimers) by segregating funds meant for other purposes.¹¹⁴ The Ninth Circuit cited *Gaspee Project* in *No on E*.¹¹⁵

As far as how much ad space disclaimers use, the Ninth Circuit's decision in *American Beverage Association v. City & County of San Francisco*¹¹⁶ does not establish a 20 percent constitutional line as the plaintiffs claim. [Dkt. 40 at 14] In *No on E*, the Ninth Circuit distinguished *American Beverage* from campaign finance cases "in two critical ways."¹¹⁷ First, the governmental interest in the election context is "much stronger and more important than the governmental interest in warning consumers about the dangers of sugar-sweetened beverages."¹¹⁸ "Second, the constitutional problem in *American Beverage* was that the City required a disclaimer that was twice as large as necessary to accomplish the City's stated goals."¹¹⁹ The law there "mandated that, no matter the size of the ad, the health warning had to occupy at least 20% of the advertising space,"¹²⁰ which was excessive because record evidence showed that a disclaimer taking up just 10 percent would have worked just as well.¹²¹ Here, by contrast, the law does not

¹¹⁴ See *supra* pg. 15-16.

¹¹⁵ 85 F.4th at 504 n.7 & 509.

¹¹⁶ 916 F.3d 749 (9th Cir. 2019).

¹¹⁷ 85 F.4th at 507.

¹¹⁸ *Id.* at 507-08.

¹¹⁹ *Id.* at 508.

¹²⁰ *Id.*

¹²¹ 916 F.3d at 757.

require the disclaimers to take up more space than needed: the text need not be printed any larger than necessary to be read, nor read any slower than necessary to be heard.¹²²

In any event, even if a constitutional line for disclaimers (like 20 percent) existed, that would not be enough to support this facial challenge, which requires showing that a “substantial number” of the disclaimer law’s “applications are unconstitutional, judged in relation to the statute’s plainly legitimate sweep.”¹²³ The plaintiffs make factual allegations about how much space the disclaimers here might take up in hypothetical ads. [Dkt. 40 at 12-16] But although the top-donor disclaimer law has been in place since 2010—sixteen years at this point—the plaintiffs have failed to produce evidence showing a “lopsided ratio”¹²⁴ of unconstitutional applications. And the State’s evidence shows a “plainly legitimate sweep” of unproblematic applications: the State offers examples of independent expenditure group mailers that contain the disclaimers. [Ex. K] Plaintiff FLF was likewise able to accommodate the disclaimers in its own ads. [Ex. L] As the Court can see, the disclaimers are unobtrusive and do not overwhelm the campaign messages. This is sufficient to defeat this *facial* challenge even if the plaintiffs can produce examples of possibly unconstitutional *applications* of the law to hypothetical ads.

¹²² See AS 15.13.090(c), (d), (g) (requiring written disclaimers to be “easily discernible” and spoken ones to be “read in a manner that is easily heard”).

¹²³ *AFPP*, 594 U.S. at 615.

¹²⁴ See *Hansen*, 599 U.S. at 770 (“In the absence of a lopsided ratio, courts must handle unconstitutional applications as they usually do—case-by-case.”).

If the plaintiffs ever actually have trouble fitting the disclaimers into a real ad of theirs, they can challenge the application of the law to that ad.¹²⁵ As the First Circuit observed in *Gaspee Project*, an entity “could, of course, raise any concerns particular to its circumstances by means of an as-applied challenge.”¹²⁶ Any entity uncertain about whether its ads comply with the law can ask APOC for an advisory opinion¹²⁷ and—if they do not like the answer—bring an as-applied challenge in which the Court can scrutinize concrete examples. But the plaintiffs have produced no evidence here that could create a genuine issue of material fact in this *facial* challenge that must focus on the disclaimer law’s “plainly legitimate sweep,”¹²⁸ not edge-case hypotheticals.

C. The out-of-state disclaimer is narrowly tailored.

Count II also challenges the provision requiring disclaimers from entities primarily funded from outside Alaska.¹²⁹ This claim rests on the mistaken premise that this is like a limit on nonresident participation. [Dkt. 40 at 19] It is not. And like the top-donor disclaimer, it is narrowly tailored to the State’s informational interest.

¹²⁵ Cf. *Yes on Prop B v. City & Cty. of San Francisco*, 440 F. Supp. 3d 1049, 1056 (N.D. Cal.), *appeal dismissed as moot*, 826 F. App’x 648 (9th Cir. 2020) (considering an as-applied challenge to a disclaimer requirement, and noting that “[t]he burden imposed by a given disclaimer will vary depending on the type of disclaimer, relevant advertisement, and various other case-specific factors”).

¹²⁶ 558 U.S. at 367-68.

¹²⁷ See AS 15.13.374 (providing that “[a]ny person” can request an advisory opinion).

¹²⁸ *AFPF*, 594 U.S. at 615.

¹²⁹ See AS 15.13.090(g).

The same “exacting scrutiny” standard applies to the out-of-state disclaimer as to the top-donor disclaimer. *Citizens United* applied strict scrutiny to a *ban* on speech by corporations, but it applied exacting scrutiny to disclosure and disclaimer laws because they “do not prevent anyone from speaking.”¹³⁰ Likewise here, strict scrutiny would apply if the State *banned* speech by out-of-state funded entities, but it does not apply to disclaimer laws that do not prevent them from speaking.

Thompson v. Hebdon is irrelevant because it invalidated out-of-state campaign contribution limits and Alaska no longer has any such limits.¹³¹ Contribution limits must be justified by the interest in preventing quid pro quo corruption,¹³² and *Thompson* concluded that this interest did not justify aggregate limits on nonresident contributions.¹³³ That does not matter here because the State is neither limiting nonresident contributions nor justifying the out-of-state disclaimer as a means of preventing quid pro quo corruption.

Instead, the interest justifying the out-of-state disclaimer is the first important state interest discussed above: having an informed electorate. By passing Ballot Measure 2, Alaska voters decided that they want to know when a campaign message is funded

¹³⁰ 558 U.S. at 366 (quoting *McConnell*, 540 U.S. at 201).

¹³¹ 909 F.3d 1027, 1040-43 (9th Cir. 2018), *judgment vacated on other grounds*, 140 S. Ct. 348 (2019).

¹³² *Id.* at 1043 (“Campaign contribution limits rise or fall on whether they target quid pro quo corruption or its appearance.”).

¹³³ *Id.*

mostly by non-Alaskans. This can help voters from being misled when an entity uses a name—like “Families of the Last Frontier”—that implies otherwise. [See Dkt. 40 at 3, 9] The disclaimer is narrowly tailored to accomplish this.

The plaintiffs have argued that the State’s informational interest “lacks any limiting principle,” but as the Ninth Circuit observed, speculation about non-existent hypothetical laws does not justify enjoining the law that is before the Court.¹³⁴ These disclaimers do not require any extra information beyond what is already included in the unchallenged recipient disclosure laws that already ask about donor location.¹³⁵

III. Count III: The “true source” provisions facially satisfy exacting scrutiny.

Count III challenges the requirement that disclosures include the “true source” of money.¹³⁶ The “true source” is the “person or legal entity whose contribution is funded from wages, investment income, inheritance, or revenue generated from selling goods or services,” and includes an entity that got the funds through “contributions, donations, dues, or gifts” if those were “less than \$2,000 per person per year.”¹³⁷

¹³⁴ *Smith*, 95 F.4th at 1219 n.10 (“Plaintiffs also argue that the disclaimer requirement lacks a ‘limiting principle’ because, if upheld, the state would have a ‘blank check’ to require disclosure of ‘any and all information it wants,’ including the donors’ contact information, ‘race, religion, political affiliation, sexual orientation, ethnic background, and interest-group memberships.’ As we have reiterated, these hypothetical and imaginary concerns are irrelevant to our analysis in the context of a facial challenge to a law that requires none of these disclaimers.”).

¹³⁵ *See* AS 15.13.040.

¹³⁶ *See* AS 15.13.040 & AS 15.13.110(k) (requiring reporting of “true source”).

¹³⁷ *See* AS 15.13.400(19) (defining “true source”).

This rule responds to the reality that disclosures have limited value if they reveal only that funding came from an intermediary with an opaque name like “Citizens for Alaska.”¹³⁸ If the interest in informing voters justifies disclosing the funding for independent expenditures—which, as discussed above, it does—it also justifies measures needed to make disclosure meaningful.¹³⁹ Again, shining a light on spending not only helps voters, but also deters corruption and foreign interference.¹⁴⁰

The “true source” rule operates when a donor contributes \$2,000 or more to a recipient that makes independent expenditures.¹⁴¹ Because both participants in this large

¹³⁸ Cf. *McConnell*, 540 U.S. at 128 n.23 (“[E]xamples of mysterious groups included ‘Voters for Campaign Truth,’ ‘Aretino Industries,’ ‘Montanans for Common Sense Mining Laws,’ ‘American Seniors, Inc.,’ ‘American Family Voices,’ and the ‘Coalition to Make our Voices Heard’”) (internal citation omitted); *Ctr. for Arizona Pol’y Inc.*, 560 P.3d at 935 (“Without the Act’s disclosure requirements, the public could never evaluate the true source of the funds hidden by filtering through front groups or intermediaries.”); *Meyer*, 724 F. Supp. 3d at 871 (explaining that the interest in an informed electorate “is not meaningfully vindicated by disclosures identifying only the ‘creative but misleading names’ of the immediate donors”).

¹³⁹ Cf. *No on E*, 85 F.4th at 506 (“Because the interest in learning the source of funding for a political advertisement extends past the entity that is directly responsible, the challenged ordinance is substantially related to the governmental interest in informing the electorate.”); see *Vt. Right to Life Comm., Inc. v. Sorrell*, 758 F.3d 118, 138 (2d. Cir. 2014) (“[Donor] disclosure requirements simply address[] the situation where, for example, a corporation creates an entity with an opaque name—say ‘Americans for Responsible Solutions’—contributes money to that entity, and has that entity engage in speech on its behalf.”); *Nat’l Org. for Marriage*, 649 F.3d at 58 (concluding that donor disclosure requirements were narrowly tailored in that they “require[ed] disclosure only of . . . identifying information for any contributors who have given more than \$50 to the PAC to support or oppose a candidate or campaign”).

¹⁴⁰ See *supra* pg. 13-16.

¹⁴¹ See AS 15.13.110(k).

transaction will have to report the true source of the funds, the recipient should ask for (and the donor should provide) this information.¹⁴² If the donor has normal sources of income like wages, investments, or business profits, the donor can likely report itself as the true source (assuming the sums do not exceed normal income). Even if the donor is an entity that has no normal income—getting money only through gifts, dues, and donations—it can still report itself as the true source as long as it is just passing on money that it received in increments of under \$2,000.¹⁴³

It is only when neither of these things is true—i.e., when the donor has no normal income to account for the funds and is passing on money received in large chunks—that the donor is considered an “intermediary” and so-called “secondary donor disclosure” is required.¹⁴⁴ [Dkt. 40 at 20] That is, if this intermediary donor wants to pass on the money to fund independent expenditures, it must report where it got the money, which is something it should know. Only if that source was *also* an intermediary—that is, an entity with no normal income passing on money received in large chunks—would further disclosure be needed, requiring slightly more work. In such a situation, the intermediary

¹⁴² See AS 15.13.040(r).

¹⁴³ See AS 15.13.400(19) (“[T]o the extent a membership organization receives dues or contributions of less than \$2,000 per person per year, the organization itself shall be considered the true source.”). Although this exception applies only to a “membership organization,” this term is not defined, so any entity that amasses contributions of under \$2,000 could likely qualify.

¹⁴⁴ See AS 15.13.400(19) (stating that “a person or legal entity who derived funds via contributions, donations, dues, or gifts is not the true source, but rather an intermediary for the true source”).

donor would have to ask the prior intermediary about the source of the funds to comply with reporting. But this is precisely the situation where further disclosure is needed, because just knowing that “Alaskans for Jones” received its funds from “Citizens for Alaska” sheds very little light on who is funding election communications.

The plaintiffs claim that prohibiting “dark money” from remaining in the shadows violates their right to “private association.” [Dkt. 40 at 20] But they have no constitutional right to anonymous political spending given decades of precedent upholding disclosure laws.¹⁴⁵ Since there is no constitutional right to anonymous political spending, there is no right to circumvent disclosure by funneling money through intermediaries.

And the true source rule is no barrier to anonymous *non-political* spending. The rule does not prevent solicitation or donation, it just requires donors and recipients to be clear with each other and to reveal the sources of funds that will pay for political independent expenditures. If a donor or intermediary cannot or will not disclose the true source of funds, that does not mean they cannot donate those funds—it simply means those funds cannot pay for political expenditures. The donor can remain anonymous (or refuse to disclose its sources), and the recipient can place the funds in an account that will

¹⁴⁵ See *Buckley*, 424 U.S. at 75-76; *McConnell*, 540 U.S. at 196-98; *Citizens United*, 558 U.S. at 368-71; cf. *Meyer*, 724 F. Supp. 3d at 874 (“This appears to be an argument that all campaign disclosure laws are unduly burdensome because they require disclosure of who is funding election-related speech. This position is obviously foreclosed by precedent and there is no cognizable burden to prohibiting anonymous donations to covered persons.”).

not be used for political expenditures. In other words, the true source rule just means that money paying for independent expenditures cannot be masked by intermediaries. Without it, effective disclosure is easily circumvented.

The plaintiffs' own avowedly political activities fall squarely within the law's plainly legitimate sweep; none allege that they were inadvertently subject to disclosure while lacking political intent.¹⁴⁶ [Exs. A at 10; B at 9; J at 2-6; D at 4-5, 10; G at 5; E at 2-3; H at 7-9; F at 4; I at 3] Nor could they identify anyone else who had. [Exs. A at 5; B at 4; D at 5; E at 3; F at 4] They cannot succeed by invoking the imagined circumstances of other hypothetical donors; they lack standing to raise other people's as-applied challenges and courts "decline to 'speculate about "hypothetical" or "imaginary" cases.'" ¹⁴⁷

Even if the Court were to consider the plaintiffs' theory that the true source rule goes too far because charitable or other organizations without political intentions will be inadvertently subject to disclosure, this theory does not support a plausible claim. [Dkt. 40 at 20] If, for example, a church were to donate over \$2,000 to an independent expenditure group, it would have at least two options to avoid disclosing all its large donors. First, a church likely has substantial funds from donations under \$2,000, so if the sum donated did not exceed the church's small-donor income, the church could disclose

¹⁴⁶ The individual plaintiffs have "donate[d] amounts in excess of \$2,000 to organizations that engage in independent expenditures." [See Dkt. 40 at 2-3, 5-7] The organizational plaintiffs are independent expenditure groups. [See Dkt. 40 at 3]

¹⁴⁷ *Yamada*, 786 F.3d at 1201.

itself as the “true source.”¹⁴⁸ Second, the church could refuse to provide true source information, thereby telling the recipient that the money cannot pay for independent expenditures. The church would only have to disclose its large donors if it *wanted* their money to pay for independent expenditures—in which case disclosure would be entirely appropriate.¹⁴⁹ The church and its large donors could avoid unwanted disclosures by making their intentions clear so that the church knows what uses donors consent to. Likewise if, for example, a trade group were to solicit contributions for its independent expenditure account, it should (and likely would) tell donors that this is where their contributions would go (along with asking for true source information).¹⁵⁰

Again, if any problematic hypothetical were to become reality, those involved could seek an advisory opinion¹⁵¹ and, if unsatisfied, bring an as-applied challenge. Facial challenges are “disfavored” because they “often rest on speculation” and risk interpretation on “factually barebones records” like this one.¹⁵²

¹⁴⁸ See AS 15.13.400(19).

¹⁴⁹ Depending on the details, such a political donation could put tax-exempt status at risk. See 26 U.S.C. 501(c)(3).

¹⁵⁰ Some entities are legally required to do this. See AS 15.13.074(i) (“A nongroup entity may not solicit or accept a contribution to be used for the purpose of influencing the outcome of an election unless the potential contributor is notified that the contribution may be used for that purpose.”).

¹⁵¹ See AS 15.13.374.

¹⁵² *Wash. State Grange*, 552 U.S. at 450 (cleaned up).

Because the plaintiffs produced no evidence creating a genuine issue of material fact about whether the true source law is facially unconstitutional, the Court should grant summary judgment to the defendants on Count III. [Dkt. 40 at 20-21]

IV. The plaintiffs have no as-applied challenge based on threats of retaliation.

Finally, although the Supreme Court has “left open the possibility of as-applied challenges to disclosure and disclaimer requirements if a threat of retaliation looms,” the plaintiffs here pursue a facial challenge and allege no “reasonable probability” of “threats, harassment, or reprisals” to themselves.¹⁵³

The Supreme Court has repeatedly rejected threat-of-retaliation challenges. In *Buckley*, it found no evidence of “economic reprisals or physical threats” from disclosure, in contrast with a prior case about NAACP membership lists in 1950s Alabama.¹⁵⁴ Likewise in *Citizens United*, although some amici said donors were “blacklisted, threatened, or otherwise targeted,” the plaintiff “offered no evidence that its members may face similar threats or reprisals.”¹⁵⁵ And in *John Doe No. 1 v. Reed*, the Court acknowledged that disclosing names on “controversial” petitions might lead to threats,

¹⁵³ See *Gaspee Project*, 13 F.4th at 92; cf. *Ctr. for Arizona Pol’y Inc.*, 560 P.3d at 934 (“Plaintiffs’ particularized allegations of the Act’s chilling effect cannot support a facial challenge, which requires showing that ‘donors to a substantial number of organizations will be subjected to harassment and reprisals.’”) (quoting *AFPF*, 594 U.S. at 617); *id.* at 941 (concluding that sporadic harassing communications did not support an as-applied challenge); *Meyer*, 724 F. Supp. 3d at 879 (rejecting as-applied challenge “based on generic allegations regarding the treatment of their donors in unrelated matters”).

¹⁵⁴ *McConnell*, 540 U.S. at 198.

¹⁵⁵ 558 U.S. at 370.

but rejected a facial challenge because “only modest burdens attend[ed] the disclosure of a typical petition.”¹⁵⁶

Here, the plaintiffs’ generic “cancel culture” allegations cannot support a threat-of-retaliation challenge.¹⁵⁷ [Dkt. 40 at 7, 10-11] First, recipients already disclose donor names (as the plaintiffs acknowledge in calling the disclosures duplicative), so the laws challenged here add no extra publicity and thus no threat. [Dkt. 40 at 17-18] Second, by “cancel culture” they just mean criticism and lost business—nothing illegal—and they described no more than vague fears. [Exs. A at 5-7; B at 4-6, 10-11; J at 22-32; C at 1-2; D at 5-8; G at 3-4; E at 3, 6-7; H at 11-23; F at 4-7; I at 11-14] Nor are they even particularly afraid. [Exs. H at 20-21; G at 8-10; F at 5-7; I at 14] In Justice Scalia’s words, “harsh criticism, short of unlawful action, is a price our people have traditionally been willing to pay for self-governance. Requiring people to stand up in public for their political acts fosters civic courage, without which democracy is doomed.”¹⁵⁸

¹⁵⁶ 561 U.S. 186, 201-02 (2010).

¹⁵⁷ Cf. *Rio Grande Found. v. Oliver*, 2020 WL 6063442, at *11 (D.N.M. 2020) (no reasonable probability of retaliation to show likely success on an as-applied challenge); *ProtectMarriage.com v. Bowen*, 830 F. Supp. 2d 914, 934 (E.D. Cal. 2011), *aff’d in part, dismissed in part sub nom. Protectmarriage.com-Yes on 8 v. Bowen*, 752 F.3d 827 (9th Cir. 2014) (“[P]icketing, protesting, boycotting, distributing flyers, destroying yard signs and voicing dissent do not necessarily rise to the level of ‘harassment’ or ‘reprisals,’ especially in comparison to acts directed at groups in the past.”).

¹⁵⁸ *John Doe No. 1*, 561 U.S. at 228 (Scalia, J., concurring); *see also ProtectMarriage.com v. Bowen*, 599 F. Supp. 2d 1197, 1217-18 (E.D. Cal. 2009) (“Plaintiffs’ exemption argument appears to be premised, in large part, on the concept that individuals should be free from even legal consequences of their speech. That is simply not the nature of their right.”).

CONCLUSION

The State respectfully requests summary judgment on all counts.

DATED: April 10, 2026.

STEPHEN J. COX
ATTORNEY GENERAL

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Certificate of Word Count

I certify that this document complies with the word count limit in Local Civil Rule 7.4(a)(1) because it contains **9,995** words.

/s/ Margaret Paton Walsh
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Certificate of Service

I certify that on April 10, 2026, the foregoing **State Defendants' Motion for Summary Judgment** was served electronically on:

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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

Doug Smith, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No.: 3:22-cv-00077-SLG
	)	
Richard Stillie, Jr., in his official capacity	)	
as chair of the Alaska Public Offices	)	
Commission, <i>et al.</i> ,	)	STATE'S FIRST DISCOVERY
	)	REQUESTS TO ALASKA FREE
Defendants,	)	MARKET COALITION
	)	
and	)	
	)	
Alaskans for Better Elections, Inc.	)	
	)	
Intervenor-Defendant.	)	
_____	)	

AFMC originally organized as the Ketchikan Free Market Coalition in 2017 before being reorganized as the Alaska Free Market Coalition in 2018.

AFMC has not engaged in IE activities since the conclusion of the 2020 General Election.

AFMC is a closely controlled political entity operating under the direction of a group of business associates with shared ideological values. Trevor Shaw, with the advice of the below listed individuals, has exercised day-to-day decision-making authority of AFMC since its inception:

1. Glen Thompson, Former Chair and Deputy Treasurer (when it was the Ketchikan Free Market Coalition)
2. David Spokely, Former Chair
3. Lisa Marie Shaw, Former Deputy Treasurer (when it was the Ketchikan Free Market Coalition)

Interrogatory No. 2: Please identify all political campaigns or independent expenditure groups that AFMC has contributed to inside or outside of Alaska.

Response:

As an IE group, AFMC has never contributed to any political candidates, and always conducted its own IE activities.

Interrogatory No. 3: Please identify all donors or would-be donors to independent expenditure groups in Alaska that you are aware have had difficulty complying with AS 15.13.040(r) (the donor disclosure law).

Response:

AFMC has ceased active IE operations since the 2020 General Election due to internal concerns of compliance/disclosure burdens that would be experienced by potential donors with the passage of the ballot proposition in 2020 codifying current AS 15.13.040(r).

Interrogatory No. 4: Please explain in detail the difficulties each donor or would-be donor to independent expenditure groups in Alaska, identified in your response to Interrogatory No. 3, faced in complying with AS 15.13.040(r) (the donor disclosure law), including any difficulties donors faced in reporting contributions on time.

Response:

AFMC has ceased to actively seek donors or conduct independent expenditures due to the passage of the ballot proposition in 2020 codifying current AS 15.13.040(r).

Interrogatory No. 5: Please identify all donors or would-be donors known to you who made contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018 and who also lack internet access.

Response:

Unknown

Please see previous responses.

Interrogatory No. 9: Please identify all would-be donors known to you who have not made contributions to independent expenditure groups in Alaska because they did not want to disclose the true source of their contribution, as required by AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”).

Response:

Please see previous responses.

Interrogatory No. 10: Please identify all would-be donors known to you who attempted to make contributions to AFMC but had those contributions rejected because AFMC was unable to determine the true source of the contribution, as required by AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”).

Response:

Please see previous responses.

Interrogatory No. 11: Please identify all instances after January 1, 2018 where you have been disclosed as a donor in connection with independent expenditures (as defined above) despite lacking any intention for your contribution to be used for independent expenditures.

Response:

N/A

Interrogatory No. 12: Please identify all persons known to you who have been disclosed as a donor after January 1, 2018 in connection with independent expenditures (as defined above) despite lacking any intention for their contribution to be used for independent expenditures.

Response:

N/A

Interrogatory No. 13: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of the term “cancel culture” (as you have used it in your complaint) because of your political views, identifying (1) the act you took or the statement you made that triggered the “cancel culture” response, (2) the identity of the person or persons who made the response, and (3) the act taken or statement made that you believe constitutes “cancel culture” as you use the term in your complaint.

Response:

Quantifying the potential consequences of political speech is inherently challenging, yet the risks are both real and substantial. The impact of disclosure requirements, particularly those related to donor identity, can vary widely depending on the political climate and the nature of the donor’s views.

Expanding disclosure mandates inevitably increases the number of situations in which donors may be subject to adverse consequences, especially when their political views diverge from prevailing sentiments in their community or industry. This is

especially concerning for entrepreneurs, business owners, and others whose livelihood is intertwined with public perception, customer trust, and professional relationships.

For these individuals, there is no reliable way to measure—or even detect—the extent to which negative outcomes may result from their political speech or affiliations. Repercussions may be overt, such as consumer boycotts, social media backlash, or termination of business partnerships, or they may be subtle and indirect, such as the quiet loss of clients, exclusion from professional networks, or difficulties securing financing or regulatory approvals. These effects, often difficult to trace directly, nonetheless exert a chilling influence on civic participation and free expression.

In such an ever-polarizing environment, even the perception of potential retaliation may deter individuals from supporting causes or engaging in public discourse.

Interrogatory No. 14: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of “reprisals against donors and their business interests” (as you have used it in your complaint) because of your political views, identifying (1) the act you took or the statement you made that triggered the “reprisal” (2) the identity of the person or persons who made the reprisal, (3) the act taken or statement made that you believe constitutes a reprisal, (4) the platform or method used to make the reprisal, (5) the date the reprisal occurred and (6) anyone that you told about the reprisal.

Response:

Please see previous responses.

Interrogatory No. 15: Please describe every time since January 1, 2018 that you have contacted the police or law enforcement because of an instance of “cancel culture” or “reprisals” (as you have used the terms in your complaint) related to your political views.

Response:

N/A

Interrogatory No. 16: Please describe in detail every instance you are aware of since January 1, 2018 where compliance with AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications), compliance with AS 15.13.040(r) (the donor disclosure law), or compliance with AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”) elicited or resulted in a threat to or retaliation against AFMC, AFMC donors, Families of the Last Frontier, Families of the Last Frontier donors, Individual Plaintiffs, or any other person/entity, including who made the threat or acted in retaliation, the substance of the threat or retaliation, the date the threat or retaliation occurred, and anyone that you told about the threat or retaliation.

Response:

Please see previous responses.

Interrogatory No. 17: Please identify all sources of funding for this lawsuit.

Response:

Public-interest litigation support provided by the Liberty Justice Center.

Interrogatory No. 18: Please identify and cite all laws, regulations, and reporting requirements that “duplicate” (as you have used the term in your complaint) AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response:

All such instances are cited in the complaint, case-related filings, or associated documents provided by the plaintiff’s counsel.

Interrogatory No. 19: For each law, regulation or reporting requirement identified in response to Interrogatory No. 18, please explain how that law, regulation, or reporting requirement duplicates the timing and substance requirements of the “duplicative” AS 15.13 provision.

Response:

All such instances are cited in the complaint, case-related filings, or associated documents provided by the plaintiff’s counsel.

Interrogatory No. 20: Please describe and cite all laws, regulations, and reporting requirements that you believe should exempt donors or “intermediate organizations” (as

you have used the term in your complaint) who comply with that law, regulation or reporting requirement from also complying with AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response:

All such instances are cited in the complaint, case-related filings, or associated documents provided by the plaintiff’s counsel.

Interrogatory No. 21: If your response to any request for admission below is anything other than an unqualified admission, please explain the reasons for your denial and state all facts upon which your denial is based.

Response:

Please see the responses below.

REQUESTS FOR ADMISSION

Request for Admission No. 1: Admit that you have made contribution(s) of more than \$2,000 to independent expenditure groups in Alaska while AS 15.13.040(r) (the donor disclosure law) has been in effect.

Response:

They are.

Request for Admission No. 6: Admit that you are not aware of any donors who managed to make contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018, but could not manage to report those contributions due to lack of internet access.

Response:

AFMC is not aware of any such donors.

Request for Admission No. 7: Admit that AFMC's purpose is to promote candidates who are fiscally conservative, pro-business, and supportive of free market economic principles.

Response:

That is the purpose of AFMC.

Request for Admission No. 8: Admit that AFMC does not use donor contributions for any purpose that is not related to its purpose of promoting candidates who are fiscally conservative, pro-business, and supportive of free market economic principles.

Response:

AFMC does not use donor contributions for any purpose that is not related to its purpose of promoting candidates who are fiscally conservative, pro-business, and supportive of free market economic principles.

Request for Admission No. 9: Admit that AFMC can avoid the need to disclose donations not intended for independent expenditures (and the corresponding need to include such donors' names in disclaimers or disclosures) by segregating funds meant for non-political purposes.

Response:

AFMC can avoid the need to disclose donations not intended for independent expenditures (and the corresponding need to include such donors' names in disclaimers or disclosures) by segregating funds meant for non-political purposes.

Request for Admission No. 10: Admit that AFMC has never produced a political communication in the form of a television advertisement.

Response:

AFMC has never produced a political communication in the form of a television advertisement.

Request for Admission No. 11: Admit that AFMC has never produced a political communication in the form of a radio or other audio media advertisement.

Response:

AFMC produced audio media advertisement in the form of robocalls during the 2020 election cycle.

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

Intervenor-Defendant.

Case No.: 3:22-cv-00077-SLG

**STATE’S FIRST DISCOVERY
REQUESTS TO FAMILIES OF THE
LAST FRONTIER**

2020 as IE Group supported Council on Good Government, Robert Myers and Kathy Henslee (all in Alaska)

2021 as IE Group supported Dave Bronson in Alaska

2022 as IE Group: No campaign activity.

2023 as IE Group supported Leigh Sloan, Spencer Moore, & Rachel Ries, And Opposes Karen Bronga, George Martinez, & Zac Johnson-(all in Alaska)

2024 as IE Group supported Craig Johnson & opposed Chuck Kopp; supported David Nelson & opposed Clifford Groh; supported Stanley Wright & opposed Theodore Eischeid; supported Barton LeBon & opposed Maxine Dibert; supported Rebecca Schwanke; supported James Kaufman & opposed Janice Park and supported Michael Cronk & opposed Savannah Fletcher (all in Alaska).

Interrogatory No. 3: Please identify all donors or would-be donors to independent expenditure groups in Alaska that you are aware have had difficulty complying with AS 15.13.040(r) (the donor disclosure law).

Response: No donors have compliance issues. An unknown number of would-be donors could have been deterred by the disclosure law.

Interrogatory No. 4: Please explain in detail the difficulties each donor or would-be donor to independent expenditure groups in Alaska, identified in your response to Interrogatory No. 3, faced in complying with AS 15.13.040(r) (the donor disclosure law), including any difficulties donors faced in reporting contributions on time.

