

RAD Referral 21L-18  
 Independent Alaska  
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**21L-18**

**REPORTS ANALYSIS DIVISION REFERRAL**

TO

ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: April 23, 2021

ANALYST: Jeremiah Hempel

**I. COMMITTEE:**

Independent Alaska  
 C00757294  
 Susanna Orr, Treasurer  
 700 13th Street, NW  
 Suite 800  
 Washington, DC 20005

**II. RELEVANT STATUTE:**

52 U.S.C. § 30104(b)(8)  
 11 CFR §104.3(d)

**III. BACKGROUND:**

**Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)**

Independent Alaska (“the Committee”) amended its 2020 12-Day Pre-General Report to disclose newly incurred debts totaling \$70,900.00, which were not disclosed on the original report (Attachment 2).

On October 22, 2020, the Committee filed the original 2020 12-Day Pre-General Report covering the period from October 1, 2020 through October 14, 2020. The report did not disclose any debts incurred during this reporting period on Line 10 (Debts and Obligations Owed by the Committee) of the Summary Page (Image 202010229336368855, Attachment 2).

On January 8, 2021, the Committee filed an Amended 2020 12-Day Pre-General Report. The report disclosed \$70,900.00 on Schedule D as newly incurred debts for the reporting period that were not disclosed on the original report (Image 202101089398329527, Attachment 2).

On February 10, 2021, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2020 12-Day Pre-General Report. The RFAI

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requested clarification regarding the substantial increase in debts disclosed on the Amended 2020 12-Day Pre-General Report (Images 202102100300105279-80).

On March 17, 2021, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission), which stated, in part:

“This is in response to your letter dated February 10, 2021 concerning the Amended 12 Day Pre-General Report (10/01/2020 – 10/14/2020) of Independent Alaska (the “Committee?). Due to an invoicing delay by one of the Committee’s vendors, the Committee was not aware of additional reportable expenses incurred during the Pre-General reporting period. However, the Committee filed an amendment to its 12 Day Pre-General Report (10/01/2020-10/14/2020) promptly upon discovering the additional expenses. We hope that this information adequately addresses your question. If you need any further information, please contact the Committee” (Image 202103179440599287).

On March 19, 2021, the Reports Analysis Division (RAD) Analyst emailed Susanna Orr, the Committee’s Treasurer, stating, in part:

“I am the assigned Campaign Finance Analyst for INDEPENDENT ALASKA (C00757294). I have not been able to contact you via phone, and it is extremely important that I speak with you regarding an outstanding matter on the Committee’s Amended 12-Day Pre-General Report (10/01/2020 - 10/14/2020), received January 8, 2021. This is a time sensitive matter, and I would appreciate a return call as soon as possible so I can discuss this with you” (Attachment 3).

On March 22, 2021, Paul Sullivan, the Committee’s representative, called the RAD Analyst in response to the RFAI that the Committee had received noting the substantial increase in debts disclosed on the Committee’s Amended 2020 12-Day Pre-General Report. The Analyst informed Mr. Sullivan that due to the nature of the violations disclosed on the amended report, the Committee may be referred to another Commission office for potential further action. Mr. Sullivan acknowledged the information and ended the call (Attachment 3).

On April 19, 2021, the RAD Analyst called Mr. Sullivan and informed him that the Committee will be referred to another Commission office for potential further action. Mr. Sullivan acknowledged the information and ended the call (Attachment 3).

To date, no further communications have been received from the Committee regarding this matter.

| O-Index (2021-2022)  |        |     |           |     |                    |            |            |             |            |            |            |          |       |       |               |   |
|--|--------|-----|-----------|-----|--------------------|------------|------------|-------------|------------|------------|------------|----------|-------|-------|---------------|---|
| Cmte. ID: C00757294 Cmte. Name: INDEPENDENT ALASKA   |        |     |           |     |                    |            |            |             |            |            |            |          |       |       |               |   |
| Treasurer Name: ORR, SUSANNA Address: 700 13TH STREET NW SUITE 800, WASHINGTON, DC 20005                                     |        |     |           |     |                    |            |            |             |            |            |            |          |       |       |               |   |
| Cmte. Type: O (INDEPENDENT EXPENDITURE-ONLY COMMITTEE) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER |        |     |           |     |                    |            |            |             |            |            |            |          |       |       |               |   |
| Form Tp  | Rpt Tp | A/I | Recpt Dt  | Pgs | Begin Img#         | Beg Cvg Dt | End Cvg Dt | Ltr Mail Dt | Begin Cash | Recpts     | Disb       | End Cash | Debts | Loans | Debts & Loans |   |
| MS-T   |        |     | 3/17/2021 | 1   | 202103179440599287 |            |            |             | -          | -          | -          | -        | -     | -     | -             | - |
| <b>Totals</b>  |        |     |           |     |                    |            |            |             |            | <b>\$0</b> | <b>\$0</b> |          |       |       |               |   |

