

**IN THE SUPREME COURT OF THE STATE OF ALASKA**

State of Alaska, Division of )  
Elections, )  
 )  
Appellant, )  
v. )  
 )  
Dan J. Sullivan, )  
 )  
Appellee. )

Supreme Court No. S-\_\_\_\_\_

\_\_\_\_\_  
Trial Court Case Nos. **3AN-26-07485CI**

APPEAL FROM THE SUPERIOR COURT  
THIRD JUDICIAL DISTRICT AT ANCHORAGE  
THE HONORABLE DAVID A. NESBETT, JUDGE

**JOINT EXCERPT OF RECORD  
VOLUME 1 OF 1**

CORI MILLS  
ACTING ATTORNEY GENERAL

Rachel L. Witty (0409052)  
Civil Division Director  
Department of Law  
1031 West Fourth Avenue, Ste. 200  
Anchorage, AK 99501  
(907) 269-5100

Filed in the Supreme Court  
of the State of Alaska  
on March \_\_, 2026

Christopher Murray (*pro hac vice*)  
Michael Francisco (*pro hac vice*)  
First and Fourteenth PLLC

MEREDITH MONTGOMERY, CLERK  
Appellate Courts

By: \_\_\_\_\_  
Deputy Clerk

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# STATE OF ALASKA

## DIVISION OF ELECTIONS

### QUALIFICATIONS FOR HOLDING OFFICE

**STATEWIDE CANDIDATES** are those seeking the office of United States Senator, United States Representative, Governor or Lieutenant Governor. The qualifications for these offices are as follows:

#### **United States Senator**

- ◆ 30 years of age;
- ◆ citizen of the United States for 9 years; and
- ◆ an inhabitant of the state from which elected.

#### **United States Representative**

- ◆ 25 years of age;
- ◆ citizen of the United States for 7 years; and
- ◆ an inhabitant of the state from which elected.

#### **Governor and Lieutenant Governor**

- ◆ At least 30 years of age on the first Monday in December following the election;
- ◆ citizen of the United States for at least 7 years;
- ◆ qualified voter of the state;
- ◆ resident of Alaska for at least 7 years immediately preceding filing for office.

**DISTRICTWIDE CANDIDATES** are those seeking the office of State Senator and State Representative. The qualifications for these offices are as follows:

#### **State Senator**

- ◆ At least 25 years of age on the first scheduled day of the first regular session of the legislature convened after the election;
- ◆ 3 year resident of Alaska; and
- ◆ 1 year resident of the district from which elected immediately preceding filing for office.

#### **State Representative**

- ◆ At least 21 years of age on the first scheduled day of the first regular session of the legislature convened after the election;
- ◆ 3 year resident of Alaska; and
- ◆ 1 year resident of the district from which elected immediately preceding filing for office.

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**FILING FOR OFFICE**

**U.S SENATOR OR REPRESENTATIVE**

**CANDIDATE PACKET**

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**State of Alaska**  
**Office of the Lieutenant Governor**  
**Division of Elections**  
**2026**



# CANDIDATE FILING REQUIREMENTS

A candidate who wishes to appear on the Primary Election ballot must file a Declaration of Candidacy form by the filing deadline, **MONDAY, JUNE 1, 2026**. Below is a checklist provided as a convenience to a candidate filing for office. Candidates are free to declare candidacy in another format provided it complies with the provisions of AS 15.25.030.

## CHECKLIST FOR FILING FOR OFFICE

- Complete your Declaration of Candidacy.** AS 15.25.030
- Sign your Declaration of Candidacy before a Notary.** A Notary is available at all Division of Elections offices. AS 15.25.030(a)
- Determine filing fee.** The fees are non-refundable. AS 15.25.050
  - \$100 for the office of U.S. Senator or U.S. Representative
- Contact the Federal Election Commission for federal reporting deadlines.** Candidates for U.S. Senator or U.S. Representative must contact the Federal Election Commission for campaign reporting requirements. These candidates are not subject to the Alaska Public Offices Commission requirements. AS 15.25.030(b), AS 15.25.030(c), AS 39.50
- File completed forms no later than 5:00 p.m. on the filing deadline, Monday, JUNE 1, 2026.** All Division of Elections Offices will be open from 8:00 a.m. to 5:00 p.m. AS 15.25.040

| DEADLINE   | DESCRIPTION  | OFFICE                |
|--|--|-----------------------|
| Mon., 06/01/26   | Simultaneous filing of: <ul style="list-style-type: none"> <li>• Declaration of Candidacy</li> <li>• Filing Fee</li> <li>• Federal Election Commission reporting requirements (Contact the FEC to ensure current requirements are met.)</li> </ul> | Division of Elections |
| Sat., 06/27/26   | Last day to submit a letter of withdrawal from the Primary Election ballot.  | Division of Elections |
| Wed., 07/22/26   | Last day to submit materials for the Official Election Pamphlet.   | Division of Elections |
| Mon., 08/31/26   | Last day to submit a letter of withdrawal from the General Election ballot.  | Division of Elections |
| <p><i>For federal reporting deadlines, federal candidates may contact the Federal Election Commission toll free at 1-800-424-9530 or online at <a href="http://www.fec.gov">www.fec.gov</a>.</i></p> |  |                       |



# 2026 IMPORTANT DATES

Check the Division of Elections website for a current calendar: [www.elections.alaska.gov](http://www.elections.alaska.gov)

- Mon., 06/01/26 **Filing deadline for candidates.** Candidates must file a "Declaration of Candidacy" and an appropriate Financial Disclosure Statement for any office appearing on the Primary Election ballot. Election offices will be open from 8:00 a.m. - 5:00 p.m. *AS 15.25.040*
- Thur., 06/11/26 Last day to file a complaint with the Division of Elections regarding the eligibility of a candidate. *AS 15.25.042 and 6 AAC 25.260*
- Tues., 06/16/26 Candidates who faxed filing materials to the Division of Elections by the June 1st deadline must have their mailed documents received by the Division of Elections by this date. *AS 15.25.040(a)(2)*
- Sat., 06/27/26 Last day for candidates to withdraw their names from Primary Election ballot. *AS 15.25.055*
- Wed., 07/22/26 **Candidate deadline for Official Election Pamphlet information material.** Candidates submit materials to the Division of Elections for the state's 2026 General Election voter pamphlet.
- Sat., 08/01/26 **Filing deadline for judges seeking retention.** Candidates for judicial retention must file a Declaration of Candidacy for Retention and Financial Disclosure Statement. *AS 15.35.040, AS 15.35.055, AS 15.35.070, AS 15.35.110, AS 39.50.020*
- Fri., 08/07/26 **Judicial retention deadline for Official Election Pamphlet information material.** Judges and the Judicial Council submit materials to the Division of Elections for the state's 2026 General Election voter pamphlet. *AS 15.58.030(g), AS 15.58.050*
- Tues., 08/18/26 **PRIMARY ELECTION DAY.** *AS 15.25.020*
- Mon., 08/31/26 Last day for candidates to withdraw their names from the General Election ballot. *AS 15.35.135, 6 AAC 25.210(b)*
- Thur., 10/29/26 **Filing deadline for write-in candidates.** Write-in candidates must submit a Letter of Intent by this date prior to 5:00 p.m. Alaska Time. *AS 15.25.105(13)(c)*
- Tues., 11/03/26 **GENERAL ELECTION DAY.** *AS 15.15.020*

**\*\* IMPORTANT NOTICE \*\***  
**OFFICIAL ELECTION PAMPHLET INFORMATION**

**Filing to be in the Official Election Pamphlet is a separate process from the Declaration of Candidacy or Retention forms submission.**

All candidates who wish to appear in the pamphlet must submit the materials listed below by the statutory deadline. The division recommends filing your materials as soon as possible. Materials should be submitted electronically. Forms for making the submission are available on the division's website at:

<https://www.elections.alaska.gov/Core/oepinfocandidates.php>

1. **Candidate Statement:** A biographical statement of 150 words or less and a position statement of 250 words or less. AS 15.58.030(e)
2. **Photograph:** A 5" x 7" photograph (five inches wide by seven inches high) or comparable resolution digital photograph taken within the last five years and limited to the head, neck and shoulders of the candidate. Digital files are preferred. All photographs will be printed in black and white. AS 15.58.030(f)
3. **Filing Fee:** Submit payment in the appropriate amount to the State of Alaska, Division of Elections. (Cash, check, credit card accepted.) AS 15.58.060(a)
  - a. \$300.00 – President of the United States, Vice President of the United States, United States Senator, United States Representative, Governor, Lieutenant Governor, Supreme Court Justice, Court of Appeals Judge
  - b. \$150.00 – Superior Court Judge, District Court Judge
  - c. \$100.00 – State Senator, State Representative

Prior to the General Election, the Division of Elections distributes the Official Election Pamphlet (OEP) to the households of registered voters. The pamphlet contains information about candidates and issues appearing on the General Election ballot. In addition, the information submitted by candidates for the OEP is posted to the division's website prior to the election in which the candidate will appear on the ballot.

*NOTE: For the Primary Elections, a ballot measure only pamphlet is mailed to voters only if a ballot measure appears on the Primary Election ballot. Candidate information **does not** appear in a Primary Election pamphlet.*

**Statutory Deadlines:**

- Presidential/Vice Presidential Candidates: **Wednesday, August 30, 2028** (AS 15.58.030(a))
- State/Federal Candidates: **Wednesday, July 22, 2026** (AS 15.58.030(b))
- Judicial Retention Candidates: **Friday, August 7, 2026** (AS 15.58.030(g))

**LATE SUBMISSIONS WILL NOT BE ACCEPTED.**

**Translated Materials Deadlines:**

- Presidential/Vice Presidential Candidates: **Monday, July 31, 2028** (6 AAC 25.720)
- State/Federal Candidates: **Monday, June 22, 2026** (6 AAC 25.720)
- Judicial Retention Candidates: **Wednesday, July 8, 2026** (6 AAC 25.720)

**Materials for Alaska Native language translation must be received 30 days before the statutory deadlines.** If submitted by this deadline, materials will be translated for a candidate for a federal or statewide office, a candidate for State Senate in Districts C, R, S, or T, a candidate for State Representative in House Districts 5, 36 – 40, or a judicial retention candidate for Supreme Court, Court of Appeals or judicial districts 2, 3 or 4. We **strongly encourage** you to submit your pamphlet material following this requirement so that the division can have your information translated to assist limited English proficient Alaska Native voters. We cannot accept already translated submissions.

**THIS MAY BE YOUR ONLY NOTICE REGARDING  
FILING MATERIALS FOR THE OFFICIAL ELECTION PAMPHLET.  
PLAN AHEAD AND SUBMIT EARLY**

# NONPARTISAN TOP 4 PRIMARY IN ALASKA

Candidates must file their Declaration of Candidacy on or before 5:00 p.m. **Monday, June 1, 2026**, for the **August 18, 2026** Primary Election required by AS 15.25.030. When filing for office, candidates must have their Financial Disclosure Statement already on file with the Alaska Public Offices Commission or must submit it simultaneously with their Declaration of Candidacy.

Any registered voter who meets the requirements of AS 15.25.030(a) and seeks to become a candidate in the Primary Election can file a declaration of candidacy. A Nonpartisan Top 4 Primary is used to determine which candidates will advance to the General Election. All candidates will appear on one ballot and there is no limit to how many candidates can file for each race in the Primary Election.

In accordance with Alaska's laws, a Primary Election candidate does not have to be a member of a political party or group to run for office. If a candidate is registered as affiliated with a political party or group, it does not imply the candidate is nominated by, approved by, or associated with that particular party or group.

# METHODS FOR FILING YOUR PAPERWORK

Candidates may file a Declaration of Candidacy for the **August 18, 2026** Primary Election to any Division of Elections office. The declaration and filing fee must be filed simultaneously on or before 5:00 p.m. **Monday, June 1, 2026**, using one of the methods listed below:

Candidates may file a Declaration of Candidacy for the August 18, 2026 Primary Election to any Division of Elections office. The declaration and filing fee must be filed simultaneously on or before 5:00 p.m. Monday, June 1, 2026, using one of the methods listed below:

- In person: A Declaration of Candidacy may be delivered in person to any Division of Elections regional office no later than 5:00 p.m. on June 1<sup>st</sup> or the Director's Office, located at 240 Main Street, Suite 400, Juneau, AK.
  
- By mail: A Declaration of Candidacy sent by mail must be received by the Division of Elections on or before 5:00 p.m. on June 1st. If the postmark is illegible, a dated receipt from the post office where dispatched shall be acceptable evidence of mailing. Declarations may be mailed to any Division of Elections regional office or to the Director's Office at P.O. Box 110017, Juneau, AK 99811-0017.
  
- By reliable electronic transmission: A Declaration of Candidacy or a copy of the statements made in paragraphs (1) – (5) of the declaration as required by AS 15.25.030(a) may be electronically transmitted by email to [elections@alaska.gov](mailto:elections@alaska.gov) or by fax at (907) 465-3203 or to any Division of Elections regional office and must be received by the division no later than 5:00 p.m. on June 1st. The original declaration containing paragraphs (1)-(16), as required by AS 15.25.040(a), must be received by the Division of Elections within 15 days of the filing deadline.

**If you have questions regarding filing for office, call the Director's Office at (907) 465-4611 or (866) 952-8683 (toll free within the U.S.).**

RECEIVED

STATE OF ALASKA DECLARATION OF CANDIDACY  
U.S. CONGRESS

JUL 11 2025

**STEP 1**

Did you include your \$100 filing fee with this Declaration of Candidacy? REGION II

I acknowledge that I am responsible for contacting the Federal Election Commission for federal reporting requirements: 1050 First Street, NE, Washington, DC 20463

**STEP 2** GENERAL INFORMATION (please print or type)

I, Dan Sullivan, declare myself to be a candidate for the office of (check one):

UNITED STATES SENATOR  UNITED STATES REPRESENTATIVE

I request that my name be placed on the 2026 PRIMARY ELECTION ballot.

I request that the political affiliation on my voter registration record, Republican, appear on the ballot. \*

OR I prefer to have nonpartisan or undecclared be designated on the ballot: Nonpartisan  OR Undeclared

\* Note: If this is not the party affiliation currently on your voter registration record, it will be changed to reflect what you provided.