Response: Not applicable to FLF donors. Any deterred would-be donors challenges are not known.

Interrogatory No. 5: Please identify all donors or would-be donors known to you who made contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018 and who also lack internet access.

Response: NIL to FLF knowledge. Plaintiff cannot speak to would-be donors who never came to pass due to the chilling effect of this law, which is the nature of the problem.

Interrogatory No. 6: Please identify all donors or would-be donors known to you who have made contributions of more than \$2,000 to independent expenditure groups in Alaska and who do not understand the language of AS 15.13.040(r) (the donor disclosure law).

Response: NIL to FLF knowledge. And FLF cannot know what would-be donors might have been.

Interrogatory No. 7: Please identify all would-be donors known to you who have not made contributions to independent expenditure groups in Alaska because of AS 15.13.040(r) (the donor disclosure law).

Response: Would-be donors sought to avoid this disclosure, hence they remain unknown. No donors contributed to FLF during the 2022 general election cycle after this

Response: FLF reiterates its objection to identifying “would-be” donors, because as explained supra they are by definition people who have declined to identify themselves.

Interrogatory No. 11: Please identify all instances after January 1, 2018 where you have been disclosed as a donor in connection with independent expenditures (as defined above) despite lacking any intention for your contribution to be used for independent expenditures.

Response: This situation did not arise during the specified time period.

Interrogatory No. 12: Please identify all persons known to you who have been disclosed as a donor after January 1, 2018 in connection with independent expenditures (as defined above) despite lacking any intention for their contribution to be used for independent expenditures.

Response: This situation did not arise during the specified time period.

Interrogatory No. 13: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of the term “cancel culture” (as you have used it in your complaint) because of your political views, identifying (1) the act you took or the statement you made that triggered the “cancel culture” response, (2) the identity of the person or persons who made the response, and (3) the act taken or statement made that you believe constitutes “cancel culture” as you use the term in your complaint.

Response: This situation did not arise during the specified time period.

Interrogatory No. 14: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of “reprisals against donors and their business interests” (as you have used it in your complaint) because of your political views, identifying (1) the act you took or the statement you made that triggered the “reprisal” (2) the identity of the person or persons who made the reprisal, (3) the act taken or statement made that you believe constitutes a reprisal, (4) the platform or method used to make the reprisal, (5) the date the reprisal occurred and (6) anyone that you told about the reprisal.

Response: FLF objects to the request to identify hypothetical donors it never heard from, for the reasons stated *supra*.

Interrogatory No. 15: Please describe every time since January 1, 2018 that you have contacted the police or law enforcement because of an instance of “cancel culture” or “reprisals” (as you have used the terms in your complaint) related to your political views.

Response: This situation did not arise during the specified time period.

Interrogatory No. 16: Please describe in detail every instance you are aware of since January 1, 2018 where compliance with AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications), compliance with AS 15.13.040(r) (the donor disclosure law), or compliance with AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”) elicited or resulted in a threat to or retaliation

against FLF, FLF donors, Alaska Free Market Coalition, Alaska Free Market Coalition donors, Individual Plaintiffs, or any other person/entity, including who made the threat or acted in retaliation, the substance of the threat or retaliation, the date the threat or retaliation occurred, and anyone that you told about the threat or retaliation.

Response: This situation did not arise during the specified time period.

Interrogatory No. 17: Please identify all sources of funding for this lawsuit.

Response: FLF, along with the other Plaintiffs in this lawsuit, is represented pro bono by the Liberty Justice Center, a non-profit public interest law firm that takes cases on a pro bono basis to protect constitutional rights. LJC is a 501(c)(3) funded by charitable contributions, supplemented by the occasional award of fees in successful litigation, like other non-profit public interest firms. There is no other source of funding for this lawsuit.

Interrogatory No. 18: Please identify and cite all laws, regulations, and reporting requirements that “duplicate” (as you have used the term in your complaint) AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response: Plaintiff objects to the extent this request requires them to identify all laws they might possibly object to—what is relevant is that they object to the laws at issue in this case.

But to the extent examples are useful, the reporting of true source details by both the donor and FLF is clearly duplicate reporting. Reporting a contribution immediately prior to an election required the filing of a 3rd document (the 24 Hour Report) which is blended into an APOC Independent Expenditure reporting summary and may lead to over reporting of a donor's actual contributions. Furthermore, an IE group like FLF is required to report these contributions a 4th time on a 30 day before regular report, or 7 day before regular report or 105 day after regular report or year end report. The public inspection of this multiple reporting affirmatively confuses any public use. A failure to file any of the these multiple reports can draw any APOC fine to further discourage any citizen from attempting to engage in their First Amendment Right on an Alaskan Election.

Interrogatory No. 19: For each law, regulation or reporting requirement identified in response to Interrogatory No. 18, please explain how that law, regulation, or reporting requirement duplicates the timing and substance requirements of the “duplicative” AS 15.13 provision.

Response: FLF reiterates its objection to Interrogatory 19.

To the extend a response is required, the reporting of true source details by both the donor and FLF is clearly duplicate reporting. As noted above, the APOC regulation require the donor to report their contribution, the IE Group must file a 24 hour report if the contribution is received shortly before election as well as a IE report that the funds were received when reporting expenses and file a potential 4th report for a 30 day before election, 7 day before election, 105 day after election regular campaign disclosure. Over

reporting to complicate the entire APOC process. Misinformation is the likely outcome of such a process.

Interrogatory No. 20: Please describe and cite all laws, regulations, and reporting requirements that you believe should exempt donors or “intermediate organizations” (as you have used the term in your complaint) who comply with that law, regulation or reporting requirement from also complying with AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response: FLF objects to the request to identify all laws it might object to for one or another reason. FLF has filed law lawsuit objecting to the laws at issue, which are the ones relevant to this case.

Interrogatory No. 21: If your response to any request for admission below is anything other than an unqualified admission, please explain the reasons for your denial and state all facts upon which your denial is based.

Response: FLF objects to this interrogatory to the extent it attempts to the expand the scope of what is required by requests for admission. Where explanations of denials are relevant, FLF provides them along with the responses below.

Request for Admission No. 5: Admit that all forms, disclosures or reports that FLF filed with the Alaska Public Offices Commission after January 1, 2018 are accurate and complete.

Response: All FLF forms filed after 1.1.2018 are correct.

Request for Admission No. 6: Admit that you are not aware of any donors who managed to make contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018, but could not manage to report those contributions due to lack of internet access.

Response: FLF knows of no donor lacking internet access.

Request for Admission No. 7: Admit that FLF's purpose is to elect conservatives to public office.

Response: FLF's purpose is to elect conservatives to public office.

Request for Admission No. 8: Admit that FLF does not use donor contributions for any purpose that is not related to its purpose of electing conservatives to public office.

Response: FLF does not use donor contributions for any purpose not related to its purpose of electing conservatives to public office.

Request for Admission No. 9: Admit that FLF can avoid the need to disclose donations not intended for independent expenditures (and the corresponding need to include such donors' names in disclaimers or disclosures) by segregating funds meant for non-political purposes.

Response: Not applicable.

Request for Admission No. 10: Admit that FLF has never produced a political communication in the form of a television advertisement.

Response: No, FLF has done streaming video ads but not television advertisements.

Request for Admission No. 11: Admit that FLF has never produced a political communication in the form of printed materials (as the term is used in your complaint).

Response: No. FLF has produced mailers.

Request for Admission No. 12: Admit that FLF has no concrete plans to issue political communications (as defined above) in the future.

Response: No plans in place

Request for Admission No. 13: Admit that FLF has never experienced an instance of “cancel culture” (as you have used the term in your complaint).

Response: FLF knows of none.

Request for Admission No. 14: If your answer to RFA No. 13 was anything other than an unqualified admission, admit that FLF has never experienced an instance of “cancel culture” (as you have used the term in your complaint) related to the campaign finance laws challenged in the complaint.

Response: FLF knows of none.

Request for Admission No. 15: Admit that FLF has never experienced any “reprisals against donors and their business interests” (as you have used the term in your complaint).

Response: FLF denies this on the group that potential donors who might have contributed are, by definition, unknown to FLF.

Request for Admission No. 16: If your answer to RFA No. 15 was anything other than an unqualified admission, admit that FLF has never experienced any “reprisals against donors and their business interests” (as you have used the term in your complaint) related to the campaign finance laws challenged in the complaint.

Response: During the 2022 general election cycle, donors reprisal by not exercising their First Amendment Rights and donation to FLF.

Request for Admission No. 17: Admit that FLF has not experienced threats or retaliation as a result of AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications), AS 15.13.040(r) (the donor disclosure law), or AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”).

Response: FLF effectively shut down in 2022 election cycle due to concerns of retaliation on a would be donor.

CONFIDENTIAL:

All parties to this case have stipulated that documents marked confidential must be handled with discretion and cannot be distributed outside the parameters enumerated in the July 30, 2025, stipulated protective order (Docket Number 85).

Griffin v. Stillie, Case No. 3:22-cv-00077-SLG

Defendants Richard Stillie Jr., Lanette Blodgett, Eric Feige, Dan LaSota, and Walter Carlton Monegan III have objected to plaintiff Families of the Last Frontier (FLF)'s responses to three questions from its deposition conducted under Rule 30(b)(6). FLF was hesitant to respond because of its fear of retaliation. With confirmation that these responses are confidential and cannot be shared outside of this litigation, we have new, clear responses to the defendant's three questions.

Question I: Tr. 54-56 (FLF's response to RFA No. 17 – that FLF effectively shut down in the 2022 election cycle due to concerns of retaliation on a would be donor)

Donor 1 specifically said he was worried about retaliation on his business by political entities that he might do work for, as well as corporate entities that might not want to award him work due to his political participation. His family, including several of his adult children who work at his firm, would be affected by the impact of punishing his business for being politically active.

Question II: Tr. 84-85 (Are there specific FLF donors who communicated they didn't want to donate due to reprisals/cancel culture? – relates to Interrogatory Nos. 16/13, RFA Nos. 13/15, RFP Nos. 23/24 etc.)

Yes, both **Donor 1** and **Donor 2** communicated this concern to FLF.

Question III: Tr. 100-103 (Are there specific FLF donors who communicated they didn't want to donate due to disclosure provision and/or true source provision, and are there specific donors who told FLF they experienced cancel culture because of donations? – relates to Interrogatory Nos. 7/9/13/14/16, RFP Nos. 23/24, etc.)

Donor 1 specifically said he was worried about retaliation on his business by political entities that he might do work for, as well as corporate entities that might not want to award him work due to his political participation. His family, including several of his adult children who work at his firm, would be affected by the impact of punishing his business

for being politically active.

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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

Doug Smith, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No.: 3:22-cv-00077-SLG
	)	
Richard Stillie, Jr., in his official capacity	)	
as chair of the Alaska Public Offices	)	
Commission, <i>et al.</i> ,	)	STATE'S FIRST DISCOVERY
	)	REQUESTS TO TREVOR SHAW
Defendants,	)	
	)	
and	)	
	)	
Alaskans for Better Elections, Inc.	)	
	)	
Intervenor-Defendant.	)	
_____	)	

17. “political view” means any view, opinion, belief, or attitude about (i) issues of significance to the governments of Alaska or the United States or (ii) issues that are part of any political party or candidate’s platform or campaign.

18. “refer,” “relate” and “discuss” mean to embody, discuss, describe, reflect, identify, deal with, consist of, establish, comprise, list, or in any way pertain, in whole or in part, to the subject of the request.

19. “retaliation” means any type of adverse action taken against any person or entity, including blacklisting or otherwise targeting for retaliation.

20. “threat” means any expression of intention to inflict harm, injury, or damage, including physical, economic or other threats, in addition to any other form of reprisal or harassment.

21. “including” is used merely to emphasize that a request for certain types of documents or information should not be construed as limiting the request in any way.

INTERROGATORIES

Interrogatory No. 1: Please identify all donors or would-be donors to independent expenditure groups in Alaska (including yourself) that you are aware have had difficulty complying with AS 15.13.040(r) (the donor disclosure law).

Response:

I have personally ceased all donations to IE groups following passage of the ballot proposition in 2020 codifying current AS 15.13.040(r).

Interrogatory No. 2: Please explain in detail the difficulties each donor or would-be donor to independent expenditure groups in Alaska, identified in your response to Interrogatory No. 1, faced in complying with AS 15.13.040(r) (the donor disclosure law), including any difficulties donors faced in reporting contributions on time.

Response:

It was easier for me to stop donations than to be mandated to expend the resources, monetary or otherwise, to ensure full compliance with the new disclosure regime imposed by the passage of the ballot proposition in 2020 codifying current AS 15.13.040(r). Failure to ensure full compliance could be just as costly in terms of fines and civil penalties.

Interrogatory No. 3: Please identify all donors or would-be donors known to you (including yourself) who made contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018 and who also lack internet access.

Response:

None known personally.

Interrogatory No. 4: Please identify all donors or would-be donors known to you (including yourself) who have made contributions of more than \$2,000 to independent

expenditure groups in Alaska and who do not understand the language of AS 15.13.040(r) (the donor disclosure law).

Response:

Difficult to fully determine. I sought legal counsel in the aftermath of passage of the ballot proposition in 2020 codifying current AS 15.13.040(r), a service not previously required under the previous disclosure laws.

Interrogatory No. 5: Please identify all would-be donors known to you (including yourself) who have not made contributions to independent expenditure groups in Alaska because of AS 15.13.040(r) (the donor disclosure law).

Response: Myself, along with all previous donors to the IE group Alaska Free Market Coalition.

Interrogatory No. 6: Please identify all would-be donors known to you (including yourself) who have not made contributions to independent expenditure groups in Alaska because they did not want to disclose the true source of their contribution, as required by AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”).

Response:

I have ceased all personal donations to IE groups in Alaska. It is difficult to determine how many others have as well.

Interrogatory No. 7: Please identify all instances after January 1, 2018 where you have been disclosed as a donor in connection with independent expenditures (as defined

above) despite lacking any intention for your contribution to be used for independent expenditures.

Response:

None.

Interrogatory No. 8: Please identify all persons known to you who have been disclosed as a donor after January 1, 2018 in connection with independent expenditures (as defined above) despite lacking any intention for their contribution to be used for independent expenditures.

Response:

None personally known.

Interrogatory No. 9: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of the term “cancel culture” (as you have used it in your complaint) because of your political views, identifying (1) the act you took or the statement you made that triggered the “cancel culture” response, (2) the identity of the person or persons who made the response, and (3) the act taken or statement made that you believe constitutes “cancel culture” as you use the term in your complaint.

Response:

Quantifying the potential consequences of political speech is inherently challenging, yet the risks are both real and substantial. The impact of disclosure

requirements, particularly those related to donor identity, can vary widely depending on the political climate and the nature of the donor's views.

Expanding disclosure mandates inevitably increases the number of situations in which donors may be subject to adverse consequences, especially when their political views diverge from prevailing sentiments in their community or industry. This is especially concerning for entrepreneurs, business owners, and others whose livelihood is intertwined with public perception, customer trust, and professional relationships.

For these individuals, there is no reliable way to measure—or even detect—the extent to which negative outcomes may result from their political speech or affiliations. Repercussions may be overt, such as consumer boycotts, social media backlash, or termination of business partnerships, or they may be subtle and indirect, such as the quiet loss of clients, exclusion from professional networks, or difficulties securing financing or regulatory approvals. These effects, often difficult to trace directly, nonetheless exert a chilling influence on civic participation and free expression.

In such an ever-polarizing environment, even the perception of potential retaliation may deter individuals from supporting causes or engaging in public discourse.

Interrogatory No. 10: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of “reprisals against donors and their business interests” (as you have used it in your complaint) because of your political views, identifying (1) the act you took or the statement you made that triggered the “reprisal” (2) the identity of the person or persons who made the reprisal, (3) the act taken or statement made that you believe constitutes a reprisal, (4) the platform or

method used to make the reprisal, (5) the date the reprisal occurred and (6) anyone that you told about the reprisal.

Response:

Please see the response to Interrogatory No. 9.

Interrogatory No. 11: Please describe every time since January 1, 2018 that you have contacted the police or law enforcement because of an instance of “cancel culture” or “reprisals” (as you have used the terms in your complaint) related to your political views.

Response:

Please see the response to Interrogatory No. 9.

Interrogatory No. 12: Please describe in detail every instance you are aware of since January 1, 2018 where compliance with AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications), compliance with AS 15.13.040(r) (the donor disclosure law), or compliance with AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”) elicited or resulted in a threat to or retaliation against you, other Individual Plaintiffs, Families of the Last Frontier, Families of the Last Frontier donors, Alaska Free Market Coalition, Alaska Free Market Coalition donors, or any other person/entity, including who made the threat or acted in retaliation, the substance of the threat or retaliation, the date the threat or retaliation occurred, and anyone that you told about the threat or retaliation.

Response:

Please see the response to Interrogatory No. 9.

Interrogatory No. 13: Please identify all sources of funding for this lawsuit.

Response:

Public-interest litigation support provided by the Liberty Justice Center.

Interrogatory No. 14: Please identify and cite all laws, regulations, and reporting requirements that “duplicate” (as you have used the term in your complaint) AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response:

Interrogatory No. 15: For each law, regulation or reporting requirement identified in response to Interrogatory No. 14, please explain how that law, regulation, or reporting requirement duplicates the timing and substance requirements of the “duplicative” AS 15.13 provision.

Response:

All such instances cited in the complaint, case-related filings, or associated documents provided by the plaintiff’s counsel.

Interrogatory No. 16: Please describe and cite all laws, regulations, and reporting requirements that you believe should exempt donors or “intermediate organizations” (as

you have used the term in your complaint) who comply with that law, regulation or reporting requirement from also complying with AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response:

All such instances cited in the complaint, case-related filings, or associated documents provided by the plaintiff’s counsel.

Interrogatory No. 17: If your response to any request for admission below is anything other than an unqualified admission, please explain the reasons for your denial and state all facts upon which your denial is based.

Response:

Please see responses below.

REQUESTS FOR ADMISSION

Request for Admission No. 1: Admit that you have made contribution(s) of more than \$2,000 to independent expenditure groups in Alaska while AS 15.13.040(r) (the donor disclosure law) has been in effect.

Response:

I have not.

Request for Admission No. 2: If your answer to RFA No. 1 was an admission, admit that you successfully reported the contribution(s) described in RFA No. 1 using forms provided by the Alaska Public Offices Commission.

Response:

N/A

Request for Admission No. 3: Admit that all forms, disclosures or reports that you filed with the Alaska Public Offices Commission after January 1, 2018 are accurate and complete.

Response:

They are.

Request for Admission No. 4: Admit that you intended for your post-January 1, 2018 contribution(s) of more than \$2,000 to independent expenditure groups in Alaska to be used on independent expenditures related to elections.

Response:

Any such contributions were intended to be used on independent expenditures related to elections.

Request for Admission No. 5: Admit that you are not aware of any donors who managed to make contributions of more than \$2,000 to independent expenditure groups

in Alaska after January 1, 2018, but could not manage to report those contributions due to lack of internet access.

Response:

I am not aware of any donors who managed to make contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018, but could not manage to report those contributions due to lack of internet access.

Request for Admission No. 6: Admit that you have never produced a political communication as defined above.

Response:

I have produced political communications as defined above as a prior candidate, campaign manager or consultant, and as the head of the Alaska Free Market Coalition.

Request for Admission No. 7: Admit that you have never produced a political communication in the form of a radio or other audio media advertisement.

Response:

I have produced political communications in the form of a radio or other audio media advertisement as a prior candidate, campaign manager or consultant, and as the head of the Alaska Free Market Coalition.

Request for Admission No. 8: Admit that you have never produced a political communication in the form of a television advertisement.

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Bob Griffin, et al.,

Plaintiffs,

v.

Richard Stillie, et al.,

Defendants,

**Request for Admission Responses
and Interrogatory Responses for
Robert “Bob” Griffin**

This document records the interrogatory responses and Request for Admission responses for plaintiff Robert “Bob” Griffin.

I. Interrogatory Responses

Interrogatory No. 1: Please identify all donors or would-be donors to independent expenditure groups in Alaska (including yourself) that you are aware have had difficulty complying with AS 15.13.040(r) (the donor disclosure law).

Response: *Just myself. Not aware of any other donors or would-be donors.*

Interrogatory No. 2: Please explain in detail the difficulties each donor or would-be donor to independent expenditure groups in Alaska, identified in your response to Interrogatory No. 1, faced in complying with AS 15.13.040(r) (the donor disclosure law), including any difficulties donors faced in reporting contributions on time.

Response: *No difficulties noted.*

Interrogatory No. 3: Please identify all donors or would-be donors known to you (including yourself) who made contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018 and who also lack internet access.

Response: *Not aware of any that meet those specific criteria.*

Interrogatory No. 4: Please identify all donors or would-be donors known to you (including yourself) who have made contributions of more than \$2,000 to independent expenditure groups in Alaska and who do not understand the language of AS 15.13.040(r) (the donor disclosure law).

Response: *Not aware of any that meet those specific criteria.*

Interrogatory No. 5: Please identify all would-be donors known to you (including yourself) who have not made contributions to independent expenditure groups in Alaska because of AS 15.13.040(r) (the donor disclosure law).

Response: *Not aware of any that meet those specific criteria.*

Interrogatory No. 6: Please identify all would-be donors known to you (including yourself) who have not made contributions to independent expenditure groups in Alaska because they did not want to disclose the true source of their contribution, as required by AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”).

Response: *Not aware of any that meet those specific criteria.*

Interrogatory No. 7: Please identify all instances after January 1, 2018 where you have been disclosed as a donor in connection with independent expenditures (as defined above) despite lacking any intention for your contribution to be used for independent expenditures.

Response: *There have been a few instances that I was disclosed as a donor for a variety of different causes. Some may have occurred before 1 January 2018. Some many have been after. I was not aware of any requirements for keeping detailed personal records of those transactions or interactions. The one instance I do recall for sure was a 4/15/2025 contribution to Repeal Now for \$1,000.*

Interrogatory No. 8: Please identify all persons known to you who have been disclosed as a donor after January 1, 2018 in connection with independent expenditures (as defined above) despite lacking any intention for their contribution to be used for independent expenditures.

Response: *Not aware of any that meet those specific criteria.*

Interrogatory No. 9: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of the term “cancel culture” (as you have used it in your complaint) because of your political views, identifying (1) the act you took or the statement you made that triggered the “cancel culture” response, (2) the identity of the person or persons who made the response, and (3) the act taken or statement made that you believe constitutes “cancel culture” as you use the term in your complaint.

Response: I would say that I have experienced this effect many times --through mostly social media ad hominin attacks over the last six and half years. I was unaware of any requirement to keep detailed records of those fairly frequent interactions.

Interrogatory No. 10: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of “reprisals against donors and their business interests” (as you have used it in your complaint) because of your political views, identifying (1) the act you took or the statement you made that triggered the “reprisal” (2) the identity of the person or persons who made the reprisal, (3) the act taken or statement made that you believe constitutes a reprisal, (4) the platform or method used to make the reprisal, (5) the date the reprisal occurred and (6) anyone that you told about the reprisal.

Response: *Not aware of any that meet those specific criteria.*

Interrogatory No. 11: Please describe every time since January 1, 2018 that you have contacted the police or law enforcement because of an instance of “cancel culture” or “reprisals” (as you have used the terms in your complaint) related to your political views.

Response: *Not aware of any that meet those specific criteria.*

Interrogatory No. 12: Please describe in detail every instance you are aware of since January 1, 2018 where compliance with AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications), compliance with AS 15.13.040(r) (the donor disclosure law), or compliance with AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”) elicited or resulted in a threat to or retaliation against you, other Individual Plaintiffs, Families of the Last Frontier,

Families of the Last Frontier donors, Alaska Free Market Coalition, Alaska Free Market Coalition donors, or any other person/entity, including who made the threat or acted in retaliation, the substance of the threat or retaliation, the date the threat or retaliation occurred, and anyone that you told about the threat or retaliation.

Response: *Not aware of any that meet those specific criteria.*

Interrogatory No. 13: Please identify all sources of funding for this lawsuit.

Response: *Not aware of the funding sources.*

Interrogatory No. 14: Please identify and cite all laws, regulations, and reporting requirements that “duplicate” (as you have used the term in your complaint) AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response: *Not aware of any that meet those specific criteria.*

Interrogatory No. 15: For each law, regulation or reporting requirement identified in response to Interrogatory No. 14, please explain how that law, regulation, or reporting requirement duplicates the timing and substance requirements of the “duplicative” AS 15.13 provision.

Response: *Based on my previous response, this interrogative does not seem to apply.*

Interrogatory No. 16: Please describe and cite all laws, regulations, and reporting requirements that you believe should exempt donors or “intermediate organizations” (as you have used the term in your complaint) who comply with that law, regulation or reporting requirement from also complying with AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response: *Not aware of any.*

Interrogatory No. 17: If your response to any request for admission below is anything other than an unqualified admission, please explain the reasons for your denial and state all facts upon which your denial is based.

Response: *See above.*

II. Request for Admission Responses

Request for Admission No. 1: Admit that you have made contribution(s) of more than \$2,000 to independent expenditure groups in Alaska while AS 15.13.040(r) (the donor disclosure law) has been in effect.

Response: *As far as I can recall, I have not made contributions of more than \$2,000 to independent expenditure groups in Alaska since Ballot Measure 2 went into effect.*

Request for Admission No. 2: If your answer to RFA No. 1 was an admission, admit that you successfully reported the contribution(s) described in RFA No. 1 using forms provided by the Alaska Public Offices Commission.

Response: To the best of my knowledge, the contributions I made were disclosed in the APOC report which has been turned over in discovery.

Request for Admission No. 3: Admit that all forms, disclosures or reports that you filed with the Alaska Public Offices Commission after January 1, 2018 are accurate and complete.

Response: Yes, to the best of my knowledge, they are accurate and complete.

Request for Admission No. 4: Admit that you intended for your post-January 1, 2018 contribution(s) of more than \$2,000 to independent expenditure groups in Alaska to be used on independent expenditures related to elections.

Response: As far as I recall, I have not made contributions of more than \$2,000 to independent expenditure groups in Alaska since Ballot Measure 2 went into effect.

Request for Admission No. 5: Admit that you are not aware of any donors who managed to make contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018, but could not manage to report those contributions due to lack of internet access.

Response: Yes, admitted.

Request for Admission No. 6: Admit that you have never produced a political communication as defined above. ("an announcement or advertisement intended to influence the outcome of an election and disseminated through: (i) print or broadcast media, including radio, television, cable, and satellite; (ii) social media; (iii) the Internet; or (iv) a mass mailing.")

Response: I have made social media posts urging people to vote for specific causes or individuals, but I did not pay to promote those posts.

Request for Admission No. 7: Admit that you have never produced a political communication in the form of a radio or other audio media advertisement.

Response: Yes, admitted.

Request for Admission No. 8: Admit that you have never produced a political communication in the form of a television advertisement.

Response: Yes, admitted.

Request for Admission No. 9: Admit that you have never produced a political communication in the form of “printed materials,” as the term is used in your complaint.

Response: Yes, admitted.

Request for Admission No. 10: Admit that you have never produced a political communication using the Internet, social media, or other digital means.

Response: No. I have engaged in explicit political advocacy on social media. However, I did not pay to promote those posts.

Request for Admission No. 11: Admit that you have no concrete plans to issue political communications, as defined above, in the future.

Response: Yes, admitted.

Request for Admission No. 12: Admit that you have never experienced an instance of “cancel culture.”

Response: No, I have experienced cancel culture. People called my employer and attempted to get me fired because of my work with the Board of Education on protecting women’s sports in schools.

Request for Admission No. 13: If your answer to RFA No. 12 was anything other than an unqualified admission, admit that you have never experienced an instance of “cancel culture” (as you have used the term in your complaint) related to the campaign finance laws challenged in the complaint.

Response: Yes, admitted.

Request for Admission No. 14: Admit that you have never experienced any “reprisals against donors and their business interests” (as you have used the term in your complaint).

Response: No, people contacted my employer and demanded I be fired for my work with the Board of Education on protecting women’s sports in schools.

Request for Admission No. 15: If your answer to RFA No. 14 was anything other than an unqualified admission, admit that you have never experienced any “reprisals against donors and their business interests” (as you have used the term in your complaint) related to the campaign finance laws challenged in the complaint.

Response: Yes, admitted.

Request for Admission No. 16: Admit that you have not experienced threats or retaliation as a result of AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications), AS 15.13.040(r) (the donor disclosure law), or AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”).

Response: Yes, admitted.

Conclusion

This document will be attached to Bob Griffin’s signature attesting to the veracity of what he said.

Date: November 3, 2025

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

Doug Smith, *et al.*,
Plaintiffs,
v.
Richard Stillie, Jr., in his official capacity
as chair of the Alaska Public Offices
Commission, *et al.*,
Defendants,
and
Alaskans for Better Elections, Inc.
Intervenor-Defendant.

INTERROGATORIES

Interrogatory No. 1: Please identify all donors or would-be donors to independent expenditure groups in Alaska (including yourself) that you are aware have had difficulty complying with AS 15.13.040(r) (the donor disclosure law).

Response:

Plaintiff objects to the extent the question asks for testimony regarding the subjective experience of third parties other than Plaintiff.

To the extent a response is required, anyone and everyone would have difficulty complying with AS 15.13.040(r). It is a regulatory requirement imposed on everyone who desires to express their political opinion, and doubly so for anyone who desires for others to know their political opinion.

Interrogatory No. 2: Please explain in detail the difficulties each donor or would-be donor to independent expenditure groups in Alaska, identified in your response to Interrogatory No. 1, faced in complying with AS 15.13.040(r) (the donor disclosure law), including any difficulties donors faced in reporting contributions on time.

Response:

As Plaintiff sees it, the difficulties include, but are not limited to:

1. AS 15.13.040 is, approximately, 66 paragraphs of legalese that is anything but easy to read through.

2. Reading AS 15.13.040, and especially sub-paragraph r, is not a requirement for citizenship.
3. Reading AS 15.13.040, and especially sub-paragraph r, is not a requirement to register to vote.
4. Reading AS 15.13.040 is a limitation not imposed by the Bill of Rights.

Interrogatory No. 3: Please identify all donors or would-be donors known to you (including yourself) who made contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018 and who also lack internet access.

Response: Internet access is a subjective evaluation not subject to objective standards. Everyone, myself included, who I know of, who has access to the internet at any quantitative level, pays for this service. The reliability of such access varies considerably among individual users but it is never 100%. In many instances I am aware that the reliability drops to near zero (unusable for practical purposes). All users who have access to the internet at least some of the time experience difficulties with access to the internet at times. I personally have access to the internet at times and at other times I do not.

Interrogatory No. 4: Please identify all donors or would-be donors known to you (including yourself) who have made contributions of more than \$2,000 to independent expenditure groups in Alaska and who do not understand the language of AS 15.13.040(r) (the donor disclosure law).