| O-Index (2019-2020)  |        |     |            |     |                    |            |            |             |            |                    |                    |           |          |       |               |   |
|--|--------|-----|------------|-----|--------------------|------------|------------|-------------|------------|--------------------|--------------------|-----------|----------|-------|---------------|---|
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| Form Tp  | Rpt Tp | A/I | Recpt Dt   | Pgs | Begin Img#         | Beg Cvg Dt | End Cvg Dt | Ltr Mail Dt | Begin Cash | Recpts             | Disb               | End Cash  | Debts    | Loans | Debts & Loans |   |
| RQ2  | 12G    | A   | 2/10/2021  | 2   | 202102100300105279 | 10/1/2020  | 10/14/2020 | 2/10/2021   | -          | -                  | -                  | -         | -        | -     | -             | - |
| F3XN   | Q3     | N   | 10/15/2020 | 21  | 202010159295580374 | 9/3/2020   | 9/30/2020  |             | \$0        | \$1,900,000        | \$1,382,135        | \$517,864 | \$17,850 | -     | \$17,850      |   |
| F3XN   | 12G    | N   | 10/22/2020 | 14  | 202010229336368854 | 10/1/2020  | 10/14/2020 |             | \$517,864  | \$250,000          | \$610,208          | \$157,656 | \$0      | -     | \$0           |   |
| F3XA   | 12G    | A   | 1/8/2021   | 16  | 202101089398329526 | 10/1/2020  | 10/14/2020 |             | \$517,864  | \$250,000          | \$610,208          | \$157,656 | \$70,900 | -     | \$70,900      |   |
| F3XN   | 30G    | N   | 12/3/2020  | 12  | 202012039338739862 | 10/15/2020 | 11/23/2020 |             | \$157,656  | \$335,000          | \$238,641          | \$254,015 | -        | -     | \$0           |   |
| F3XA   | 30G    | A   | 1/11/2021  | 13  | 202101119398336454 | 10/15/2020 | 11/23/2020 |             | \$157,656  | \$335,000          | \$238,641          | \$254,015 | \$70,900 | -     | \$70,900      |   |
| F3XN   | YE     | N   | 1/29/2021  | 7   | 202101299417802795 | 11/24/2020 | 12/31/2020 |             | \$254,015  | \$0                | \$1,131            | \$252,884 | \$70,900 | -     | \$70,900      |   |
| F1N  |        | N   | 9/3/2020   | 5   | 202009039267077714 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             | - |
| F24N   | 48     |     | 10/4/2020  | 1   | 202010049285006739 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             |   |
| F24N   | 48     |     | 10/2/2020  | 1   | 202010029284992768 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             |   |
| F24N   | 48     |     | 9/17/2020  | 1   | 202009179267236599 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             |   |
| F24N   | 48     |     | 9/11/2020  | 5   | 202009119267138938 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             |   |
| F24N   | 48     |     | 10/16/2020 | 1   | 202010169297136929 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             |   |
| F24N   | 24     |     | 10/17/2020 | 1   | 202010179297151529 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             |   |
| F24N   | 48     |     | 10/14/2020 | 3   | 202010149293892290 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             |   |
| F24N   | 24     |     | 10/27/2020 | 1   | 202010279336628553 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             |   |
| F24N   | 24     |     | 10/23/2020 | 1   | 202010239336506074 |            |            |             | -          | -                  | -                  | -         | -        | -     | -             |   |
| F24N   | 24     |     | 10/24/2020 | 1   | 202010249336528614 |            |            |             |            |                    |                    |           |          |       |               |   |
| <b>Totals</b>  |        |     |            |     |                    |            |            |             |            | <b>\$2,485,000</b> | <b>\$2,232,115</b> |           |          |       |               |   |

| O-Index (2017-2018)  |        |     |          |     |            |            |            |             |            |        |      |          |       |       |               |  |
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| Form Tp  | Rpt Tp | A/I | Recpt Dt | Pgs | Begin Img# | Beg Cvg Dt | End Cvg Dt | Ltr Mail Dt | Begin Cash | Recpts | Disb | End Cash | Debts | Loans | Debts & Loans |  |
| No records were found for this cycle.  |        |     |          |     |            |            |            |             |            |        |      |          |       |       |               |  |

**Independent Alaska (C00757294)**

## 2020 12-Day Pre-General Report/Amended 2020 12-Day Pre-General Report

Overview of Additional Debt

| Report Line  | Original<br>2020 12-Day<br>Pre-General<br>Report<br>(Image<br>2020102293363688<br>54) | Amended<br>2020 12-Day<br>Pre-General<br>Report,<br>Received<br>1/8/2021<br>(Image<br>20210108939832<br>9526) | Debt Variance | Actual<br>Increase in<br>Amount<br>New Debts<br>Incurred |
|--|---|---|---------------|--|
| Amount Incurred This Period (Schedule D)                 | \$0.00  | \$70,900.00   | \$70,900.00   | \$70,900.00  |
| Outstanding Balance Beginning This Period (Schedule D)   | \$17,850.00   | \$17,850.00   | \$0.00        |  |
| Payments This Period (Schedule D)                        | \$17,850.00   | \$17,850.00   | \$0.00        |  |
| Outstanding Balance at Close of This Period (Schedule D) | \$0.00  | \$70,900.00   | \$70,900.00   |  |
| Line 10: Debts and Obligations Owed by the Committee     | \$0.00  | \$70,900.00   | \$70,900.00   |  |

**Independent Alaska (C00757294)**

Amended 2020 12-Day Pre-General Report (Images 202101089398329534-35)

Detailed Overview of New Debts Incurred

| Vendor            | Outstanding Beginning Balance | Amount Incurred    | Payments      | Increase in Debt Incurred |
|-------------------|-------------------------------|--------------------|---------------|---------------------------|
| The Alaska Center | \$0.00                        | \$30,236.76        | \$0.00        | \$30,236.76               |
| The Alaska Center | \$0.00                        | \$30,236.76        | \$0.00        | \$30,236.76               |
| The Alaska Center | \$0.00                        | \$10,426.48        | \$0.00        | \$10,426.48               |
| <b>Total:</b>     | <b>\$0.00</b>                 | <b>\$70,900.00</b> | <b>\$0.00</b> | <b>\$70,900.00</b>        |