**STEP 3** RESIDENCY INFORMATION (please print or type)

My current residence address is: 12230 Lilac Drive  
Anchorage, Alaska 99516

My current mailing address is: (Same as Above)

**STEP 4** MAILING ADDRESS and PHONE INFORMATION (used for correspondence and website listing)

3705 Arctic Blvd. #447 Anchorage, Alaska 99503  
(Candidate's Mailing) (City) (State) (Zip Code)

dan.sullivanforalaska.com info@danforak.com  
(Candidate's Website) (Candidate's Email Address) (Phone Number)

**STEP 5** BALLOT NAME INFORMATION

I request that my name appear on the ballot in the following manner:

Sullivan Dan  
(Last Name) (First Name) (MI) (\*\*Nickname and/or Suffix)

\*The Director of Elections may not include on the ballot as part of candidate's name, any honorary or assumed title or prefix but may include in the candidate's name any nickname or familiar form or proper name of candidate. (AS 15.15.030(d))

**STEP 6** CERTIFICATION

I, the undersigned, certify that the information in this Declaration of Candidacy is true and complete and that I meet the specific citizenship requirements of this office. I certify that, if elected, I shall be an inhabitant of the state of Alaska. I further certify that, if elected, I will meet the age requirements upon taking the oath of office. I am not a candidate for any other office to be voted upon at the Primary election, nor am I a candidate for this office under any other Declaration of Candidacy. I also acknowledge that should I choose to withdraw my candidacy; my withdrawal must be received by the Director of Elections in writing over my signature at least 52 days before the election.

Subscribed and sworn to before me this 11th day of July, 2025

[Signature]  
(Signature of Notary Public)

[Signature]  
(Candidate's Signature)

My commission expires: With office

(Phone Number) [Redacted]

To assist staff in verifying candidate/voter information, please provide one of the following: (SSN, ADL, Voter # or DOB) Nov. 13, 1964

**NOTARY PUBLIC**  
J. MARTINEZ  
My Commission Expires  
STATE OF ALASKA  
With Office

**Privacy Disclaimer**

Unless otherwise made confidential or protected from disclosure, information provided on this form may be subject to disclosure under the Alaska Public Records Act (AS 40.25.100-40.25.205). Failure to provide requested personal information may result in the Division of Elections' refusal to process the information provided on this form. Requested information will be used only for purposes directly associated with the processing of this form. For information on how to challenge the accuracy or completeness of personal information reported to the Division, please send the Division a written request that the personal information be changed. The request must comply with AS 40.25.310 and be sent to the Division of Elections at the following address: Division of Elections, Director's Office, PO Box 118017, Juneau, AK 99811-0017.

A23 (Rev 03/17/2025)

**From:** [Org Admin](#)  
**To:** [Elections, Division of \(GOV sponsored\)](#)  
**Subject:** Declaration of Candidacy - Dan Sullivan  
**Date:** Friday, May 29, 2026 9:30:49 AM  
**Attachments:** [declaration.pdf](#)

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You don't often get email from dan@sullivanforsenate.com. [Learn why this is important](#)

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

Good Morning,

I'm attaching the State of Alaska Declaration of Candidacy form for Dan Sullivan filing to run for United States Senator.

The \$100 filing fee check will be mailed today along with the original notarized documents.

Please let me know if you if you have any issues accessing the document.

With Gratitude,  
Dan Sullivan



**STATE OF ALASKA DECLARATION OF CANDIDACY  
U.S. CONGRESS**

**RECEIVED**

MAY 29 2026

Director's Office  
Division of Elections

**STEP 1**

Did you include your \$100 filing fee with this Declaration of Candidacy?

I acknowledge that I am responsible for contacting the Federal Election Commission for federal reporting requirements: 1050 First Street, NE, Washington, DC 20463

**STEP 2** **GENERAL INFORMATION** (please print or type)

I, Daniel J. Sullivan, declare myself to be a candidate for the office of (check one):

**UNITED STATES SENATOR**                       **UNITED STATES REPRESENTATIVE**

I request that my name be placed on the 2026 PRIMARY ELECTION ballot.

I request that the political affiliation on my voter registration record Republican appear on the ballot.\*

OR I prefer to have nonpartisan or undeclared be designated on the ballot: Nonpartisan  OR Undeclared

\* Note: If this is not the party affiliation currently on your voter registration record, it will be changed to reflect what you provided.

**STEP 3** **RESIDENCY INFORMATION** (please print or type)

My current residence address is: 439 Mitchell Highway  
Petersburg, AK 99833

My current mailing address is: P.O. Box 1656  
Petersburg, AK 99833

**STEP 4** **CONTACT INFORMATION** (used for correspondence and website listing)

P.O. Box 1656 Petersburg AK 99833  
(Candidate's Mailing) (City) (State) (Zip Code)

sullivanforseenate.com dan@sullivanforseenate.com 8197  
(Candidate's Website) (Candidate's Email Address) (Phone Number)

**STEP 5** **BALLOT NAME INFORMATION**

I request that my name appear on the ballot in the following manner:

Sullivan Dan  
(Last Name) (First Name) (MI) (\*Nickname and/or Suffix)

\*The Director of Elections may not include on the ballot as part of candidate's name, any honorary or assumed title or prefix but may include in the candidate's name any nickname or familiar form or proper name of candidate. (AS 15.15.030(4))

**STEP 6** **CERTIFICATION**

I, the undersigned, certify that the information in this Declaration of Candidacy is true and complete and that I meet the specific citizenship requirements of this office. I certify that, if elected, I shall be an inhabitant of the state of Alaska. I further certify that, if elected, I will meet the age requirements upon taking the oath of office. I am not a candidate for any other office to be voted upon at the Primary election, nor am I a candidate for this office under any other Declaration of Candidacy. I also acknowledge that should I choose to withdraw my candidacy, my withdrawal must be received by the Director of Elections in writing over my signature at least 52 days before the election.

Subscribed and sworn to before me this 28th day of May, 2026

[Signature]  
(Signature of Notary Public)

[Signature]  
(Candidate's Signature)

907-213-8197  
(Phone Number)

To assist staff in verifying candidate/voter information, please provide one of the following:  
(SSN, ADL, Voter # or DOB) [Redacted]

My commission expires: 12/3/26

**ELLAINA MARTINSEN**  
Notary Public  
State of Alaska  
My Commission Expires Dec 3, 2029

**Privacy Disclaimer:**

Unless otherwise made confidential or protected from disclosure by law, information provided on this form may be subject to disclosure under the Alaska Public Records Act (AS 40.25.100—40.25.295). Failure to provide requested personal information may result in the Division's inability to process relevant portions of this form. Requested information will be used only for purposes directly associated with the processing of this form. For information on how to challenge the accuracy or completeness of personal information maintained by the Division, please send the Division a written request that the personal information be changed. The request must comply with AS 40.25.310 and be sent to the Division of Elections at the following address: Division of Elections, Director's Office, PO Box 110017, Juneau, AK 99811-0017.

**\*CHECKLIST – DECLARATION OF CANDIDACY FOR LEGISLATURE**  
FOR USE WITH FORM A25

|  |   |
|--|---|
| NAME <u>Daniel J Sullivan</u> VN # <span style="background-color: black; color: black;">[REDACTED]</span><br>OFFICE <u>US. Senator</u> DIST _____<br>REGION: I <input checked="" type="radio"/> II <input type="radio"/> III <input type="radio"/> IV <input type="radio"/> V<br>DO <input type="checkbox"/> FAX <input type="checkbox"/> <input checked="" type="checkbox"/> IN PERSON <input type="checkbox"/> MAIL <input type="checkbox"/> EMAIL | DATE RECEIVED<br><b>RECEIVED</b><br><br><b>JUN 01 2026</b><br><br>TIME _____ AM/PM<br><small>(Time only required on deadline)</small> |
| PROCESSED BY: <u>Sharon E. Moore</u>   |   |

**PRINT A SCREEN OF CANDIDATE'S RECORD FROM VREMS**

- Step 1 of the form is complete (X or checks)
- Name complete
- Office filing for and district indicated
- District verified in record
- Political party indicated and verified
- Current Alaska residence address indicated & verified
- Length of residency at current address indicated
- Previous address indicated if needed OR (circle) N/A
- Length of residency in Alaska indicated
- Length of residency in the district indicated
- Mailing address and phone number for web complete
- "Ballot name information" section complete
- Certification complete
- Signed by candidate, notarized, phone number & details provided.
- Date stamped all filing papers
- Receipt provided for the filing fee NA
- Include check # if applicable, and office filed for on the receipt.
- "Before" and "After" screen-prints enclosed if changes were made or N/A

Comments: Rep Alan Harris dropped off on behalf of Daniel J. Sullivan

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| Voter Information                             | Previous Name and Address                 | Previous Status/Condition and Party |
|---|---|-------------------------------------|
| <b>Voter Information</b>                      | <b>Districts</b>                          | <b>Dates</b>                        |
| Voter ID: [REDACTED]                          | HD: 02                                    | Status/Cond: A/RG                   |
| Name: SULLIVAN DANIEL JAMES                   | Prec: 02-755<br>PETERSBURG/KUPREANOF      | Condition Date: 01/25/2008          |
| Residence: 439 MITKOF HWY<br>PETERSBURG 99833 | Polling Place: COMMUNITY CENTER           | Suspend Date:                       |
| PRA: <input type="checkbox"/>                 | Senate: A                                 | Restore Date:                       |
| Mailing: PO BOX 305<br>PETERSBURG AK 99833    | Judicial: 1                               | Last Contact: 05/29/2026            |
| DOB: [REDACTED]                               | Prior HD:                                 | Reg: 05/29/2026                     |
| SSN or Last 4: [REDACTED]                     | Prior Prec:                               | Orig Reg: 05/19/1982                |
| DL/State ID: [REDACTED]                       | Majors:                                   | Dist Reg: 02/16/1990                |
| Gender: MALE                                  | Minors: PETERS, PETESPB, PTSBSA1          | Prec Reg:                           |
| Party: ALASKA REPUBLICAN PARTY                | Registrar: <input type="checkbox"/>       | Disabled: <input type="checkbox"/>  |
| Old Plan House/Precinct: 35-755               | Election Worker: <input type="checkbox"/> | PAV: <input type="checkbox"/>       |
| Scan Documents                                | Display Signature                         | Display Document                    |
| Absentee Ballot                               | Petition History                          | Change Audit History                |
| Back  |   | Cancel                              |

**STATE OF ALASKA DECLARATION OF CANDIDACY  
U.S. CONGRESS**

**RECEIVED**

JUN 01 2026

**STEP 1**

Did you include your **\$100 filing fee** with this Declaration of Candidacy?

I acknowledge that I am responsible for contacting the Federal Election Commission for federal reporting requirements: 1050 First Street, NE, Washington, DC 20463

**REGION II**

**STEP 2** **GENERAL INFORMATION** (please print or type)

I, Daniel J. Sullivan, declare myself to be a candidate for the office of (check one):

**UNITED STATES SENATOR**                       **UNITED STATES REPRESENTATIVE**

I request that my name be placed on the **2026 PRIMARY ELECTION** ballot.

I request that the political affiliation on my voter registration record Republican appear on the ballot. \*

OR I prefer to have nonpartisan or undeclared be designated on the ballot: **Nonpartisan**  OR **Undeclared**

\* Note: If this is not the party affiliation currently on your voter registration record, it will be changed to reflect what you provided.

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Petersburg, AK 99833

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Petersburg, AK 99833

**STEP 4** **CONTACT INFORMATION** (used for correspondence and website listing)

P.O. Box 1656 Petersburg AK 99833  
(Candidate's Mailing) (City) (State) (Zip Code)

sullivanforseenate.com dan@sullivanforseenate.com 8197  
(Candidate's Website) (Candidate's Email Address) (Phone Number)

**STEP 5** **BALLOT NAME INFORMATION**

I request that my name appear on the ballot in the following manner:

Sullivan Dan  
(Last Name) (First Name) (MI) (\*Nickname and/or Suffix)

\*The Director of Elections may not include on the ballot as part of candidate's name, any honorary or assumed title or prefix but may include in the candidate's name any nickname or familiar form or proper name of candidate. (AS 15.15.030(4))

**STEP 6** **CERTIFICATION**

I, the undersigned, certify that the information in this *Declaration of Candidacy* is true and complete and that I meet the specific citizenship requirements of this office. I certify that, if elected, I shall be an inhabitant of the state of Alaska. I further certify that, if elected, I will meet the age requirements upon taking the oath of office. I am not a candidate for any other office to be voted upon at the Primary election, nor am I a candidate for this office under any other *Declaration of Candidacy*. I also acknowledge that should I choose to withdraw my candidacy, my withdrawal must be received by the Director of Elections in writing over my signature at least 52 days before the election.

Subscribed and sworn to before me this 28th day of May, 2026

[Signature]  
(Signature of Notary Public)

[Signature]  
(Candidate's Signature)

907-213-8197  
(Phone Number)

To assist staff in verifying candidate/voter information, please provide one of the following:  
(SSN, ADL, Voter # or DOB) [Redacted]

My commission expires: 12/3/26

**ELLAINA MARTINSEN**  
Notary Public  
State of Alaska  
My Commission Expires Dec 3, 2029

**Privacy Disclaimer**

Unless otherwise made confidential or protected from disclosure by law, information provided on this form may be subject to disclosure under the Alaska Public Records Act (AS 40.25.100-40.25.295). Failure to provide requested personal information may result in the Division's inability to process relevant portions of this form. Requested information will be used only for purposes directly associated with the processing of this form. For information on how to challenge the accuracy or completeness of personal information maintained by the Division, please send the Division a written request that the personal information be changed. The request must comply with AS 40.25.310 and be sent to the Division of Elections at the following address: Division of Elections, Director's Office, PO Box 110017, Juneau, AK 99811-0017.



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

Office of the Lieutenant Governor

DIVISION OF ELECTIONS  
Office of the Director

240 Main Street, Suite 400  
PO Box 110017  
Juneau, Alaska 99811-0017  
Main: 907.465.4611  
Fax: 907.465.3202  
elections@alaska.gov

June 1, 2026

Mr. Daniel J. Sullivan  
P.O. Box 1656  
Petersburg, AK 99833

Dear Mr. Sullivan:

This letter confirms the receipt of and certifies your Declaration of Candidacy. Your declaration indicates you are running for the office of US Senator as a Registered Republican candidate representing the State of Alaska.

On the 2026 Primary Election ballot, your name will appear as follows:

Sullivan, Dan J. (Registered Republican)

For information regarding campaign disclosure and conflict of interest statements that are required by the federal government, please contact: Federal Election Commission, 999 E Street NW, Washington, D.C. 20463, phone (800) 424-9530.

If you have a campaign website and/or an e-mail address, we can link that to the candidate page on our website at <https://www.elections.alaska.gov/candidates>. A form is enclosed for you to return if you wish for this information to be included on our website.