Interrogatory No. 7: Please identify all instances after January 1, 2018 where you have been disclosed as a donor in connection with independent expenditures (as defined above) despite lacking any intention for your contribution to be used for independent expenditures.

Response: I am not aware of any instances since 2018 wherein my name was disclosed as a donor in connection with independent expenditures despite a lack of intention on my part to participate in an independent expenditure. I do not keep track of donor disclosure reports and do not know what is in them. However, I can neither admit or deny that such an occurrence has occurred. To the best of my ability to remember, I simply do not have any knowledge of any such occurrence.

Interrogatory No. 8: Please identify all persons known to you who have been disclosed as a donor after January 1, 2018 in connection with independent expenditures (as defined above) despite lacking any intention for their contribution to be used for independent expenditures.

Response: I do not keep track of donors to independent expenditures. For that reason I do not have personal knowledge of any such persons.

Interrogatory No. 9: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of the term “cancel culture” (as you have used it in your complaint) because of your political views, identifying (1)

the act you took or the statement you made that triggered the “cancel culture” response, (2) the identity of the person or persons who made the response, and (3) the act taken or statement made that you believe constitutes “cancel culture” as you use the term in your complaint.

Response: Plaintiff objects to the breath of this interrogatory. However, with that said, I have experienced cancel culture (as I define it) more times than I can count and certainly more times than I can remember.

Interrogatory No. 10: Please describe every time since January 1, 2018 that you have experienced something that falls within your definition of “reprisals against donors and their business interests” (as you have used it in your complaint) because of your political views, identifying (1) the act you took or the statement you made that triggered the “reprisal” (2) the identity of the person or persons who made the reprisal, (3) the act taken or statement made that you believe constitutes a reprisal, (4) the platform or method used to make the reprisal, (5) the date the reprisal occurred and (6) anyone that you told about the reprisal.

Response: My memory goes back well before 2018 and it is close to impossible to forget the lessons learned during one’s journey through life. One of the many lessons I have learned is how to avoid controversy. Included in my definition of controversies is the reality of reprisals against donors and their business interests including the threat of such reprisals. These reprisals are a reality of life and many (and possibly most) well-

adjusted folks learn how to navigate around these events. The events and the opportunities for such events, are too numerous to attempt to enumerate.

Interrogatory No. 11: Please describe every time since January 1, 2018 that you have contacted the police or law enforcement because of an instance of “cancel culture” or “reprisals” (as you have used the terms in your complaint) related to your political views.

Response: To the best of my ability to remember, I have never contacted the police or law enforcement because of an instance of cancel culture or reprisals. Based upon my definitions of cancel culture and of reprisals, I do not know which, if any statute makes cancel culture or reprisals a criminal offense. I acknowledge that it is entirely possible for some types of cancel culture activities and some types of reprisals could be in violation of one or another statute.

Interrogatory No. 12: Please describe in detail every instance you are aware of since January 1, 2018 where compliance with AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications), compliance with AS 15.13.040(r) (the donor disclosure law), or compliance with AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”) elicited or resulted in a threat to or retaliation against you, other Individual Plaintiffs, Families of the Last Frontier, Families of the Last Frontier donors, Alaska Free Market Coalition, Alaska Free Market Coalition donors, or any other person/entity, including who made the threat or acted in retaliation, the

substance of the threat or retaliation, the date the threat or retaliation occurred, and anyone that you told about the threat or retaliation.

Response: My memory goes back well before 2018 and it is close to impossible to forget the lessons learned during one's journey through life. One of the many lessons I have learned is how to avoid controversy. Included in my definition of controversies is the reality of reprisals against donors and their business interests including the threat of such reprisals. These reprisals are a reality of life and many (and possibly most) well adjusted folks learn how to navigate around these events.

Interrogatory No. 13: Please identify all sources of funding for this lawsuit.

Response: Plaintiff Al Vezy, along with the other Plaintiffs in this lawsuit, is represented pro bono by the Liberty Justice Center, a non-profit public interest law firm that takes cases on a pro bono basis to protect constitutional rights. LJC is a 501(c)(3) funded by charitable contributions, supplemented by the occasional award of fees in successful litigation, like other non-profit public interest firms. There is no other source of funding for this lawsuit.

Interrogatory No. 14: Please identify and cite all laws, regulations, and reporting requirements that "duplicate" (as you have used the term in your complaint) AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of "true source"), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response: I would cite AS 15.13.040 and 2 AAC 50. There are others as well.

Interrogatory No. 15: For each law, regulation or reporting requirement identified in response to Interrogatory No. 14, please explain how that law, regulation, or reporting requirement duplicates the timing and substance requirements of the “duplicative” AS 15.13 provision.

Response: It should be self-obvious that having regulations requiring multiple persons report duplicate information is duplicative.

Interrogatory No. 16: Please describe and cite all laws, regulations, and reporting requirements that you believe should exempt donors or “intermediate organizations” (as you have used the term in your complaint) who comply with that law, regulation or reporting requirement from also complying with AS 15.13.040(r) (the donor disclosure law), AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”), or AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications).

Response: Plaintiff objects to the request to identify all laws he might object to for one or another reason. He has filed law lawsuit objecting to the laws at issue, which are the ones relevant to this case.

Interrogatory No. 17: If your response to any request for admission below is anything other than an unqualified admission, please explain the reasons for your denial and state all facts upon which your denial is based.

Response: Deny. I lack sufficient knowledge to neither admit or deny the accuracy or completeness of my filings.

Request for Admission No. 4: Admit that you intended for your post-January 1, 2018 contribution(s) of more than \$2,000 to independent expenditure groups in Alaska to be used on independent expenditures related to elections.

Response: Deny.

Request for Admission No. 5: Admit that you are not aware of any donors who managed to make contributions of more than \$2,000 to independent expenditure groups in Alaska after January 1, 2018, but could not manage to report those contributions due to lack of internet access.

Response: Deny.

Request for Admission No. 6: Admit that you have never produced a political communication as defined above.

Response: Deny. I do not know the definition of produced as used in this request.

Request for Admission No. 7: Admit that you have never produced a political communication in the form of a radio or other audio media advertisement.

Response: Deny. I do not know the definition of produced as used in this request.

Request for Admission No. 8: Admit that you have never produced a political communication in the form of a television advertisement.

Response: Deny. I do not know the definition of produced as used in this request.

Request for Admission No. 9: Admit that you have never produced a political communication in the form of “printed materials,” as the term is used in your complaint.

Response: Deny. I do not know the definition of produced as used in this request.

Request for Admission No. 10: Admit that you have never produced a political communication using the Internet, social media, or other digital means.

Response: Deny.

Request for Admission No. 11: Admit that you have no concrete plans to issue political communications, as defined above, in the future.

Response: Deny.

Request for Admission No. 12: Admit that you have never experienced an instance of “cancel culture” (as you have used the term in your complaint).

Response: Deny.

Request for Admission No. 13: If your answer to RFA No. 12 was anything other than an unqualified admission, admit that you have never experienced an instance of “cancel culture” (as you have used the term in your complaint) related to the campaign finance laws challenged in the complaint.

Response: Deny

Request for Admission No. 14: Admit that you have never experienced any “reprisals against donors and their business interests” (as you have used the term in your complaint).

Response: Deny.

Request for Admission No. 15: If your answer to RFA No. 14 was anything other than an unqualified admission, admit that you have never experienced any “reprisals against donors and their business interests” (as you have used the term in your complaint) related to the campaign finance laws challenged in the complaint.

Response: Deny.

Request for Admission No. 16: Admit that you have not experienced threats or retaliation as a result of AS 15.13.090(a)-(g) and AS 15.13.135(b) (requiring disclaimers on political communications), AS 15.13.040(r) (the donor disclosure law), or AS 15.13.040 and AS 15.13.110(k) (requiring reporting of “true source”).

Response: Deny.

REQUESTS FOR PRODUCTION

Request For Production No. 1: Produce all documents that reflect, refer to or discuss any difficulties you have faced complying with AS 15.13.040(r) (the donor disclosure law), including difficulties complying because you lacked internet access or did not understand the language of the donor disclosure law.

Request For Production No. 2: Produce all documents that reflect, refer to or discuss any difficulties other donors have experienced when attempting to comply or complying with AS 15.13.040(r) (the donor disclosure law).

Response: Plaintiff has nothing responsive to produce.

Request For Production No. 3: Produce all documents that reflect, refer to or discuss how AS 15.13.040(r) (the donor disclosure law) has disincentivized donors or would-be donors (including yourself) from making contributions to independent expenditure groups in Alaska.

Response: Plaintiff has nothing responsive to produce.

1 REPORTER'S TRANSCRIPT OF PROCEEDINGS
2 BE IT REMEMBERED that, pursuant to Defendants'
3 Notice of Taking Rule 30(b)(6) Deposition of ALASKA
4 FREE MARKET COALITION followed by the deposition of
5 Mr. Trevor A. Shaw, in his personal capacity on
6 Wednesday, the 12th day of November, 2025, at the
7 hour of 10:00 a.m., thereof, appeared at the offices
8 of Ketchikan Courthouse 410 Main Street Suite 204,
9 Ketchikan, Alaska 99901, before Judy A. Zenge, Notary
10 Public in and for the State of Alaska, duly
11 commissioned and qualified was present on behalf of
12 the Plaintiff thereupon examined and interrogated as
13 hereinafter set forth:
14 THE REPORTER: I've already put the caption on
15 the record. At this time I'll swear in the witness.
16 Sir, would you raise your right hand?
17 (Oath administered)
18 MR. SHAW: I so swear.
19 TREVOR A. SHAW
20 called as a witness, testified as follows on:
21 DIRECT EXAMINATION
22 BY THE REPORTER:
23 Q You can lower your hand. For the record, would
24 you please state your full name, spelling your
25 last?

1 A Yes. My full name is Trevor Alexander Shaw,
2 last name S-H-A-W.
3 Q A mailing address, please?
4 A S248 Yeoman, Y-E-O-M-A-N, Road, Ketchikan,
5 Alaska, 99901.
6 Q And a telephone number?
7 A 907-821-8072.
8 THE REPORTER: Thank you. We are on record at
9 10:09.
10 BY MR. MR. JENKINS-GOETZ:
11 Q All right. Good morning, Mr. Shaw.
12 A Good morning.
13 Q My name is Max Jenkins-Goetz. I'm an Assistant
14 Attorney General with the State of Alaska, and
15 I'm representing APOC in this matter. A couple
16 sort of background ground rules and things like
17 that. First question, have you ever had your
18 deposition taken?
19 A I have not.
20 Q Okay. Some basic rules just to make sure our
21 record is clean and clear and everything is easy
22 for our court reporter. First, I'm going to ask
23 you a series of questions. If any of them are
24 unclear or confusing to you, feel free to ask
25 for clarification.

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1 forward, those donations will be subject to the
2 disclosure requirements of Ballot Measure 2.
3 And you've spoken a little bit about that
4 already.
5 A Correct.
6 Q You've spoken about having to spend money on
7 legal counsel to understand what compliance
8 would look like.
9 A Yes.
10 Q What is your understanding of what the
11 disclosure requirements are under Ballot Measure
12 2?
13 A Well, there's a variety of them, right? There's
14 the main -- I think I would highlight the major
15 changes in terms of timeframes, not only quicker
16 turnaround on reporting, especially donations
17 from individuals, which they have to file now.
18 There were changes under Ballot Measure 2 to the
19 amount and how timely those have to be filed.
20 True source laws, you know, just making sure
21 again that -- AFMC has always believed in over-
22 reporting and making sure that we adequately do
23 so in a manner that also protects our -- our
24 political speech. Just the -- again, we didn't
25 outline what it would look like moving forward

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1 under the new regime to actually begin
2 independent expenditures, to restart them. And
3 so, barring a change to the law or really
4 simple, you know, simple donations and what I
5 would call that is an individual in Alaska wants
6 to donate \$25,000.00 because they oppose the
7 implementation of an income tax. And then you
8 have to now run through with that individual all
9 the things that it would take for them to also
10 comply, which previously didn't have to
11 necessarily be done. So, that was our takeaway
12 from when Ballot Measure 2 was adopted. And we
13 honestly didn't dive in too much deeper into
14 what it would take to maintain our existing
15 level of operations just because we knew there
16 would be new costs associated with that and that
17 would take money directly away from spending on
18 -- towards candidates.
19 Q That's interesting. Let's dig in there a
20 little.
21 A Okay.
22 Q Help me understand again in detail, I'm sorry,
23 because you've spoken to it already, sort of the
24 thought process after Ballot Measure 2 passed
25 that led to the decision to effectively stop

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1 independent expenditures. How much sort of
2 detail did you or others go into in assessing
3 what would be required under Ballot Measure 2
4 before you concluded it's not worth it?
5 A So, I'm a -- so by the time Ballot Measure 2 was
6 adopted, I maintained essentially sole control
7 over AFMC. And so, after my conversations with
8 -- consultation with the attorney that I went
9 to, and, you know, just kind of, they provided
10 an overview of the law and kind of next steps
11 for what they thought it would take to maintain
12 the existing level of compliance. And my
13 question was, is this something that I could do,
14 continue doing myself? And their advice was no.
15 It's not because of the fines potentially
16 associated with non-compliance or oversights and
17 reporting, but it just was something that we
18 would have to look at a new compliance
19 structure. So, that was really -- that was
20 really the deciding factor.
21 Q Now, a moment ago, you mentioned part of Ballot
22 Measure 2, including true source laws.
23 A Uh-huh. (Affirmative.)
24 Q What do you understand those to be?
25 A Well, I understand them to be, you know, the

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1 intent is to prevent organizations from
2 shielding where the money directly came from for
3 the purposes of independent expenditures. And
4 so, the -- I -- true source laws being that if
5 you know for a fact -- if the money is not
6 directly for a different use, that you have to,
7 you know, report where that came from.
8 Q Okay. And correct me if I'm wrong, but
9 previously you said from 2018 to 2020 --
10 A Uh-huh. (Affirmative.)
11 Q -- when AFMC was receiving somewhat significant
12 contributions and making expenditures, all or
13 almost all of the contributions came from either
14 yourself or from Connect Solutions. Is that
15 right?
16 A Correct.
17 Q Okay.
18 A Yes.
19 Q Okay. Okay, we'll come back to some of this,
20 but let's go to paragraph 57, same page, which
21 is page 11. Under Ballot Measure 2, if AFMC
22 secures a majority of funding from sources
23 outside Alaska, it will be subject to the out-
24 of-state disclosure requirements of Ballot
25 Measure 2. Now, your last quest -- your last

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1 A Correct.

2 Q Okay. Okay. And let's turn again to the true

3 source component of your concerns, which I think

4 probably ties in more closely to cancel culture,

5 as I understand your concerns. To confirm, any

6 contributions that you or Connect Solutions gave

7 to AFMC, where that may be some exceptions

8 around debt to contractors, were in-kind

9 services contributions. Correct?

10 A Or cash that was paid for a third-party vendor

11 invoice. Yes.

12 Q Okay. Or cash to a third-party vendor. Now,

13 any contributions you specifically made to AFMC,

14 whether cash or in-kind services, is it fair to

15 say that you were the true source of that money?

16 A I mean, I believe I was the true source. Can I

17 read Ballot Measure 2 and say exactly that I

18 meet all of my -- that I fully disclosed? That

19 was one -- that was one of the primary

20 questions. Like, what -- what does this look

21 like? And APOC may take a specific stance of,

22 well, no, that's your money. You're the true

23 source. But what stop the third party who

24 interprets that a lot differently from coming in

25 and saying, no, you need to disclose where you

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1 actually got your money from. And so that was

2 one of the -- that was one of the major concerns

3 of ours.

4 Q Okay. But at least as you understand it, any

5 money you have that you've given to AFMC, the

6 money that you have, you've earned in

7 businesses, things like that. That's money that

8 you've earned working in some capacity.

9 A Correct.

10 Q Okay. And any contributions you made to AFMC in

11 the form of your labor, I think we can agree you

12 would be the source of your labor.

13 A Correct.

14 Q Okay. And any contributions that Connect

15 Solutions made to AFMC in the form of labor, the

16 true source of those contributions would be

17 yourself or other AF -- other Connect Solutions

18 individuals who are literally working. Is that

19 fair to say?

20 A That is fair to say.

21 Q Okay. So to your knowledge or your

22 understanding, any contributions that AFMC ever

23 received before Ballot Measure 2 were from --

24 the true sources of those contributions were

25 either yourself or Connect Solutions.

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1 A Correct.

2 Q Okay. And both yourself and Connect Solutions

3 are listed throughout the APOC filings as

4 contributors, in your case also as the

5 individual filing. You're also listed in

6 connection with AFMC as a member of AFMC.

7 A Uh-huh. (Affirmative.)

8 Q So there are no contributions that you or

9 Connect Solutions made to AFMC that were

10 shielded from public view prior to Ballot

11 Measure 2.

12 A Correct.

13 Q Okay. So you might disagree, but would it be

14 fair to say, I'm curious your opinion, that as

15 far as AFMC goes, not yourself, Trevor Shaw, but

16 as far as AFMC goes, if AFMC operated after

17 Ballot Measure 2 in the same way that it did

18 before, which is it perceived the same

19 contributions from the same sources, Ballot

20 Measure 2 would not have changed anything for

21 AFMC when it comes to filing.

22 A I think we would have spent an extensive amount

23 of monetary resources either through AFMC,

24 Connect Solutions, or myself personally to

25 ensure legal accounting compliance with Ballot

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1 Measure 2.

2 Q Okay.

3 A So I certainly believe that it would have

4 changed our operations because it would have

5 taken money out of direct political spending.

6 Q Okay. And one more on cancel culture.

7 A Uh-huh. (Affirmative.)

8 Q As far as you being the primary source of

9 contributions to AFMC in the past, do you have

10 any examples of you experiencing reprisals or

11 backlash or cancel culture as a result of the

12 contributions you've made to AFMC?

13 A Well, I've maintained a very high public profile

14 around our office several times. I've called

15 the office several times. And so it's difficult

16 to say directly whether that will be any

17 instances of disagreement and people choosing

18 not to use businesses that I own or things along

19 those lines. It's, I think, kind of, again,

20 difficult to quantify what's related to any

21 political spending or the -- or the beliefs that

22 I hold. And the two kind of go hand in hand,

23 right? So, I -- but what that has proven to me

24 is that cancel culture, and that's one term we

25 use, but also just, you know, repercussions of

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1 political speech are certainly real.
2 Q Okay. So from your perspective, any
3 repercussions you have experienced in your life,
4 you wouldn't be able to separate out, that's
5 from spending on AFMC, that's for a public
6 statement I made, that's from when I was in
7 office, nothing like that. It would be hard to
8 separate those out.
9 A It would. But political spending with more
10 extensive disclosure requirements, I think,
11 opens up the opportunity for more people to be
12 aware of and have the chance to have those
13 conversations. To take opposing political
14 stances or, you know, choose not to, again,
15 utilize our businesses or our products based on
16 that political speech.
17 MR. JENKINS-GOETZ: Okay. So I think I'm
18 approaching done with questions directed towards
19 AFMC. I don't know that we need to go off record,
20 but maybe I could just take a second to review my
21 notes before, sort of, formally switching to
22 questions for Mr. Shaw. How does that sound?
23 MR. STEPHENS: I do need a minute.
24 MR. JENKINS-GOETZ: Okay, just one last question
25 for AFMC if we're ready to go.

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1 Q I'm looking at Exhibit B, which we introduced
2 earlier, that's the amended complaint, and I'm
3 looking at paragraph 83 on page 16. I can read
4 it out. FLF and AFMC have in the past and will
5 in the future use television ads, radio ads, and
6 or printed materials to share their views with
7 Alaska voters. I just wanted to confirm, as far
8 as AFMC, none of those types of ads have been
9 made in the past, right?
10 A Correct. Again, they're with the intent based
11 on availability of monetary resources,
12 potentially doing those types of advertising.
13 Q Okay, so possibly in the future, but all
14 products that you would call ads or political
15 ads of any kind are reproduced at pages 1
16 through 11 of Exhibit E, which was your
17 productions, and those were sort of visual ads
18 that went on Facebook and other social media.
19 A Correct.
20 Q Okay, thank you.
21 A You're welcome.
22 Q All right, I would like to turn now to asking
23 you plenty more questions about very similar
24 topics, but shifting, yeah, putting on your
25 personal hat.

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1 A (Indiscernible) hat, yeah.
2 Q That's right.
3 MR. JENKINS-GOETZ: Unless anyone on Zoom thinks
4 there's a reason we need to stop, I think we CAN just
5 go right ahead. And we discussed at the beginning
6 that any questions from other attorneys will come
7 after asking you questions in your capacity for AFMC
8 and your personal capacity.
9 A Okay.
10 Q All right. Mr. Shaw, tell me where you're from.
11 A I'm from Ketchikan.
12 Q Ketchikan. Have you lived here your whole life?
13 A Most of it. I've been here since I was six.
14 Q Okay, so your whole adult life.
15 A My, my whole adult life, yeah.
16 Q Gotcha. What's your educational background?
17 A I have a high school diploma from K-High; go
18 Kings. And I've taken a variety of college
19 courses.
20 Q Okay. How would you describe in general your
21 professional background?
22 A Varied. I kind of started -- so I kind of
23 started in politics first. I got elected to our
24 local school board when I was a senior in high
25 school, and from that came a job in government

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1 affairs for a company called Power Systems and
2 Supplies of Alaska, which is where I met Dave
3 and Andrew Spokley, and so I did government
4 affairs for them for many years. Still do that.
5 And that has then resulted in a variety of
6 different business opportunities. And so now I
7 would call myself a serial entrepreneur. I
8 think I have business interests in about 14
9 different business entities.
10 Q So you said school board when you were in high
11 school. We'll come back to your political
12 engagement in a moment, but roughly what years?
13 A Oh, so -- so, I graduated '14, so I got -- I got
14 elected to the school board in 2013.
15 Q Okay, and you graduated high school in 2014.
16 A I did.
17 Q And within a couple years of that, you were
18 working government affairs work for the company
19 you just mentioned?
20 A Yes, I started government affairs for them in
21 2016, and so before that I had worked as the
22 assistant branch manager at a local credit union
23 and then was doing accounting for the Alaska
24 Marine Highway. So.
25 Q And that has since branched into many different

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1 Q Okay. And paragraph 9 -- paragraph 9, which is
2 on page 3, says you are a citizen of Ketchikan,
3 Alaska, and you sometimes donate amounts in
4 excess of \$2,000.00 to organizations that engage
5 in independent expenditures. What are the
6 organizations, the IE groups, that you have
7 donated over \$2,000.00 to?
8 A Unless I am miss -- I'm remembering,
9 exclusively, Alaska Free Market Coalition.
10 Q Okay. And based on our discussion earlier, most
11 of those contributions are in-kind services,
12 either through yourself or through Connect
13 Solutions, although in some cases it might be
14 pay and contractors, things like that.
15 A I would say any of the times that the
16 contributions were directly from myself, they
17 were cash paying for third-party vendors. So in
18 2020, I believe -- I mean, you know, the bulk of
19 the expenditures that year, I believe, were to
20 Axiom Strategies.
21 Q Okay. We can come back to that, just to check
22 in Exhibit E. But --
23 A And then also, I forgot, I probably donated in
24 excess of \$2,000.00 to the Dunleavy for Alaska
25 Independent Expenditure when Governor Dunleavy

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1 was first running in 2018.
2 Q Okay. Now, paragraph 30 of the amended
3 complaint, Exhibit B, you say you donated to
4 independent expenditure group and candidates in
5 past elections, including approximately
6 \$6,646.00 in 2018, \$4,647.00 in 2019, and
7 \$6,850.00 in 2020. These donations included a
8 mix of cash and in-kind contributions. You may
9 not recall, but how did you come to these
10 figures that were supplied for the complaint?
11 A I think these were -- I believe these were the
12 exact cash donations that would have been done
13 to -- directly to AFMC. And so, these amounts
14 do not encompass the full amount that I would
15 have donated to all independent expenditure
16 groups and candidates in those election years.
17 Q Okay.
18 A I mean, I recall spending, you know, at least
19 ten grand on my borough assembly race in 2020.
20 And so, I'd be happy to get you updated,
21 complete numbers if you'd like them. But I -- I
22 think those were just -- they would have been
23 the contribution amounts to AFMC since the two
24 are related.
25 Q Okay. So, fair to say this might be a bit

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1 under-inclusive, maybe because you -- here you
2 answered how much in cash or in-kind have you
3 contributed to AFMC, but it was framed as how
4 much have you contributed across the board?
5 A Correct.
6 Q Okay. Thanks. At paragraph 32 on page 7 of the
7 amended complaint, it reads, plaintiff Smith,
8 Griffin, Haynes, Haynes, Veazey, and Shaw,
9 parentheses the donor plaintiffs, also donate to
10 the general funds of charitable, religious,
11 business, community, and philanthropic
12 organizations whose donations are not disclosed.
13 A Uh-huh. (Affirmative.)
14 Q Across 2018 to 2020, can you give me a rough
15 estimate of how much money you donated to those
16 sorts of organizations?
17 A In excess of probably \$50,000.00.
18 Q No worries if you can't recall all of them, but
19 who are some of the major recipients?
20 A My church. We have a 501(c) for all that, my
21 business partners do. We donate extensively to
22 Ketchikan Chamber of Commerce, Friends of the
23 NRA, Ketchikan Youth Court. There are quite a
24 few.
25 Q Okay. Those are the ones that come to mind as

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1 probably the biggest recipients?
2 A The biggest, uh-huh. (Affirmative.)
3 Q Okay. Paragraph 32 goes on; those organizations
4 may, without their knowledge or consent, use
5 general fund dollars to support other
6 organizations which may, at that level or some
7 future level, support an independent
8 expenditure. Now, of course, that says without
9 your knowledge, but are you at this point aware
10 of any instances of that happening? Which is to
11 say, are you aware of any instances of charities
12 or business organizations that you've donated to
13 using your money or general funds money that you
14 have
15 A The only one that comes to mind is, of course,
16 the National Rifle Association.
17 Q All right. Do you know if, since the passage of
18 Ballot Measure 2, you have ever been listed as a
19 true source for independent expenditures based
20 on money that you spent in this sort of way?
21 A Not that I'm aware of it.
22 Q At paragraph 35 of the amended complaint, it
23 reads, the burdensome additional requirements
24 such as 24-hour disclosure added by Ballot
25 Measure 2 are a serious and compelling

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1 disincentive for the donor plaintiffs to
2 continue giving as they have in the past. Now,
3 you've spoken a lot about this already earlier
4 on. Can you tell me if the 24-hour disclosure
5 requirement for donor disclosure is a particular
6 disincentive for you as a donor, as opposed to
7 connected with AFMC?
8 A Oh, absolutely. I mean, that's why I sought
9 legal counsel specifically more at the donor,
10 and then, you know, the conversation veered into
11 AFMC just because the two are so closely
12 connected.
13 Q Okay. So, confirming that this money you spent
14 on legal counsel after Ballot Measure 2 was in
15 your capacity will count for advice as to being
16 a donor, but it may have spilled into AFMC as
17 well.
18 A Sure. I mean, certainly, I was worried about
19 the -- just the legal exposure and risk
20 personally doing all of the filings and
21 everything.
22 Q Okay. All right. I want to introduce --
23 MR. STEPHENS: Are we using one set of exhibits
24 for both?
25 MR. JENKINS-GOETZ: So, I have been. I think

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1 that's easiest.
2 MR. STEPHENS: Yeah. No, that works for me. I
3 just wanted to be -- make sure we're all on the same
4 page.
5 MR. JENKINS-GOETZ: Yeah. Thank you for
6 clarifying that. I appreciate it.
7 MR. STEPHENS: Yeah. All right.
8 Q I want to introduce Exhibit D, which was a
9 letter we did skip over earlier with that in
10 mind. Do you recognize this, Mr. Shaw?
11 A I do.
12 (Exhibit D introduced)
13 Q Great. What is it?
14 A It's my personal response to the state's
15 discovery request.
16 Q That's right. Did you fill this out at the same
17 time that you filled out answers for AFMC?
18 A Not simultaneously, but yes.
19 Q At interrogatory number 1, which is on page 8,
20 when asked to identify all donors or would-be
21 donors to IE groups in Alaska that you are aware
22 have had difficulty complying with the donor
23 disclosure law, you say, I have personally -- I
24 have personally ceased all donations to IE
25 groups following passage of the ballot

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1 proposition in 2020. We've talked quite a lot
2 about this already, but confirming that's
3 correct?
4 A Correct.
5 Q So, not just any donations to AFMC, but any
6 donations to any IE group?
7 A Yes.
8 Q And you did not -- to confirm, excuse me, you
9 did not try making a donation to either AFMC or
10 any other group, find it too difficult, and then
11 stop? You rather spoke with an attorney,
12 thought about and decided not to try. Is that
13 fair to say?
14 A Correct.
15 Q Okay. At interrogatory number 5, on page 10,
16 you're asked to identify all would-be donors
17 that you know of who have not made contributions
18 to independent expenditure groups in Alaska, and
19 you -- because of the donor disclosure law, and
20 you respond, myself, along with all previous
21 donors to Alaska Free Market Coalition. To
22 confirm, when you say all previous donors, you
23 just mean yourself and Connect Solutions, which
24 is yourself and several others, correct?
25 A Yes. All of -- al -- I would extend that to say

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1 all of my business entities and business
2 partners have ceased any support of independent
3 expenditure groups.
4 Q Okay. But you're not saying those were prior
5 donors to AFMC? You're saying, as a separate
6 matter, they've also ceased?
7 A Potential would-be donors.
8 Q Would-be donors.
9 A And then, of course, I know personally of GOPAC,
10 Republican State Leadership Committee.
11 Q Okay. Thank you. At interrogatory number 6,
12 still on page 10, you're asked to identify
13 would-be donors who have not made contributions
14 to IE groups because they didn't want to
15 disclose the true source of their contribution.
16 So that's the true source requirement, as
17 distinct from the requirement to file your own
18 donor disclosure report. And you say, I have
19 ceased all personal donations to IE groups. It
20 is difficult to determine how many others have
21 as well. You've already confirmed that you have
22 not donated to IE groups since Ballot Measure 2.
23 But if I understand our conversation earlier
24 correctly, any donation you've ever made prior
25 to Ballot Measure 2, you were listed as a donor.

