

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 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

RAD Referral 21L-18
Independent Alaska
Page 2 of 2

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	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			3/17/2021	1	202103179440599287				-	-	-	-	-	-	-
Totals										\$0	\$0				

O-Index (2019-2020)															
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	Ltrr 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				-	-	-	-	-	-	-
Totals										\$2,485,000	\$2,232,115				

O-Index (2017-2018)															
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	Ltrr 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 2020 12-Day Pre-General Report (Image 2020102293363688 54)	Amended 2020 12-Day Pre-General Report, Received 1/8/2021 (Image 20210108939832 9526)	Debt Variance Amount	Actual Increase in New Debts 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
Total:	\$0.00	\$70,900.00	\$0.00	\$70,900.00