If you choose to withdraw your candidacy, the Division of Elections must receive your written and signed withdrawal by **Saturday, June 27, 2026**.

An Official Election Pamphlet (OEP) is prepared and printed for the **November General Election** to assist Alaska voters in making informed choices prior to the General Election. The final deadline for submitting OEP materials is **July 22, 2026**; however, **June 22, 2026**, is the deadline to submit information to be translated to the appropriate Native languages for the regions being served. Please review the enclosed flyer for additional information on the OEP or visit our website at <https://www.elections.alaska.gov/publications/official-election-pamphlet>.

The 2026 Candidate Filing Packets are available at any Division of Elections office and on our website at: <https://www.elections.alaska.gov/Core/candidatefiling.php>. These packets contain important dates and information for candidates regarding the 2026 elections, including information on the submission of materials for the *Official Election Pamphlet*.

Mr. Daniel Sullivan

June 1, 2026

Page 2 of 3

Candidates are allowed to assign observers for the absentee and questioned ballot review processes. You must provide to the division a list of observers 24 hours prior to the first ballot review. You are allowed one observer for each table that will be reviewing ballots. For the 2026 Primary Election, the Absentee Review Boards will begin reviewing ballots on **August 11, 2026**, and the Questioned Review Boards will review ballots beginning on **August 20, 2026**. Please contact your regional election office for more information about the process or to submit your list of observers.

Additionally, below is the ballot counting schedule for the 2026 Primary Election.

|  |   |
|--|---|
| Tuesday, August 18, 2026<br>Election Day | <ul style="list-style-type: none"><li>• Early ballots voted through August 13, 2026</li></ul>   |
| Tuesday, August 25, 2026<br>7-day count  | <ul style="list-style-type: none"><li>• Early ballots voted August 14, 2026 through Election Day</li><li>• 1<sup>st</sup> count of Absentee ballots for districts where ballots for the entire district have been reviewed by the Absentee Review Board</li><li>• 1<sup>st</sup> count of Questioned ballots for districts where ballots for the entire district have been reviewed by the Questioned Ballot Review Board</li></ul> |
| Friday, August 28, 2026<br>10-day count  | <ul style="list-style-type: none"><li>• Remaining Absentee ballots for all districts</li><li>• Remaining Questioned ballots for all districts</li></ul>   |

Sincerely,

Carol Beecher  
Director

Enclosure

cc: Federal Election Commission





THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Office of the Lieutenant Governor

DIVISION OF ELECTIONS  
Office of the Director

240 Main Street, Suite 400  
PO Box 110017  
Juneau, Alaska 99811-0017  
Main: 907.465.4611  
Fax: 907.465.3202  
elections@alaska.gov

July 16, 2025

The Honorable Daniel Sullivan  
3705 Arctic Blvd., #447  
Anchorage, AK 99503

Dear Senator Sullivan:

This letter confirms the receipt of and certifies your Declaration of Candidacy. Your declaration indicates you are running for the office of US Senator as a Registered Republican candidate representing the State of Alaska.

On the 2026 Primary Election ballot your name will appear as follows:

Sullivan, Dan (Registered Republican)

For information regarding campaign disclosure and conflict of interest statements that are required by the federal government, please contact: Federal Election Commission, 999 E Street NW, Washington, D.C. 20463, phone (800) 424-9530.

If you have a campaign website and/or an e-mail address, we can link that to the candidate page on our website at <https://www.elections.alaska.gov/candidates/>. A form is enclosed for you to return if you wish for this information to be included on our website.

If you choose to withdraw your candidacy, the Division of Elections must receive your written and signed withdrawal by **Saturday, June 27, 2026**.

An Official Election Pamphlet (OEP) is prepared and printed for the **November General Election** to assist Alaska voters in making informed choices prior to the General Election. The deadline for submitting OEP materials is **July 22, 2026**. Please review the enclosed flyer for additional information on the OEP or visit our website at <https://www.elections.alaska.gov/publications/official-election-pamphlet/>.

The 2026 Candidate Filing Packets are available at any Division of Election's office and on our website at: <https://www.elections.alaska.gov/Core/candidatefiling.php>. These packets contain important dates and information for candidates regarding the 2026 elections, including information on the submission of materials for the *Official Election Pamphlet*.

Candidates are allowed to assign observers for the absentee and questioned ballot review processes. You must provide to the division a list of observers 24 hours prior to the first ballot review. You are allowed one observer for each table that will be reviewing ballots. For the 2026 Primary Election, the Absentee Review Boards will begin reviewing ballots beginning on **August 11, 2026**, and the Questioned Review Boards will begin reviewing ballots beginning on **August 20, 2026**. Please contact your regional election office for more information about the process or to submit your list of observers.

Additionally, below is the ballot counting schedule for the 2026 Primary Election.

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| Friday, August 28, 2026<br>10-day count  | <ul style="list-style-type: none"><li>• Remaining Absentee ballots for all districts</li><li>• Remaining Questioned ballots for all districts</li></ul>   |

Sincerely,



Carol Beecher

Director

Enclosure

cc: Federal Election Commission

**Candidate Contact Information for the Division of Elections Website**

Your contact information appears on our website as follows:

Sullivan, Dan (Registered Republican)

3705 Arctic Blvd. #447

Anchorage, AK 99503

*phone number*

e-mail: info@danforak.com

Candidate's Web site: dansullivanforalaska.com

**If you would like to change this information, please provide the new information below:**

( ) \_\_\_\_\_  
Candidate Mailing Address                      City                      St                      Zip

( ) \_\_\_\_\_  
Candidate Contact Phone Number

If you would like to include a link to your website or e-mail address please provide below:

( ) \_\_\_\_\_  
Candidate Website

( ) \_\_\_\_\_  
Candidate E-mail Address

**Complete and return this form via mail or fax to:**

**Division of Elections  
PO Box 110017  
Juneau, AK 99811  
Fax: (907) 465-3203**



**Senator Tim Scott**  
Chairman

**Jennifer DeCasper**  
Executive Director

The Honorable Nancy Dahlstrom  
Lieutenant Governor  
Alaska State Capitol  
120 4th Street, 3rd Floor  
Juneau, AK 99801

Ms. Carol Beecher  
Director of Elections  
Division of Elections  
Court Plaza Building  
240 Main Street, 4th Floor  
Juneau, AK 99801

June 1, 2026

Dear Lt. Gov. Dahlstrom and Director Beecher:

We are writing regarding an urgent matter to protect the integrity of the Alaska voting system from being corrupted by an individual attempting to confuse Alaska voters and rig the election in favor of Democratic Senate Candidate Mary Peltola (“Candidate Peltola”). You are charged with facilitating the “fairness, simplicity, and clarity [of Alaska’s] voting procedure.”<sup>1</sup> In accordance with that authority, you must determine that Daniel J. Sullivan, Jr. of Petersburg, Alaska (“Sham Candidate Sullivan”) is not an eligible candidate for U.S. Senate and therefore must not appear on the August 18, 2026 Alaska primary ballot.

**I. The Lieutenant Governor Has The Legal Authority And Duty To Ensure Confidence In Alaska’s Elections; She Therefore Must Not Certify As Eligible Any Candidates For Office Whose Primary Purpose Is To Confuse Alaska Voters And Rig The Election In Favor Of Another Candidate.**

To be sure, both the United States and Alaska Constitutions guarantee the right of political parties to associate in order to advance their political goals. Furthermore, state ballot access requirements must be crafted in a manner that does not unduly burden a candidate’s right of free expression and political association. However, the law also recognizes that states have a legitimate interest in maintaining orderly elections and jealously guards the right of citizens to cast a ballot free from interference. To that end, Alaska regulations provide that a candidate’s name may not appear on the ballot in a

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<sup>1</sup> Alaska Stat. § 15.15.030.

manner that is “confusing or misleading to voters or compromises the fairness or neutrality of the ballot.”<sup>2</sup>

Alaska law entrusts the Lieutenant Governor with the responsibility to “administer state election laws” and “control and supervise the division of elections.”<sup>3</sup> The Director of Elections is tasked, in turn, with “general administrative supervision over the conduct of state elections.”<sup>4</sup> In particular, the director is responsible for “prepar[ing] all official ballots” in a way that “facilitate[s] fairness, simplicity, and clarity in the voting procedure,” and “reflect[s] most accurately the intent of the voter.”<sup>5</sup>

State and federal law both emphasize the critical role of state law and election officials in ensuring the integrity the electoral process. The state law that establishes the Division of Elections and charges the Lieutenant Governor and Director of Elections makes clear that “[i]t is essential that the nonpartisan nature, integrity, credibility, and impartiality of the administration of elections be maintained.”<sup>6</sup> And the U.S. Supreme Court has upheld a state’s strong interest in “preserving the integrity of its election process”<sup>7</sup> and “public confidence in the integrity of the electoral process,” which “encourages citizen participation in the democratic process.”<sup>8</sup> More specifically, the Supreme Court has even recognized that states have an “important” interest in avoiding voter “confusion” and “deception” in the context of electoral ballots.<sup>9</sup> To that end, Alaska regulations provide that a candidate’s name may not appear on the ballot in a manner that is “confusing or misleading to voters or compromises the fairness or neutrality of the ballot.”<sup>10</sup> You must uphold your statutory obligation to enforce these regulations and protect the principles they safeguard by keeping Sham Candidate Sullivan off the ballot.

It is not just voters who would be harmed if Sham Candidate Sullivan appears on the August ballot. Listing him on the ballot under the label of “Republican” would also infringe on the Republican Party’s freedom of association. Political parties “enjoy freedom of association protected by the First and Fourteenth Amendments”<sup>11</sup>—including “the freedom to identify the people who constitute the association, and to limit the association to those people only.”<sup>12</sup> Yet even though the Republican Party wants nothing to do with Sham Candidate Sullivan, he is trying to hijack Alaska’s voting laws in an effort to trick voters into believing the Party supports his candidacy. The First Amendment does not permit this misuse of state law, and your office should conclude as much.

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<sup>2</sup> Alaska Admin. Code tit. 6, § 25.212.

<sup>3</sup> Alaska Stat. §§ 44.19.020(1), 15.10.105(a).

<sup>4</sup> *Id.* § 15.15.010.

<sup>5</sup> *Id.* § 15.15.030.

<sup>6</sup> *Id.* § 15.10.105(b).

<sup>7</sup> *Eu v. San Francisco Cnty. Democratic Cent. Comm.*, 489 U.S. 214, 231 (1989).

<sup>8</sup> *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 197 (2008).

<sup>9</sup> *Jenness v. Fortson*, 403 U.S. 431, 442 (1971).

<sup>10</sup> Alaska Admin. Code tit. 6, § 25.212.

<sup>11</sup> *Eu*, 489 U.S., at 224 (internal quotation marks omitted).

<sup>12</sup> *California Democratic Party v. Jones*, 530 U.S. 567, 574 (2000).

**II. There Is Clear Evidence At Least One Alaskan Democrat Consultant, Who Is Supporting The Campaign Of Candidate Peltola, Is Also Assisting Sham Candidate Sullivan's Campaign For The Same Senate Seat, Demonstrating Intent To Confuse Alaska Voters In An Attempt To Rig The Election in Candidate Peltola's Favor.**

Although Alaska Democrats tried to conceal this fact, as reported in the *New York Times*, the metadata on the press release announcing Sham Candidate Sullivan's entry into the Alaska Senate race revealed its author was Amber Lee, an Alaskan "Democratic consultant" who is supporting Candidate Peltola for U.S. Senate and in fact is a longtime Peltola supporter.<sup>13</sup> Federal Election Commission records show that Amber Lee's consulting firm, Amber Lee Strategies, has received thousands of dollars for "PAC Strategy Consulting" from a PAC that has been a supporter of Candidate Peltola.<sup>14</sup> This is no surprise. Lee has long been affiliated with Democratic candidates and progressive causes. Her company's website boasts work on behalf of multiple Democratic candidates for the Alaska Legislature and other liberal and progressive interest groups such as the Environmental Defense Fund.<sup>15</sup>

There is no credible explanation for this type of coordination between Sham Candidate Sullivan and Candidate Peltola's consultants other than to exploit Alaska's voting system in order to benefit Candidate Peltola. If Sham Candidate Sullivan were truly seeking to prevail, he would have had no incentive to share the most confidential details of his impending candidacy with Candidate Peltola's Democratic consultant allies. But he is not seeking to prevail. Sham Candidate Sullivan is coordinating with Candidate Peltola's Democrat consultants to help Candidate Peltola win by taking the actions outlined below to promote confusion between Sham Candidate Sullivan and U.S. Senator Dan Sullivan. The incentive and motivation for the Peltola campaign consultants to help Sham Candidate Sullivan with his campaign to confuse Alaskan voters is obvious: If Alaskans are confused and mistakenly vote for Sham Candidate Sullivan when they want to vote for U.S. Senator Dan Sullivan, it directly benefits Candidate Peltola's chance for victory. But of course it would be a victory through cheating. What follows is ample evidence that Sham Candidate Sullivan's actions are purposefully intended to confuse Alaskans and help Candidate Peltola rig the election in her favor.

**III. Sham Candidate Sullivan Has Falsely Claimed That He Is A Republican Which Is Grounds To Disqualify His Candidacy.**

Sham Candidate Sullivan has filed a sworn Declaration of Candidacy for U.S. Senate apparently certifying as "true and complete" that he is a registered Republican

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<sup>13</sup> Jazmine Ulloa, *Palin Lost a Shot at a House Seat, but She Has a Second Chance*, N.Y. TIMES (Sept. 1, 2022); see also Tim Balk, *Senator Dan Sullivan Has a New Challenger in Alaska: Dan Sullivan*, N.Y. TIMES (May 31, 2026); Attachment A (screenshots of press release metadata).

<sup>14</sup> Expenditures of Vote Alaska Before Party PAC to Amber Lee Strategies, [https://www.fec.gov/data/disbursements/?recipient\\_name=amber+lee&data\\_type=processed](https://www.fec.gov/data/disbursements/?recipient_name=amber+lee&data_type=processed).

<sup>15</sup> Amber Lee Strategies, <https://www.amberleestrats.com>.

voter.<sup>16</sup> Yet, as detailed below, the overwhelming evidence on the public record suggests that Sham Candidate Sullivan is not a registered Republican voter and has never been. His Declaration of Candidacy is therefore defective and must not be certified.