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1 Is that fair to say?
2 A Correct.
3 Q There was no case where you were a true source
4 whose donation came in through some other listed
5 donor and you were not listed.
6 A Correct.
7 Q Okay. So I guess I'm wondering, as distinct
8 from the donor disclosure requirement, which I
9 understand is a separate concern, are you
10 actually concerned that Ballot Measure 2 is --
11 or do you believe that Ballot Measure 2 has been
12 preventing you from making certain donations
13 where you could have been shielded but are now
14 listed as the true source?
15 A Myself personally, no, but other potential
16 donors, yes.
17 Q Okay.
18 A Again, reference GOPAC and RSLC are the first
19 that come to mind.
20 Q Right. Okay. So others potentially. But it
21 would it be fair to say maybe that when you
22 respond, I have ceased all personal donations to
23 IE groups in Alaska in connection with true
24 source reporting, maybe that part, not so much.
25 It sounds like others --

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1 A Correct.
2 Q -- yes, but you have not been -- as a donor, you
3 have not been personally affected by the true
4 source requirement. Is that fair?
5 A Correct.
6 Q Okay.
7 A There's -- I mean, again, there's concerns about
8 the extensiveness of the kind of the teeth to
9 the true source components and what could
10 potentially be compelled to be disclosed.
11 Q Okay. So maybe some concerns about --
12 A Again, customers, clients --
13 Q -- customers of your businesses, customers who
14 pay your businesses for services or products
15 being listed as true sources.
16 A Correct.
17 Q But you are not personally worried that you
18 could be a true source who is outed when you
19 wouldn't otherwise be outed?
20 A No.
21 Q Okay. Thank you. Okay. Let's talk a little
22 bit more about your political spending sort of
23 writ large. And you mentioned that in the
24 complaint where it says you spent, I think it
25 was around 6,000, 4,000, 6,000 over three years,

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1 that might not cover all of your political
2 spending.
3 A Right.
4 Q Who else did you donate to in that period 2018
5 to 2020?
6 A Several different candidates for the state
7 legislature, a couple of candidates for
8 governor, some federal candidates. I mean,
9 pretty -- pretty varied. Those were, I mean,
10 smaller amounts. The bulk of my political
11 spending has been on my own personal campaigns
12 and then independent expenditures.
13 Q Okay. Let's break that down. Independent
14 expenditures, you said exclusively AFMC.
15 A Correct.
16 Q Some spending on your own campaigns.
17 A Yeah.
18 Q And then some spending on other people's
19 campaigns.
20 A Yeah.
21 Q The money you've spent on other campaigns, has
22 that been money or services or a combination of
23 both?
24 A It would be a combination of both.
25 Q Okay. But sometimes it's actual cash.

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1 A Actual cash, yeah.
2 Q Okay.
3 A Then I give pretty extensively to the Alaska
4 Republican Party.
5 Q And is -- that's cash or services?
6 A That's cash. Oh, it's both.
7 Q Okay. When you give to your own or when you
8 have given to your own campaigns, is that also a
9 mix of cash and services?
10 A No, no. It's all exclusively payment for third
11 party.
12 Q Okay. So you're paying -- you're donating to
13 the campaign to pay third parties for whatever
14 campaign services you need.
15 A Right.
16 Q Okay.
17 THE REPORTER: Mr. Shaw?
18 A Yes. Thanks, Judy.
19 Q Obviously, as a candidate in your own campaigns,
20 you're doing a lot of work.
21 A Yeah. Do you -- you don't record that as like
22 contributions of in-kind services?
23 A No.
24 Q Okay. That makes sense. It would be a lot to
25 record. Okay. I've got a few questions that we

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1 covered earlier in your capacity as AFMC. Okay.
2 I would like to jump to head -- jump ahead to
3 another exhibit. This is labeled Exhibit I.
4 Can you tell me what you're seeing on Exhibit I?
5 A It looks like a search on the APOC database for
6 campaign disclosure income from myself.
7 (Exhibit I introduced)
8 Q Okay. And on page 1 of 8, it looks like your
9 campaign contributions in 2018. Page two is
10 2019. We don't see any contributions there.
11 That sounds right, I would think.
12 A Yes, it was off year.
13 Q Yep. 2020, we see your contributions and they
14 include contributions to AFMC, to the Alaska
15 Republican Party, and to yourself, which
16 presumably means your -- your campaign.
17 A Right.
18 Q It goes on 2021 off year 2022. You made some
19 contributions. I see Republican Women of
20 Fairbanks there. Does that ring a bell?
21 A Where are we looking? I'm sorry.
22 Q No problem. Page 5. Apologies.
23 A Yes.
24 Q Did that ring a bell, that contribution?
25 A I think it was to a debate.

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1 Q Okay. Tuckerman Babcock. That's a larger
2 contribution. Does that one sound familiar?
3 A Yeah. He was a state Senate candidate.
4 Q Did he win?
5 A He did not.
6 Q Okay. The next page 6 is 2023. No
7 contributions. Page 7, 2024. We see Alaska
8 Republican Party and Jeremy Bynum. Remind me, I
9 think you said earlier, Jerry -- Jeremy Bynum is
10 who?
11 A Jeremy Bynum is our local state representative
12 and he's also my employer.
13 Q Okay. You work as his?
14 A Chief of Staff.
15 Q Thank you. And you made contributions to his
16 campaign?
17 A I sure did.
18 Q Okay. And then the last page 8, 2025, it looks
19 like so far, as of the time of this search, you
20 had made one contribution to the Alaska
21 Republican Party.
22 A Right.
23 Q So is it fair to say across this period from
24 2018 to this year, you continue to be quite
25 politically engaged and you continue to spend

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1 money in politics?
2 A I would say that's fair.
3 Q Can you think of any spending, political
4 spending that wouldn't be captured here?
5 A Yes. All federal contributions, some of which
6 they're -- I mean, it'll show donations to
7 Senator Murkowski, Senator Sullivan, Congressman
8 Begich, the federal account of the Alaska
9 Republican Party, President Trump, the
10 Republican National Committee.
11 Q Okay. If you had to just ballpark it in recent
12 years, roughly how much of the money you spend
13 is going to federal races or federal issues
14 versus state?
15 A Probably about half and half.
16 Q About half and half? Okay. Gotcha. Now, all
17 of these campaign contributions in Exhibit I,
18 you are listed as the contributor, but I'm
19 correct, right, in saying that you did not have
20 to file APOC forms.
21 A Correct.
22 Q It was the campaigns that filed disclosure
23 forms.
24 A Uh-huh. (Affirmative.)
25 Q But fair to say that you felt comfortable enough

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1 with your name being out there attached to these
2 campaigns and issues to contribute knowing that
3 it would go up on it.
4 A Sure.
5 Q Okay. And earlier you said you're -- you're
6 certainly not shy about your political beliefs.
7 That's -- that's true?
8 A That's absolutely true.
9 Q Okay. All right. Just a couple more questions
10 about APOC filing in particular.
11 A Okay.
12 Q You mentioned, and we talked actually in some
13 detail earlier about you being the person who
14 files all of AFMC's reports. Is that right?
15 A That is correct.
16 Q With APOC. Do you file for any other -- do you
17 file APOC reports of any kind for any other
18 organizations?
19 A I filed in the past for the District 1
20 Republicans, which is our local district
21 Republican committee.
22 Q What kind of group is that?
23 A It's a political party.
24 Q Okay. Have you filed any campaign disclosure
25 forms for any campaigns?

Page 105 1 A I would say that I think the pattern of behave - 2 - of behavior that I've just kind of seen with 3 APOC in assessing fines has certainly changed 4 since when I last dealt with them on the matter 5 and after the adoption of the Ballot Measure 2. 6 But I can't really -- 7 Q Okay. 8 A -- say for certain. I haven't been subject to 9 APOC cancel culture, but I wouldn't say that it 10 doesn't exist. 11 Q Okay. So we just looked at those two fines. 12 One was, I think, for \$17.50, one was for 13 \$47.50. 14 A Yes. 15 Q And I think you'll agree you've submitted a lot 16 of filings for various different organizations 17 to APOC over the years. Is that fair to say? 18 A That's fair to say. 19 Q That's a pretty good record, seems like, two 20 fines over that period of time. What do you 21 think? 22 A I think so, yeah. 23 Q So I guess I want to just return briefly now to 24 your concerns about donor disclosure 25 requirements.	Page 107 1 just in the busyness of life, it can be really 2 easy to, well, I'm going to go ahead and file, 3 in my case, file for AFMC, and I'll get to my 4 personal filing tonight. Well, who knows what's 5 going to happen tonight? You could end up in 6 the hospital for 10 days, having recently just 7 done that. Those are the kinds of things that 8 come to mind. Like, and even in that scenario, 9 your fine's only going to get reduced by 90 10 percent, barring, you know, going through the 11 full appeal process and everything, and having 12 to take it before the commission itself and lay 13 everything out. And so, no, I wouldn't say that 14 -- I mean, yes, I have a lot of experience with 15 APOC, and I think I've got -- I would agree I 16 have a pretty good filing record, but just the 17 concerns of what it takes to ensure compliance 18 in the face of extensive penalties was a major 19 consideration in me ceasing my independent 20 expenditure giving. 21 Q You're saying in the face of expensive 22 penalties? 23 A Potential. 24 Q Potential penalties. 25 A If you -- it only takes one misstep, right? And
Page 106 1 A Yes. 2 Q As I understand it, part of your concern as an 3 individual, as a prospective donor, is the 4 burdensome requirements of reporting your own 5 donations -- 6 A Yeah. 7 Q -- in addition to any requirements that fall on 8 a recipient to report -- 9 A Uh-huh. (Affirmative.) 10 Q -- what is received. I guess the way I see it, 11 it seems like you are a pretty effective filer. 12 You have a pretty nuanced and detailed 13 understanding of APOC filings. In many cases 14 for AFMC or other organizations, I think you 15 have filed reports on short turnaround 16 requirements, like 24-hour requirements. But 17 I'd love to hear from you if you could, sort of 18 in light of all that, explain what your concern 19 is with donor disclosure. 20 A Sure. I mean, I've certainly gotten more busy 21 over the years. And so, as we've seen from one 22 of these fines that was ultimately dismissed was 23 for \$24,500.00. That was for -- for AFMC. And 24 then, you know, some of these accrue at \$50.00 a 25 day, they accrue at different amounts. And so,	Page 108 1 the extra time that I also have to spend on 2 compliance that I didn't have to before, 3 especially in my case, where, and we've already 4 talked about, I'm the true source, right? We 5 don't have to -- that's done, we know that for a 6 fact. Now I have to go file one extra form that 7 if I happen to forget about or something 8 happens, and I could be facing, you know, a 9 multi-thousand dollar penalty. That not only 10 takes time to have to deal with, which is -- 11 which is very precious when you have as many 12 businesses as I do, and also a family and 13 everything else, but also then the resources if 14 you have to pay a fine because of an oversight 15 or something out of your control, and then take 16 that money that you would rather be putting 17 towards your political beliefs to then have to 18 hand it over to the state. 19 Q Okay. And then turning one last time to your 20 concern, your true source requirements and 21 related cancel culture concerns, I just want to 22 make sure we're clear. We broke it down a 23 little bit earlier. 24 A Yeah. 25 Q In your position as a possible donor, whether to

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1 AFMC or others, you aren't -- please correct me
2 if I'm wrong, you aren't concerned about being
3 outed as a true source yourself, and that's
4 because you've always consistently made
5 donations where you are listed, and you are not
6 sort of shy about or ashamed of your political
7 views. So in that sense, you're not concerned
8 about true source reporting. What I heard from
9 you was that you're more concerned about the
10 possibility of having to list customers of your
11 businesses as true source.
12 A Correct.
13 Q But I don't want to put words in your mouth, so
14 please tell me if there's more that I'm missing.
15 A No, that's a correct assessment. I personally
16 don't have concerns relating to the true source
17 requirements because I have no problem having my
18 name listed clearly. And then -- but my
19 concerns relating to true source are as, you
20 know, for independent expenditure organizations
21 such as AFMC.
22 Q Okay, okay.
23 MR. JENKINS-GOETZ: I think I'm all done. This
24 is probably a good time for a 10-minute break. I can
25 confirm I'm done after the break.

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1 MR. STEPHENS: Sure. Yep. My -- my -- Scott,
2 do you think you're going to have enough to justify a
3 lunch break or --
4 MR. KENDALL: You know, I think I'm going to be
5 done in between 5 and 10 minutes, so I'm going to be
6 --
7 MR. STEPHENS: I'll just push through probably,
8 I think, but (indiscernible)
9 MR. JENKINS-GOETZ: That sounds all right.
10 Yeah. A 10-minute break --
11 MR. STEPHENS: Yep. I'm good.
12 MR. JENKINS-GOETZ: -- and then we'll be done
13 pretty soon after that.
14 A Okay, perfect. Thanks, everybody.
15 THE REPORTER: We'll be off record.
16 (Off record)
17 MR. JENKINS-GOETZ: Thanks so much for your
18 time.
19 A Oh, definitely.
20 MR. JENKINS-GOETZ: All right, no further
21 questions for me. Thanks so much, Mr. Shaw.
22 A You're very welcome.
23 MR. STEPHENS: Next will be Scott, I think.
24 TREVOR A. SHAW
25 testified as follows on:

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1 CROSS EXAMINATION
2 BY MR. KENDALL:
3 Q Yeah, thank you, Mr. Shaw, and I'm glad to hear
4 that you're on the mend from your health
5 challenges. That's good to know, and give my --
6 give my best to your boss. I met him earlier
7 this summer. Seems like a great guy. I love
8 Ketchikan, so just --
9 A I'm (indiscernible)
10 Q Yeah, it's a beautiful place. Just a few
11 things. I'll be really quick. First of all, I
12 think we covered it, but you do donate to
13 candidates as well as doing work in the IE
14 space, correct?
15 A Yes, sir.
16 Q And are you aware that there is presently --
17 well, is there a limit on individual donations
18 to candidates in Alaska elections currently?
19 A There's currently not.
20 Q No limit? So you could give any amount of money
21 you wanted to give?
22 A Personally, yes.
23 Q Okay. So you described yourself as an APOC
24 nerd.
25 A Yeah.

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1 Q That reflects that you -- you go through these
2 reports with some frequency and at some length?
3 A Yes.
4 Q Yeah, it's regrettable. There's a few of us out
5 there, you know.
6 A Many. It's a -- it's a problem.
7 Q Yeah, so why do you do that?
8 A I -- I like to see how the money flows and just
9 kind of who's -- who's -- who's who in the zoo.
10 Q Okay. So you -- you want to know who's giving
11 to which candidates and what amounts?
12 A I want to know which of the kind of standard
13 players in Alaska, because it's pretty routinely
14 the same folks, are standing up IEs, who's
15 giving who in support of -- who's giving what in
16 support of which candidates, ballot measures,
17 those kinds of things. Yes.
18 Q And does that information that might impact
19 whether or not you support someone?
20 A Certainly. I mean, you know, there's limited
21 resources and just ensuring that there isn't --
22 isn't duplication. And, you know, also, -- how
23 well is something being supported, right? Like,
24 that's -- that's always a question when we were
25 doing independent expenditures, like, okay,

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ROBERT GRIFFIN, ALLEN VEZEY,)
TREVOR SHAW, FAMILIES OF)
THE LAST FRONTIER, and ALASKA)
FREE MARKET COALITION,)

Plaintiffs,)

vs)

RICHARD STILLIE, JR., in his)
official capacity as chair)
of the Alaska Public Offices)
Commission, et al.,)

Defendants,)

and)

ALASKANS FOR BETTER ELECTIONS,)
INC.,)

Intervenor-Defendant.)

Case No. 3:22-cv-00077-SLG

DEPOSITION OF ROBERT G. GRIFFIN

November 10, 2025

APPEARANCES:

FOR THE PLAINTIFF:

MR. RILEY STEVENS
MR. CRAIG RICHARDS
Pioneer Law
Attorneys at Law
810 N Street, Suite 100
Anchorage, Alaska 99501
(907) 339-4805

1 **say you just filled out a couple weeks ago?**

2 A Uh-huh. (Affirmative)

3 **Q I'll hand them back to you. And that's Exhibit**
4 **A.**

5 A Okay.

6 MS. WEIANT: And you have those.

7 MR. STEVENS: Yeah.

8 MS. WEIANT: And I'll get another copy.

9 **Q So in -- in Interrogatory 1, that's the first**
10 **page, you describe yourself as the only person**
11 **that you know that had difficulty complying**
12 **with the donor disclosure law?**

13 A I -- oh, yeah.

14 **Q Okay.**

15 A I'm not aware of any other donors or -- or
16 would-be donors, yes.

17 **Q Okay.**

18 A And that was my response.

19 **Q And -- but in Interrogatory 2 when asked to**
20 **describe the difficulty that you or anyone your**
21 **aware about knew, you describe no difficulties**
22 **noted?**

23 A Yeah, because I'm -- I'm not aware of any, no.

24 **Q Okay. So you've never had any trouble**
25 **complying with the requirement?**

1 A With the -- that -- with Ballot Measure 2?

2 Q **Yeah.**

3 A Yeah, I -- I ran into a little of a hiccup
4 here, too, on -- on Ballot Measure 2, luckily I
5 have a resource of Cheryl Frasca, texted me
6 while I was gone on vacation and said that --
7 that I needed to file some report for that
8 night, and -- and I did, but I also ended up
9 paying an APOC fine for doing it late.

10 Q **Okay.**

11 A Yeah.

12 Q **Are you aware of that requirement now?**

13 A I am, yeah.

14 Q **What's that requirement say? Will that play
15 there?**

16 A That I had to disclose that -- that I had to
17 disclose to APOC that I had made that donation.

18 Q **Okay. And is that -- is that donation that you
19 provided in discovery for Repeal Now or is that
20 a different disclosure that you're talking
21 about?**

22 A That's for Repeal Now, yeah.

23 Q **This -- this April?**

24 A Yeah.

25 Q **Okay. I'm going to show you what's marked as**

1 **Exhibit B.**

2 **(Deposition Exhibit B marked)**

3 MR. STEVENS: Wait, what -- what's B

4 **Q And is that what you're referring to is Exhibit**
5 **B?**

6 A It is, yeah.

7 **Q Okay. So you're now aware of that requirement?**

8 A I am aware of that requirement now.

9 **Q Okay. Okay. So absent that situation, you're**
10 **-- you don't have any difficulties complying**
11 **with law now that you're aware of it; is that**
12 **true?**

13 A That -- it still is I would said a little bit
14 of a hassle, you know, that.....

15 **Q What -- what part of it's a hassle?**

16 A Well, just navigating the APOC website to get
17 to the right place to make -- it -- it's not a
18 particularly user friendly one -- thing, and in
19 this particular case I -- I had to make a phone
20 call to -- to Cheryl Frasca and have her walk
21 me through, you know, how I got to the -- the
22 point where I could -- I could make that
23 report.

24 **Q Okay. Do you apply for a PFD annually?**

25 MR. STEVENS: Could you explain what a PFD is?

1 MS. WEIANT: Sure, I apologize.

2 A Yeah, Permanent Fund.....

3 Q **Permanent Fund dividend.**

4 A Permanent Fund dividend, I do, yeah.

5 Q **Do you apply that -- do you apply for that on**
6 **line?**

7 A I do.

8 Q **Are you aware of the ability to make those form**
9 **15-5 statement of contributions on the**
10 **Permanent Fund, same My Alaska account you**
11 **would make your PFD with?**

12 A I was not aware of that.

13 Q **Okay. Would that -- with the understanding**
14 **that you just became aware of that, do you**
15 **think that would simplify things?**

16 A I think it could be a lot -- it could be a lot
17 simpler, you know, yeah.

18 Q **Was the -- was the information requested of you**
19 **during the process of filing out that**
20 **contribution difficult to obtain?**

21 A I don't recall.

22 Q **Okay. And I guess by that I mean was it basic**
23 **information that you knew or was it information**
24 **you had to go dig up?**

25 A I -- again this was probably a couple months

1 ago, I -- I don't.....

2 **Q** **Okay. That's fine.**

3 **A** Yeah.

4 **Q** **All right. So I'm going to have you -- you can**
5 **take B back.**

6 **A** Okay.

7 MS. WEIANT: And we'll hand that to Madam
8 Recorder so I don't get in trouble.

9 **Q** **We're going to go back to the.....**

10 **A** Okay.

11 **Q** **.....interrogatory.**

12 **A** Sure.

13 **Q** **Interrogatory 5, which is I believe on the**
14 **second page, you talked about you didn't know**
15 **any persons who decided not to donate because**
16 **of the donor disclosure law?**

17 **A** And again I don't know any of the -- any -- any
18 of the donors. I don't interact with other
19 donors. I make donations and -- and so I have
20 no -- I'm -- I'm not aware of -- of.....

21 **Q** **Okay.**

22 **A** how difficult or not difficult it is for
23 other people because I just don't interact with
24 other donors.

25 **Q** **Okay. And -- and I guess, you know, you -- you**

1 neck out every once in a while and take some
2 risks and -- and -- for things that you believe
3 in even -- even if it's -- it's likely to -- to
4 trigger ridicule or -- or something, no.

5 **Q So in Interrogatory 7 you describe that you**
6 **were disclosed as a donor for the information**
7 **that's contained in Exhibit B, that's that**
8 **Repeal Now receipts. Let me -- let me hand you**
9 **a copy of that back.**

10 UNIDENTIFIED VOICE: Here we go. This one?

11 A Uh-huh.

12 **Q And so I guess the question is, did -- what --**
13 **how were you disclosed?**

14 A I think it's probably social media posts that -
15 - that -- mostly, yeah.

16 **Q Can you give me like more specific information?**

17 A I don't -- I don't have more specific
18 information than -- than that.

19 **Q Okay. What is Repeal Now?**

20 A Repeal Now is to basically go back to the --
21 the system prior to rank choice voting.

22 **Q Okay. When you made that donation referenced**
23 **in Exhibit B.....**

24 A Uh-huh.

25 **Qwhat did you intend for them to do with**

1 **the money?**

2 A I intended them to repeal -- use that -- those
3 resources to repeal rank choice voting.

4 **Q Okay. So is it fair to say that it was your**
5 **intention for your contribution to be used in**
6 **that way, the way that it was used?**

7 A Yes.

8 **Q Okay. So returning to Interrogatory 7, were**
9 **there any times where you were disclosed as a**
10 **donor where you did not intend the money to be**
11 **used in the way that it was?**

12 A Yeah, I'm sorry, can you -- can you clarify the
13 question?

14 **Q Sure. So the -- the question asks you to**
15 **disclose any times where you were disclosed as**
16 **a donor to an IE group, but you didn't actually**
17 **mean for your money to be used for an**
18 **independent expenditure, you meant for it to be**
19 **used for something else. Now what you describe**
20 **here in Exhibit B was -- sounds like your**
21 **donation was used exactly as it was intended**
22 **to.**

23 A Okay. I -- I'm -- I'm sorry, I'm reading my
24 response here and I don't -- I don't see that
25 in my response, the -- the way you're

1 characterizing that.

2 **Q The way I'm character -- characterizing your**
3 **response or.....**

4 **A** Right. Yes.

5 **Qor what the question -- well, I'm reading**
6 **what the question was and I'm.....**

7 **A** Okay.

8 **Qclarifying your response to the**
9 **question.....**

10 **A** Okay.

11 **Qas it's written. Does that make sense?**

12 **A** Well, I guess it's kind of a long run on two
13 part sentence and maybe I was -- it looks like
14 I responded mostly to the -- to the first part.
15 Maybe that's my ADHD, an inability to read
16 to.....

17 **Q Okay.**

18 **A**to the end of the paragraph.

19 **Q Fair enough. I just wanted to.....**

20 **A** Okay.

21 **Qclarify.**

22 **A** Okay.

23 **Q Okay. So -- well, I'll have to take a look.**

24 **I'm going to show you what's been marked**

25 **Exhibit H.**

1 MS. WEIANT: I'll hand you B back.

2 REPORTER: Yeah, I need B.

3 MS. WEIANT: Here you go.

4 REPORTER: Thank you.

5 MS. WEIANT: Okay.

6 **Q So in the -- in the interrogatories you were**
7 **asked to describe any reprisals against donors**
8 **and their business interests you've experienced**
9 **since January 20 -- January 1st, 2018 and give**
10 **me a second, I can get you a citation.**

11 MR. STEVENS: Objection. Can you just give me
12 what's the interrogatory again?

13 MS. WEIANT: Yeah. Yep. Give me just a second.

14 **A Sure.**

15 MS. WEIANT: 10.

16 MR. STEVENS: 10? Thank you.

17 MS. WEIANT: Uh-huh.

18 **Q Should have printed this on the page numbers,**
19 **but that's okay. You said you were not aware**
20 **of anything?**

21 **A I'm not aware, no.....**

22 **Q All right.**

23 **Athat met those specific criteria.**

24 **Q Okay. Now, if you turn to the end of that**
25 **document, there's a section that's called A,**

1 request for admissions, I am going to direct
2 you to Number 14.

3 A Number 14.

4 Q And Number 14 for the record says, admit that
5 you've never experienced anything reprisals
6 against donors or their business interests and
7 you provided an answer. Can you -- I guess you
8 describe actions people took based on your
9 board of education position; is that accurate
10 what's your answer in the request for
11 admission?

12 A Okay. What's the -- what's the question?

13 Q You say -- okay. So if -- in comparison of
14 Interrogatory Number 10 where you're asked to
15 describe any time that you experienced
16 something that was a reprisal against interest
17 (ph).....

18 A Un-huh.

19 Qyou said you were not aware of anything
20 that fit that criteria?

21 A Uh-huh. (Affirmative)

22 Q Okay. But in Request for Admission Number 14
23 when we ask you to admit that you had never
24 experienced any reprisals against interest, you
25 provided an example of a situation that it

1 **seems like you were describing as a reprisal**
2 **against business interest?**

3 A In 14 where it.....

4 MR. STEVENS: Right. So at the end of the
5 document there's.....

6 A Oh, end of the document.

7 **Q Sorry.**

8 MR. STEVENS: So -- yeah, at the end of the
9 document there's a description of.....

10 A Oh, no 14, okay.

11 MR. STEVENS:but she's comparing this with
12 the interrogatories.....

13 A Yeah. And that -- that -- that was a response
14 that was -- that -- that I gave over the phone
15 and I'd like to amend that, that -- that
16 particular incident, it happened be -- was
17 before my service on the State Board of
18 Education and that was -- and I think it was --
19 I -- I did assign to that, but I didn't -- I --
20 I don't think it was characterized as they --
21 they were trying to fire me, and they were
22 definitely trying to pressure me to not
23 participate, you know.

24 **Q Okay. And.....**

25 A Okay. I -- I had a situation that I'd been

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1 politically active for quite some time, and I -
2 - and I got a call from my direct manager that
3 I was to have a sit-down discussion with the --
4 the regional leadership for Alaska Airlines to
5 discuss my -- my political activity and it was
6 strongly suggested by one of the regional
7 manager that -- that I should stop, you know,
8 participating in -- in the -- in the process,
9 and the -- the other one was more sympathetic
10 to -- that my activities outside of -- of work
11 were not work related, and so that -- but that
12 was -- it was not related to the -- the Men and
13 Women's Sports, that -- that was -- the Men and
14 Women's Sports was -- came after that by quite
15 a bit and I -- I did receive probably 1500 very
16 angry emails over -- over that -- that
17 particular.....

18 **Q Okay.**

19 **A Yeah.**

20 **Q I'm going to ask you a few clarifying**
21 **questions.**

22 **A Sure.**

23 **Q So the -- the meeting that you had with the**
24 **Alaska Airline folks about your political**
25 **activities.....**

1 A Uh-huh.

2 Qto the best of your understanding was sort
3 of internal to the business operations of
4 Alaska Airlines and not related to calls from
5 the -- the mob to have you thrown off the job,
6 but was more internal?

7 A Yeah, I don't -- and I don't -- I don't know
8 how -- what -- what the process was that
9 alerted my regional managers to the -- that
10 they needed to sit down and -- and talk to me,
11 so I -- I don't know when -- whether it was a
12 mob or an individual or an organization, yeah.

13 Q Okay. That's fair enough. You -- you did
14 mention that you got a lot of emails related to
15 your board of education work. Those -- were
16 those to your board of education email?

17 A That -- it -- generally yes, they were to the
18 board of education emails, yeah.

19 Q Did -- did anybody show up at your house to
20 complain, for example?

21 A I -- I had no one show up at my house to
22 complain, yeah.

23 Q Okay.

24 A Now, you know, we -- we have had -- had a few
25 incidents of -- of, you know, windows that have

1 been shot and everything, and when -- but I --
2 I just wrote that off as general ruckus in
3 Alaska I guess, and so.....

4 **Q** **Okay. No reason to believe that they were**
5 **related.....**

6 A No, no -- no.....

7 **Q** **.....to your political actions?**

8 A Yeah, no -- no reason to believe that.

9 **Q** **Okay.**

10 A You know, eggs on the house, that kind of
11 thing, no.

12 **Q** **Okay. And so that kind -- kind of goes into**
13 **the -- one of the next questions I had, which**
14 **is you -- you talked about -- and I'll give you**
15 **in interrogatory number if you -- to keep track**
16 **of things. Number 11, you -- you were not aware**
17 **of any situation where you -- you had to call**
18 **police since January 1st, 2018 because of**
19 **cancel culture or reprisal. You're.....**

20 A No.

21 **Q** **.....not aware of anything?**

22 A No.

23 **Q** **Okay. That's still your answer today, yeah?**

24 A Yes. Yeah.

25 **Q** **Okay.**

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1 A I've never had to call the police.

2 Q Okay. Well, we're not going to -- and
3 Interrogatory 12 is a little bit longer of a
4 question. I'll give you a chance to just look
5 at really quick.

6 A Okay. Yeah, I'm not aware of -- of any
7 instances that met those criteria.

8 Q Okay. And I was -- that was -- my follow-up
9 question was related to that earlier incident.

10 A Yeah.

11 Q Okay.

12 MS. WEIANT: It is -- I know we didn't start
13 exactly at nine, but this might be a good place to take
14 a quick break, 10:00 o'clock.

15 A Sure.

16 Q To some extent we've been in here for an hour,
17 so we can -- we can do that.

18 REPORTER: Off record.

19 (Off record)

20 (On record)

21 REPORTER: Back on record at 10:09.

22 RECORDING: This meeting is being recorded.

23 Q All right. So I want to return to Exhibit A
24 which is those interrogatories we were talking
25 about before we took the break. And I'm going

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1 to direct your attention to Number 9 -- I'll
2 have to look at that. Number 9 which is about
3 cancel culture. Found the (indiscernible) If
4 you'll look. Kind of went back.....

5 A Yeah. Okay.

6 Q and full (ph) labeled.

7 A This is the first -- first nine, okay. Number
8 -- first Number 9 or the second Num.....

9 Q Correct, first Number 9.

10 MR. STEVENS: It's the it's the third page.

11 A Third page. Okay.

12 Q Okay. So I'm just going to ask you generally,
13 what does cancel culture mean to you?

14 A What is cancel culture, it's when individuals
15 try to make your opinion or -- less relevant,
16 or try and make you -- make it seem like
17 you're, you know, very far out -- out off the
18 mainstream, and that you should be -- your
19 opinions should be ignored I guess.

