

anc.law.ecf@alaska.gov

**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

ALASKA PUBLIC INTEREST	)	
RESEARCH GROUP & 907	)	
INITIATIVE	)	
	)	
Complainant,	)	
	)	
v.	)	
	)	
REPUBLICAN GOVERNOR’S	)	
ASSOC., A STRONGER ALASKA,	)	Case No. 22-01-CD
et al.	)	
	)	
Respondents.	)	

**ORDER**

Having considered the motion to issue subpoenas duces tecum, and having reviewed those requests, the motion is GRANTED. Messrs. Canligil and Rexrode shall have **7 calendar days from the date of this ORDER** to respond to the subpoenas duces tecum as requested by APOC Staff. The Chair of the Commission will sign the subpoenas.

**BY ORDER OF THE COMMISSION** Date: November 16, 2022

DEPARTMENT OF LAW  
OFFICE OF THE ATTORNEY GENERAL  
ANCHORAGE BRANCH  
1031 W. FOURTH AVENUE, SUITE 200  
ANCHORAGE, ALASKA 99501  
PHONE (907) 269-5100

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**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

ALASKA PUBLIC INTEREST )  
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INITIATIVE )

Complainant, )

v. )

**SUBPOENA DUCES TECUM**

REPUBLICAN GOVERNOR’S )  
ASSOC., A STRONGER ALASKA, )  
et al. )

Case No. 22-01-CD

Respondents. )

**TO:** Erim Canligil  
Treasurer, A Stronger Alaska  
c/o Richard R. Moses  
701 W 8<sup>th</sup> Ave, Ste. 700  
Anchorage, AK 99501-3408

**INSTRUCTIONS AND DEFINITIONS**

1. This subpoena is directed to Mr. Erim Canligil and A Stronger Alaska.

It calls for the production of documents or things in your possession, custody, or control, and for documents or things that are in the possession, custody, or control of your agents, attorneys, representatives, or other persons who have documents or things deemed to be in your possession, custody, or control.

2. Each request calls for all information that is available to you by reasonable inquiry of your agents, attorneys, representatives, or others acting on your behalf.

3. It is not intended that these requests for production require the disclosure of any information that is protected against disclosure as “work product” of attorneys

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or information protected by “privilege,” although APOC Staff reserves the right to move for disclosure or production of such materials. Accordingly, whenever information or documents requested in these requests are claimed to be protected against disclosure as “work product” or “privileged” and are withheld on that ground, please provide a written response with the following information:

- a. A description of the information or document sufficiently particular to identify it and to enable you to identify, disclose, or produce it in response to an order;
- b. The nature of the protection claimed;
- c. A list of all persons with knowledge of the information, or who participated in the preparation of the document; and
- d. With regard to documents, a list of all persons to whom the document was circulated or its contents communicated.

4. In these requests, the following definitions apply:

- a. “Document” means any written, recorded or graphic matter, however produced or reproduced. If a document has been prepared in several copies, or if additional copies have been made, and the copies are not identical, or have undergone alteration, each non-identical copy is a separate “document.” The word “document” shall also include all drafts of any requested documents.

“Document” shall also include any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, copies and drafts, and including but not limited to:

papers, books, accounts, letters, photographs, objects, tangible things, correspondence, telegrams, memoranda, notes, desk calendars, diaries, notations, work papers, communications to, between and among directors, officers, agents, partners, secretaries, or any other employees, transcripts, minutes, reports, and recordings of telephone or other conversations, or interviews, or of committee meetings or of other meetings, affidavits, statements, summaries, opinions, reports, indices, studies, analyses, evaluations, contracts, licenses, agreements, balance sheets, income statements, questionnaires, answers to questionnaires, statistical records, appointment books, telephone logs, lists, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, information or documents stored in computer hard drives, discs or memory, microfilms, all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing, regardless of their author or origin, however denominated by it.

b. “You” or “your” refers to A Stronger Alaska and Mr. Erim Canligil.

c. “Individual” or “person” has the meaning as defined under AS 15.13.400.