Based on the most recent public records, Sham Candidate Sullivan is not registered as affiliated with the Republican Party as his Declaration of Candidacy apparently states. As of the date of this letter, the Alaska Division of Elections “My Voter Portal indicates that Sham Candidate Sullivan’s party affiliation is “undeclared.”<sup>17</sup> As you know, the State of Alaska Voter Registration Application provides voters with an optional field to declare a political affiliation. The form is signed under penalty of perjury. The Registrar Handbook published by the Division of Elections makes clear that “[a]pplicants who ... do not indicate a political affiliation on their registration application will be registered as undeclared.”<sup>18</sup> There is no available evidence on the public record that Sham Candidate Sullivan has filed an updated Voter Registration Application listing his political affiliation as “Republican.” To the contrary, the available evidence suggests that the most recent Voter Registration Form that Sham Candidate Sullivan signed either included a blank party affiliation field or listed his affiliation as “undeclared.”

The Alaska law governing the declaration of candidacy makes clear that the declaration must state “the political party or political group with which the candidate is *registered as affiliated*, or whether the candidate would prefer a nonpartisan or undeclared designation placed after the candidate’s name on the ballot.”<sup>19</sup> The law simply does not allow a candidate to affiliate with a political party on the basis of a declaration of candidacy. Additionally, while the regulations permit candidates who have *already* filed a declaration of candidacy to change political affiliation, that procedure is available only to candidates who have already filed a proper declaration of candidacy.<sup>20</sup> Therefore, Sham Candidate Sullivan’s Declaration of Candidacy is defective and must not be accepted.

#### **IV. Sham Candidate Sullivan’s Attempted Republican Affiliation Is Also Evidence That The Primary Intent of His Candidacy Is To Confuse Alaskans And Rig The Election In Favor Of Candidate Peltola.**

Sham Candidate Sullivan’s attempt to run as a “registered Republican” is further evidence that the true purpose of his candidacy is to confuse Alaskan voters. Most Alaskans know that their current U.S. Senator Dan Sullivan is a registered Republican and he has filed his reelection candidacy as a Republican. Sham Candidate Sullivan has never been a Republican. As the attached letter from Alaska Republican Party Chair Carmela Warfield makes clear, Sham Candidate Sullivan “has no affiliation with the

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<sup>16</sup> Alaska Division of Elections, Candidates, <https://www.elections.alaska.gov/candidates> (last visited June 1, 2026) (listing Daniel J. Sullivan as a “registered Republican”).

<sup>17</sup> Alaska Division of Elections, My Voter Portal, <https://myvoterportal.alaska.gov/voter> (last visited June 1, 2026).

<sup>18</sup> Alaska Division of Elections, Registrar Handbook, at 10 (Revised Oct. 12, 2023).

<sup>19</sup> Alaska Stat. § 15.25.030(a)(5) (emphasis added).

<sup>20</sup> Alaska Admin. Code tit. 6, §25.214(a).

Alaska Republican Party.”<sup>21</sup> The party has disavowed him. And rightly so. The only possible explanation for his sudden desire to affiliate with the Republican Party after a decades of supporting Democrats is to further confuse Alaskans seeking to reelect their incumbent U.S. Senator. Some voters may mistakenly cast a ballot for Sham Candidate Sullivan because they are confused by the identical name and party affiliation on the ballot. This kind of obvious manipulation of the Alaska election system should not be allowed.

Sham Candidate Sullivan has a long public history of supporting Democrats and progressive causes, including Candidate Peltola’s prior campaigns. Over the years, he has donated a total of \$650 to numerous Democrats nationwide, including \$130 to Candidate Peltola, \$100 to Alaska Democrat Scott McAdams, and \$50 to Kat Abughazaleh for Illinois, a self-described progressive and democratic socialist.<sup>22</sup> Sham Candidate Sullivan was also publicly reported as supporting Democrat Mark Begich’s 2014 Senate campaign.<sup>23</sup> The only plausible explanation for someone with this record running for office as a “registered Republican” is to mislead unwitting Alaska voters who intend to cast a ballot for incumbent Republican U.S. Senator Dan Sullivan. This is an obvious and outrageous manipulation of the Alaska election system that should not be allowed.

**V. Sham Candidate Sullivan’s Blatant Use And Copying Of U.S. Senator Dan Sullivan’s Long Established Campaign Logo And Materials Is Both A Violation Of U.S. Trademark Law And Compelling Evidence That The Primary Goal Of His Candidacy Is To Confuse Alaskan Voters And Rig The Election In Favor Of Candidate Peltola.**

Perhaps the most obvious evidence that Sham Candidate Sullivan’s candidacy is primarily about confusing Alaskans is Sham Candidate Sullivan’s own website and campaign materials. It is shocking the extent to which Sham Candidate Sullivan simply stole U.S. Senator Dan Sullivan’s long established campaign logo and campaign branding: same blue and gold color scheme; same font and typography; same prominent display of “Sullivan,” with an identical size of “U.S. Senate” designation; and even the same Alaska North Star over the entire logo.<sup>24</sup> U.S. Senator Dan Sullivan has used the same campaign logo and material for over 13 years. Now Sham Candidate Sullivan, in clear violation of U.S. trademark laws, plastered this stolen campaign logo all over his website and press releases. The only reason Sham Candidate Sullivan would make his campaign logos, websites, and letterhead identical to U.S. Senator Sullivan’s is to confuse Alaskan voters about who he is. He knows this will mislead Alaskans who are supporters

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<sup>21</sup> See Attachment B (Letter of Alaska Republican Party Chair Carmela Warfield).

<sup>22</sup> See Attachment C (FEC records of Sham Candidate Sullivan’s federal political contributions).

<sup>23</sup> Nathaniel Herz, *In GOP Primary, Some Worry Being Dan Sullivan Could Hurt—or Help—Dan Sullivan*, ANCHORAGE DAILY NEWS (July 24, 2014) (quoting a Begich spokesman indicating that he expected Dan Sullivan of Petersburg to vote for Democrat Mark Begich).

<sup>24</sup> See Attachment D (images of campaign logos between the long-established campaign logos, websites and signs of U.S. Senator Dan Sullivan and the stolen and misappropriated logos, website and campaign letterhead used by Sham Candidate Sullivan).

of U.S. Senator Dan Sullivan and cause them to mistakenly support Sham Candidate Sullivan, thereby helping to rig the election in Candidate Peltola's favor.

**VI. Alaskans' Confidence In The Integrity Of Their Electoral System, Especially Ranked Choice Voting, Will Be Significantly Undermined Unless Sham Candidate Sullivan's Declaration Of Candidacy Is Rejected.**

In sum, Sham Candidate Sullivan has taken actions that reveal the primary goal of his candidacy is to create confusion for Alaskan voters. Sham Candidate Sullivan has gone to great lengths in this regard. He has attempted to claim he is a Republican like U.S. Senator Dan Sullivan even though he clearly is not. He has blatantly stolen U.S. Senator Dan Sullivan's long established campaign logo, website and materials in violation of intellectual property laws to further confuse Alaskan voters. Why would Sham Candidate Sullivan go to such lengths? Do these actions suggest a candidacy focused on advancing his own policy views and ideas to benefit Alaskans? Do these actions respect the integrity of the Alaskan voting system? Certainly not. Sham Candidate Sullivan's deceitful and illegal actions are being taken in coordination with a Democratic campaign consultant and supporter of Candidate Peltola's campaign in the obvious hopes that confusion about Sham Candidate Sullivan will siphon votes away from U.S. Senator Dan Sullivan to Sham Candidate Sullivan which will directly benefit Candidate Peltola.

Your office should not countenance such abuse of the Alaskan voting system, particularly when the Declaration of Candidacy itself does not conform to the legal requirements. Sham Candidate Sullivan's sham candidacy threatens to undermine Alaskans' confidence in the newly implemented ranked choice voting ("RCV") system. RCV is the current law of the state, but it has come under significant criticism. One of the main criticisms is that the RCV system could lend itself to abuse and manipulation by nefarious actors who will use it to manipulate outcomes in devious ways that confuse voters and thwart the will of the Alaskan people. Allowing Sham Candidate Sullivan to appear on the ballot only furthers these criticisms and threatens confidence in Alaska's election system.

It is telling that even public RCV advocates such as prominent Alaskan lawyer Scott Kendall have called Sham Candidate Sullivan's candidacy "pathetic." After hearing of Sham Candidate Sullivan's filing, Kendall posted, "I really hope that neither the Dem party nor Peltola are involved in this. It represents politics at its worst—purposefully trying to confuse voters into wasting their ballot. Candidates need to wage a battle of ideas, not resort to cowardly nonsense."<sup>25</sup> What Kendall hoped was not the case has turned out to be true—an Alaskan Democratic consultant and activist supporting the Peltola Campaign was directly involved in this.

Permitting this behavior to stand risks negative consequences not just for Alaska but for America. The outcome of the Alaska Senate race may decide which party controls

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<sup>25</sup> Scott Kendall, X (May 30, 2026), [https://x.com/scooterkendall/status/2060564395990904893?s=46&t=\\_Lw5960Yx05vFb22409nA](https://x.com/scooterkendall/status/2060564395990904893?s=46&t=_Lw5960Yx05vFb22409nA).

the United States Senate. National Democrats, led by Senate Minority Leader Chuck Schumer, have said that their path to the Senate majority includes electing Candidate Peltola in Alaska.

It is clear from all the evidence that Sham Candidate Sullivan is taking these actions to proactively confuse Alaskan voters and rig the voting system to the obvious benefit of Democrat Candidate Peltola's campaign. His work with a Candidate Peltola Democratic activist and supporter is further proof of this. Such a fraud on the Alaskan election system is exactly what the Lieutenant Governor is authorized by both state and federal law to prevent. Alaska cannot allow its electoral process to be used for any political party's advantage. You are the officials charged with safeguarding the process and integrity of Alaskan elections. You have the responsibility under the law to ensure a fair, simple and clear process that prevents Alaskan voters from being deceived or confused into voting for an individual they did not intend to support.

We are confident that your office will immediately recognize Sham Candidate Sullivan's sham candidacy for what it is and determine that Sham Candidate Sullivan has not satisfied the basic eligibility requirements for a declaration of candidacy as required by Alaska law. However, in the event that your office does not deem Sham Candidate Sullivan's Declaration of Candidacy defective, the NRSC reserves the right to pursue all available legal remedies to ensure that the Alaska electoral process remains fair. To that end, we have sent preservation demands to Sham Candidate Sullivan, Ms. Lee and the campaign of Candidate Peltola to ensure that any records of their apparent coordination in furtherance of this scheme to commit fraud on Alaskan voters are preserved in the event of future litigation.<sup>26</sup>

Thank you for your prompt consideration of this request.

Sincerely,



Blake Murphy  
General Counsel  
NRSC

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<sup>26</sup> See Attachment E (Preservation Notices to Daniel J. Sullivan, Amber Lee, Amber Lee Strategies, and Alaskans for Mary).

**ATTACHMENT A**



FOR IMMEDIATE RELEASE  
May 29, 2026  
[Press@sullivanforsenate.com](mailto:Press@sullivanforsenate.com)

## Dan Sullivan Challenges Dan Sullivan for U.S. Senate Seat

*Urges Alaskans to defeat incumbent,  
elect a Sullivan who Stands up for Alaska*

**Alaska** — Today, Dan Sullivan officially filed his candidacy for the United States Senate, launching a campaign focused on unseating the incumbent, putting Alaska first, and restoring accountability, common sense, and public service to Washington, D.C.

"For too long, Senator Sullivan has failed to put Alaska first," Dan Sullivan said. "When you truly care about a people and a place, you have a duty to make every sacrifice within your power to protect them. That's why I'm running."

Sullivan grew up in a large Catholic family as the youngest of five children. His father, Dan Sullivan, and Katherine Sullivan, instilled traditional American values, responsibility, and a commitment to serving others. Dan Sullivan today and principles he has found lacking in

The shacshave his songs Sullivan Sullivan spend his childhood and conditioning on having saby them instructing him in the art of forestry. Those experiences shaped his understanding of hard work and self-reliance.

|                   |  |
|-------------------|--|
| File Name         | Sullivan_Release_052926.pdf                            |
| Document Type     | PDF document   |
| PDF Version       | 1.3  |
| Page Count        | 3  |
| Page Size         | 9.5 x 11 inches  |
| Title             | Sullivan_Release_v3                                    |
| Author            | Amber Lee  |
| Subject           |  |
| PDF Producer      | macOS Version 14.0.1 (Build 22H222); Quartz PDFContext |
| Content Creator   | Word   |
| Creation Date     | May 28, 2026 at 11:59 AM                               |
| Modification Date | May 28, 2026 at 11:58 AM                               |

Longtime Peltola Advisor

As reported in the New York Times, the metadata on the press release announcing Sham Candidate Sullivan's entry into the Senate race revealed its author was Amber Lee — an Alaskan "Democratic Consultant" who supports Candidate Peltola for U.S. Senate. FEC records show Amber Lee's consulting firm has received thousands of dollars for "PAC Strategy Consulting" from a PAC that supported Candidate Peltola.

**ATTACHMENT B**



**STATEMENT FROM ALASKA REPUBLICAN PARTY  
CHAIRMAN CARMELA J. WARFIELD**

Alaskans deserve elections that are fair, transparent, and free from deliberate attempts to mislead voters.

The recent filing of a second candidate named “Dan Sullivan” for the United States Senate raises serious concerns about voter confusion and the integrity of Alaska’s election process. By all appearances, this candidacy is being promoted for the purpose of misleading voters rather than presenting a legitimate campaign, and every Alaskan should be concerned regardless of party affiliation.

This situation highlights yet another flaw in Alaska’s failed Ranked Choice Voting system. Time and again, Alaskans have witnessed political gamesmanship, voter confusion, ballot exhaustion, and tactics designed to manipulate outcomes rather than allow voters to make clear and informed choices. Alaska voters deserve an election system that rewards honesty and transparency.

Let me be absolutely clear:

**The Alaska Republican Party has unanimously and enthusiastically endorsed Senator Dan Sullivan for re-election to the United States Senate.**

Senator Sullivan has earned the trust of Alaskans through years of dedicated service, fighting for our military, veterans, resource development, energy independence, fishermen, and working families. His record is clear, and Alaskans know exactly who he is and what he stands for.

Any effort to exploit a candidate’s name recognition in order to confuse voters is an insult to Alaska voters and undermines confidence in our elections. Further, even this candidate’s very campaign website, down to the styling of the font used, appears to be copied from Senator Sullivan’s. As of Friday, when this sham candidate filed, he was still registered as undeclared and has no affiliation with the Alaska Republican Party, which only heighten serious concerns about the legitimacy and good faith of his candidacy. To my knowledge, he has never attended Republican Party events or meetings and has had no affiliation with the Alaska Republican Party.