20 Q Okay. And so you -- you noted in your response
21 that you've experienced situations like that
22 although you didn't have specific examples?

23 A Yeah, it's -- and -- and mostly in -- in social
24 media interactions and, of course, everybody's
25 keyboard warriors. I -- I have always used my

1 own name, but there's a lot of people who are
2 some unknown thing with it, that will make
3 comments that -- yeah, that -- and, yeah, I'd -
4 - I'd say that that happens pretty frequently.

5 **Q Okay. Can you -- I guess I'd like to hear from**
6 **you how you would personally distinguish what**
7 **you describe as cancel culture.....**

8 **A** Uh-huh.

9 **Qfrom something like the idea of free**
10 **speech?**

11 **A** Cancel culture and -- and free speech? Yeah, I
12 -- I think there's -- there's limits on -- on
13 free speech. When -- I think when your
14 intention is to -- to -- I guess when your
15 intention is to harm someone and use to --
16 their opinions I guess like -- yeah, I -- it's
17 -- it's a difficult -- difficult question,
18 yeah.

19 **Q Okay. Yeah. Have you ever decided to stop**
20 **supporting someone because of like a public**
21 **statement or position that they made?**

22 **A** Sure.

23 **Q Okay. Can you give me an example?**

24 **A** There's a case like Senator Giessel in -- in
25 particular that -- that I -- I was part of an

1 independent expenditure group that was intended
2 to help support her campaign, and -- and she
3 made a 180-degree turn on a lot of specific
4 issues and -- and although I spent -- I made
5 frequent visits to the legislature and -- and
6 dealt with many of the legislators first hand,
7 she won't make eye contact with me today, you
8 know, in the hallways. I -- I -- that would be
9 a specific example where I -- I stopped
10 supporting and donating to her. I think I -- I
11 have donations to her on -- on my list there in
12 the -- in the past, yeah.

13 **Q Would you describe that situation as cancel**
14 **culture, free speech or something else**
15 **entirely?**

16 **A** No. No, I wouldn't describe that as a -- as a
17 cancel culture.

18 **Q Okay. Okay.**

19 **A** It's that -- that basically our -- our views --
20 her views changed and I think mine didn't.

21 **Q Okay. What about, for example, a business like**
22 **a store, where they made a statement that you**
23 **didn't agree with, has there been a**
24 **circumstance where you decided to no longer**
25 **support that business?**

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1 A I -- I think it's more in the other direction
2 where businesses that support things that I
3 believe in that -- that I tend to be supportive
4 of them. I -- yeah.

5 Q I guess would that sort of circumstance fall
6 into cancel culture or would it fall into
7 something else entirely?

8 A It's something else entirely.

9 Q Okay. Do you think that's okay?

10 A To support businesses who support causes that
11 you believe in, yes.

12 Q Okay. Okay. What about the reverse then, to
13 not support business who support causes you
14 don't believe in?

15 A I -- I think that's legitimate as well.

16 Q Okay. You -- you talked earlier about your mom
17 raised you to stand behind your name, you said
18 you post on line as your name?

19 A Uh-huh. (Affirmative)

20 Q Are you.....

21 A I don't -- I don't know if my mom specifically
22 told me to do that, but.....

23 Q Got to that.

24 AI do, yeah.

25 Q It sounds -- is it -- are you afraid of cancel

1 **culture personally?**

2 A Not really in this stage of life. What are
3 they going to do to me? Bend my dog tags? No,
4 I have -- I'm pretty much bulletproof as far as
5 I'm -- I'm not in any -- any more boards and
6 and commissions and not running for public
7 office, yeah.

8 **Q Do you believe as a general rule your political**
9 **beliefs are probably fairly well known?**

10 A Yeah, I don't think there's any -- anybody who
11 knows me well has to guess about what I have --
12 I'm blessed with a character flaw of having
13 strong opinions and the inability to keep them
14 to myself, so.....

15 **Q Yeah. I guess sort of first along that line,**
16 **does the same thing go with the causes you**
17 **support?**

18 A What's the question?

19 **Q I'm sorry, that -- you're correct to call me on**
20 **that one. I guess is it fair to say that you -**
21 **- that your -- you public -- publicly support**
22 **the causes that you support, you don't hide**
23 **behind?**

24 A I don't, no. Yeah.

25 **Q Okay. If a -- okay. So you occasionally write**

1 politically.....

2 **Q And what was the subject of that meeting?**

3 A The subject of that meeting is that the
4 regional manager -- managers -- one of the
5 regional managers anyway was -- was pretty
6 adamant that I -- I stop participating in -- in
7 maybe at the level that I -- I was, and the --
8 the other one was -- was quite a bit more
9 supportive. I guess we -- we came to the
10 conclusion that, you know, I -- I wasn't doing
11 anything to damage the brand of Alaska Airlines
12 or -- and this was off-duty activities, so --
13 but someone complained that made it up to the
14 regional level of the -- the management of --
15 of my organization that -- that had -- had me
16 drawn in for this.....

17 **Q And.....**

18 Ahour long meeting or so with these -- that
19 -- that.....

20 **Q And -- and if it was before the board of**
21 **education, what was the -- was there paper**
22 **or.....**

23 A That -- that's.....

24 **Qsubjects or topics?**

25 Ait -- it was around education policy as

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1 well because that's -- at -- at that time I was
2 the senior education research fellow for the
3 Alaska Policy Forum and it published a lot of
4 Must Read Alaska articles and -- and other
5 opinion pieces, Alaska Daily News, et cetera,
6 and -- and as -- as a member of the -- the
7 budget advisory commission for the Anchorage
8 School District.....

9 **Q And -- and -- so you said this is before your**
10 **Department of Education seat you were -- you**
11 **were on Board of Education starting in 2019, so**
12 **that -- when did the meeting before that happen**
13 **then? Would that have been 2017 or '18 or.....**

14 **A Yeah, probably 20-7 -- 17 or -- or around that**
15 **time frame.**

16 **Q Okay. So actually when it -- when the**
17 **(indiscernible) says January 2018, it might**
18 **have been before that actually?**

19 **A It might have been before.....**

20 **Q Yeah. Yeah.**

21 **Athat, yep. Yes. It -- it was.....**

22 **Q Yeah.**

23 **Avery likely before that.**

24 **Q Okay.**

25 **MR. STEVENS: No more questions.**

1 IN THE SUPERIOR UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF ALASKA

3 DOUG SMITH, ROBERT GRIFFIN, ALLEN
4 VEZEY, ALBERT HAYNES, TREVOR SHAW,
5 FAMILIES OF THE LAST FRONTIER, and
ALASKA FREE MARKET COALITION,

6 Plaintiffs,

7 vs.

8 RICHARD STILLIE, JR., in his official
capacity as chair of the Alaska Public
9 Offices Commission, and LANETTE
BLODGETT, ERIC FEIGE, DAN LASOTA,
10 and WALTER CARLTON MONEGAN, III, in
their official capacities as members of
11 the Alaska Public Offices Commission,

12 Defendants,

13 and

14 ALASKANS FOR BETTER ELECTIONS, INC.,

15 Intervenor-Defendant.

16 Case No. 3:22-cv-00077-SLG

17

18 VIDEOCONFERENCE DEPOSITION OF STANLEY ALLEN VEZEY, JR.

19

20 Friday, November 14, 2025
21 10:00 a.m.

21

22 Pages 1 - 150, inclusive

24 Taken by Counsel for Defendants
via

25

Zoom Videoconference

PACIFIC RIM REPORTING

Case 3:22-cv-00077-SLG Document 131-9 Filed 04/10/26 Exhibit Page 1 of 14

Page 6 1 you today to provide, to the best of your ability, 2 full and accurate answers. 3 Do you understand that? 4 A Yes. 5 Q Okay. Anything today that would impede your 6 ability to testify truthfully and accurately? 7 A Well, I have a -- a number of 8 disabilities, but I don't think they affect my 9 ability to reason and -- and my integrity, no, I 10 don't think they affect that. 11 Q Okay. Great. 12 If I ask you a question that you find 13 confusing or unclear in some way, I would like you to 14 ask me to repeat or clarify, just to make sure that 15 you understand, okay? 16 A Yes. 17 Q Your attorney might object during the 18 deposition, but you would still be under an obligation 19 to answer, unless he specifically instructs you not to 20 answer. That's going to be Mr. Stephens here. 21 Do you understand that? 22 A Yes, I do. 23 Q Okay. And we talked earlier, if you need a 24 break at any time, just let us know, but if there is a 25 question pending, we'll want you to go ahead and	Page 8 1 right? Very careful with that sometimes. 2 BY MS. WEIANT: 3 Q Mis- -- is it Vezey? 4 A Yes. 5 Q Okay. Do you use any other -- well, I guess 6 what's your preferred name -- first name, Stanley or 7 Allen or a little bit of everything? 8 A My -- I go by my middle name, which is 9 Allen. My first name is Stanley. I -- I'm a Jr., 10 so to avoid confusion around the household, I was 11 called by my middle name. Most people call me 12 Allen, just the way people are. 13 Q Okay. Where do you live? 14 A You know, address or just -- well, I live 15 in North Pole -- 16 Q Just the town is fine. 17 A -- Alaska. 18 Q Okay. Did you do anything to prepare for 19 this deposition? 20 A Yes, I did. 21 Q Okay. Did you review any documents? 22 A Yes, I did. 23 Q What were those documents? 24 A I reviewed the complaint -- 25 Q Okay.
Page 7 1 answer the question before we start the break. 2 Do you understand that? 3 A Okay. 4 Q Okay. We have a stack of exhibits that I'm 5 going to hand to you. They're labeled. I'll -- I'll 6 work through them as necessary, so no need to, like, 7 look through them all now. 8 A Okay. 9 MR. STEPHENS: This is all of them or -- 10 MS. WEIANT: Yes -- 11 MR. STEPHENS: Okay. 12 MS. WEIANT: -- that's all of them. 13 MR. STEPHENS: Okay. 14 MS. WEIANT: Yeah, and that -- you keep 15 that copy. 16 MR. STEPHENS: Okay. 17 THE WITNESS: Is this mine to keep or -- 18 MS. WEIANT: It's certainly yours to use 19 today, whether or not you want to keep it, I 20 guess -- I don't have a problem -- 21 MR. STEPHENS: You can take it home for a 22 souvenir, if you like. 23 MS. WEIANT: Or firestarter, you know -- 24 MR. STEPHENS: Yeah. 25 MS. WEIANT: -- waste not, want not,	Page 9 1 A -- and I reviewed Ballot Proposition 2, 2 and I reviewed Alaska Title 15, 13. 3 Q Okay. How did you get involved in this 4 lawsuit? 5 A I think I made a donation, I don't even 6 remember who it was to, and then I was told that -- 7 I don't remember if it was the same day or the next 8 day or -- fairly quickly after I made it, within a 9 couple days, I was told that I had to file a report 10 to the Alaska Public Offices Commission, and I 11 recall protesting vehemently, but I think I was told 12 how severe the penalties were, and I think I made 13 the decision that, even though I didn't think that 14 it was right that I be asked to do it, I -- it was 15 just going to be a lot cheaper to comply than it 16 would be to try to make an issue out of it. 17 Q Okay. Who was that that you were talking 18 with? 19 A I don't remember. 20 Q Okay. Would it have been somebody 21 associated with the group that you had made the 22 donation to or in -- in some other -- 23 A I would think so, but I -- I don't 24 remember. 25 Q Okay.

Page 46 1 than 25 years. How much informa- -- 2 Q No, that's -- that's plenty. 3 A Okay. 4 Q That's plenty. 5 A The Alaska Miners Association, my 6 association with them -- oh, gosh, that -- I can't 7 remember, but that goes back to '82 or '84, or 8 something like that. 9 Q Did you mine? 10 A Well, the answer is yes, but the Alaska 11 Miners Association, especially back in those days, 12 was focused on gold mining and placer mining, in 13 particular, and I have done exploration work, but I 14 haven't ever mined for gold, but I've done a lot of 15 mining for industrial minerals. 16 Q Okay. So I'll -- the next question I'll 17 focus a little bit towards the General Contractors 18 Association because it seems like you had a little bit 19 of a different type of role there as the board 20 president, it sounds like. 21 Is the political action committee separate 22 from the association itself? 23 A It's a -- the association is an umbrella 24 over political action committee. Is the committee 25 different than other committees under that same	Page 48 1 were making a contribution to that specific political 2 action committee -- political -- political action 3 committee -- 4 A PAC. 5 Q Yeah, PAC -- 6 A Uh-huh. 7 Q -- would you be intending -- what would you 8 be intending for your -- your money to be used for? 9 A To advocate for issues that the Associated 10 General Contractors, as a -- a -- well I'm trying to 11 think of the word to describe what they're acting 12 at -- it's -- the word won't come to my mind right 13 at the second, it -- it's a -- it's an industry 14 group that advocates for issues of general interest 15 to the -- broad interest to the industry. 16 They typically don't get involved in 17 specific issues, like, one party versus another, but 18 if there is a general issue of -- the Associated 19 General Contractors will pick some issue to advocate 20 for, and they will pick candidates that support the 21 AGC's position on broad range of issues. 22 Q To the best of your understanding, would 23 that Miners Association PAC work the -- sort of, the 24 same way? 25 A And I'm still trying to think of the word
Page 47 1 umbrella? Yes, it's a different committee. 2 Q Okay. So if somebody wanted to make a 3 donation to the general contractors group but not the 4 political action committee, they'd just donate to the 5 group? 6 A I believe the best answer to your question 7 is, yes. There are all kind of contributions to the 8 Associated General Contractors, usually, in my 9 experience, with a purpose in mind. 10 The political action committee group is 11 regulated by the federal government, and those 12 contributions have to be within those regulatory 13 compliance. 14 Q Okay. So when you personally made donations 15 to the political action committee -- again, I'm not 16 going to ask you about any specific one, unless one 17 stands out to you, but -- 18 A Well, now, are you talking about the 19 Associated General Contractor's political action 20 committee or -- 21 Q Yes. 22 A -- other ones? 23 Q The Associated General Contractors -- 24 A General -- 25 Q -- sorry for -- no, clarifying -- if you	Page 49 1 that des- -- describe the -- professional 2 organization is not the word, but industry 3 association, or something like that -- well, they're 4 very different, but -- 5 Q Sure. I guess, what causes they'd be 6 supporting, but -- 7 A I think in the context of your -- what 8 you're trying to ask, I think the answer is, yes, 9 but there's very noticeable differences, including 10 how the committee is selected, and the issues 11 they're fighting, obviously -- or the issues they're 12 advocating for and the candidates they're advocating 13 for are not necessarily the same. 14 Q Sure. Okay. As a person who is donating to 15 those groups, is it expected that they use them -- the 16 funds in elections? 17 A I don't really keep track of their 18 finances, so I -- I can't really say what percent 19 goes to what and what percent goes to something 20 else, but I would say generally most of the money 21 that's donated to those PACs goes to political 22 candidates -- 23 Q Okay. 24 A -- that -- that's what I -- my com- -- 25 that's my perception, and like -- I think I'm right

Page 66 1 was ranked choice voting, it is a -- an abominable 2 system, in my opinion. 3 It's not new. It's been around since, I 4 believe, 1858, and it was invented -- or it was 5 adapted by a MIT professor in Cambridge, 6 Massachusetts as an alternative to the chaos that 7 does occur in our election system with our primaries 8 and our general elections and runoff elections, and 9 there's been numerous efforts to engineer the 10 election process to, kind of, reduce this chaos and 11 make it more organized. 12 This particular professor, whose name 13 doesn't come to my mind right now, came up with this 14 ranked choice voting, which really he adopted from 15 an idea that came out of Europe in the early 19th 16 century -- or mid- -- mid-19th century. 17 It wasn't entirely his idea, is what I'm 18 saying. I mean, he just -- 19 Q Sure. 20 A -- adopted it and tried to make it 21 practical. 22 And at one point the only place in the 23 United States that practiced ranked choice voting 24 was Cambridge, Massachusetts. 25 Now, since then others have adopted it.	Page 68 1 needed to dig a little deeper and give a little 2 more. 3 MS. WEIANT: Okay. So I'm going to show 4 you what's marked as Exhibit E. 5 (Exhibit E marked.) 6 BY MS. WEIANT: 7 Q And so this Exhibit E was provided in 8 discovery as Bates number 127. 9 A Oh, now -- okay. Okay. 10 Q That's the number on the very bottom. 11 A These, 0127. Okay. 12 Q Yeah. 13 That -- if I understand correctly, this 14 means it's in your -- the -- the documents that you 15 provided to your attorney and they provided to us 16 under your name versus the other plaintiffs -- 17 A Okay. 18 Q -- is what that part of it means. 19 So I want you to take a look at this 20 document for me for just a minute -- 21 A Okay. 22 Q -- does it look familiar to you? 23 A Yes, it -- it does. I do recall seeing 24 this document before. 25 Q Okay. So does this appear to be related to
Page 67 1 San Francisco attempted to adopt it a number of 2 years ago, but Gavin Newsom was the mayor of San 3 Francisco at that time, and he vetoed it because he 4 knew what a bunch of bull it was. 5 But then, as governor, I think he signed a 6 bill that enacted ranked choice voting for the state 7 of California, I think. I'm not -- I don't keep up 8 with it well enough to know, but that's my 9 understanding. 10 Anyway, I -- I just thought that ranked 11 choice voting was -- was a terrible mistake, still, 12 do, and I contributed, as I recall, \$500 -- that I 13 don't recall, I just saw it on the piece of paper -- 14 \$500 to the repeal -- or vote no initiative -- or 15 vote no group, and I think there was three groups 16 that were campaigning against it at that time. 17 I only contributed to one of them, as I 18 remember, and then three weeks later I made a bigger 19 contribution. 20 I'm not sure what happened in that three 21 weeks, more than likely a large check came in, and I 22 had more money than I did three weeks earlier, but 23 maybe I went to listen to somebody speak or maybe 24 somebody gave me a sales pitch, I -- I don't 25 remember, but something happened, and I decided I	Page 69 1 one of those 2020 donations that you were just talking 2 about to -- 3 A I -- I -- 4 Q -- defeat ranked choice voting? 5 A -- it's certainly possible, but I -- I 6 can't answer that question it -- with any certainty. 7 Q Okay. So in looking at this document, it -- 8 does it appear to be, like, a receipt of some kind -- 9 receipt of some kind? 10 A This document is? 11 Q Yeah. 12 A I don't see this document as a receipt. 13 Q Okay. Well, I would just -- there's a line 14 at the top that says, "Thank you for your 15 contribution." 16 A "Thank you for your contribution" -- 17 Q Okay. 18 A -- because that could go to anybody that 19 contributed, I guess. 20 Q Sure. I guess not a specific receipt? 21 A Yeah, I agree with you. 22 Q Okay. So in looking at this document, it 23 provides -- would you agree that it provides 24 instructions to somebody who had made a contribution? 25 A I don't remember it that well, but that

Page 70 1 does appear to be what this document is saying, yes. 2 Q Okay. And does it provide a -- sort of, a 3 dollar amount in which these instructions are 4 triggered? 5 A Yes, it says, "Contributors who donate 6 \$500 or more must file a 15-5 form." 7 Q Okay. And then it -- it provides you 8 instructions on how to complete that form? 9 A It -- it has a list of steps, so, yes, 10 you -- you could say it provides instructions. 11 That's a fair statement. 12 Q Okay. Does it provide you with information 13 as to how quickly it needs to be completed? 14 A It says it must be done within 30 days of 15 making the contribution, that's -- 16 Q Okay. 17 A -- what the form says. 18 Q Okay. And then does it provide you, you 19 know, where to go for help if you need help? 20 A It does, it provides you with a contact 21 phone number and address. 22 Q Okay. So in the instructions numbered 1 23 through 8 on this form, it advises you to go to a 24 myAlaska link. Have you ever heard of "myAlaska"? 25 A Yes.	Page 72 1 BY MS. WEIANT: 2 Q Earlier -- first thing this morning we 3 talked about you -- that you were told you had to fill 4 out a statement of contributions, and you, sort of, 5 did it because you didn't want the fines? 6 A That -- that would be a true statement, 7 yeah. 8 Q Okay. So this is what the Statement of 9 Contributions Form 15-5 that's reflected in Exhibit E, 10 that's the form they say, go online and fill that out 11 or -- 12 A Okay. 13 Q Okay. Exhibit D is also provided in 14 discovery as Bates 269 and 270. 15 A Oh, 269 and 790 -- 16 Q Yeah. 17 A -- okay. Okay. 18 Q And do you see a submission date on there at 19 the top of page -- the first page? 20 A First date says 9/28/2020. 21 Q Okay. And who's the filer there? 22 A Who is the filer? Oh, it says, "Stanley." 23 Q Is that you? 24 A Then it says, "Filer last name: Vezey." 25 Q And then in the contribution it shows that
Page 71 1 Q Okay. Is that where you would apply for 2 your Permanent Fund Dividend? 3 A That is a little bit of a convoluted 4 process, and I think that is one of the options you 5 have is that you can apply for it through myAlaska, 6 and there's a -- another website, I think, and I 7 could be totally wrong on this, but it seems to me 8 there is a PFD website that doesn't go through 9 myAlaska. 10 I -- I -- you probably know this better 11 than I, but I do have a myAlaska account, and I have 12 been there on -- couple of times a year maybe -- I 13 go there once a year anyway, and it always takes me 14 forever to figure out what my password is, all that 15 kind of stuff, but, yes, I -- I am familiar with 16 myAlaska. 17 MS. WEIANT: Okay. I'm going to show you 18 what's been marked as Exhibit D. 19 THE WITNESS: And exhibit which? 20 MS. WEIANT: D, as in dog. 21 THE WITNESS: D. D. D. 22 MS. WEIANT: And not -- it's not one, I 23 don't think, we've gotten to yet, so right there. 24 THE WITNESS: Okay. Right there. Okay. 25 (Exhibit D marked.)	Page 73 1 September 7th, 2020, check for \$500? 2 A Yes, it does. 3 Q Okay. And then if we look at the next page, 4 270, this one is for a submission date of 5 November 1st, 2020? 6 A Yes. 7 Q And it looks like this is related to the -- 8 the \$1,500 check that was in October of 2020? 9 A That -- that -- I would agree with that 10 statement, yeah. 11 Q Okay. 12 A I -- I -- doesn't appear to me that the 13 dates on this document and the dates on the 14 spreadsheet we looked at a minute ago are the same, 15 but that doesn't matter. 16 Q Okay. Are they pretty close? 17 A I -- I seem to recall they're off about 18 the month, but that's -- is that close? 19 Q Let's look. 20 A I mean -- I mean, I -- I could be totally 21 wrong. I mean, what -- we -- I thought we were on 22 B, right? The -- so I'm at 2020. 23 Q So this chart, it looks like, shows the \$500 24 on 9/15 and the \$15 -- \$1,500 on 10/7. 25 A Okay. Well, that -- that's -- the second

Page 74 1 one is very close, and the first one's only off a 2 week or so. Yeah, I -- I thought I was looking at 3 the right numbers. 4 Q Okay. All right. Would you have been the 5 person that completed that form? 6 A I don't remember -- remember, but it -- it 7 seemed logical that I would be the one that did 8 that, yes. 9 Q Okay. And if we think about that 10 instruction page that is Exhibit -- 11 A That was Exhibit -- 12 Q -- Exhibit E? 13 A -- E, yes. 14 Q -- it says must be filed within 30 days of 15 the contribution, looking at the dates on Exhibit D, 16 does it appear that that -- you did that? 17 A Well, the first page, page VZ0269 [as 18 spoken], it appears to be within 30 days. The 19 second page appears to be within 30 days. 20 Q Okay. Did you ever receive any 21 communications from the Alaska Public Offices 22 Commissions related to these contributions that you 23 messed them up somehow or got a fine or anything along 24 those lines? 25 A Not that I remember. I'm not going to say	Page 76 1 sources, but primarily from the corporate income, 2 either paid to as wages or distributions or rent or 3 whatever, but my primary source of income was the 4 construction company. 5 And the accounting of how those 6 distributions are accounted for is over my head, but 7 there's all -- but they're -- you know, I have to 8 admit there are other things, like, Permanent Fund 9 Dividends and whatnot, and dividends from securities 10 that I own, and that kind of stuff. 11 There are -- there are other sources, but 12 the- -- they're fairly small compared to the income 13 that comes in from the construction company. 14 Q Would those be your Permanent Fund 15 Dividends? 16 A To be perfectly honest, I don't know where 17 my wife put that money. In fact, she used to brag 18 that she had money hidden everywhere that I didn't 19 know about, but it -- yes, it would be -- I mean, 20 the money -- the Permanent Fund Dividend, as I 21 recall, my check and her check were both 22 electronically deposited, so they had to go into a 23 bank account somewhere -- 24 Q Okay. 25 A -- and I -- but I couldn't tell you which
Page 75 1 that I didn't, but not that I remember. 2 Q Okay. All right. And if you think about 3 the -- that money, the \$500 and the \$1,500, where 4 would that money have come from? 5 A Well, the \$500 said it was a check, and 6 the number of the check was 8871. That doesn't 7 really ring a bell with me. 8 And then the number of the next check was 9 8874, I -- I can't really tell you from that 10 information which checking account this came from. 11 Q Okay. Do you have multiple? 12 A Oh, yes. 13 Q Okay. If it is in your checking account, 14 any of them, I guess, how would you have earned or 15 received that moneys [as spoken], income from your 16 job? 17 A Well, that -- oh, that -- now, that -- 18 getting to be a complex question. The checking 19 account that I use the most to make political 20 contributions was a checking account in my name and 21 my mother's name, and the money in that account came 22 from her. 23 Q Okay. 24 A My other checking accounts -- our other 25 checking accounts, the money came from a variety of	Page 77 1 one. 2 Q Okay. But not some random person's 3 Permanent Fund, yours and your wife's -- 4 A Yes. Yes. 5 Q -- probably in -- okay. 6 So would it -- if you are contributing the 7 money from that bank account -- not the one you 8 mentioned where your mother's -- there was some of 9 your mother's money, would it be fair to say that you 10 are the true source of money that you are spending 11 from that account? 12 A I think that's a very true statement, yes. 13 Q Okay. And then if it was money from the 14 account that you shared with your mother, and it was 15 her money, she would be the -- 16 A Well, Mother was deceased -- 17 Q Okay. 18 A -- on that -- 19 Q So it was, like, an inheritance? 20 A Yeah, inheritance. 21 Q Okay. So that -- you are the true source of 22 that money -- 23 A Yes. 24 Q -- because it's your -- you have the rights 25 to that money?