Pursuant to AS 15.13.045(d), you are **HEREBY COMMANDED TO PRODUCE** the following documents for copying and inspection in person at the offices of the Alaska Public Offices Commission, 2221 E. Northern Lights #128, Anchorage, AK 99508 **or** by email to [apoc@alaska.gov](mailto:apoc@alaska.gov) **WITHIN 7 CALENDAR DAYS** of the date of the Commission’s Order granting the issuance of this subpoena.

1. Documents identifying each individual and/or person that has knowledge of or has engaged in A Stronger Alaska's campaign plans, projects or needs since February 24, 2021. When used herein the phrase, "plans, projects or needs" includes, but is not limited to, the formulation of campaign messaging, its conceptualization, drafting, recording (both video and audio), and placing. Please identify each such individual and/or person by name, address, phone number and email.
2. Documents identifying the role the individuals and/or persons identified no. 1 above plays or played in A Stronger Alaska's campaign and the specific activities related to its campaign that individual or person engaged in or has knowledge of.
3. All communications you or any officer or agent of A Stronger Alaska's campaign has had with the Republican Governors Association since February 24, 2021. This request includes, but is not limited to, records of all phone calls, emails, text messages, social media messaging, and in-person conversations. Please provide a copy of all recorded communications responsive to this request. This includes, but is not limited to all texts, emails, social messaging and phone messages.
4. All communications you or any officer or agent of A Stronger Alaska has had with Strategic Synergies, LLC or any of its officers or agents, including Brett Huber, since February 25, 2021. This request includes, but is not limited to, records of all phone calls, emails, text messages, social media messaging, and in-person conversations Please provide a copy of all recorded communications responsive to this request. This includes, but is not limited to all texts, emails, social messaging and phone messages.
5. Please produce ASA's campaign depository bank records from February 24, 2021 to present.

You are further notified that failure to comply with this subpoena may result in legal action against you. If you have questions about compliance with this subpoena, or wish to arrange for an earlier time to produce, please contact Thomas Lucas at (907) 276-4176.

DATE: 11-16-2022

CHAIR: Anne H. Eger

Subpoena issued at the request of:  
**Brandon Smith**  
Assistant Attorney General  
1031 W. 4<sup>th</sup> Ave., Suite 200  
Anchorage, AK 99501

Before this subpoena may be issued, the above date and signature of Chair must be completed and proof must be presented to the clerk that the subpoena has been served upon opposing counsel.

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**BEFORE THE ALASKA PUBLIC OFFICES COMMISSION**

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 ASSOC., A STRONGER ALASKA, )  
 et al. )  
 )  
 Respondents. )

**SUBPOENA DUCES TECUM**

Case No. 22-01-CD

**TO:** Erim Canligil  
 Chief Financial Officer, Republican Governor’s Association  
 c/o Stacey C. Stone  
 701 W 8<sup>th</sup> Ave, Ste. 700  
 Anchorage, AK 99501-3408

**INSTRUCTIONS AND DEFINITIONS**

1. This subpoena is directed to Mr. Erim Canligil and Republican Governor’s Association. It calls for the production of documents or things in your possession, custody, or control, and for documents or things that are in the possession, custody, or control of your agents, attorneys, representatives, or other persons who have documents or things deemed to be in your possession, custody, or control.
2. Each request calls for all information that is available to you by reasonable inquiry of your agents, attorneys, representatives, or others acting on your behalf.
3. It is not intended that these requests for production require the disclosure of any information that is protected against disclosure as “work product” of attorneys or information protected by “privilege,” although APOC Staff reserves the right to

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move for disclosure or production of such materials. Accordingly, whenever information or documents requested in these requests are claimed to be protected against disclosure as “work product” or “privileged” and are withheld on that ground, please provide a written response with the following information:

- a. A description of the information or document sufficiently particular to identify it and to enable you to identify, disclose, or produce it in response to an order;
- b. The nature of the protection claimed;
- c. A list of all persons with knowledge of the information, or who participated in the preparation of the document; and
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“Document” shall also include any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including originals, copies and drafts, and including but not limited to:

papers, books, accounts, letters, photographs, objects, tangible things, correspondence,



telegrams, memoranda, notes, desk calendars, diaries, notations, work papers, communications to, between and among directors, officers, agents, partners, secretaries, or any other employees, transcripts, minutes, reports, and recordings of telephone or other conversations, or interviews, or of committee meetings or of other meetings, affidavits, statements, summaries, opinions, reports, indices, studies, analyses, evaluations, contracts, licenses, agreements, balance sheets, income statements, questionnaires, answers to questionnaires, statistical records, appointment books, telephone logs, lists, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, information or documents stored in computer hard drives, discs or memory, microfilms, all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing, regardless of their author or origin, however denominated by it.

b. “You” or “your” refers to A Stronger Alaska and Mr. Erim Canligil.

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1. Documents identifying the date of each Republican Governors Public Policy Committee (RGPPC) meeting/event since February 24, 2021, and, if any were provided, the agenda and written materials provided to the attendees for each meeting/event. Documents identifying the list of attendees of each meeting/event for which Tyson Gallagher attended.

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2. Documents identifying the format of RGPPC meetings/events and the topics discussed.

You are further notified that failure to comply with this subpoena may result in legal action against you. If you have questions about compliance with this subpoena or wish to arrange for an earlier time to produce, please contact Thomas Lucas at (907) 276-4176.

DATE: 11-16-2022                      CHAIR: *Anne H. Eger*

Subpoena issued at the request of:                      Before this subpoena may be issued, the  
**Brandon Smith**    above date and signature of Chair must be  
Assistant Attorney General                                      completed and proof must be presented to the  
1031 W. 4<sup>th</sup> Ave., Suite 200                                      clerk that the subpoena has been served  
Anchorage, AK 99501    upon opposing counsel.

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REPUBLICAN GOVERNOR’S )  
ASSOC., A STRONGER ALASKA, )  
et al. )

Case No. 22-01-CD

Respondents. )

**TO:** Dave Rexrode  
Chair, A Stronger Alaska  
c/o Richard R. Moses  
701 W 8<sup>th</sup> Ave, Ste. 700  
Anchorage, AK 99501-3408

**INSTRUCTIONS AND DEFINITIONS**

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It calls for the production of documents or things in your possession, custody, or control, and for documents or things that are in the possession, custody, or control of your agents, attorneys, representatives, or other persons who have documents or things deemed to be in your possession, custody, or control.

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DATE: 11-16-2022

CHAIR: Anne H Elzer

Subpoena issued at the request of:  
**Brandon Smith**  
Assistant Attorney General  
1031 W. 4<sup>th</sup> Ave., Suite 200  
Anchorage, AK 99501

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telegrams, memoranda, notes, desk calendars, diaries, notations, work papers, communications to, between and among directors, officers, agents, partners, secretaries, or any other employees, transcripts, minutes, reports, and recordings of telephone or other conversations, or interviews, or of committee meetings or of other meetings, affidavits, statements, summaries, opinions, reports, indices, studies, analyses, evaluations, contracts, licenses, agreements, balance sheets, income statements, questionnaires, answers to questionnaires, statistical records, appointment books, telephone logs, lists, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, information or documents stored in computer hard drives, discs or memory, microfilms, all other records kept by electronic, photographic or mechanical means, and things similar to any of the foregoing, regardless of their author or origin, however denominated by it.

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2. Documents identifying the format of RGPPC meetings/events and the topics discussed.

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**DATE:** November 16, 2022

**CHAIR:** Anne Helzer *Anne Helzer*

Subpoena issued at the request of:

**Brandon Smith**  
Assistant Attorney General  
1031 W. 4<sup>th</sup> Ave., Suite 200  
Anchorage, AK 99501

Before this subpoena may be issued, the above date and signature of Chair must be completed and proof must be presented to the clerk that the subpoena has been served upon opposing counsel.