As Alaska’s chief elections officer, the Lieutenant Governor has a responsibility to ensure that Alaska’s elections are conducted fairly and that voters are protected from deceptive practices. Alaska law is clear that candidate names may not appear on a ballot in a way that confuses or misleads voters or undermines the fairness or neutrality of the ballot.

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[www.alaskagop.net](http://www.alaskagop.net)

We call upon the Lieutenant Governor and the Division of Elections to thoroughly review this filing, examine all relevant facts and circumstances, and determine that this candidacy does not comply with either the letter or spirit of Alaska election law. It is our position that it does not.

We also call on Mary Peltola to publicly condemn these tactics of voter confusion, ballot gimmicks, and political gamesmanship. If this candidacy is backed by Democrat interests, Alaskans deserve to know where she stands.

This is not a partisan issue. Every candidate, every political party, and every Alaskan should agree that elections should be won by earning votes, not by confusing voters.

The Alaska Republican Party will continue to stand for election integrity, transparency, and accountability. We will work tirelessly to ensure that every voter understands that Senator Dan Sullivan always puts Alaska First and is the Alaska Republican Party's unanimously endorsed candidate for the United States Senate.

This election should be decided by the people of Alaska based on the issues, the candidates, and their records.

Alaska deserves better.

Alaska voters deserve better.

And Alaskans, including Senator Dan Sullivan, deserve a fair election.

**Carmela J. Warfield**  
Chairman, Alaska Republican Party

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[www.alaskagop.net](http://www.alaskagop.net)

DOE 033  
Exc. 33

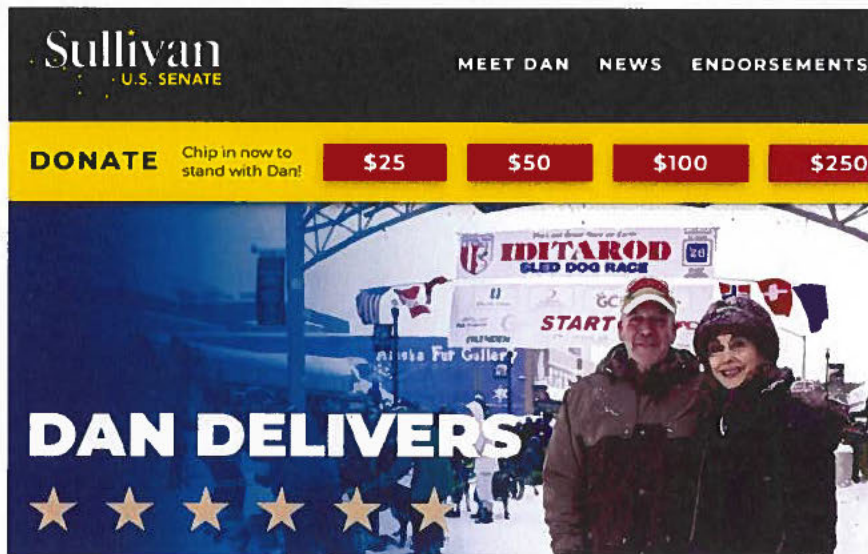
**ATTACHMENT C**

| Contributor   | Recipient   | Party Affiliation | Address                                      | Date       | Amount  |
|---------------|---|-------------------|--|------------|---------|
| SULLIVAN, DAN | EARMARKED FOR KAT FOR ILLINOIS (C00900449)                          | D-IL              | BOX 305, PETERSBURG, AK                      | 10/29/2025 | \$50.00 |
| SULLIVAN, DAN | EARMARKED FOR MONICA TRANEL FOR MONTANA (C00845008)                 | D-MT              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 10/25/2024 | \$50.00 |
| SULLIVAN, DAN | CONTRIBUTION TO ACTBLUE   | D-PAC             | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 10/25/2024 | \$5.00  |
| SULLIVAN, DAN | EARMARKED FOR ALASKA DEMOCRATIC PARTY - FEDERAL ACCOUNT (C00191247) | D-AK              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 8/31/2024  | \$25.00 |
| SULLIVAN, DAN | EARMARKED FOR ALASKA DEMOCRATIC PARTY - FEDERAL ACCOUNT (C00191247) | D-AK              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 8/11/2024  | \$20.00 |
| SULLIVAN, DAN | EARMARKED FOR MARY PELTOLA FOR ALASKA (C00812388)                   | D-AK              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 8/11/2024  | \$30.00 |
| SULLIVAN, DAN | EARMARKED FOR MONTANANS FOR TESTER (C00412304)                      | D-MT              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 8/10/2024  | \$50.00 |

|                     |  |       |  |            |                 |
|---------------------|--|-------|--|------------|-----------------|
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>TIM RYAN FOR<br>OHIO (C00777771)              | D-OH  | 439 MITKOF<br>HIGHWAY PO<br>BOX 305,<br>PETERBURG,<br>AK | 10/9/2022  | \$50.00         |
| SULLIVAN,<br>DAN    | CONTRIBUTION<br>TO ACTBLUE                                     | D-PAC | 439 MITKOF<br>HIGHWAY PO<br>BOX 305,<br>PETERBURG,<br>AK | 10/9/2022  | \$5.00          |
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>MARY PELTOLA<br>FOR ALASKA<br>(C00812388)     | D-AK  | 439 MITKOF<br>HIGHWAY PO<br>BOX 305,<br>PETERBURG,<br>AK | 8/17/2022  | \$100.00        |
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>PETERS FOR<br>MICHIGAN<br>(C00437889)         | D-MI  | PO BOX 305,<br>PETERBSURG,<br>AK                         | 10/13/2020 | \$50.00         |
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>HIRAL FOR<br>CONGRESS<br>(C00649897)          | D-AZ  | PO BOX 305,<br>PETERBSURG,<br>AK                         | 4/28/2020  | \$15.00         |
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>ALYSE FOR<br>ALASKA<br>(C00665711)            | D-AK  | PO BOX 305,<br>PETERBSURG,<br>AK                         | 3/22/2020  | \$100.00        |
| SULLIVAN,<br>DANIEL | EARMARKED FOR<br>SCOTT MCADAMS<br>FOR US SENATE<br>(C00484949) | D-AK  | PO BOX 305,<br>PETERSBURG,<br>AK                         | 9/1/2010   | \$100.00        |
| <b>TOTAL</b>        |  |       |  |            | <b>\$650.00</b> |

**ATTACHMENT D**

U.S. Senator Dan Sullivan's Longstanding Campaign Logo/Website



**Sham Candidate Sullivan's Stolen Logo and Website**



**WE NEED A SULLIVAN WHO STANDS UP FOR ALASKA**

**ATTACHMENT E**



Senator Tim Scott  
Chairman

Jennifer DeCasper  
Executive Director

Ms. Holly Giarraputo  
Treasurer  
Alaskans for Mary  
PO BOX 90031  
Anchorage, AK 99509

VIA Email: [holly@campaigncompliance.net](mailto:holly@campaigncompliance.net)

June 1, 2026

Re: Preservation of Records Notice

Dear Ms. Giarraputo:

I write as General Counsel to the NRSC, the national party committee, which has sent the attached letter to Alaska's Lieutenant Governor and Director of Elections concerning the defective U.S. Senate candidacy of Daniel J. Sullivan. The facts surrounding this matter, including metadata from the press release announcing Mr. Sullivan's candidacy containing the name of Peltola ally and consultant Amber Lee, demonstrate that Mr. Sullivan coordinated his candidacy with Alaskans for Mary, Mary Peltola and/or their agents. They also demonstrate that Mr. Sullivan's government filings may not be complete and truthful. The NRSC reserves its rights to pursue all available legal remedies concerning this matter.

In the event of litigation or other administrative complaints concerning this matter, we believe that Alaskans for Mary, Mary Peltola and their agents (collectively "the Campaign") would have relevant evidence. As such, we hereby request that the Campaign take all measures to preserve such evidence in the event of future legal action. Specifically, please preserve any and all records concerning the following:

- **Records related to Campaign communications with or about Mr. Daniel J. Sullivan or his agents.** Please preserve all records relating to Campaign communications with or about Mr. Daniel J. Sullivan or agents of Mr. Sullivan regarding his Declaration of Candidacy, Voter Registration Application, party affiliation, communications plans, website development or other materials related to Sullivan's U.S. Senate campaign. Please also preserve any schedules and travel records detailing meetings with Mr. Daniel J. Sullivan. Finally please preserve any accounting and financial records detailing any consulting work performed or financed by Alaskans for Mary on behalf of Mr. Sullivan or his campaign including bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.

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DOE 041  
Exc. 41



Senator Tim Scott  
Chairman

Jennifer DeCasper  
Executive Director

- **Records related to Campaign communications with Amber Lee, agents of Amber Lee Strategies.** Please preserve any and all records relating to your communications with Amber Lee and representatives and agents of Amber Lee Strategies regarding the candidacy of Mr. Daniel J. Sullivan, his Declaration of Candidacy, Voter Registration Application, party affiliation or communications plans, website development or other materials related to Sullivan's U.S. Senate campaign. Please also preserve any travel records including schedules, transportation receipts, or other expense reports detailing meetings with Ms. Lee or representatives of Amber Lee Strategies. Finally, please preserve any accounting and financial records detailing any consulting work performed by Amber Lee or Amber Lee Strategies on behalf of Mr. Sullivan and or his campaign that were paid for by Mary Peltola or Alaskans for Mary, including bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.

Such records may include physical records, including letters, files or notes, as well as electronically stored information such as e-mail messages, text messages, open-source messaging apps such as Signal, WhatsApp, Telegram, data contained in instant message applications (such as Google Chat, Slack, Microsoft Teams), private social media messaging including messages sent via Facebook, X, Instagram and similar platforms, call logs and phone records or auto-generate transcripts from meeting platforms (Zoom, Google Meet, Teams, etc.), voicemails, computer files, Microsoft Word documents, Excel documents, scanned PDFs, facsimiles, personal calendars, day-timers, appointment books and diaries, and any other information or data stored electronically, such as in cloud-based storage or on disks, CD-ROMs, hard drives, or thumb-drives, including those stored on handheld electronic devices. The type of records you should retain should be construed broadly. We ask that you preserve all such information and records in your possession, custody and control at present and on an ongoing basis including by disabling any auto-delete or disappearing message settings immediately. Thank you for your prompt attention to this matter.

Sincerely,

Blake Murphy  
General Counsel  
NRSC

Enclosure (Letter to Letter to Lt. Gov. Dahlstrom and Director Beecher)



Senator Tim Scott  
Chairman

Jennifer DeCasper  
Executive Director

Ms. Amber Lee  
c/o Amber Lee Strategies LLC  
2136 Sorbus Way  
Anchorage, AK 99508

VIA Email: [amber@amberleestrategies.com](mailto:amber@amberleestrategies.com)

June 1, 2026

Re: Preservation of Records Notice

Dear Ms. Lee:

I write as General Counsel to the NRSC, the national party committee, which has sent the attached letter to Alaska's Lieutenant Governor and Director of Elections concerning the defective U.S. Senate candidacy of Daniel J. Sullivan. The facts surrounding this matter, including metadata from the press release announcing Mr. Sullivan's candidacy that indicates you served as the document author, demonstrate that Mr. Sullivan coordinated his candidacy with Mary Peltola and her allies. They also suggest that Mr. Sullivan's government filings may not be complete and truthful. The NRSC reserves its right to pursue all available legal remedies concerning this matter.

In the event of litigation concerning this matter, we believe that you and your consulting firm would have relevant evidence. As such, we hereby request that you take all measures to preserve such evidence in the event of future legal action. Specifically, please preserve any and all records concerning the following:

- **Records related to your communications with or about Mr. Daniel J. Sullivan or his agents.** Please preserve all records relating to your communications with or about Mr. Daniel J. Sullivan or agents of Mr. Sullivan regarding his Declaration of Candidacy, Voter Registration Application, party affiliation, communications plans, website development or other materials related to Sullivan's U.S. Senate campaign. Please also preserve any accounting and financial records detailing any consulting work undertaken by you or your firm on behalf of Daniel J. Sullivan including schedules, travel records, transportation receipts, bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.
- **Records related to your communications and interactions with Mary Peltola Alaskans for Mary and their agents.** Please preserve all records relating to your communications with Mary Peltola, Alaskans for Mary, and their agents regarding the

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DOE-043

Exc. 43



Senator Tim Scott  
**Chairman**

Jennifer DeCasper  
**Executive Director**

candidacy of Mr. Daniel J. Sullivan, his Declaration of Candidacy, Voter Registration Application, party affiliation, communications plans, website development or other materials related to Sullivan's U.S. Senate campaign. Please also preserve any accounting and financial records detailing any consulting work undertaken by you or your firm on behalf of Alaskans for Mary on behalf of or in support of Daniel J. Sullivan including schedules, transportation receipts, expense reports, bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.

Such records may include physical records, including letters, files or notes, as well as electronically stored information such as e-mail messages, text messages, open-source messaging apps such as Signal, WhatsApp, Telegram, data contained in instant message applications (such as Google Chat, Slack, Microsoft Teams), private social media messaging including messages sent via Facebook, X, Instagram and similar platforms, call logs and phone records or auto-generate transcripts from meeting platforms (Zoom, Google Meet, Teams, etc.), voicemails, computer files, Microsoft Word documents, Excel documents, scanned PDFs, facsimiles, personal calendars, day-timers, appointment books and diaries, and any other information or data stored electronically, such as in cloud-based storage or on disks, CD-ROMs, hard drives, or thumb-drives, including those stored on handheld electronic devices. The type of records you should retain should be construed broadly. We ask that you preserve all such information and records in your possession, custody and control at present and on an ongoing basis, including by disabling any auto-delete or disappearing message settings immediately. Thank you for your prompt attention to this matter.

Sincerely,

Blake Murphy  
General Counsel  
NRSC

Enclosure (Letter to Letter to Lt. Gov. Dahlstrom and Director Beecher)

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DOE 044  
Exc. 44



Senator Tim Scott  
Chairman

Jennifer DeCasper  
Executive Director

Mr. Daniel J. Sullivan  
PO Box 1656  
Petersburg, AK 99833

VIA Email: [dan@sullivanforsenate.com](mailto:dan@sullivanforsenate.com)

June 1, 2026

Re: Preservation of Records Notice

Dear Mr. Sullivan:

I write as General Counsel to the NRSC, the national party committee, which has sent the attached letter to Alaska's Lieutenant Governor and Director of Elections concerning your defective Declaration of Candidacy for U.S. Senate. The facts surrounding this matter, including metadata from the press release announcing your candidacy, indicate that you received material assistance from consultants affiliated with Mary Peltola. They also suggest that your candidate filings may not be complete and truthful. The NRSC reserves its rights to pursue all available legal remedies concerning this matter.