Page 102 1 Q Okay. 2 A Okay. 3 MR. STEPHENS: Okay. And -- 4 THE WITNESS: Have it right out, period. 5 BY MS. WEIANT: 6 Q Okay. All right. So on -- I think it 7 starts page 9, is where the actual questions start. 8 A Questions start on page 9. Okay. 9 Q Okay. I want to talk a little bit about 10 number 1 and number 2, you were asked to identify any 11 donors who are -- you knew about who are having 12 trouble complying with the donor disclosure law, 13 and -- so and I'll -- 14 A You ask -- 15 Q -- I'll ask you a couple questions about 16 that. 17 A Okay. 18 Q Has anyone ever mentioned to you that they 19 had trouble making their disclosure online? 20 A Are we -- what -- what are we talking 21 about? I mean -- 22 Q The donor disclosure where you -- so, for 23 example, although not exactly applicable because it 24 was before the Ballot Measure 2 date, you had to make 25 those disclosures online that you donated to the	Page 104 1 Be glad to discuss that with you further, 2 but we could spend a whole day talking about my 3 experiences with agencies. 4 Q Okay. And I guess I'm just trying to 5 clarify where the difficulty is, if it's they don't 6 want to do it or is it that they can't find where to 7 do it or something else entirely? 8 A I don't think I've ever found anybody that 9 was -- had asked me, where can I find a form to fill 10 out -- no, that -- that's the wrong way to phrase 11 it, where can I go to find where they require me to 12 fill out a form? 13 I mean, I -- I -- people don't seek out 14 reporting forms on their own initiative. 15 Q Okay. 16 A You do it because your penalties for not 17 doing it are worse than the pain of just going 18 through the process and following procedures. 19 My -- one of my favorite personal 20 experiences is working with the Alcohol, Tobacco, 21 and Firearms, if you ever think about violating the 22 BATF regulation regarding explosives, by the time 23 you get through filling out all the far- -- forms, 24 you'd wish to hell you'd never thought of it, much 25 less did it.
Page 103 1 Defend Alaska Ex -- Elections group. 2 A Everyone that I've talked to, and that's 3 not that many people, has expressed the concern that 4 having to make the disclosure online is -- let's 5 say, the -- it -- to the effect that it's a 6 undesirable experience, and -- and I'm just trying 7 to put it in politically correct terms. 8 Q Okay. I'm going to ask you a little bit 9 further though -- 10 A Okay. 11 Q -- because when you say an "undesirable 12 experience," do -- does it seem like they know where 13 they need to make the disclosure? 14 A Well, let's just talk about the 15 experience. I mean, every regulatory agency in the 16 country, every government agency in the whole United 17 States uses forms and regulations to require 18 reporting of some kind, every one of them -- 19 Q Okay. 20 A -- and they're all a nuisance, at the 21 absolute best. 22 Some of them are -- are very, very 23 prudent, very wise, but the way agencies encourage 24 or discourage behavior is by requiring forms be 25 filled out.	Page 105 1 And every regulatory agency's the same 2 way. I mean, you -- they -- you've got to fill out 3 these for- -- you've got to do this, then you got to 4 fill out this form. 5 And if you don't do this, you got to fill 6 out this other form. And, I mean, it just -- this 7 goes on and on and on. People don't seek out more 8 forms to have to comply with. 9 Q Okay. So in the time since Ballot Measure 2 10 has passed, have you been in a situation where you are 11 required to make a disclosure with that Form 15-5? 12 A No. 13 Q Okay. Do you know what information is on 14 that form? 15 A I don't remember. 16 Q Okay. 17 A I -- I did -- obviously I filled it out at 18 one time, but that was a while back, and it's just 19 another form. I don't remember what was on it. 20 Q Okay. We talked about it in an exhibit 21 where you reported your Defend Alaska Election 22 donations -- 23 A Yeah. Yes, we did. 24 Q -- but you -- it sounds like you've not had 25 reason to access that form since Ballot Measure 2

Page 106 1 passed? 2 A Well, I -- I don't have reasons because 3 I've avoided putting myself in that position where I 4 would have to fill out another form and send it in 5 to anybody. 6 Q Is the information contained within the form 7 confusing? 8 A I -- I don't remember the answer to that 9 question. It -- it's not really a question of -- of 10 whether it's confusing, is it redundant? Yes. Is 11 it necessary? No. 12 Does it helps [as spoken] the public 13 rights to know? I don't think so. Is the public's 14 right to know a constitutional right? No, it's not. 15 The right to free speech is, but the 16 public's right to know is just a concept that, from 17 my memory bank, has come along since Watergate. 18 Q Okay. 19 A I mean, we -- we can go on and on. I -- 20 I -- we're just talking the philosophy of -- 21 Q Okay. 22 A -- of eight regulatory agencies exercising 23 legislative power because it's been granted to them 24 by the legislative branch of government, and it just 25 goes on -- it's just endless.	Page 108 1 that document. 2 A Okay. And it doesn't mention here, try to 3 remember your password. Okay. So apparently these 4 folks are saying that, if you click the right icon 5 under the right header, it will take you to a header 6 called "APOC disclosure forms." Okay. 7 Q So they're providing you instructions on how 8 to fill out that form? 9 A Well, they're providing instructions, but 10 that doesn't mean that I -- I and other people could 11 not thor- -- make a thorough mess out of it. 12 Q Okay. Fair enough. 13 You -- the people that you have talked with 14 about the difficulties in completing these 15 disclosures, are they people that are familiar with 16 the myAlaska website? 17 A I don't recall myAlaska website ever 18 coming up in a conversation. 19 Q Okay. Do you know if there are people that 20 get PFDs, Permanent Fund Dividends? 21 A Other than with my wife, they -- it -- 22 her. 23 Q Okay. 24 A Do I know what? 25 Q Are these people that, for example, are
Page 107 1 Q Okay. And I think we talked earlier about 2 that those forms are something you can access through 3 your myAlaska account? 4 A I don't know "yes" or "no." I -- I don't 5 know. I would -- I would think that the myAlaska 6 website, if you're clever enough to click on the 7 right spot, will take you to that agency, and then 8 from that agency, probably take you to that form. 9 I really don't know the answer to that 10 question, but I would think so. I think the answer 11 would be that, yes, you could. 12 Q Okay. Earlier we talked about that -- 13 Exhibit E, which is the instruction sheet that you -- 14 E as EI- -- 15 A I just saw -- 16 Q Yeah. 17 A -- it here a minute ago. Yeah. Yeah. 18 Right? 19 Q Yeah. 20 A Okay. 21 Q -- we talked about that instruction sheet 22 having instructions about how to use the myAlaska 23 website to fill out that form? 24 A Obviously, and I don't remember it, so -- 25 Q Sure. Sure, but I guess in -- in review of	Page 109 1 people who apply for and receive Permanent Fund 2 Dividends? 3 A I -- I don't ask that question, but I -- I 4 would have to assume that most of them do apply for 5 it and do receive it. 6 Q Okay. So when you filled out that form back 7 in 2020 about those disclosures -- again, this is 8 pre-Ballot Measure 2, but -- did you have to read a 9 statute book or anything in order to fill out that 10 form? 11 A Yeah, no, will you say that again, please? 12 Q Okay. So the disclosures that you made, 13 which is going to be Exhibit D, which were the 14 disclosures for the do- -- \$1,500 and \$500 donations 15 you made to Defend Alaska Elections -- 16 A Right. Right. 17 Q -- did you have to read the whole section on 18 the Alaska Public Offices Commission's regulations to 19 be able to fill out that form? 20 A I would have to say no. 21 Q Okay. Would -- that would likely not be 22 very efficient if they're trying to get people to 23 comply? 24 A That certainly wouldn't encourage 25 compliance to require reading 20 pages of rather

Page 110 1 boring statute. 2 Q Okay. So I'm going to have you look at -- 3 it's interrogatory number 4 -- so if we go back to 4 Exhibit A -- 5 A Oh, okay. Go back to A -- 6 Q Yeah. 7 A -- on what page? 8 Q It should be page 10. 9 A Page 10. 10 Q -- and here you were asked to identify 11 anyone who has made contributions of more than \$2,000 12 to IE groups, independent expenditure groups, and who 13 do not understand the language of the donor disclosure 14 law. See that? 15 A Okay. 16 Q And in response you said you do- -- you 17 didn't think you knew anyone who actually understood 18 those laws. 19 A Well, I -- I do know people that think 20 they understand it. I'm not sure they do, but, I 21 mean, they think they do. 22 Q Okay. For the donor disclosure law itself, 23 which is just about you as a donor having to make an 24 online report to APOC, what parts of that are -- do 25 you think are particular confusing?	Page 112 1 answer those questions -- what would they call that? 2 They call that a positive defense that you made an 3 effort to comply with the law -- I believe I use 4 that term correctly -- but I don't go around 5 soliciting forms to fill out to submit. 6 I -- I really try to avoid it -- 7 Q Okay. 8 A -- to the point that I just don't make 9 \$2,000 contributions -- 10 Q Okay. 11 A -- to -- to -- for entities -- to entities 12 that -- that are required to comply with the 13 statute. 14 Q Okay. So to clarify, are you saying it's 15 not that -- it's not that you, in particular, find the 16 process confusing, it's just a burden to have to 17 comply with it? 18 A It's certainly a burden, but I -- I do 19 think there is an element of confusion also. 20 Q Could you explain for me what -- what part 21 stands out to you as a con- -- as confusing? 22 A Oh, I'd have to -- can we pull out the 23 statute and read it or -- 24 Q No. 25 A Okay. We can't do that.
Page 111 1 A No -- no, say this again. 2 Q Sure. The donor disclosure law -- 3 A Right. 4 Q -- just the fact that you, as an individual 5 disc- -- donor dis- -- would need to make a disclosure 6 to the Alaska Public Offices Commission if you donate 7 the \$2,000 or more, what part of that do you think is 8 confusing to people? 9 A I don't know that confusing is the driving 10 force, it is an issue, but I simply have quit making 11 \$2,000 donations to anything, subject to that 12 reporting form. It's just not in my interest to put 13 myself in that position voluntarily to do that. 14 Q Okay. And, I guess, your response is about 15 how you -- 16 A People, I think, the -- 17 Q -- you think people think they understand 18 but don't -- 19 A -- about people -- 20 Q -- actually -- but don't actually? 21 A Well, my response was that I would include 22 myself in that group. And bear in mind, the form is 23 not a quiz on Title 15, Chapter 13, it asks certain 24 questions. 25 And if you make a reasonable effort to	Page 113 1 Off the top of my head, I think the first 2 confusing factor is why am I doing that, because 3 there is -- even if you accept the principle that 4 the public's right to know weighs stronger than the 5 right of freedom of speech, then if you're requiring 6 two sources to ascertain the public's right to know, 7 then you're putting a burden on two different 8 sources, one being the recipient and one being the 9 donor, to inform the public. Oh, and -- and I would 10 certainly consider that as an impediment to making 11 contributions. 12 Where is it confusing? I'd have to go 13 back and look at what the form asked for and what 14 triggers it. 15 I mean, at this -- it doesn't really make 16 sense, why is a donor doing this? Because the 17 people you're donating to have, for a number of 18 years, been required to report the receipts and -- 19 and how many -- how much informa- -- informative -- 20 how many times do the people have to be informed 21 before they're -- they have a right -- before their 22 right to know has been satisfied. 23 Q Okay. So would it -- would it be fair to 24 say that, sort of, the average donor would need to 25 know the dollar amount that would trigger the need to

Page 114 1 donate? 2 A I -- I think it gets very confusing if you 3 get in -- when you get into -- with individuals it's 4 straightforward, ca- -- individual candidates, but 5 there are statutes that limit the number of groups 6 that a campaign can create, use, they all have to 7 report as if they were one. 8 And the same certainly goes for other 9 groups that might have more than one name, they 10 might be other groups under the umbrella, and I 11 don't think that the average donor has any interest 12 in trying to pursue which group might be under the 13 umbrella of another group. 14 Q Okay. So we -- we talked earlier about the 15 words "true source" and -- when we were talking about, 16 you know, where your money, in particularly, comes 17 from, right, the one account is your mom's inher- -- 18 your -- you know, so your mom's -- what your mom left 19 you, and the other one is, sort of, your funds from 20 your own Per- -- Permanent Funds, your stock, or 21 things like that, and your business income? 22 A Yes. 23 Q Okay. And so you would be considered the 24 true source of both of those bank accounts? 25 A I believe that -- I -- I certainly -- I	Page 116 1 do get around it, or simply avoid it by not making a 2 contribution, but they do one thing or the other. 3 I know an equal, if not more, instances 4 where people refused to put up a yard sign, for 5 instance, because they don't want people to know 6 that they identify with supporting a certain 7 candidate or a certain issue. 8 Not wanting to disclose to other people, 9 who may or may not have some impact on your 10 livelihood, what you do for a livelihood, disclosed, 11 because they don't want to alienate anybody. 12 They -- they depend upon being very good 13 politicians and having people believe that they 14 agree with everybody, but they stand on principle. 15 Have I answered your question or -- 16 Q Say in that aspect, I guess I'm wondering if 17 you've ever spoken with somebody who is a -- a donor 18 who doesn't mind that their name is associated with 19 the campaign but does not want to say, this is where 20 the money in my bank account comes from, which is to 21 say, the true source of their donation? 22 A Well, the best example that I can think 23 of, off the top of my head, came from Tom Fink, who 24 was the former mayor of Anchorage, who did not run 25 for election because he was required to disclose
Page 115 1 would agree with that statement, yes. 2 Q Okay. And so in your interrogatory -- and 3 let me give you quest- -- the number, it's number 6 -- 4 we asked you to identify anyone who hasn't made a 5 contribution to an independent expenditure group 6 because they didn't want to disclose the true source 7 of their contributions. 8 A True source issue makes it a compound 9 question, but I hear all the time that people don't 10 want it disclosed, don't want to disclose that 11 they're making contributions. I mean, it -- 12 Q And -- and so I'm sorry to interrupt, I -- 13 there -- are you referring to situations where 14 somebody -- your neighbor, Jim Smith, does not want it 15 disclosed that he is making contributions or that he 16 does not want to have to report where his own money is 17 actually coming from? Does that distinction make 18 sense? 19 A And let me think about that a second. 20 I've had many, many experiences where people did not 21 want to show support for a candidate, and they would 22 make -- I believe the new limit is \$50 that you can 23 make without having yourself identified by the 24 recipient -- not by yourself, but by the recipient, 25 and I don't know how they get around that, if they	Page 117 1 where all the sources of his money came from, and he 2 did not feel that that was ethical for him to 3 disclose his customers -- 4 Q Okay. 5 A -- which was the true source of his 6 income. 7 Lawyers, being clever as they are, I 8 believe that they got around that issue by placing 9 these entities that collect money from individuals 10 into a corporation, and if the money goes to the 11 corporation, or LLC, or whatever form of -- of 12 business structure you -- they choose to use, and 13 then it goes from that entity to them, and so they 14 managed to work around that. 15 That all generally lasted two or four 16 years, I don't remember, before people got wise as 17 to how they go around and forced a lot of businesses 18 to restructure their organization, but they did it. 19 And I think that thing applies more 20 broadly than we know, that people do not want to 21 disclose the sources of their income. 22 In some cases it's for very legitimate 23 reasons, and in some cases it's for very nefarious 24 reasons. I'm trying to answer your question. 25 Q No, you're okay.

Page 126 1 I mean, maybe -- 2 Q I guess -- we'll, kind of -- maybe we'll 3 return back to it. 4 If you -- what about if you -- you found out 5 there was a business and you really agreed with their 6 political beliefs, and then you decided to, sort of, 7 prioritize spending at that business? 8 A I do that all the time. 9 Q Okay. Why do you do that? 10 A To support them. 11 Q Okay. 12 A I -- I do all kind -- I do all kinds of -- 13 I -- I take my business where I feel I'm supporting 14 people that I want to support, and -- and I don't 15 mean just politically, I mean, it might be -- they 16 might be a member of my church congregation or, you 17 know, maybe I support them because they're doing 18 such good work with the Boy Scouts of America or -- 19 I mean, there's a thousand reasons, but I -- I do do 20 business with people that I want to support, yes -- 21 Q Do you think that as -- 22 A -- or maybe they buy me a free lunch -- 23 oh, yeah -- yeah, and that's another reason. 24 Q -- do you think that as -- you know, you're 25 a person who has a business who you're hiring people,	Page 128 1 your prerogative, right, to spend your money where 2 you -- 3 A I -- I have to agree with that. 4 Q Okay. And I -- earlier you said something 5 along the lines of, "with a few limitations," when you 6 say the words, "with a few limitations," are you 7 referring to the limitations by being part of the 8 business and making expenses those ways or -- 9 A Well, I -- I don't remember what we were 10 talking about when I said that. 11 Q Okay. 12 A We'd have to go back and bring that 13 subject and that question back up, but sometimes 14 you're forced to go to a certain supplier -- 15 Q Okay. 16 A -- and just for numerous reasons -- 17 Q Right. 18 A -- sometimes you go to a certain supplier 19 strictly for convenience, which is also a monetary 20 issue, but it -- sometimes it's just your personal 21 time that you choose how to spend it, and it's more 22 convenient to go to this store than to that store. 23 I mean, these are very common sense things. 24 Q Okay. I want to transition a little bit to 25 cancel culture, which is something that you were asked
Page 127 1 you're -- you're doing contracts, but also you're a 2 person who makes -- you buy stuff on your own, right, 3 is it, sort of, your prerogative to spend money with 4 whoever you want to? 5 A With reasonable limitations, I -- I think 6 the answer is yes. It is -- how I spend my money -- 7 and now we're getting into, is it my money or the 8 corporation's money, and then most of the money I 9 spend is the corporation's money and not mine, but 10 the question was: Do I have a right to decide how 11 to spend it? 12 Q Yeah. 13 A I -- I believe that as a managing person, 14 of the corporation, that I do have that right, yes. 15 Q Okay. And if -- oh, jeez -- 16 A And -- and that's -- bear in mind, that's 17 because we fit in a little niche -- 18 Q Okay. 19 A -- and if we were in another niche, we 20 would not have that right. 21 Q If we're just talking about you as an 22 individual -- 23 A Uh-huh. 24 Q -- that is your right to spend -- if you 25 want to go Fred Meyer, you want to go Walmart, that's	Page 129 1 about in these interrogatories. 2 What does "cancel culture" mean to you? 3 A Oh, now, I'd have to go back and think 4 about it, because that's a fairly new word for me. 5 Cancel culture -- oh, let me think about this just a 6 second. 7 To me, "cancel culture" means ostracizing 8 certain function -- certain entities because you 9 disagree with something that they're supporting, or 10 something like that. 11 Q Can you explain to me how, if at all, that 12 is different from what we just talked about where it 13 is your choice to spend your money in the way that you 14 see fit? 15 A Well, yes, because cancel culture doesn't 16 necessarily mean people spending their own money, it 17 means a lot more, including the fact that just 18 encouraging third parties spending their money, it 19 could be everything from boycott -- cancel culture 20 is -- really should probably look at the definition 21 of it, because I don't really remember the 22 definition that well, but cancel culture's more than 23 just people choosing how they spend their own money, 24 it is making a concerted effort to negate the 25 ability of some entities to function.

Page 130 1 Q Okay. So if, for example, I looked up who a 2 business owner contributed to politically and I 3 disagreed with the stance that person took, and I 4 said, I'm not going to shop at that store anymore, is 5 that cancel culture? 6 A I don't know. 7 Q Okay. 8 A Is it? I -- I mean -- 9 Q Oh, and -- and I guess just a-- 10 A -- I don't -- I don't know what -- 11 Q -- personal -- 12 A -- I don't know what the -- I'm not 13 positive what the definition of "cancel culture" is 14 but in my interpretation of what "cancel culture" 15 is, no, that would be your own discretion, but if 16 you were to walk the sidewalk in front of the 17 establishment, you know, and -- and say, don't do 18 business here, then I -- I would think that would be 19 part of cancel culture. 20 But I'm trying to think of a real good 21 example of cancel culture, and they don't come to my 22 mind right now, but that's, kind of, a word that's 23 only popped up in my lexicon in the last, I'd say, 24 two years with -- 25 Q Have you personally ever experienced	Page 132 1 want to -- I'm going to hire a different contractor 2 because I don't agree with you -- 3 A Well, I don't think we'd be talking 4 anyway, but go ahead. 5 Q Okay. But would those -- do you think those 6 things are, sort of, of the same -- 7 A The same what? 8 Q -- I guess, are those things similar or is 9 one of them cancel culture and one not? 10 A I'm not quite sure how we define "cancel 11 culture," but, to me, it's not an individual. 12 Cancel culture is a concerted effort to organize 13 a -- an association of like-minded people to the 14 detriment of maybe one individual or another group 15 of people. 16 Q Okay. There's one, sort of, final area I 17 want to talk to you about, and it's another thing that 18 was addressed in the -- 19 A You promise this is the final area? 20 Q No, I'm a lawyer, absolutely not -- and you 21 were asked about it in your interrogatories, and I -- 22 it's going to be -- not that -- interrogatory 12 where 23 they ask you to describe instances where compliance 24 with the laws at issue in this litigation resulted in 25 a threat or retaliation against you or the other
Page 131 1 anything like that, like we just talked about, 2 somebody is picketing in -- 3 A Well, I can't use the example of 4 picketing, but I certainly have been turned down on 5 request to put up a yard sign a certain place -- or 6 bigger than the yard sign in certain places, yes, I 7 have, on numerous occasions, been denied the 8 opportunity to put up a sign of some political 9 orientation. 10 Q And if -- if -- can you explain to me how 11 that is different if it's, sort of, one person saying, 12 no, I don't want you to put up a sign in my yard, is 13 different then, no, I don't want to do business with 14 you myself? 15 A Well, how is that different? I would say 16 the difference is putting up a sign is advertising 17 to the public, whatever passerby there is. 18 Not doing business with an entity is a 19 personal decision, and if the person who is 20 receiving the business doesn't have to disclose who 21 he do -- business with, it's a very private matter. 22 Q I guess, it -- if somebody says, I don't 23 want your sign, Mr. Vezey, on my yard, and also -- 24 A I have had that experience, but -- 25 Q Yeah, it sounds like it -- and also, I don't	Page 133 1 plaintiffs, but you did not pro- -- sort of, provide a 2 specific example of any threats that were made against 3 you; is that correct? 4 A I'm -- I'm not sure. 5 Q Yeah. 6 A Let me take a look at this. 7 Well, if you -- if you ignore a lot of the 8 details in this question -- I -- I certainly am 9 aware of threats of retaliation. 10 I'm not quite sure if I can put all this 11 together, but my response was -- and this is 12 probably one of the ones I -- I probably spent a 13 little more time just trying to figure out the 14 question -- okay. 15 Okay. Do- -- does my response answer your 16 question or -- or did you want -- 17 Q No, it does -- it does. That's -- so -- so 18 this question specifically asks, are you aware of 19 threats of retaliation specifically because of the 20 donor disclosure law, political disclaimers required, 21 or true source reporting. 22 A Okay. Requiring disclaimers on political 23 communications, that really is more of an issue of 24 controlling speech than it is about retribution -- 25 or cancel culture activities, whatever you want to

Page 134 1 call it. 2 Requiring disclaimers on political 3 communication is the person trying to communicate 4 is -- and we're primarily talking audio or visual -- 5 or audio or visual -- audio communications, the 6 person buying that airtime, that advertising space, 7 is paying for this. 8 The State of Alaska is not, the voters are 9 not, and then you're requiring them to spend a 10 certain amount of their money putting out a -- a 11 canned statement, be it in writing or be it in just 12 verbal, oral. 13 So am I aware of retributions based on 14 disclosing the "paid for by" requirements -- 15 Q Uh-huh. 16 A -- I think it's self-obvious that there 17 would be -- people would choose to associate or not 18 associated with persons that took a point of view 19 that they were opposed to. 20 Q Okay. So what I hear you saying is that 21 people might weigh that their name might be publicized 22 will make it -- 23 A Well, no, that -- that wasn't really 24 wasn't the issue -- the overwhelming issue, it's an 25 issue, but that doesn't compare to the fact that	Page 136 1 their campaign funds posting a message mandated by 2 the State of Alaska. 3 Q So I guess I -- I hear you talking about 4 the, sort of, duplicative -- what you describe as a 5 duplicative effort if -- if multiple people have to do 6 that -- 7 A There -- there -- it -- the duplicative 8 effort is everywhere you look, yes. 9 Q But I -- I don't hear you responding with a 10 situation, like a threat or retaliation where 11 somebody's name has been published on an ad as a donor 12 and somebody threatened them because -- 13 A Oh, well, I -- I am aware that that 14 happens -- 15 Q Can you provide specifics? 16 A -- but I -- I have never been a 17 participant, but I'm -- I'm -- yeah, no, I'm 18 definitely aware where that happens, and I am trying 19 to think of -- there are many, many cases, and I -- 20 I think I can name one or two that I have personal 21 experience with where entities are basically being 22 deprived of their ability to communicate because 23 donors are being discouraged, sometimes forcibly, to 24 not donate -- 25 Q Which donor specifically?
Page 135 1 you're forcing an entity, be it the campaign, which 2 is an entity separate from the individual who is 3 running for office, to spend a certain amount of 4 their contributions -- if we're talking radio 5 airtime, it -- it makes a 15-second -- second radio 6 commercial virtually worthless because you're 7 spending six or seven seconds of those seconds, or 8 more -- I forget how many seconds it all takes -- to 9 deliver a canned speech that's prescribed by the 10 State of Alaska. 11 If you're talking about television time, 12 that screen is your real estate that you're buying, 13 and you have to put a certain amount of money 14 into -- not a certain amount of money, but you pay 15 for the screen time, and a certain percent of that 16 screen time is dominated by a mandatory display. 17 And at the same time, the media that is 18 actually doing this, work putting the stuff on the 19 air, putting it on the television, whatever, they 20 also have to report who's buying what, and, you 21 know, they have -- they have to do disclosure 22 statements. 23 So why are we requiring both parties to 24 disclose, number one, but number two, why are we 25 forcing people to spend a disproportionate amount of	Page 137 1 A I'm talking about donors who would respond 2 to a request for contributions, and those requests 3 for contributions are -- for the lack of a better 4 word, they're blacklisted, they're not allowed to 5 publish them by the publisher, be it the media -- 6 whatever media they're using. 7 One example would be -- oh, we talked 8 about these websites earlier, but, like, Google and 9 Facebook and other social media sites have had to 10 testify before Congress about their efforts to 11 blacklist certain entities, be it individuals or 12 groups or corporations, or whatever, because they 13 didn't like the message that they were saying. 14 Q Okay. 15 A I think -- I think I'm addressing it, but 16 I can -- it gets -- it gets -- when you're talking 17 about the first -- well, 12, requiring disclaimers 18 on political communications, you have -- when you 19 lump them all together, it's really confusing me, 20 but when you're requiring disclaimers on political 21 communications, it's more than re- -- it's more than 22 redundant. 23 I mean, it really is far more than 24 redundant. I'm trying to think of a word that might 25 describe something as more than redundant, it --

Page 138 1 it's punitive. 2 The donor disclosure law, the fact that 3 it's duplicative, you're requiring more effort by 4 the part of the entities that are trying to support 5 a communication, just making more work for more 6 people. 7 Q Do you know anyone who's been threatened 8 because they filed their donor disclosure report? 9 A Do I know of anyone who has been 10 threatened -- and let me think about that a minute, 11 do I know of anyone who's been threatened because 12 they filed their donor disclosure reports? 13 As I sit here right now, I can't think of 14 any names or entities that have been threatened, but 15 I know people have been threatened. 16 Q When you say "you know," if you can't think 17 of a specific name or entity, but you -- you say that 18 you know, where did you learn that information? 19 A I got that information, one, by observing 20 the fact that they withdrew their support but no 21 longer do things like put up signs in their 22 property, would no longer -- I know people that have 23 been threatened to have a -- be boycotted, cancel 24 culture, if you would, for supporting certain 25 individuals or certain init- -- initiatives.	Page 140 1 Most people, the vast majority of people 2 that I've associated with, won't discuss these 3 threats of boycotts or cancel culture effect, or 4 whatever you want to call it, they just won't 5 discuss it. 6 It's something they don't want to 7 discuss -- 8 Q Okay. 9 A -- but you see it in -- in their 10 reactions -- 11 Q Okay. 12 A -- their responses. 13 Q So the final sentence in that interrogatory 14 response is -- you note that, "These reprisals are a 15 reality of life and many (and possibly most) 16 well-adjusted folks learn how to navigate around these 17 events." 18 A Yes. 19 Q When you say "well-adjusted" person -- 20 A Well, there's a lot of people who aren't, 21 but go ahead. 22 Q Okay. I -- I guess the next question is: 23 Do you think some people are -- are too easily 24 offended by -- 25 A So, no --
Page 139 1 I -- yes, I -- I do know, and it would be 2 really hard for me to sit down and start digging out 3 names, but I could probably come up with -- I think 4 I could come up with a very long -- I know I could 5 come up with a very long list. 6 Q Okay. And are those specifically related to 7 their disclosing that they financially supported them 8 or something else? 9 A Well, ye- -- yes, and I'm -- I'm trying -- 10 I don't want to slander anyone, but, yes, people are 11 commonly told, you know, if you support this, then 12 we're going to encourage our group to not support 13 your business or your activity, or whatever. 14 Q Okay. But you don't have a specific example 15 of that? 16 A Well, the information I have is not 17 firsthand in most cases, and where it is, I'm 18 hesitant to say something that might be considered 19 slanderous. 20 Q So you've learned about this, be it talking 21 to other people but not interacting with the parties 22 who were threatened? 23 A I have, on occasion, interacted with 24 people who -- who tell me that they were threatened 25 with loss of business.	Page 141 1 Q -- some of these things or -- 2 A -- that -- that you're going -- now, 3 what -- 4 Q -- are you -- were -- 5 A -- most people have the ability to be -- 6 have some kind of a political correct trait in their 7 personality, that they know how not to offend 8 people. 9 Not offending people is a key part of 10 being successful in many endeavors. 11 MS. WEIANT: Okay. Okay. I am going to 12 check with the team we -- 13 MR. STEPHENS: Okay. 14 MS. WEIANT: -- we -- just take a couple 15 minute break. I don't know how long we've been 16 going -- 17 THE WITNESS: I'm not sure either. 18 MR. STEPHENS: No problem. 19 MS. WEIANT: Sam, probably has things, 20 but -- 21 MR. STEPHENS: All good. 22 (Brief break.) 23 MS. WEIANT: I think I'm good. 24 MR. STEPHENS: Sam? Hello? 25 MR. GOTTSTEIN: I do have a few questions.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ROBERT GRIFFIN, ALLEN VEZEY,
TREVOR SHAW, FAMILIES OF
THE LAST FRONTIER, and ALASKA
FREE MARKET COALITION,

Plaintiffs,

vs

RICHARD STILLIE, JR., in his
official capacity as chair
of the Alaska Public Offices
Commission, et al.,

Defendants,

and

ALASKANS FOR BETTER ELECTIONS,
INC.,

Intervenor-Defendant.

Case No. 3:22-cv-00077-SLG

DEPOSITION OF STEVEN R. STRAIT

November 10, 2025

APPEARANCES:

FOR THE PLAINTIFF:

MR. RILEY STEVENS
MR. CRAIG RICHARDS
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1 **related to all the subjects?**

2 A Yes.

3 **Q So let's just start with some general**
4 **background. Can you describe for me what kind**
5 **of organization FLF is?**

6 A I'm going to refer to the request for -- first
7 discovery request.

8 **Q Okay.**

9 A I think we outlined it quite specifically
10 there. And the question again?

11 **Q So can you tell me what type of organization**
12 **FLF is?**

13 A Yes. I'm referring now to Page 9, it's a --
14 it's a group whose intent and purpose is to get
15 good conservatives elected to public office.

16 **Q Okay. And do you know is this a non-profit, is**
17 **this an independent expenditure group, is it a**
18 **corporation, do you know what type of.....**

19 A Under Alaska law, I'd have to check with that,
20 we're not a -- we're not a corporation. We
21 file with the state of Alaska but we're not an
22 expenditure group either, or -- or -- I'm not
23 sure if we are or if we're a political action
24 committee. I'm -- I -- I'm not clear on that.

25 **Q Okay. Do you know when FLF was formed?**

1 A I do. And I'm referring to the discovery again
2 on Page 9 where it's specified there, it was
3 formed June 25th, 2018.

4 Q Okay. And why was FLF formed?

5 A To get good conservative candidates elected.

6 Q Can you tell me anything about the process of
7 the organization starting?

8 A It started over a cup of coffee in my lounge,
9 my living room.

10 Q Okay. So who was there?

11 A I believe that's also specified here in the --
12 once again I'm going to have to keep referring
13 to this, first discovery requests, Page 9, and
14 I'll just read from that. The group's purpose
15 was change -- was changed to elect
16 conservatives to public office, Christy Strutz
17 became the treasurer, Paul Harrison served as
18 treasurer until September of 2018. Steve
19 Strait, myself, served as chair. And Steve
20 Agny -- well, it's listed here. If I could --
21 I'll read the whole thing if you'd like or you
22 can just refer to it on Page -- Page 9.

23 Q We can come back to specific names but in terms
24 of do you remember who was in the room when the
25 organization started so.....

1 A Yes.

2 Qyou mentioned yourself.

3 A Yes, I do. I could answer.....

4 Q **Who else?**

5 Ayes. Yes. Randy Ruedrich, Gloria
6 Shriver, Christy Strutz, myself, and that's
7 what I can remember, uh-huh.

8 Q **Okay. So let's go ahead and mark these**
9 **discovery responses since I think we'll all be**
10 **referring to them.**

11 REPORTER: B is marked.

12 (Deposition Exhibit B marked)

13 Q **Okay. And, you know, I think you already**
14 **covered this but do you recognize this document**
15 **that I just handed you?**

16 A I do recognize the document titled state's
17 first discovery requests to Families of the
18 Last Frontier.

19 Q **And were you involved in producing this**
20 **document?**

21 A In part.

22 Q **Okay. And who else was involved?**

23 A Randy Ruedrich, Lance Pruitt.

24 Q **Okay.**

25 A And Christy Strutz, I believe, in a limited

1 role.

2 Q So if you look at Page 9, which I believe is
3 where you were and your response to
4 Interrogatory 1, let me know when you're there.

5 A Yes.

6 Q So it says that the group purpose changed from
7 electing Republicans to electing Conservatives.
8 Can you give more detail about what you mean by
9 that?