Because litigation or other administrative complaints concerning this matter are foreseeable, we hereby request that you take all measures to preserve relevant evidence. Specifically, please preserve any and all records concerning the following:

- **Records related to your communications with or about Amber Lee or Amber Lee Strategies.** Please preserve any and all records relating to your communications with or about your 2026 Senate Candidacy with Ms. Amber Lee or representatives of Amber Lee Strategies including records pertaining to the preparation of your Declaration of Candidacy, Voter Registration Application, party affiliation, communications plans, website development or other materials related to your U.S. Senate campaign. Please also preserve any accounting and financial records detailing any consulting work undertaken by Ms. Lee or Amber Lee Strategies on behalf of you or your campaign including bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.
- **Records related to your communications with Mary Peltola, Alaskans for Mary, and their agents.** Please preserve any and all records relating to your communications with Mary Peltola, Alaskans for Mary and or their agents regarding your 2026 Senate Candidacy, including records related to the preparation of your Declaration of Candidacy,



Senator Tim Scott

**Chairman**

Jennifer DeCasper

**Executive Director**

Voter Registration Application, party affiliation, communications plans, website development or other materials related to your U.S. Senate campaign. Please also preserve any records including schedules, transportation receipts, or other expense reports related to meetings or discussions with Mary Peltola, Alaskans for Mary, and their agents. Finally, please preserve any accounting and financial records detailing any payments made by Mary of Alaska on behalf of you or your campaign, including bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.

Such records may include physical records, including letters, files or notes, as well as electronically stored information such as e-mail messages, text messages, open-source messaging apps such as Signal, WhatsApp, Telegram, data contained in instant message applications (such as Google Chat, Slack, Microsoft Teams), private social media messaging including messages sent via Facebook, X, Instagram and similar platforms, call logs and phone records or auto-generate transcripts from meeting platforms (Zoom, Google Meet, Teams, etc.), voicemails, computer files, Microsoft Word documents, Excel documents, scanned PDFs, facsimiles, personal calendars, day-timers, appointment books and diaries, and any other information or data stored electronically, such as in cloud-based storage or on disks, CD-ROMs, hard drives, or thumb-drives, including those stored on handheld electronic devices. The type of records you should retain should be construed broadly. We ask that you preserve all such information and records in your possession, custody and control at present and on an ongoing basis, including by disabling any auto-delete or disappearing message settings immediately. Thank you for your prompt attention to this matter.

Sincerely,

Blake Murphy  
General Counsel  
NRSC

Enclosure (Letter to Letter to Lt. Gov. Dahlstrom and Director Beecher)

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DOE 046

Exc. 46

**From:** [Beecher, Carol L \(GOV\)](#)  
**To:** [info@danforak.com](mailto:info@danforak.com)  
**Subject:** Name on Ballot  
**Date:** Monday, June 1, 2026 10:36:00 AM

---

Hello Senator Sullivan,

I am writing regarding how to place your name on the Primary ballot in a way that reduces confusion to the voters. Do you have a preference as to how your name should appear on the ballot?

Thank you,

Carol Beecher  
Director  
AK Division of Elections  
907-465-4611

Dan Sullivan  
P.O Box 1656  
Petersburg, Alaska 99833  
907-213-8197  
dan@sullivanforsenate.com

June 3, 2026

Carol Beecher  
Director of Elections  
Alaska Division of Elections  
240 Main Street, 4th Floor  
Juneau, AK 99801  
[carol.beecher@alaska.gov](mailto:carol.beecher@alaska.gov)  
[elections@alaska.gov](mailto:elections@alaska.gov)

**Re: My Candidacy for Senate**

Dear Director Beecher:

I write in response to the NRSC's letter, dated June 1, 2026, challenging my candidacy for United States Senate in the August 18, 2026 primary election on the ground that I share a first and last name with incumbent Senator Dan Sullivan. I have every right to run for Senate. I am a registered Alaska voter. I filed an accurate and timely declaration of candidacy, and I have the constitutional qualifications: I am older than 30, I have been a U.S. citizen my whole life, and I reside in Alaska. I am running because I am tired of sitting back and watching our current Senator routinely fail to represent the interests of ordinary Alaskans like me. The fact that Senator Sullivan shares my first and last names adds insult to injury, motivating me to raise my hand as an alternative choice for Alaskans. Senator Sullivan and NRSC have no right to exclude me from the ballot simply because we happen to share a name.

In addition to complaining about my name, the NRSC complains that I was not previously a registered Republican. Historically, I affiliated with the Alaskan Independence Party. However, the party was disbanded, and my registration was automatically marked as unaffiliated. I wish to run for office as a Republican to give Alaska voters another choice for what Republican representation in the U.S. Senate can look like. The form itself informed me that "if this is not the party affiliation currently on your voter registration record, it will be changed to reflect what

you provided.” I faithfully followed the instructions on the form provided by your office to indicate as such. And the primary ballot will itself tell voters that my designated affiliation does not imply that the Alaska Republican Party endorses me.

Alaska law requires you to place my name on the August primary ballot as a Republican candidate for U.S. Senate. Section 15.25.060 of the Alaska Statutes provides that you “shall ... place the names of all candidates who have properly filed in groups according to offices” on the primary ballot. It gives you no discretionary authority to exclude me. And when third parties, like the NRSC, question a candidate’s eligibility, Title 6, Section 25.260 of the Alaska Administrative Code provides that your review of their complaint “is limited to the grounds cited in the complaint that are related to candidate *qualifications* addressed in the candidate’s declaration of candidacy.” You are prohibited from considering “other grounds cited in the complaint.” None of the NRSC’s cited grounds are related to my indisputable qualifications to run for and serve as a U.S. Senator from Alaska. You therefore have no authority to exclude me from the ballot.

The NRSC’s letter does not allege that I failed to timely file a complete and accurate declaration of candidacy. Instead, it takes issue with my name and the fact that I filed to run as a Republican. As explained above, I followed the instructions on the form itself to designate myself as a Republican candidate for U.S. Senate, and I listed my legal name—I have no other. It is my right to do so whether the NRSC supports my candidacy or not. As far as I am aware, there is no Alaska or federal law that gives the NRSC the exclusive right to determine who may run as a Republican candidate for U.S. Senate. If such a right did exist, we would not need primary elections at all—the NRSC could just pick our nominees.

As to my name, the NRSC claims it will confuse the voters of Alaska, but Title 6, Section 25.212 of the Alaska Administrative Code says only that a candidate’s name may not be placed on the ballot “*in a manner* that is confusing or misleading to voters or compromises the fairness or neutrality of the ballot.” This regulation instructs your office to ensure the *manner in which* my and Senator Sullivan’s names go on the ballot does not confuse voters. It does not permit your office to exclude me from the ballot based on my legal name. The NRSC’s argument that the regulation does exclude me would deprive me of my right to run for office for no adequate reason. Your office is of course free to take reasonable steps to avoid voter confusion where two individuals with the same name are running for office—for example, by including a middle initial.

In short, I properly met all legal requirements to be placed on the August 18, 2026 primary election ballot as a Republican candidate for U.S. Senate. Your office has no legal basis to exclude my name from the ballot. Doing so would violate my rights and be an affront to Alaska

voters. I wish to give the people of Alaska an alternative choice of representation in the U.S. Senate. Your office may not lawfully deny me the chance to run or Alaska voters the opportunity to vote for me.

Respectfully,

A handwritten signature in black ink that reads "Daniel J. Sullivan". The signature is written in a cursive style with a large, stylized 'D' and 'S'.

Daniel J. Sullivan



**From:** [Sullivan for Senate](#)  
**To:** [Beecher, Carol L \(GOV\)](#)  
**Subject:** Re: FW: Name on Ballot  
**Date:** Monday, June 8, 2026 8:13:30 PM

---

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

Apologies.  
Please list as Dan J. Sullivan.

On Mon, Jun 8, 2026 at 11:27 AM Sullivan for Senate <[dan@sullivanforsenate.com](mailto:dan@sullivanforsenate.com)> wrote:

Hi Carol,

Dan S. Sullivan

I also wanted to confirm that you received the response letter.

Thank you,  
Dan

On Mon, Jun 8, 2026 at 8:54 AM Beecher, Carol L (GOV) <[carol.beecher@alaska.gov](mailto:carol.beecher@alaska.gov)> wrote:

Good morning, Mr. Sullivan,

I am following up on the question below.

Thank you,

Carol Beecher

Director

AK Division of Elections

907-465-4611

---

**From:** Beecher, Carol L (GOV)  
**Sent:** Monday, June 1, 2026 10:35 AM

**To:** '[dan@sullivanforsenate.com](mailto:dan@sullivanforsenate.com)' <[dan@sullivanforsenate.com](mailto:dan@sullivanforsenate.com)>

**Subject:** Name on Ballot

Hello Mr. Sullivan,

I am writing regarding how to place your name on the Primary ballot in a way that reduces confusion to the voters. Do you have a preference as to how your name should appear on the ballot?

Thank you,

Carol Beecher

Director

AK Division of Elections

907-465-4611



Lieutenant Governor Nancy Dahlstrom  
STATE OF ALASKA

June 8, 2026

Mr. Daniel James Sullivan, Jr.  
P.O. Box 1656  
Petersburg, AK 99833  
[dan@sullivanforsenate.com](mailto:dan@sullivanforsenate.com)

RE: Evaluation of Your Declaration of Candidacy for United States Senator

Dear Mr. Sullivan:

I am responsible for administering the State's election laws and supervising the Division of Elections. The Division must determine whether your declaration of candidacy was properly filed with a good-faith intention to serve, and in the event it is, how your name should appear on the primary election ballot to avoid voter confusion. I'm troubled by the allegation that you filed for office in coordination with another campaign with the intention of confusing Alaskan voters in a way that will benefit one candidate over another. If true, it suggests that your declaration of candidacy, which was submitted under penalty of perjury, was not genuine and not properly filed. For these reasons, this letter serves as notice that I have requested an investigation of your recent declaration of candidacy for United States Senate before determining whether you can appear on the ballot and, if you can appear, in what manner your name will appear on the ballot. This investigation is necessary and pertinent to an independent review of the propriety of your declaration of candidacy. This investigation is also pertinent to the credible allegations the State has received that you did not declare your candidacy with a good faith purpose to seek office but rather with a purpose to confuse voters and have them mistakenly vote for you rather than the incumbent with the same name and same political party affiliation.

There are credible allegations that you declared your candidacy in coordination with another candidate and campaign out of intention to confuse and manipulate voters by capitalizing on the fact that you share a first and last name with the incumbent senator and have selected the same political party affiliation. Specifically, it was alleged that you filed for office with the intent to use your identical first and last name and newfound affiliation with the Republican Party to confuse or deceive voters who intend to vote for Senator Sullivan into mistakenly voting for you instead. If true, this would be an unprecedented situation. The allegations here, if true, would amount to not only deception of voters but diminish the rights of another candidate solely for the purpose of diverting valid votes and sowing confusion among voters.

Mr. Daniel James Sullivan, Jr.  
June 8, 2026  
Page 2 of 3

We have received and reviewed your June 3 letter responding to these allegations (enclosed). Your letter did not adequately respond to the specific allegations that your candidacy is motivated by an intent to deceive Alaskan voters.

To assist with our investigation into the credible allegations challenging the propriety of your declaration of candidacy, I request that you respond—in an affidavit signed by you under penalty of perjury—to the following questions:

- (1) Have you ever affiliated as a member of the Republican Party before filing your declaration of candidacy? If so, please provide information regarding such affiliation including the date(s) and jurisdiction(s) where you were affiliated with the Republican Party.
- (2) Have you ever held yourself out as being associated or affiliated with the Republican Party before filing your declaration of candidacy for this election?
- (3) What other versions of your name have you used previously when registering with the Division of Elections? Have you always only used the nickname “Dan” and your last name? Why, if you registered under a different name in the past, did you use only “Dan Sullivan” in this instance when requesting ballot access?
- (4) Describe the process for designing your campaign website and logo, including the names of all persons and vendors who assisted in its creation. Please explain whether you intentionally mimicked the campaign website and logo for U.S. Senator Dan Sullivan.
- (5) Have you had any direct or indirect interaction whatsoever with Amber Lee and/or her consulting firm Amber Lee Strategies about your declaration of candidacy? If so, please describe your interactions with Ms. Lee and Amber Lee Strategies.
- (6) Have you had any direct or indirect interaction whatsoever with any other candidate for United States Senate or an agent of such a candidate about your declaration of candidacy?
- (7) Have you had any direct or indirect interaction whatsoever with any agent of the Democratic Party with respect to your declaration of candidacy?

As part of your affidavit, please address whether in the event the State determines your declaration of candidacy to be genuine and proper, and that your name may appear, you would object to your name appearing on the ballot as “**Sullivan, Daniel James Jr. (non-incumbent)**” to distinguish you from incumbent U.S. Senator Dan Sullivan and reduce the risk of voter confusion. Please also address whether you would object to your name appearing without the Republican party designation.

Mr. Daniel James Sullivan, Jr.  
June 8, 2026  
Page 3 of 3

Your response under oath is needed to ensure that we base our final decision on reliable and credible information. The Division's obligation to administer elections includes protecting the integrity, credibility, and impartiality of Alaska's elections. This includes protecting the public confidence that elections are fairly administered and that voters are not misled about the identity of candidates appearing on the ballot. In addition to responding to these questions, your affidavit can also include any other information you believe is relevant to the charge that your declaration of candidacy is intended to confuse or mislead voters or compromise the fairness or neutrality of the ballot.

To facilitate timely consideration of your response, please provide your affidavit on or before noon on Wednesday, June 10, 2026 to [lt.governor@alaska.gov](mailto:lt.governor@alaska.gov) with a copy to [attorney.general@alaska.gov](mailto:attorney.general@alaska.gov)

Sincerely,



Nancy Dahlstrom  
Lieutenant Governor

Enclosure

**From:** [Sullivan for Senate](#)  
**To:** [Lieutenant Governor Nancy Dahlstrom \(GOV sponsored\)](#); [General Attorney \(LAW sponsored\)](#)  
**Subject:** Sullivan Response to Dahlstrom Press Release  
**Date:** Wednesday, June 10, 2026 11:58:10 AM

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You don't often get email from dan@sullivanforsenate.com. [Learn why this is important](#)

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

June 10, 2026

Nancy Dahlstrom  
Lieutenant Governor  
State of Alaska

Re: My Candidacy for Senate

Dear Lieutenant Governor Dahlstrom:

I write in response to your June 8, 2026 letter. I originally received the letter not from your office, but from a reporter. This indicates that you started working with the press to generate a story on your investigation before ever contacting me. In fact, we have never received the letter to you. This conduct is deeply troubling for an elected official who is charged- as you claim – with administering the election laws of the State of Alaska. The premise of your letter is that “credible” allegations have been made that I am running for office in coordination with Mary Peltola to confuse Alaska voters. This allegation is entirely false and, respectfully, no evidence whatsoever has been provided to your office to support it.

I am running for U.S. Senate as a Republican under my lawfully given name. It is a name and party affiliation that I share with my father and my grandfather. I am not a registered Democrat, and I have had no conversations whatsoever with the Peltola campaign about my candidacy. The law forbids your office from denying me access to the ballot just because Senator Sullivan and the NRSC would prefer I not be allowed to run. This investigation by your office – and coordination of it with the press – is an unprecedented affront to my rights as a candidate and the rights of Alaska voters to select their own representation in the U.S. Senate.

I have considered running for political office for over a decade. I made the decision to formally run for the United States Senate in the upcoming primary election because Senator Sullivan has routinely failed the people of Alaska, and they deserve a better representative. It is my right to do so. The only “evidence” the NRSC provides for its alternative theory of my candidacy is that an Alaska political consultant named Amber

Lee has been involved in my campaign, and Ms. Lee was once a consultant for a super PAC named "Vote Alaska Before Party." As I have publicly said, Amber Lee is working as a political advisor to my campaign. I am a first-time candidate and found myself in need of strategic guidance, so I reached out to Ms. Lee. As far as I know, Ms. Lee does not work for the Peltola campaign. She does have prior political experience in the State of Alaska. The fact that a political consultant has done prior political consulting is not a legitimate reason for your office to investigate me and demand I supply you with an affidavit under penalty of perjury on less than 48 hours' notice.

You also asked about my website. It features multiple prominent photographs of me. I look nothing like Senator Sullivan. It describes my background and life experience, which is very different from Senator Sullivan's. It includes a press release that says in the very first line that I am running against the incumbent Senator. And it includes my logo, which is based on the Alaska flag and differs in multiple significant ways from Senator Sullivan's.

While I find your investigation to be inappropriate, I have no problem repeating what I have already said publicly. I have had no contact with the Peltola campaign about running for office. Your office has absolutely no credible basis to continue to question my candidacy.

I filed a timely Declaration of Candidacy for the U.S. Senate. All of the information I provided is true and correct. My understanding is Senator Sullivan's legal name Daniel Scott Sullivan. My name is Daniel J. Sullivan, and like the incumbent, I also go by "Dan." I have publicly gone by "Dan Sullivan" as long as I can remember, just like my father before me and my grandfather before him. A search of public records will reinforce my longtime use of "Dan Sullivan."

Finally, it is my right to affiliate with the Republican Party on the ballot. As I already explained to the Division of Elections, I moved to Alaska in 1980 and registered with the Alaskan Independence Party. The party disbanded in 2026, leaving me unaffiliated. When I decided to run for office, I chose to do so as a Republican. My father and grandfather were both Republicans and raised me to believe in compassionate conservatism. It is that viewpoint that drives my political beliefs and led me to choose to run as a Republican. The form provided to me by the Division of Elections gave me the option to do so.

I properly met all legal requirements to be placed on the August 18, 2026 primary election ballot as a Republican candidate for U.S. Senate. Your office has no legal basis to exclude my name or party affiliation from the ballot. Rather than choosing to question the legitimacy of the many candidates that have filed for U.S. Senate in Alaska this year that do not claim Alaska residence, you continue to harass me and my pursuit of office.

The NRSC is free to advocate against my candidacy and for the candidacy of Senator Sullivan. What it is not allowed to do is use your office as a pawn to kick me off the ballot.

Respectfully,

Daniel J. Sullivan

LAW OFFICES OF  
**HOLMES WEDDLE & BARCOTT**  
A PROFESSIONAL CORPORATION

FOUNDED IN 1914

OVER A CENTURY OF SERVICE TO OUR CLIENTS  
2550 DENALI STREET, SUITE 500 • ANCHORAGE, ALASKA 99503-2752  
TELEPHONE (907) 274-0666 • FAX (907) 277-4657

June 10, 2026

VIA EMAIL AND US MAIL

Ms. Carol Beecher  
Director of Elections  
State of Alaska, Division of Elections  
Court Plaza Building  
240 Main Street, 4th Floor  
Juneau, AK 99801  
[carol.beecher@alaska.gov](mailto:carol.beecher@alaska.gov)

Re: U.S. Senate Candidate Eligibility Complaint Against Daniel J. Sullivan Jr.

Dear Director Beecher:

Daniel J. Sullivan Jr.'s Declaration of Candidacy ("Declaration") is defective under Alaska law, rendering him ineligible to qualify as a candidate. These defects are established by the following statement of grounds submitted pursuant to 6 AAC 25.260. In light of these deficiencies, you must uphold your statutory obligations and conclude that Sullivan is ineligible.

#### STATEMENT OF GROUNDS

- Sullivan's Declaration must be rejected because he misrepresented his registered party affiliation. The statute requires a declaration to state the political party "with which the candidate *is registered* as affiliated"<sup>1</sup>—a mandatory requirement measured at the time of filing. Sullivan's Declaration states he is affiliated with the Republican Party,<sup>2</sup> but Division records<sup>3</sup> show his party affiliation at filing was "Undeclared."<sup>4</sup> He has perpetuated this misrepresentation through statements made to the Division and local media.<sup>5</sup> The declaration form cannot override the statutory

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<sup>1</sup> Alaska Stat. § 15.25.030(a)(5) (emphasis added). *See also Kohlhaas v. State*, 518 P.3d 1095 (Alaska 2022) (holding that a candidate may not lie about party affiliation and may be listed on the ballot as affiliated with a political party only if the candidate is actually registered with that party).

<sup>2</sup> Exhibit A: Declaration of Candidacy of Daniel J. Sullivan.

<sup>3</sup> Exhibit B: Voter Registration Records of Daniel J. Sullivan.

<sup>4</sup> Exhibit C: March 26, 2026 State of Alaska Voter Registration Application of Daniel J. Sullivan.

<sup>5</sup> *Compare* Letter to Lieutenant Governor Dahlstrom from Daniel James Sullivan, Jr. June 3, 2026 (stating that he historically affiliated with the Alaskan Independence Party and never indicates that he registered Republican) with Alex DeMarban, "State opens probe into Sen. Dan Sullivan's namesake challenger as he says he can legally run", Anchorage Daily News, June 9, 2026 available [here](#) in which Daniel J. Sullivan reported that he registered as a Republican in December 2025).

requirement,<sup>6</sup> and Alaska law permits agencies to act only within their legislatively granted authority.<sup>7</sup> Nor can the defect in his Declaration be cured after filing, as any mechanism to change ballot designation applies only to a valid declaration<sup>8</sup> and is now time-barred.<sup>9</sup> By a preponderance of the evidence, Sullivan is not an eligible candidate.

## COMPLAINANT

Carmela J. Warfield, Chairman  
Alaska Republican Party  
PO Box 110707  
Anchorage, Alaska 99511  
(907) 868-1093

I, Carmela J. Warfield, Chairman of the Alaska Republican Party, declare that the foregoing is true and correct to the best of my knowledge and belief. If necessary, I am prepared to execute a sworn statement as to the factual assertions set forth herein.

Signed: Carmela J. Warfield, Chairman, Alaska Republican Party Date: June 10, 2026  
E03609AE8E2A4D0

Sincerely,

HOLMES WEDDLE & BARCOTT, P.C.



Stacey C. Stone, Esq.

<sup>6</sup> Contrary to the plain language of the statutory requirements for a Declaration of Candidacy, the Division's form states that if the party affiliation listed on the Declaration "is not the party affiliation currently on your voter registration record, it will be changed to reflect what you have provided."

<sup>7</sup> See Alaska Stat. § 44.62.030 ("...a regulation adopted is not valid or effective unless consistent with the statute and reasonably necessary to carry out the purpose of the statute."); thus, agency materials cannot override statutory requirements.

<sup>8</sup> See Alaska Admin. Code tit. 6, §25.214(a) (providing that "[a] candidate who *has filed* a declaration of candidacy and wishes to change the candidate's political affiliation or nonpartisan or undeclared designation on the ballot shall file a written request for the change of designation in the manner required for filing a declaration under AS 15.25.040." (emphasis added)).

<sup>9</sup> Alaska Stat. § 15.25.040.

**EXHIBIT A**  
**Declaration of Candidacy of Daniel J. Sullivan**

STATE OF ALASKA DECLARATION OF CANDIDACY  
U.S. CONGRESS

RECEIVED

MAY 29 2026

Director's Office  
Division of Elections

**STEP 1**

Did you include your \$100 filing fee with this Declaration of Candidacy?

I acknowledge that I am responsible for contacting the Federal Election Commission for federal reporting requirements: 1050 First Street, NE, Washington, DC 20463.

**STEP 2** **GENERAL INFORMATION** (please print or type)

I, Daniel J. Sullivan declare myself to be a candidate for the office of (check one):

**UNITED STATES SENATOR**  **UNITED STATES REPRESENTATIVE**

I request that my name be placed on the 2026 PRIMARY ELECTION ballot.

I request that the political affiliation on my voter registration record Republican appear on the ballot.\*

OR I prefer to have nonpartisan or undeclared be designated on the ballot: Nonpartisan  OR Undeclared

\* Note: If this is not the party affiliation currently on your voter registration record, it will be changed to reflect what you provided.

**STEP 3** **RESIDENCY INFORMATION** (please print or type)

My current residence address is: 439 Mikkol Highway  
Petersburg, AK 99833

My current mailing address is: P.O. Box 1656  
Petersburg, AK 99833

**STEP 4** **CONTACT INFORMATION** (used for correspondence and website listing)

P.O. Box 1656 Petersburg AK 99833  
(Candidate's Mailing) (City) (State) (Zip Code) 907-213-

Sullivan for senate.com dan@sullivanforsenate.com 8197  
(Candidate's Website) (Candidate's Email Address) (Phone Number)

**STEP 5** **BALLOT NAME INFORMATION**

I request that my name appear on the ballot in the following manner:

Sullivan Dan  
(Last Name) (First Name) (MI) (\*Nickname and/or Suffix)

\*The Director of Elections may not include on the ballot as part of candidate's name, any honorary or assumed title or prefix but may include in the candidate's name any nicknames or familiar form or proper name of candidate. (AS 15.03.04)

**STEP 6** **CERTIFICATION**

I, the undersigned, certify that the information in this Declaration of Candidacy is true and complete and that I meet the specific citizenship requirements of this office. I certify that, if elected, I shall be an inhabitant of the state of Alaska. I further certify that, if elected, I will meet the age requirements upon taking the oath of office. I am not a candidate for any other office to be voted upon at the Primary election, nor am I a candidate for this office under any other Declaration of Candidacy. I also acknowledge that should I choose to withdraw my candidacy, my withdrawal must be received by the Director of Elections in writing over my signature at least 52 days before the election.

Subscribed and sworn to before me this 28th day of MAY, 2026.

[Signature]  
(Candidate's Signature)

907-213-8197  
(Phone Number)

To assist staff in verifying candidate/voter information, please provide one of the following: (SSN, ADI, Voter # or DOB) [Redacted]

My commission expires: 12/3/26

ELLAINA MARTINSEN  
Notary Public  
State of Alaska  
My Commission Expires Dec 3, 2029

Privacy Disclaimer:  
Unless otherwise made confidential or protected from disclosure by law, information provided on this form may be subject to disclosure under the Alaska Public Records Act (AS 40.25.100-40.25.295). Requested information will be used only for purposes directly associated with the processing of this form. For information on how to challenge the accuracy or completeness of personal information maintained by the Division, please file the Division's written request that the personal information be changed. The request must comply with AS 40.25.310 and be sent to the Division of Elections at the following address: Division of Elections, Director's Office, P.O. Box 110017, Juneau, AK 99811-0017.

**EXHIBIT B**  
**Voter Registration Records of Daniel J. Sullivan**

1911010K

VOTER'S NAME Sullivan, Jr. Donald J.  
LAST FIRST INITIAL

PREVIOUS NAME (If registered to vote in Alaska under that name) \_\_\_\_\_

ALASKA RESIDENCE ADDRESS Fis. Green Quarters, F. Stewart  
DO NOT LIST P.O. BOX OR RURAL ROUTES

CITY Piedersivung STATE Alaska

MAILING ADDRESS Piedersivung

CITY Piedersivung STATE Alaska ZIP 99833

FOR POST OFFICE USE ONLY

DATE OF BIRTH 2/1/85

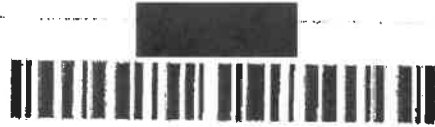
Voter Number: [Redacted]

INITIAL REGISTRATION  CHANGE OF APPLICABILITY

CHANGE OF ADDRESS  CHANGE OF NAME

FORM 01-3001 (3/82)

|  |        |      |   |        |      |  |  |  |     |  |  |
|--|--------|------|---|--------|------|--|--|--|-----|--|--|
| DATE OF NATURALIZATION   |        |      | MO  |        |      | DAY  |  |  | YR. |  |  |
| HOW LONG HAVE YOU LIVED IN ALASKA?   |        |      | HOW LONG HAVE YOU LIVED IN THIS ELECTION DISTRICT? (AT CURRENT ADDRESS) |        |      | SEX:   |  |  |     |  |  |
| YEARS  | MONTHS | DAYS | YEARS   | MONTHS | DAYS | <input checked="" type="checkbox"/> MALE <input type="checkbox"/> FEMALE   |  |  |     |  |  |
| IF YOU HAVE EVER BEEN CONVICTED OF A FELONY, HAVE YOU BEEN UNCONDITIONALLY DISCHARGED FROM INCARCERATION, PROBATION AND/OR PAROLE? <u>NO</u> |        |      |   |        |      | DATE: I, the undersigned declare that the foregoing facts concerning my qualifications as a voter or a voter changing my address are true. I further declare that I am a citizen of the United States and will be 18 years of age or older within 90 days of the date of registration. |  |  |     |  |  |
| IF SO, GIVE DATE: _____  |        |      |   |        |      | DATE: <u>5-19-82</u>   |  |  |     |  |  |
| POLITICAL AFFILIATION (Circle preference)  |        |      |   |        |      | WITNESSES  |  |  |     |  |  |
| REPUBLICAN    DEMOCRAT <u>NON-PARTISAN</u>   |        |      |   |        |      | [Redacted]   |  |  |     |  |  |
| OTHER (SPECIFY) _____  |        |      |   |        |      | TWO WITNESSES OR A QUALIFIED OFFICIAL MUST SIGN  |  |  |     |  |  |
|  |        |      |   |        |      | REGISTRAR <u>Alvin DeLo</u>  |  |  |     |  |  |



PD [REDACTED] 1100

VOTER'S NAME Sullivan Daniel J SE  
Last First Initial Suffix

PREVIOUS NAME (if registered to vote in Alaska under that name) \_\_\_\_\_

ALASKA RESIDENCE ADDRESS 276 Mitkof Highway  
Use street address. Many rural post or other physical location limitations.