10 A Yes. Things changed. The world changes. I
11 think let me -- if I could just bring it up to
12 date to today's world. Now we're talking 2018,
13 the subject today we're talking about occurred
14 in 2022 with this ballot measure and its
15 impact, but if -- to answer your question, in
16 today's world we just observed an election in
17 New York City where we have two -- two
18 candidates, one a communist, some would call a
19 communist, the other is a liberal Democrat and
20 between the two, if I were -- if we were living
21 there, if I was living, if our group was there,
22 we'd have to choose if we were going to
23 participate in that race, we'd pick the most
24 conservative candidate of the two and I think
25 that would be clear that it would be -- who

1 that would be. So that's an example of where
2 neither Repub -- they're not Republicans but if
3 they're conservative then we would support the
4 most conservative.

5 **Q Okay. So if I'm understanding correctly**
6 **conservative is maybe a broader umbrella.....**

7 A Yes.

8 **Q than Republican?**

9 A Yes.

10 **Q All right. And does FLF have any other purpose**
11 **aside from electing conservatives.....**

12 A No.

13 **Q to office? Okay. So staying on this same**
14 **page now the response to Interrogatory No. 2**
15 **where you're talking about supporting various**
16 **candidates I just want to clarify, it says, as**
17 **an IE group. Is FLF functioning or registered**
18 **in any other capacity?**

19 A Not that I'm aware of.

20 **Q Okay. And what do you do to support**
21 **candidates?**

22 A Ask that again, please?

23 **Q So what does FLF do to support candidates?**

24 A We attempt to raise money and create messaging
25 -- messages for the public as regards to

1 Amarkers. Others it's identical.....

2 Q **Okay.**

3 Ato what you're looking at.

4 Q **And so up to this point in the deposition, have**

5 **you referred to notes.....**

6 A No.

7 Q **.....of any kind?**

8 A No.

9 Q **Okay.**

10 A Do I need to?

11 Q **So RFA No. 17, so I'm looking at this response,**

12 **FLF effectively shut down in 2022 election**

13 **cycle due to concerns of retaliation on a would**

14 **be donor. So we're still in the year 2022,**

15 **tell me more about this.**

16 A You know what I'm going to do is just -- just

17 give me a moment, I'm going to come back to

18 your exhibit because I'm -- you're on 17?

19 Q **So Exhibit B.....**

20 MR. STEVENS: Request for Admission 17.

21 Q **.....Page 21, Request for Admission 17.**

22 A Okay.

23 MR. STEVENS: It's in here.

24 A My apologies. Okay. There -- you had it the

25 first time, thank you. Okay. Yes, I'm with

1 you now.

2 **Q Okay. So tell me more about FLF effectively**
3 **shutting down due to concerns of retaliation on**
4 **a would be donor?**

5 A I -- I cannot speak to that, I'm just unaw --
6 this was a -- our group put this together, I
7 would have to check on -- I could get you an
8 answer on that but I don't have it today.

9 **Q Okay. So who would know the answer to that?**

10 A Randy Ruedrich, part of our group.

11 **Q So you're not aware, just to clarify, what, if**
12 **-- if he's referring to some sort of specific**
13 **example here, this is not a response that you**
14 **reviewed or provided?**

15 A I -- what I'm saying is I'm not sure which
16 specific case he's referring to here.

17 **Q Okay.**

18 A But there are probably others also and so I'd
19 have to -- since -- Randy would be the one to
20 answer this specific question.

21 **Q Are you aware of any examples of this type of**
22 **retaliation?**

23 A None that I could mention today that I'm --
24 that -- I'd have to go back and look.

25 **Q Okay.**

1 A And research that.

2 Q **And what would you be looking at?**

3 A I'd go back and look at my notes and -- and
4 just recollect what was going on in the '22
5 cycle.

6 Q **Okay. Let's move on to 2023.**

7 REPORTER: G marked.

8 Q **And I'm going to.....**

9 A Would -- would yo -- just to clarify, would you
10 like further -- do you need more material on
11 that or you're going to handle that, do you
12 want me to get that to you, just clarifying?
13 MS. LOBER: I'll talk to Riley about that on
14 the break.

15 MR. STEVENS: We -- we can -- we'll talk
16 afterwards, if -- if they want anything else, that's
17 fine.

18 A Okay.

19 Q **We're on Exhibit G.**

20 **(Deposition Exhibit G marked)**

21 Q **Take a look and tell me if you recognize these**
22 **reports.**

23 A Yes, I do.

24 Q **Okay. So on Page 1 I'm seeing about, let's**
25 **see, four contributions from individuals; is**

1 **that correct?**

2 A On Page 1, yes.

3 **Q Okay. And then I'm looking at Page 4, there's**

4 **quite a few more contributions from**

5 **individuals, maybe about 10.**

6 A I'm counting 10.....

7 **Q 10.....**

8 A on Page.....

9 **Q okay.**

10 A 4 of Alaska contributors.

11 **Q Okay.**

12 A No, they're not all Alaska, my correction,

13 several from out of state.

14 **Q Okay. Mostly from Alaska?**

15 A Yes.

16 **Q And do you know how FLF -- oh, sorry, let's**

17 **keep going, Page 7 there's some more -- more**

18 **contributions; is that correct?**

19 A Yes. Their -- I'm showing four.....

20 **Q Okay.**

21 A more contributions.

22 **Q Do you know how FLF solicited these**

23 **contributions?**

24 A I -- I -- I think in -- in -- in keeping with

25 what we've discussed earlier, just personal

1 relationships and -- and requests.

2 **Q And, again, do you know if FLF attempted to**
3 **solicit donations from RSLC or GOPAK during**
4 **this reporting period?**

5 A I -- I cannot speak to that, I -- I'm not
6 aware.

7 **Q And so going to Page 11, the year end report,**
8 **what was FLF's total income in -- for this**
9 **reporting period?**

10 A For the period of February 10th, 2024 reports
11 total income \$41,498.

12 **Q Okay. And so then -- and what about, did FLF**
13 **have expenses during this reporting period?**

14 A They did.

15 **Q What were they?**

16 A \$41,499.66, so they over spent by a \$1.66 it
17 looks like.

18 **Q So does it -- does it seem fair of you to say**
19 **that this reporting period we're looking at,**
20 **FLF is no longer shut down?**

21 A Not at all, quite the contrary but I think in
22 terms of what you're really asking here, I
23 think in a different way, is, financially, does
24 it look like FL -- FLF has been impacted.

25 **Q So I guess what I'm asking for this reporting**

1 period, does it look to you like there are
2 multiple contributions coming into FLF?

3 A We've just discussed those so, yes, what's.....

4 Q Yes.

5 Ashown here is accurate.

6 Q And it seems like they're spending money as
7 well, right?

8 A As -- as reflected on this document, yes.

9 Q So do you know what changed from 2022 to this
10 reporting period?

11 A I think there's a -- a year has gone by and a
12 -- a little better understanding, perhaps, of
13 the Ballot Measure 2 and its implications and
14 there were other -- I'm sure there were other
15 reasons, I just couldn't speak to those because
16 I'd -- I'd have to go back and look. I just --
17 I'd have to refer to the committee.

18 Q Sorry, what do you mean by refer to the
19 committee?

20 A Well, refer to the organization further and --
21 and -- and a couple of the people that were
22 asking for money.

23 Q Okay. Moving along to H.

24 REPORTER: H marked.

25 (Deposition Exhibit H marked)

Page 68

1 A I don't know what they are but they're in the
2 works and they're big plans, we don't have
3 anything in writing, any official, we're just
4 looking forward to being actively engaged in
5 the next election cycle but no specifics.

6 **Q Okay. So talking a little more specifically**
7 **about some of FLF's donors or contributors, so**
8 **I guess do you know what I'm talking about if I**
9 **say the donor disclosure law?**

10 A The -- as part of the Ballot Measure 2?

11 **Q Correct.**

12 A And that's the self reporting of -- of money,
13 of contributions.....

14 **Q Correct.**

15 A of donors.

16 **Q Okay. So we're going to go to Exhibit B again,**
17 **your responses to Interrogatories 3 and 4,**
18 **which I believe are on Page 10.**

19 A Yes, 10.

20 **Q Okay, so the response to Interrogatory No. 3**
21 **says an unknown number have been deterred by**
22 **the disclosure law, so explain to me again how**
23 **have they been deterred?**

24 A Hum. I can't answer that. I can't answer that
25 now.

1 **Q** **So am I -- okay, and am I understanding**
2 **correctly the FLF is not aware of any of its**
3 **own donors that had an issue with the donor**
4 **disclosure law?**

5 A No, I -- I can't -- I'm not saying that, what
6 I'm saying is I can't answer that because I'm
7 just not familiar with a specific case here.
8 We stand by our response here but I don't have
9 any specifics that I can give you now.

10 **Q** **Okay. So the part that says no donors have**
11 **compliance issues, that's accurate to your**
12 **understanding?**

13 A Correct. If they donated they were very much
14 aware of the -- their contributions.....

15 **Q** **Okay. Understood.**

16 A and -- and the law, uh-huh.

17 **Q** **Thank you. So is FLF aware of any donors, just**
18 **more generally speaking, not even just to FLF,**
19 **who, like a specific example who had trouble**
20 **complying with the disclosure law that we're**
21 **talking about here?**

22 A I believe we speak to that, and I don't have it
23 in front of me where it is. Our response to
24 discovery speaks to that and I'd like to find
25 that and if you could give me a minute I will

1 look it up.

2 **Q Absolutely.**

3 A You have it somewhere too.

4 **Q I'm not sure what you're referring to actually.**

5 A Okay. And we're -- we're focused now on
6 response to question.....

7 **Q Response to Interrogatory No. 3.**

8 A No. 3, okay.

9 (Pause)

10 A Well, speaking to that, one of our concerns in
11 the original discovery requests was to name
12 donors that didn't want to donate because they
13 didn't want to be disclosed and -- and that was
14 a dicey one. Interesting question to identify
15 everybody that didn't want to be identified and
16 I think this interrogatory, No. 3, falls within
17 that, that an unknown number of would be donors
18 and you're asking me who they are, is that --
19 if I'm correct?

20 **Q So I'm asking you why the donor disclosure law,**
21 **why it's deterring unknown donors? What**
22 **specific, why is the donor disclosure law**
23 **deterring would be donors?**

24 A Okay. Then I'm going to refer back to our
25 discovery document.

1 MR. STEVENS: This is the discovery document.

2 A Yeah, I had a highlighted one that was easier
3 -- it's somewhere here, we're going to give to
4 you but, yeah, this is it. So -- and question
5 Interrogatory No. 5 -- oh, let's see 3, let's
6 go to 3 here see what's in there. Here we go.
7 No. 3. Identify donors -- no donors -- I have
8 no more information than that.

9 Q And just taking a -- taking step back for a
10 moment, so what is FLF's understanding of what
11 -- so the donor disclosure law referenced in
12 Interrogatory No. 3 and the citations there,
13 what's FLF's understanding of what that law
14 actually requires?

15 A A disclosure.

16 Q What kind of disclosure?

17 A As listed in Ballot Measure 2. And that's
18 their self -- let's see here, the reporting of
19 True Source details, donor, and -- and I'm
20 referencing Page 16 of the discovery, APOC
21 regulations require the donor to report the
22 contribution, must file a 24 hour report if the
23 contribution is received shortly before the
24 election as well as an IE report that the funds
25 were rec -- received. When reporting expenses

1 and file potential fourth report 30 days before
2 the election, seven days before the election,
3 105 days after the election, regular campaigns
4 disclosure, other reporting to complicate the
5 entire APOC process, this information is likely
6 outcome.

7 **Q So does FLF see a difference between the --**
8 **what's referenced here as the donor disclosure**
9 **law and then the True Source law that you just**
10 **referenced, are tho -- what's.....**

11 **A** There are.....

12 **Qyour understanding of those two laws?**

13 **A** There's a -- there's a \$2000 trigger that takes
14 place, contributing 2000 or more, or over 2000
15 triggers self reporting.....

16 **Q Okay.**

17 **A**is my understanding.

18 **Q So that's the donor disclosure law?**

19 **A** Uh-huh. (Affirmative)

20 **Q Okay. And so how is that deterring donors?**

21 **A** If -- you're representing the State of Alaska
22 now, APOC, is that right?

23 **A** Correct.

24 **Q And I assume you have been more involved with**
25 **more than one APOC issue than this, and as you**

1 know APOC has a history of deterring people
2 that are involved -- you may not know this, but
3 they have a -- they are known as a deterrence
4 factor in being involved in -- in campaigning
5 in Alaska and that is if you fail on any one of
6 these requirements you're subject to not only
7 immediate penalties but then additional
8 penalties on top of that for every day that
9 it's not self corrected or reported and it adds
10 up quickly. A minor violation can quickly add
11 up to 10, 15, \$20000 liability penalty
12 assessment by APOC to a candidate or to a donor
13 now in this case.

14 Q Okay. So I'm hearing, is this -- you're having
15 concerns -- FLF is having concerns about the
16 fines that donors might be subject to for not
17 correctly reporting donations?

18 A That is a concern.

19 Q Okay. Are there other concerns that I'm
20 missing as well?

21 A I -- there are -- let me just say I -- I -- I
22 can't speak to that.....

23 Q Okay.

24 Aother concerns.

25 Q And, again, sticking with the donor disclosure

1 law, as you talked about, the \$2000 trigger
2 limit to report, was FLF contacted by any past
3 or current donors to talk about that law?

4 A Yes.

5 Q Okay. And what form did that contact take?

6 A Verbal.

7 Q Verbal, okay. Do you know roughly how many
8 donors contacted FLF to.....

9 A I can't speak to that.

10 Qtalk about it?

11 A I cannot speak to that.

12 Q Okay. So no specific example that you can
13 provide right now?

14 A I'm not going to provide any examples right
15 now, correct.

16 Q So I want to move on and talk about the True
17 Source requirement. So can you tell me -- so
18 what is FLF's understanding of the True Source
19 requirement in Ballot Measure 2?

20 A We're back to the \$2000 limit, is that what
21 you're referring to?

22 Q So I was understanding we were talking about
23 the \$2000 reporting trigger when we talked
24 about the donor.....

25 A Uh-huh. (Affirmative)

1 **Q** **Okay. So these reports starting in 2018 show**
2 **the names of FLF contributors, correct?**
3 **A** **Yes.**
4 **Q** **Okay. And then -- so returning back to**
5 **specifically the True Source law, was FLF**
6 **contacted by any donors specifically to discuss**
7 **concerns about the True Source law?**
8 **A** **Yes.**
9 **Q** **Okay. And what form did those.....**
10 **A** **Just clarification.....**
11 **Q** **.....that contact take?**
12 **A** **.....trying to understand Ballot Measure 2 and**
13 **the implications to donors.**
14 **Q** **And do you know, so were donors the ones**
15 **reaching out in those situations?**
16 **A** **I couldn't say.....**
17 **Q** **Okay.**
18 **A** **.....I don't know, I'm not aware of that right**
19 **now.**
20 **Q** **Do you have any estimate of maybe how many**
21 **donors?**
22 **A** **No, I don't.**
23 **Q** **Okay. Are you aware whether, again, I'm**
24 **talking about the entire history of FLF, so**
25 **2018 to now, has FLF contributed to any other**

1 **independent expenditure groups?**

2 A I want to say, yes, but I don't have a specific
3 on it. In the history of -- since 2018, I want
4 to say, yes, but I -- I couldn't say when or
5 where and I -- I couldn't say for sure but I
6 believe we may have on one occasion.....

7 **Q Okay.**

8 A but I -- I can't recall the specifics.

9 **Q Let me -- so I can point you in the direction,**
10 **let me see -- so I'm wondering if it might be**
11 **-- if you look at Exhibit E, Page 4.**

12 A Yes.

13 **Q Do you know, is that -- so there's a box under**
14 **expenditures and can you tell me what this**
15 **expenditure was?**

16 A The expenditure was in the amount of \$16000 in
17 the year 2020, August of 2020, funds were
18 transferred to an IE group for use to support
19 Republican candidates in the 2020 primary
20 election.

21 **Q So did FLF intend for that money to be used for**
22 **campaign activities?**

23 A Yes, we reported that purpose here to -- to
24 support Republican candidates.

25 **Q All right. And then -- and I mentioned cancel**

1 **culture, let's talk about cancel culture.**

2 A You brought it up, okay.

3 **Q So how would FLF define cancel culture?**

4 A Let me think for just a moment. It -- it's in
5 -- in one of the questions here it came up and
6 that was somebody mentioned cancel culture, I
7 don't believe we were the first ones to do it,
8 maybe we did, but neither here nor there I
9 think it's a valid concern here. We're all
10 Alaskans here, we know what it's like, how
11 small of a state this is, you know your
12 neighbors, you know your businesses in state,
13 and there's a -- you just -- in politics, in
14 particular in politics as we've evolved since
15 the year 2020 probably we've become more and
16 more sensitive partisan, I think, in our views,
17 collectively, partisan in our views in -- in
18 Alaska and especially when we know the
19 candidates, often we know them, it's a small
20 state, businesses that -- businesses that
21 contribute to candidates or candidates that --
22 or elected officials that own businesses, often
23 the community sees that relationship of the
24 candidate or of the elected official in an
25 official position and that affects some

1 decisions on whether people participate or buy
2 or do service with that business that's
3 associated with contributing to candidates or
4 being an elected official.

5 **Q Okay. So -- so am I hearing, so an example**
6 **would be not buying a service or a product from**
7 **a business?**

8 A I can give you a specific of mine, an example
9 of mine, here we sit on the end of Fourth
10 Avenue, across the street there's a fine
11 restaurant, it gets top ratings, I'll never --
12 I've never been in it and I'll never go in it
13 because I know the owners are partisan
14 activists on a political party in Alaska so I'd
15 never go in there.

16 **Q Okay.**

17 A That's a cancel -- that's just how it works
18 both ways. I mean I'm not -- it's not us,
19 we're not -- you know what I'm saying. So
20 there's an example.

21 **Q Okay. So you not supporting that business is**
22 **an example of cancel culture?**

23 A And being targeted -- if you're a candidate you
24 can be targeted by people that come after your
25 business or employer.

1 **Q** **Does it matter how many people participate in**
2 **not supporting a particular business or is one**
3 **person enough?**

4 A Well, if you -- maybe I could ask you to
5 clarify the cancel -- how big you're going to
6 go with this cancel, how far -- how large you
7 want to go because I -- I think we've
8 established it's out there, now the concern is
9 how does that affect this case, I think is
10 where you're going with this?

11 **Q** **So I think I'm not fully understanding still of**
12 **a straightforward definition, what does FLF see**
13 **as cancel culture?**

14 A Okay. Once again let me give you another
15 example. This time we're not at a diner, a
16 fine diner across the street, which is highly
17 rated by the way, I know a donor, a woman who
18 owns a business in town, would donate to
19 candidates and does donate to candidates but
20 does not want her name anywhere or her
21 business, her name associated with those
22 contributions, in fact, it limits her
23 contributions and she doesn't participate in
24 the election process because she just -- her
25 business is -- her color is not red or blue,

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1 it's green, is business, and so she stays the
2 hell out of that because there's this cancel,
3 as I just mentioned, the restaurant business
4 across the street, you just -- you prefer not
5 -- you prefer not to -- if you're going to make
6 a contribution to have your name out there
7 because it does affect whether you're going to
8 contribute or not often.

9 Q Okay. And so

10 A And I've given you two examples here.

11 Q Okay. So having to put your name on a donation
12 in that case and having that result in you not
13 contributing would be an example of cancel
14 culture. Okay. And then let's look at --
15 let's see the complaint for this case, I just
16 want to make sure we -- let's look at Page 7.
17 REPORTER: Exhibit I.

18 MS. LOBER: Oh, thank you, Exhibit I.

19 (Deposition Exhibit I marked)

20 Q Did I give you a copy of it, sorry about that.
21 Okay. I may have given you the wrong page
22 number, I don't know what I said but Page 10 of
23 Exhibit I and I'm looking at paragraph 49.

24 A Okay.

25 Q Okay. And so FLF fears that publicly listing

1 our donors support the organization may lead to
2 reprisals against donors and their business
3 interests in the current climate of cancel
4 culture. So is reprisals against donors
5 referring to anything separate from cancel
6 culture or is that the same thing?

7 A I think the -- the -- they're similar, they're
8 related, but they can be different here.
9 Cancel culture, I think is -- is -- is that
10 it's a cultural term, I think the other -- what
11 we're referring to here is just an ongoing
12 desire by many not to be -- not to be in the
13 forefront of politics, they like to be -- to
14 participate quietly and maybe write a check or
15 two, small donation but they just don't want
16 their -- their name out there on the front
17 lines, leave it to somebody else to do that.

18 Q And so -- and you gave one example before of a
19 woman who didn't donate.....

20 A Right.

21 Q because she didn't want her name on it,
22 have any FLF donors ever communicated to FLF
23 that they don't want to donate because they're
24 afraid of reprisals or cancel culture?

25 A Yes.

1 **Q** **Okay. So can you give me an example?**

2 A I won't.

3 **Q** **So you -- you do have examples but you're**

4 **unwilling to.....**

5 A Correct.

6 **Q** talk about them.....

7 A Correct.

8 **Q** today? Okay. Let's take -- well, would

9 **you like a break or do you want to keep going?**

10 A I could get some water.

11 **Q** **Okay.**

12 A How you doing over here?

13 MR. STEVENS: I'm good.....

14 A You're doing all the talking.

15 MR. STEVENS:we -- it's a good time as

16 any -- it's a good time as any.

17 A You're -- you're doing all the talking.

18 **Q** **So take a short break?**

19 A Take a short break, thank you.

20 REPORTER: Off record at 2:51.

21 (Off record)

22 (On record)

23 REPORTER: On record at 3:08.

24 **Q** **Okay. So we talked about this briefly in the**

25 **beginning but can you tell me what kinds of**

1 **concerns about their name appearing on a**
2 **disclaimer on a communication?**

3 A Those that have contributed, no, they
4 understand it's going to be -- they're likely
5 to be named.

6 **Q Okay. And so then I just -- I want to followup**
7 **again while we're talking about FLF's donors.**
8 **So I want to make sure I understand.....**

9 A Could.....

10 **Q what.....**

11 A And I want to come back to this radio thing
12 before we -- when you're ready.

13 **Q So -- and I might be mischaracterizing what you**
14 **said, so please correct me, I want to make sure**
15 **we get this straight. So I was understanding**
16 **that there were FLF donors who have told you**
17 **they don't want to donate because of the**
18 **disclosure law?**

19 A Correct.

20 **Q That's correct, okay. And you're not willing**
21 **to share those names with me, is that.....**

22 A Not at this time.

23 **Q correct? Okay. So can I ask why not?**

24 A I would have to get their permission. The
25 reason they don't want to donate is they --

1 they just don't want the publicity.

2 **Q Okay. So it's a con.....**

3 A And.....

4 **Q concern.....**

5 A and so.....

6 **Q about anonymity?**

7 A Yes. And -- but I -- I.....

8 MR. STEVENS: If you're -- no, if you're
9 concerned, I -- I think I can talk to him and -- after
10 this, and we could maybe do -- we could -- we could
11 actually submit, for example, under protective order
12 maybe or something if there's a concern about that, I
13 -- I think that we can talk afterwards about that.

14 MS. LOBER: Okay.

15 **Q And then so the same for True Source, am I --**
16 **am I understanding correctly or not, have FLF**
17 **donors told you that they won't contribute**
18 **because of the True Source law?**

19 A Can we get back to you on that, I just want to
20 be real clear on that one and -- and I'm -- I'm
21 not sure I am right now.

22 **Q Okay.**

23 A Can we -- that -- you could add that.

24 **Q And then -- so, and, then, again, are there --**
25 **are there FLF donors who are not donating**

1 **because they've experienced cancel culture or**
2 **reprisals and have communicated that to FLF?**

3 A If you'd ask that again, please.

4 **Q Have any FLF donors communicated to FLF that**
5 **they have experienced examples of cancel**
6 **culture or reprisal or harassment as a result**
7 **of donations?**

8 A What we've seen here with all these examples
9 are the same top three contributors listed and
10 those top three contributors are well aware
11 that -- that they -- they have not expressed --
12 none of the three, that I'm aware of, have
13 expressed that concern.

14 **Q Okay. But, generally, for all of FLF's donors,**
15 **I just want to make sure, have any of -- are**
16 **you aware of any donors who have expressed to**
17 **FLF concerns that they've experienced cancel**
18 **culture because of their donations?**

19 A Can we add this to our list, Counsel?

20 MR. STEVENS: Okay. What -- I'm sorry, I don't
21 know what.....

22 **Q So are you aware of -- of examples of donors**
23 **who have experienced cancel culture because of**
24 **donations they have made to FLF?**

25 A Oh, I just want to be as accurate as I can and

1 -- and I think we have.

2 **Q** **Okay.**

3 A I -- I think we have but I just want to clarify
4 that. I just need to.....

5 **Q** **Okay. So.....**

6 Ato check with them.

7 **Q** **So you're unable to give an example because**
8 **you're not sure what the examples are; is that**
9 **correct?**

10 A I -- I think that's a fair statement, yes, yes,
11 at this time.

12 **Q** **Okay. Just give me.....**

13 A Can I come back to this cancel culture issue
14 one more time, which is a bid concern of ours,
15 and it's APOC and it's a recurring theme, so
16 let me just -- one of these flyers and it has
17 to do with the one with we had earlier, it was
18 the soldier here, here it is, Nelson, David
19 Nelson. So last October we sent out this flyer
20 and I'm not sure if it was a mailer or if it
21 went out on social media but it's neither here
22 nor there, but we caught this and said, look,
23 our disclaimer is incorrect, you know, we -- we
24 -- we didn't get it quite right. So we self
25 reported to APOC, okay. Proper thing to do.

Page 104

1 APOC says, oh, man, this is going to cost you,
2 we self corrected, nobody -- we self reported
3 and self corrected so there were no complaints,
4 we get a fine from APOC -- they threatened us
5 with a fine, we go, okay, bring in an attorney,
6 try to work it out, we come up with what we
7 think is a consent decree, this is all within
8 weeks of the election, APOC says, okay, here's
9 what it's going to cost you, and we're trying
10 to work through this consent decree and it just
11 goes quiet, APOC says we're not talking to you.
12 It's been a year and it's still unresolved.
13 Now, you think of any.....

14 **Q** **So.....**

15 Abusiness where you have a liability
16 hanging out for a year and you're -- and you're
17 trying to do business, it -- it's just -- it's
18 -- it's just a wet blanket once again, the
19 client, your client.

20 **Q** **Are you suggesting that so APOC's fines are an**
21 **example of cancel culture?**

22 A Yes, I am.

23 **Q** **Okay.**

24 A And not just the fines but the threats of
25 fines, the intimidation factor.



"The highest priority I have in my life is abused and neglected children. I'm supportive of Prop 14 because it authorizes and provides funding that will give kids better opportunities and better outcomes."

FRED DYSON, REPUBLICAN FORMER LEGISLATOR AND ASSEMBLY MEMBER



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IVY SPOHNHOLZ, DEMOCRAT FORMER LEGISLATOR

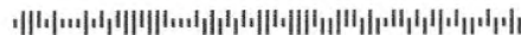
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Paid for by Yes on 14 - Care for Kids, PO Box 210763, Anchorage, AK 99521. Trevor Storrs, Chair, approved this message. The top three contributors are Alaska Children's Trust, Anchorage, AK; Western Futures Fund, Sheridan, WY; Children's Funding Accelerator, Washington, DC

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Business and economic development groups say
vote YES on Proposition 14



"The Anchorage Economic Development Corporation supports the passage of Prop 14. It provides important new investment by the community that supports increased availability of affordable childcare, allowing more workers to rejoin the workforce, while providing important early education programs for younger children in our community, an important investment in the future of our city."

- BILL POPP, CEO
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DEVELOPMENT CORPORATION



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PROPOSITION 14

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YOUR VOTE IS MOST POWERFUL WHEN YOU RANK!
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JENNIE ARMSTRONG
REP. MATT CLAMAN FOR SENATE

FOR GOVERNOR RANK:
LES GARA AND JESSICA COOK #1; BILL WALKER AND HEIDI DRYGAS #2

VOTE NO ON THE
CONSTITUTIONAL
CONVENTION

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KIMBERLY RODGERS

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6237

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VOTE FOR

- ☒ CLEAN AIR AND WATER
- ☒ HEALTHY COMMUNITIES
- ☒ A STRONG DEMOCRACY

The Alaska
Center
OUR HOME. OUR FUTURE

EARLY VOTING STARTS OCTOBER 24TH

LAST DAY TO VOTE IS NOVEMBER 8TH

Filed for and approved by The Alaska Center (E, 605 F.S., Suite 100, Anchorage, Alaska 99501, Susan Kiehn, Chair. The top contributors to The Alaska Center are: Farhad Dardari (Bellingham, WA), and Service Employees' International Union (75 Quality Care Committee, Seattle, WA), and Stephen D. Robinson (Anchorage, AK). This NOTICE TO VOTERS is required by Alaska law. The Alaska Center (E) certifies that this communication is not authorized, paid for, or approved by the candidate. A majority of contributors to The Alaska Center (E) came from outside the State of Alaska.

SECURITY 770C

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Exhibit K Page 4 of 32

MIA COSTELLO

will fight so your house, your family and your dollar stay on **SOUND FISCAL GROUND!**

- ✓ Mia Costello will **fight** against an **income tax**.
- ✓ Mia Costello will **fight for good paying jobs** and a **thriving economy**.
- ✓ Mia Costello will **fight** to roll back **government regulation**.
- ✓ Mia Costello will follow the law to **pay** the **statutory PFD**.



VOTE
TUESDAY,
NOVEMBER 8.

**Mia
Costello**
STATE SENATE

SOA000005

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Kimberly Rodgers

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The value of your **dollar** is *fading Away.*



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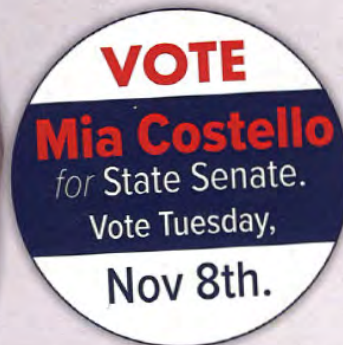
Mia Costello *has a clear record of fighting for Alaska families and businesses twice as hard...*

SOA000007

1. **fought** against an income tax
2. **fought** against a motor fuel tax

And...

- ✓ Mia Costello brought Uber and Lyft to Alaska creating thousands of new jobs
- ✓ Mia Costello supported small business tax incentives to ensure a thriving economy



106115

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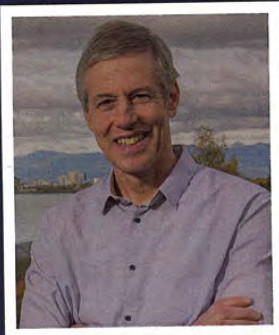
Sources:
(1) Income Tax - 2017 (HB 115 & HB 146)
(2) Motor Fuel Tax - 2017 (SB 115 & HB 60)

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MATT CLAMAN IS SEEING DOUBLE

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MATT CLAMAN:

Supported an **Income Tax X2⁽¹⁾**

Supported a **Motor Fuel Tax X2⁽²⁾**

... and it would have cost you **millions**

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MIA COSTELLO IS HAPPY TO **TAKE MONEY FROM PEBBLE** FOR HER CAMPAIGN.

08/10/2022	Credit Card	ANCHORAGE, Alaska 99511 Heatwole, Mike 5200 Huffman Rd	Occupation: Pebble Partnership Employer: VP	\$250.00
09/13/2022	Check 7621	Shively, John 8906 Arlene Drive # 2 Anchorage, Alaska 99502	Occupation: CEO Employer: Pebble Limited Partnership	\$500.00

**PEBBLE CEO JOHN SHIVELY
ONLY GAVE TO **6 CANDIDATES** THIS CYCLE.**

**WHAT MAKES MIA COSTELLO
SO APPEALING TO PEBBLE?**

Paid for and approved by The Alaska Center IE, 808 E St, Suite 100, Anchorage, Alaska 99501. Susan Klein, Chair. The top contributors to The Alaska Center IE are Farhad Ebrahimi (Boston, MA), and Service Employee's International Union 775 Quality Care Committee (Seattle, WA), and Stephen D Robbins (Anchorage, AK).

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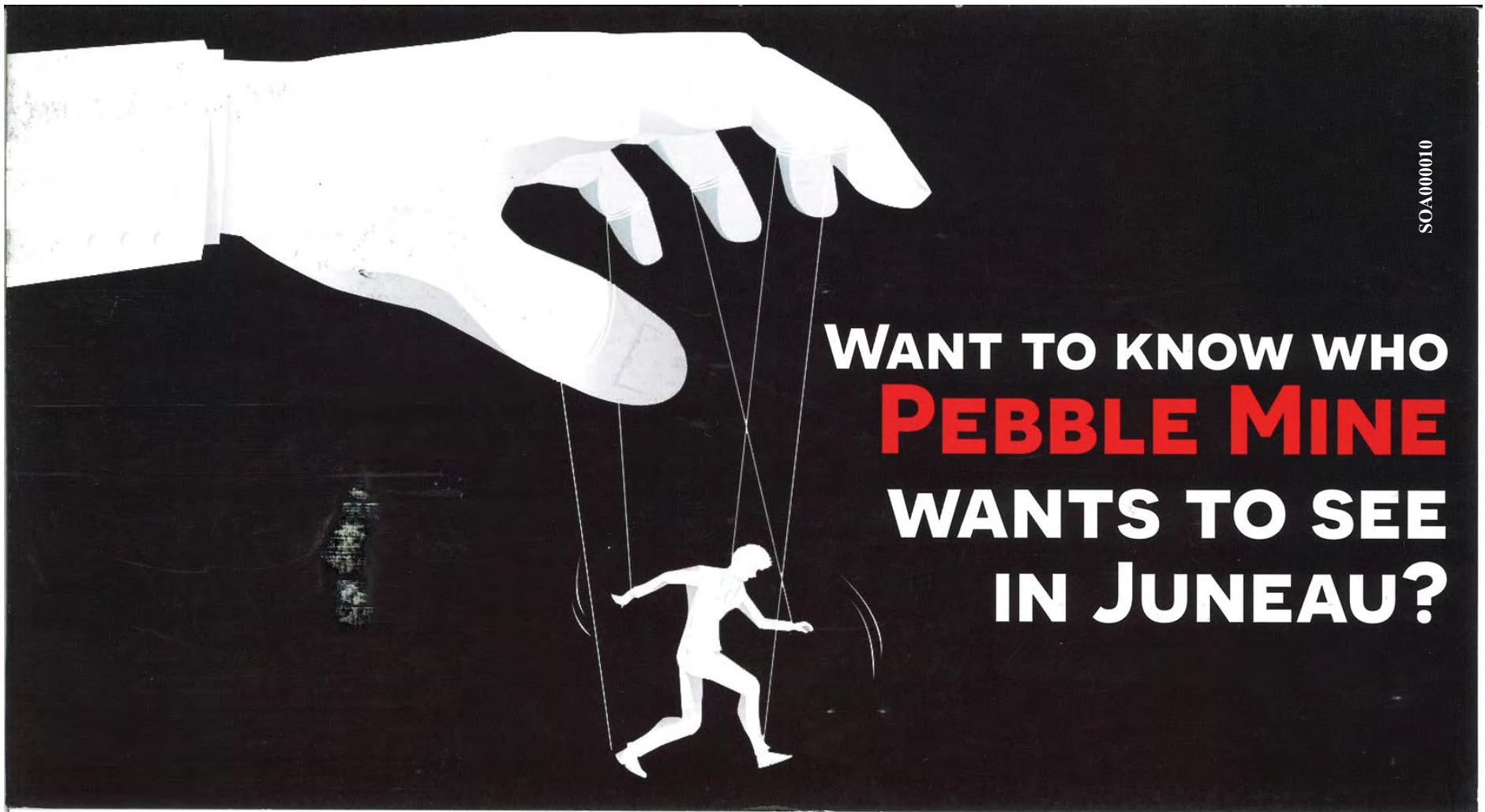
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WANT TO KNOW WHO
PEBBLE MINE
WANTS TO SEE
IN JUNEAU?

FRONT OF MAILER

Exhibit K Page 10 of 32

★ ★ ★ ★ ★
**THANK YOU,
SENATOR
MIA COSTELLO,**

for supporting
term limits
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IS APPRECIATED.**

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THANK YOU



SENATOR
MIA COSTELLO
FOR SUPPORTING
CONGRESSIONAL TERM LIMITS

Please email Sen. Mia Costello
at Senator.Mia.Costello@akleg.gov,
and thank her for supporting term limits.

This communication was paid for by U.S. Term Limits, Inc., Melbourne, FL. Howard Rich, Chairman. The top and sole contributor of U.S. Term Limits is Daniel Rich, New York, NY of the largest contributors to the person under A.S. 15.13.090(a)(2)(C). Howard Rich, as Chairman of U.S. Term Limits, approves this communication.

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This NOTICE TO VOTERS is required by Alaska law. we certify that this mailing is not authorized, paid for, or approved by the candidate.



FRONT OF MAILER

**MIA COSTELLO TURNED HER BACK ON
FIRST RESPONDERS.**

**MIA BLOCKED A BILL THAT WOULD HAVE
RETURNED OUR PUBLIC SAFETY OFFICERS
TO A DEFINED BENEFIT PENSION**

JUST SAY NO TO COSTELLO



Putting Alaskans First Committee
3333 Denali St. Ste. 125
Anchorage, AK 99503



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US POSTAGE
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ANCHORAGE, AK
PERMIT #845

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SCH 5-DIGIT 99507*****0004929*****000004

Kimberly Dawn Rodgers

Redacted

SOA000013

BACK OF MAILER

ELECTION DAY IS NOVEMBER 8TH

**JUST SAY NO TO
COSTELLO**

**MIA
COSTELLO**

says she backs
the blue.

***Her votes say
different.***



**WRONG FOR WEST
ANCHORAGE**

FRONT OF MAILER

JUST SAY NO TO COSTELLO

ELECTION DAY NOVEMBER 8

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Putting Alaskans First Committee
3333 Denali St. Ste. 125
Anchorage, AK 99503



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Kimberly Dawn Rodgers

Redacted

SOA000015

BACK OF MAILER

Mia Costello likes to talk about shared values. But does she *really* share our values?

- Costello stood by as the state cut education, the Governor wasted money settling scores with petty lawsuits, infrastructure crumbled and investment stalled.
- Costello turned her back on our first responders, fighting tooth and nail to deny them the pensions they deserve.
- During a pandemic, Costello introduced a bill to reduce the unemployment benefits of out-of-work Alaskans and neglected legislation that would address our workforce shortage and help Alaska's economy.



SOA000016

FRONT OF MAILER

MIA COSTELLO

- ✓ Will fight to drive down inflation and create good paying jobs in Alaska
- ✓ Brought Uber and Lyft to Alaska creating new jobs
- ✓ Opposes new taxes
- ✓ Will fight to pay a full statutory PFD
- ✓ Fund students not systems



Mia is fighting for Alaska families

VOTE
Mia Costello for State Senate
TUESDAY, NOVEMBER 8.

MATT CLAMAN

- ✗ Supported an income tax
- ✗ Supported a motor fuel tax
- ✗ Supported an increase in oil taxes



It costs to have Matt as your State Senator

CHOOSE YOUR SIDE

A battle of two different forces that will take Alaska in two very different directions...

This NOTICE TO VOTERS is required by Alaska law. We certify that this mailer is not authorized, paid for, or approved by the candidate. This communication was paid for by Americans for Prosperity Action - Alaska, Anchorage, AK. Bernadette Wilson, Chair, approves this message. Top contributors: Americans for Prosperity Action, Arlington, VA. A MAJORITY OF CONTRIBUTIONS TO AFPAA CAME FROM OUTSIDE THE STATE OF ALASKA.

135 W. Dimond Blvd Suite 119
Anchorage, Alaska 99515

Kimberly Rodders
Redacted



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Anchorage, AK

SOA000017

BACK OF MAILER

It is a period of economic unrest and record inflation. In Sand Lake and West Anchorage, conservative Mia Costello races towards November 8th with a plan to save her district from the unnecessary taxation and over regulation offered by her rival - Matt Claman - and restore economic opportunity with personal rights and responsibilities to the Alaskan Universe.

SOA000018

FRONT OF MAILER



BRIAN FLYNN IS MAYOR BRONSON'S HAND PICKED CANDIDATE. JUST SAY NO TO FLYNN ON APRIL 4TH.

Paid for by the Putting Alaskans First Committee, 3333 Denali St. Ste. 125 Anchorage, AK 99503. I, Kim Hays, Chair approved this message. Top three contributors are UNITE AMERICA PAC of Denver, CO, LIUNA Political Fund of Washington, DC, and NEA-Alaska PACE of Juneau, AK. This NOTICE TO VOTERS is required by Alaska law. I certify that this advertisement is not authorized, paid for, or approved by the candidate. A majority of contributions to the Putting Alaskans First Committee came from outside the State of Alaska.

Putting Alaskans First Committee
3333 Denali St. Ste. 125
Anchorage, AK 99503



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ANCHORAGE, AK
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SCH 5-DIGIT 99507***0003609***000003

Kimberly Dawn Rodgers

Redacted

BACK OF MAILER

ATTENTION WEST ANCHORAGE VOTERS:
ASSEMBLY CANDIDATE BRIAN FLYNN'S WIFE SIGNS
ALL OF MAYOR BRONSON'S CROOKED CONTRACTS

IN WITNESS WHEREOF, the parties have executed this Contract on the date and at the place shown below.

MUNICIPALITY OF ANCHORAGE

Rachelle A Alger

Mayor, Municipal Manager or Approved Designee

Name: Rachelle A Alger

Date: 03/21/2022

**DO YOU WANT MORE OF
THIS ANCHORAGE?
WE THINK NOT.**



Mayor Bronson, Rachelle Alger, and Brian Flynn

FRONT OF MAILER



BACK OF MAILER

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YOU KNOW HOW YOU CAN TELL WHEN A MEMBER OF CONGRESS HAS BEEN THERE TOO LONG?

THEY LOOK LIKE EVERYONE ELSE!

WHAT IS THE SOLUTION? TERM LIMITS!

82%

OF AMERICAN VOTERS
SUPPORT
FEDERAL TERM LIMITS.

SOA 000022

FRONT OF MAILER

Thank you,

Sen. Mia Costello,

for supporting term limits
on the U.S. Congress.

Your leadership is appreciated.

LEADER IN THE FIGHT FOR CONGRESSIONAL TERM LIMITS

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SUPPORT CONGRESSIONAL TERM LIMITS.

To learn more about our strategy and to sign
the national petition for term limits on Congress
visit www.termlimits.com/status1

105927

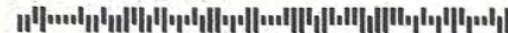
AK_SDH_1

2955 Pineda Plaza Way, Ste 226,
Melbourne, FL 32940

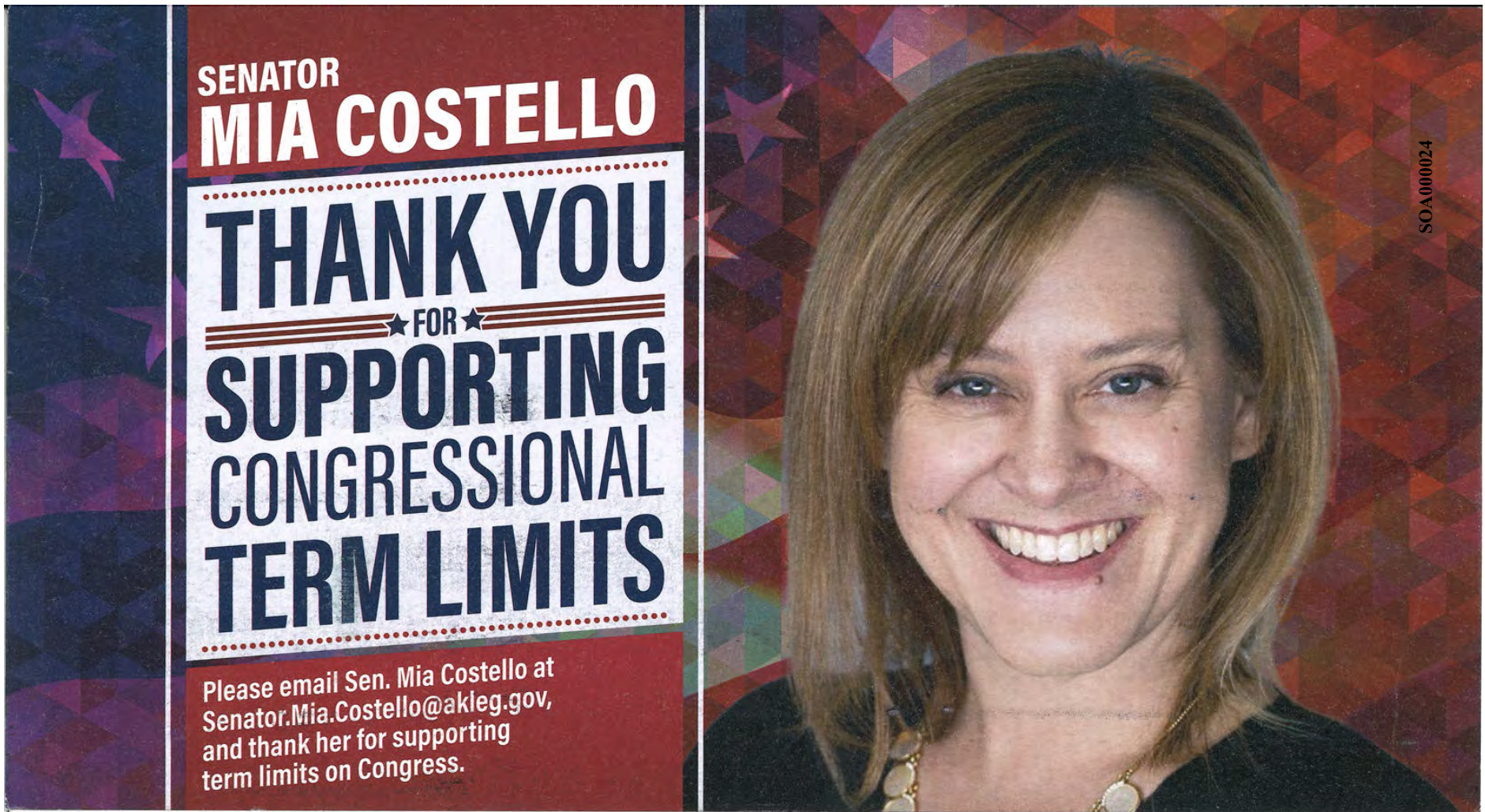
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Kimberly Rodgers
Redacted

000005 0007999 SCH 5-DIGIT 99507



BACK OF MAILER



FRONT OF MAILER

It takes courage to stand up to the Washington swamp, so contact Mia Costello and tell her thank you for supporting term limits on Congress.

Email Mia Costello at Senator.Mia.Costello@akleg.gov and tell her THANK YOU for supporting congressional term limits.

105933

2955 Pineda Plaza Way, Ste 226
Melbourne, FL 32940

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Kimberly Rodaers
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AK_SDH_4

BACK OF MAILER

It's not often we can all agree on something,
but in Alaska we know **WE DESERVE BETTER**
from Washington, and term limits will help
FIX THE MESS.



THAT'S WHY IT'S GOOD NEWS THAT

MIA COSTELLO

**SUPPORTS CONGRESSIONAL
TERM LIMITS.**



FRONT OF MAILER

Mia says she represents West Anchorage and shares our values. But her actions and votes in Juneau say otherwise:

- She co-sponsored several bills with outgoing Eagle River Senator Lora Reinbold
- She voted with the Matsu Valley delegation nearly 80% of the time
- Mia has been a rubber stamp for an unpopular and ineffective Governor

JUST SAY NO TO COSTELLO



SOA000031

Putting Alaskans First Committee
3333 Denali St. Ste. 125
Anchorage, AK 99503



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Kimberly Dawn Rodgers

Redacted

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BACK OF MAILER

MIA COSTELLO

sides with radicals like **Lora Reinbold,**
not West Anchorage.



MIA COSTELLO: TOO EXTREME.

**JUST SAY NO TO
COSTELLO.**

ELECTION DAY IS NOVEMBER 8TH

FRONT OF MAILER

Paid for by Yes on 14 - Care for Kids, PO Box 210763,
Anchorage, AK 99521. Trevor Storrs, Chair, approved this
message. The top three contributors are Alaska Children's
Trust, Anchorage, AK; Western Futures Fund, Sheridan, WY;
Children's Funding Accelerator, Washington, DC

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61*1*45412*****ECRL0T 0143D**C004
CESAR AND KIMBERLY DAWN RODGERS

Redacted

YES on 14
CARE for KIDS

**ANCHORAGE
2023 ELECTION
VOTER GUIDE:
PROPOSITION 14**

Learn the facts about
Proposition 14, which will:

- rebuild our workforce
- increase access to child
care and early education
in Anchorage.



SOA000033

BACK OF MAILER

Exhibit K Page 29 of 32

PROPOSITION 14

HOW it WORKS

Proposition dedicates the existing marijuana tax revenue to fund child care and early education, and build a strong economy.

A YES VOTE ON PROPOSITION 14

REBUILDS OUR WORKFORCE

The shortage of child care keeps thousands of Anchorage residents out of the labor force depriving their families of needed income. Prop 14 will help more parents return to work.

GROWS OUR ECONOMY

Child care challenges result in \$165 million in losses annually to Alaska's economy. Investing in child care and early education will make Anchorage a better place for businesses and families.

REDUCES LONG TERM COSTS

Failing to invest in high quality child care and early childhood education costs taxpayers more in the long run for things like remedial education, behavioral issues, and even the juvenile justice system. Prop 14 also lowers the city tax cap by \$1 million.

HELPS ANCHORAGE KIDS

Kids with access to high quality child care and early education are more likely to learn to read, succeed in their K-12 classes, and graduate.



FAST FACTS

- Prop 14 has bipartisan support
- Prop 14 is endorsed by the Anchorage Economic Development Corporation
- Prop 14 does not create a new tax



Learn more

SOA000034

FRONT OF MAILER

Exhibit K Page 30 of 32



We need more courageous people like
Mia Costello to take on the Washington elites.

Email Mia Costello at Senator.Mia.Costello@akleg.gov, and tell
her **THANK YOU** for signing the U.S. Term Limits Pledge
to put term limits on Congress.

SUPPORT CONGRESSIONAL TERM LIMITS.

To learn more about our strategy and to sign the national petition
for term limits on Congress visit www.termlimits.com/status5

105934

2955 Pineda Plaza Way, Ste 226,
Melbourne, FL 32940

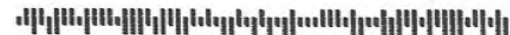
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Kimberly Rodgers

Redacted

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**The time is now.
We need to term limit Congress!**

BACK OF MAILER



82% of Americans support term limits on Congress

**WASHINGTON IS A MESS.
THERE IS SO MUCH DIVISIVENESS.**

We need fresh faces in Congress to get work done.

**MIA COSTELLO HAS SIGNED THE TERM LIMITS PLEDGE
BECAUSE SHE KNOWS THERE IS A PROBLEM IN WASHINGTON.**

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FRONT OF MAILER

The 2024 General Election
is on Tuesday,
November 5

Early voting is **underway!**
Visit **elections.alaska.gov**
to find where to vote **now** or on the 5th

VOTE

**Craig
Johnson
STATE HOUSE**



FOR



SAFE NEIGHBORHOODS

We must be tough on crime and support our police, prosecutors, and correctional officers.



THRIVING, DIVERSE ECONOMY

Creating business-friendly regulations, economic growth, expanding opportunities, and new development.



STUDENT CENTERED, QUALITY EDUCATION

We must have all education options available for parents to choose what best suits the needs of their children.

This communication was paid for by Families of the Last Frontier PO BOX 220336 Anchorage, Alaska 99522. I am Steve Strait, chair of Families of the Last Frontier and I approve this message. Top contributors are RSLC - Washington, D.C., GOPAC - Arlington, VA, and Arctic E&P - Anchorage, AK. A majority of contributions to Families of the Last Frontier came from outside the state of Alaska. This NOTICE TO VOTERS is required by Alaska law. I certify that this ad is not authorized, paid for, or approved by any candidate.



TOUGH ON CRIME

Implemented victim-centric crime reform



SUPPORTING OUR STUDENTS

Adopted a fix for school correspondence shut down by the Alaska Supreme Court.



SAVING THE BUDGET

Stopped costly bills that would have burdened us with billions in expenses over the next ten years

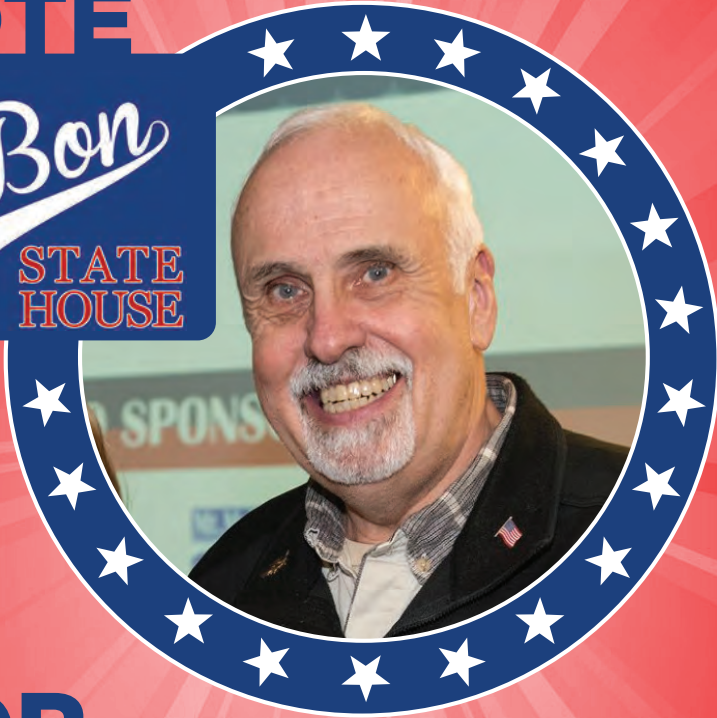
RE-ELECT CRAIG JOHNSON



The 2024 General Election
is on Tuesday,
November 5

Early voting is **underway!**
Visit **elections.alaska.gov**
to find where to vote **now** or on the 5th

VOTE
BART
LeBon
**STATE
HOUSE**



FOR



PROTECTING THE PFD

That means not overdrawing the Earnings Reserve Account and inflation-proofing the principal.



EDUCATION

UAF is a critical economic engine for Fairbanks and deserves the support of the Interior Delegation.



PUBLIC SAFETY

Bart's budget votes during the 31st and 32nd Legislatures demonstrate the support he gives to the Alaska State Troopers, VPSO's, and our correctional facility professionals.

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“Protecting the long-term best interests of our children and grandchildren will continue to be my highest priority in Juneau.”



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November 5

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to find where to vote **now** or on the 5th

VOTE

David
Nelson
State House

FOR

-  **COMPREHENSIVE FISCAL PLAN**
that includes a tough new Constitutional spending cap.
-  **DIRECT VOTE OF THE PEOPLE**
required for every measure to raise taxes or impose new taxes.
-  **PROMOTING A VIBRANT ECONOMY**
that is opportunity-driven and creates well-paying jobs for Alaskans.



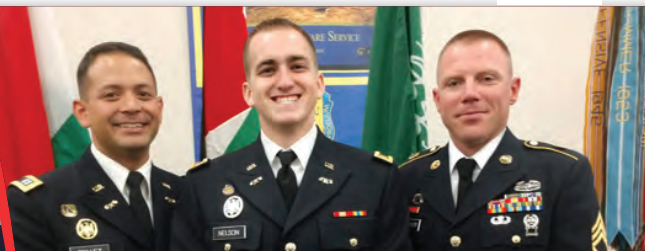
SUPPORTING OUR MILITARY

In 2021, Representative David Nelson authored the Military and Family Employment Act (HB 125) which extends our state's employment preference for veterans to military spouses and the dependent children of service members killed in the line of duty.

It passed the House by an overwhelming margin of 35 to 2.



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Keeping Juneau Accountable

Photograph does not imply endorsement by the Department of Defense, the Department of the Army or the Alaska Army National Guard.



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November 5

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to find where to vote **now** or on the 5th

VOTE



FOR



SUPPORTING OUR PEACE OFFICERS

Police, firefighters, troopers, crisis teams, emergency medical services personnel, and correctional officers.



PROTECTING CRITICAL INFRASTRUCTURE

Hillside fire risk mitigation, pedestrian road crossings, disaster evacuation routes, and \$200 million to the Port of Alaska.



'ALL OF THE ABOVE' RESOURCE DEVELOPMENT

Advocated for the Willow project, moving state-owned oil fields into production, producing Cook Inlet natural gas, along with alternative energy legislation.

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“Stability means fixing Alaska’s broken systems—whether it’s the budget, education, or transportation infrastructure. By stabilizing these critical areas, we can create a foundation for long-term growth and sustainability.”

Security means protecting our infrastructure, ensuring energy and food security, and supporting first responders. By investing in these areas, we’re building a safer, more resilient future for all Alaskans.

Innovation is the key to Alaska’s future prosperity. By removing obstacles, promoting new technologies, and allowing our universities to lead in research and development, we can drive economic diversification and create a thriving, competitive economy.”

-Senator James Kaufman

**RE-ELECT
JAMES
KAUFMAN**



The 2024 General Election
is on Tuesday,
November 5

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Visit **elections.alaska.gov**
to find where to vote **now** or on the 5th

VOTE

MIKE
CRONK
FOR STATE SENATE



FOR



INFRASTRUCTURE AND INDUSTRY

Mike wants to revitalize our timber industry, and invest in projects like the Northern Rail Extension and Pt. McKenzie Rail Extension that improve access to goods and services, and promote lower costs.



IMPROVING EDUCATION

We need a quality university teaching program that recruits and retains local teachers in our rural communities and villages.



MILITARY

Mike will continue to vigorously support our military in Alaska as well as our Veterans.

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“High energy costs continue to plague Alaska. This continues to take money out of people’s pockets, hurts small business, and our local economies. We need to responsibly develop our resources which are primarily located in rural Alaska. We need to build partnerships and infrastructure, which will lead to jobs, revenue, and a future for our youth.”

-Representative Mike Cronk



**ELECT
MIKE
CRONK**



The 2024 General Election
is on Tuesday,
November 5

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Visit **elections.alaska.gov**
to find where to vote **now** or on the 5th

VOTE
Stanley
Wright
FOR STATE HOUSE



\$800,000
for District 22 Park Improvements



\$200,000
for the Shiloh Community Resource Center



\$2.6 Million
for Ptarmigan Elementary Roof Replacement



\$245,00
for the Anchorage Reads Program

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**Supporting Bipartisan
Solutions to Create
Effective Policies and
Advocate for Our
Community.**



**RE-ELECT
STANLEY
WRIGHT**



The 2024 General Election
is on Tuesday,
November 5

Early voting is **underway!**
Visit **elections.alaska.gov**
to find where to vote **now** or on the 5th

VOTE

REBECCA
SCHWANKE

FOR HOUSE DISTRICT 36



FOR



FOOD SECURITY

Pro Alaskan Wild Game and Wild Caught Fish



FISCAL POLICY REFORM

Pro PFD and a Balanced State Budget



FAMILY RIGHTS

Pro American Rights, Liberties, and Freedoms



AFFORDABLE ENERGY

Pro Common Sense Resource Development

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**“District 36 represents
the best of Alaska.**

***We are largely an unorganized
region, self-reliant and supportive
of friends and neighbors. I will
fight to keep it that way.”***

**ELECT
REBECCA
SCHWANKE**





- ✘ Reprimanded for a sexual harassmant complaint
- ✘ Tried to block the repeal of SB-91
- ✘ Fought to keep marriage as a defense in rape cases

[READ MORE](#)

WE CAN'T TRUST CHUCK KOPP

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- ✘ Reprimanded for a sexual harassmant complaint
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[READ MORE](#)

WE CAN'T TRUST CHUCK KOPP

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- ✘ Reprimanded for a sexual harassmant complaint
- ✘ Tried to block the repeal of SB-91
- ✘ Fought to keep marriage as a defense in rape cases

[READ MORE](#)

WE CAN'T TRUST CHUCK KOPP

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FLF-00015

Exhibit L Page 15 of 24



- ✘ Reprimanded for a sexual harassmant complaint while serving as Chief of Police
- ✘ Kept \$10,000 in “hush money” when asked to resign after two weeks.

[READ MORE](#)

WE CAN'T TRUST CHUCK KOPP

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- ✘ Reprimanded for a sexual harassmant complaint while serving as Chief of Police
- ✘ Kept \$10,000 in “hush money” when asked to resign after two weeks.

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FLF-00016

Exhibit L Page 16 of 24



Re-Elect **David**
Nelson
State House

Using conservative values:

- ✓ Individual Liberty
- ✓ Personal Responsibility
- ✓ Hard Work
- ✓ Common Sense

to tackle Alaska's challenges.

**RE-ELECT
DAVID NELSON**



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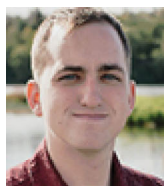
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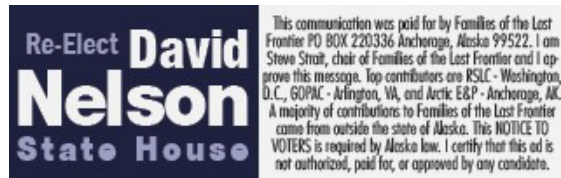


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