CITY Petersburg ALASKA ZIP 99833

MY CURRENT RESIDENCY AT THIS ADDRESS (OR IN THIS DISTRICT, WHICHEVER IS LONGER) BEGAN MO 10 DAY 1 YEAR 88 SOCIAL SECURITY NUMBER (OPTIONAL) \_\_\_\_\_

MAILING ADDRESS Box 305 **RECEIVED**

CITY Petersburg STATE AK **FEB 16 1990**

OATH: I am not registered to vote in any other state, or having been so registered, have taken necessary steps to cancel that registration. I understand that making a false claim on this registration is a criminal offense & carries a penalty of perjury that the foregoing is true.

**REGION 1 ELECTION OFFICE**

|             |                |                |
|-------------|----------------|----------------|
| <b>DATE</b> | <b>2-13-90</b> | <b>C-07 PM</b> |
|-------------|----------------|----------------|

007 (11/89)

ALASKA ABSENTEE BALLOT APPLICATION

You may use this form to: Request Absentee Ballot; Register or Re-Register to Vote; Change Your Address; Change Your Name; or Change Your Party Affiliation

|  |  |                          |  |   |
|--|--|--------------------------|--|---|
| 1. Last Name <b>Sullivan</b>   |  | First Name <b>Daniel</b> | MLL <b>J</b>   | Suffix <b>Dr. II</b>                      |
| 2. Previous Name (on Alaska Voter ID card)   |  |                          |  |   |
| 3. Alaska residence address where you have the house number or in hospital and street names only. Do not use P.O., F.R.C. or R.R. box.   |  |                          | City <b>ALASKA</b>   |   |
| 4. Permanent Mailing Address (different from residence address if applicable) (Write "none" if identical to residence address)   |  |                          |  |   |
| Permanent Mailing Address <b>Box 305</b>   |  | City <b>Petersburg</b>   | State <b>AK</b>  | Zip <b>99832</b>                          |
| 5. Temporary Ballot Mailing Address (Complete if ballot is to be mailed to an address other than the Permanent Mailing Address)  |  | City <b>Pocatello</b>    | State <b>ID</b>  | Zip <b>83309</b>                          |
| 6. PROVIDE AT LEAST ONE OF THE FOLLOWING:<br>(b) Voter Number (on Alaska Voter card)   |  |                          |  |   |
| 7. Are you a member of the military or a military dependent? <input type="checkbox"/> (a) <input type="checkbox"/> (b) <input type="checkbox"/> Check box if ballot is being sent overseas and you will be overseas 90 days prior to and during the election.  |  |                          |  |   |
| 8. Voter Oath: Read and sign below. I certify, under penalty of perjury, that:<br><ul style="list-style-type: none"> <li>I am not requesting a ballot from any other state, and am not voting in any other manner in this (these) election(s).</li> <li>I am a resident of Alaska.</li> <li>I am not registered to vote in another state, or have taken the necessary steps to have that registration cancelled.</li> <li>I have had this application attested to by witnesses other than an authorized official, if it is because no authorized official empowered to administer an oath was available.</li> </ul> <b>WARNING:</b> If you provide false information, you may be convicted of a misdemeanor.<br>Date <b>10-17-92</b> |  |                          |  |   |
| 9. Signature <b>[Redacted]</b>   |  |                          | 10. SEND ME BALLOT APPLICATIONS FOLLOWING ELECTIONS:<br><input type="checkbox"/> All in Calendar Year (You must select Primary Ballot below.)<br><input type="checkbox"/> Primary Election (See "Ballots" and "Party Affiliation" in the instructions to determine which ballot you are eligible for.)<br><input type="checkbox"/> Republican Primary Ballot<br><input type="checkbox"/> Open Primary Ballot<br><input checked="" type="checkbox"/> General Election<br><input type="checkbox"/> CREWCORSA<br><input type="checkbox"/> Other (Specify) |   |
| 11. Sex: <input type="checkbox"/> Male <input type="checkbox"/> Female<br>Party Affiliation (Please check one): <input type="checkbox"/> Democrat <input type="checkbox"/> Republican <input type="checkbox"/> Independent <input type="checkbox"/> Other <input type="checkbox"/> Unaffiliated<br><input type="checkbox"/> Alaska Independence <input type="checkbox"/> Disabled <input type="checkbox"/> Blind <input type="checkbox"/> Hearing <input type="checkbox"/> Visually Impaired <input type="checkbox"/> Other  |  |                          |  |   |
| 12. To make registration changes THIS FORM MUST BE WITNESSED. By signing as a witness, I attest that to the best of my knowledge and belief, the person by whose name I am signing is the person who has signed the oath in my presence on the date indicated.   |  |                          |  |   |
| Witness's Name (Authorized Official)   |  | Title                    |  | Signature / Print Name of State Secretary |
| [Redacted]   |  | <b>Pocatello</b>         |  | <b>Pocatello</b>                          |

OP **2-100**  
Type **177LS**  
Date Received **10-23 X-P LH**  
**OCT 23 1992**

# Absentee in Person Ballot Oath & Affidavit Envelope - Please print and press hard - You are making a copy

|  |  |  |  |
|--|--|--|--|
| <p><b>You MUST complete this section</b></p> <p>Are you a citizen of the United States? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>Are you at least 18 years old? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>  |  | <p><b>For Office Use</b></p> <p>VN [Redacted]</p> <p>D/P <u>3/250</u></p> <p>Initials: <u>dh</u></p>   |  |
| <p>Last Name: <u>Sullivan</u></p> <p>First Name: <u>Daniel</u></p> <p>Middle Initial: <u>T</u></p> <p>Suffix (Sr., Jr., Etc.):</p>   |  | <p><b>For Review Board Use</b></p> <p>Count Code: <u>478</u></p> <p>Project Code:</p> <p>Purge Date:</p>   |  |
| <p>Name Previously Registered: <u>Mikol Huxy</u></p> <p>Alaska Residence Address Where You Claim Residency:</p> <p>House # <u>439</u> Street Name <u>Petersburg</u> City <u>Petersburg</u> State <u>AK</u> Zip Code <u>99835</u></p>   |  | <p>Identification Presented: <input checked="" type="checkbox"/> Identification Presented <input type="checkbox"/> No Identification Presented</p> |  |
| <p>If your mailing address is different than your residence address, and you want to keep your residence address confidential, check the following box. <input type="checkbox"/> Yes, please keep my address confidential.</p>   |  |  |  |
| <p>Mailing Address: <u>Box 305</u> City <u>Petersburg</u> State <u>AK</u> Zip Code <u>99835</u></p>  |  | <p><b>Absentee Official Use</b></p>  |  |
| <p><b>You MUST provide at least ONE</b></p> <p>Social Security No. _____</p> <p>AK Driver's License No. _____ Last 4 Digits of SSN _____</p> <p><input type="checkbox"/> I have not been issued a SSN, AK Driver's License or AK State ID No.</p>  |  | <p>Signature of Election Official: [Redacted]</p> <p>Date: <u>11-1-06</u></p>  |  |
| <p><b>You MUST provide Date of Birth:</b> _____</p> <p>Month _____ Day _____ Year _____</p>  |  | <p>Evening Phone No. <u>548-5484</u></p>   |  |
| <p>Alaska Voter Number _____ (if known)</p>  |  | <p>District No. or REAA/CRSA: <u>2</u></p> <p>Voting Location: <u>919</u></p> <p>Primary Ballot Choice:</p>  |  |
| <p><b>11. Write Political Affiliation Choice Here</b></p>  |  |  |  |
| <p><b>12. I swear or affirm, under penalty of perjury, that: The information on this form is true, accurate and complete to the best of my knowledge. I further certify that I am a resident of Alaska and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole. I am not registered to vote in another state, or I have taken the necessary steps to cancel that registration. I am or have been a resident of Alaska at some time in the last 4 years or am newly registering. I have not and will not vote in _____</b></p> |  |  |  |
| <p><b>* Voter Signature</b></p>  |  |  |  |
| <p><b>13. This form must be witnessed. By signing as a witness I attest that to the best of my knowledge, the applicant is the person he/she claims to be and this certification was made in my presence on the date indicated.</b></p>  |  |  |  |

**WARNING: False statements made by the voter or by the attesting witness on the certificate are punishable by law.**

Items are kept confidential by the Division and are not available for public inspection except that confidential addresses may be released to government agencies or during election processes as set out in state law.

E14 (Rev 03/20/2006) AS 15.05, 07, 20, 6 AAC 25.



**STATE OF ALASKA VOTER REGISTRATION APPLICATION**  
 Refer to instructions on the reverse side for specific information and identification requirements  
 Please print clearly in blue or black ink.

|  |                            |   |                      |
|--|----------------------------|---|----------------------|
| <b>1. You MUST complete this section for registration.</b><br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No    I am a citizen of the United States.<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No    I am at least 18 years old or will be within 90 days of completing this application.<br><b>If you checked NO to either question, do not complete this form as you are not eligible to register to vote.</b>  |                            |   |                      |
| <b>2. Last Name</b>  | <b>First Name</b>          | <b>Middle Initial</b>   | <b>Suffix</b>        |
| SULLIVAN   | DANIEL                     | JAMES   |                      |
| <b>3. Former Name :</b> (If your name has changed)   |                            |   |                      |
| <b>4. You MUST provide the Alaska residence address where you claim residency. Do not use PO, PSC, HC or RR.</b>   |                            |   |                      |
| 439 MITKOF HIGHWAY   | PETERSBURG                 | 99833   | ALASKA               |
| <small>House No.</small>   | <small>Street Name</small> | <small>Apt No. City</small>   | <small>State</small> |
| * <input type="checkbox"/> Keep my residence address confidential. (Your mailing address in section 5 must be DIFFERENT from your residence address in section 4 to remain confidential.)  |                            |   |                      |
| <b>5. Mailing Address :</b> (Address where you receive your mail if different from above)  |                            | <b>7.</b> <input type="checkbox"/> I am a voter with a disability and would like information on alternative voting methods.   |                      |
| PO BOX 305   |                            | <b>8.</b> <input type="checkbox"/> I am interested in serving as an election official.<br><small>(Provide your phone number and/or email address in section 9.)</small> |                      |
| 439 MITKOF HWY   |                            | <b>9.</b> Daytime Phone No: _____   |                      |
| PETERSBURG AK 99833  |                            | Evening Phone No: _____   |                      |
| PETERSBURG USA   |                            | Email Address: _____  |                      |
| <b>6. *AK Voter Number</b> _____<br><small>(If known)</small>  |                            |   |                      |
| <b>10. Identifiers - You MUST provide at least one:</b>  |                            |   |                      |
| *SSN or Last 4 of SSN _____  |                            | *Alaska Driver's License No. or State ID Number _____   |                      |
| <input type="checkbox"/> I have not been issued a Social Security, Alaska Driver's License or State ID number.   |                            |   |                      |
| <b>11. You MUST provide</b>  |                            | <b>12. Gender</b> <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female  |                      |
| *Date of Birth _____<br><small>Month    Day    Year</small>  |                            |   |                      |
| <b>13. Political Affiliation</b> For political affiliation choices in Alaska, see instruction number 4 on the reverse side.<br>Write political affiliation: <u>NONPARTISAN</u>   |                            |   |                      |
| <b>14. I am registered to vote in another state, cancel my registration in:</b>  |                            |   |                      |
| City: _____  | State: _____               | County: _____   | Zip: _____           |
| <b>Voter Certificate. Read and Sign:</b> I certify, under penalty of perjury, that the above information I provided on this document is true and correct. I am not registered to vote in another state, or I have provided information to cancel that registration. I further certify that I am a resident of Alaska and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole.<br><br><b>WARNING:</b> If you provide false information on this application you can be convicted of a misdemeanor AS 15.56.050. |                            |   |                      |
| *SIGNATURE: _____  |                            | DATE: 02/22/2020  |                      |
| Your signature must be handwritten signature. A typed or digital signature is not valid.   |                            |   |                      |
| <b>Registrar/Agency/Official - Check ID and complete this section</b>  |                            |   |                      |
| Registrar Name _____   | Voter No. or SSN _____     | OR  | Agency Name _____    |

\*Items are kept confidential by the Division of Elections and are not available for public inspection except that confidential addresses may be released to government agencies or during election processes as set out in state law.

**Absentee In Person Ballot Oath & Affidavit Envelope - Please print and press hard - You are making a**

**1. You MUST complete this section**  
 Yes  No I am a citizen of the United States  
 Yes  No I am at least 18 years old.

**2. Last Name** Sullivan **First Name** Derek **Middle Initial** J **Suffix (sr., jr., etc.)**

**3. Name Previously Registered:**

**4. Alaska Residence Address Where You Claim Residency**  
**House No.** 438 **Street Name** Yukon Highway **City** Perseus **State** Alaska  
 If your mailing address is different than your residence address, and you want to keep your residence address confidential, check the following box. \*If Yes, please keep my address confidential.

**5. Mailing Address** Box 305 **City**  **State**  **Zip Code**

**6. \*You MUST provide at least ONE**  
**Social Security No.** [REDACTED] **Last 4 Digits of SSN**   
**AK Driver's License No.**  **AK State ID Card No.**   
 I have not been issued a SSN, AK Driver's License or AK State ID No.

**7. \*You MUST provide Date of Birth**  
 Month  Day  Year  **8. Sex**  Male  Female

**9. \*Alaska Voter Number**  **10. \*Daytime Phone No.**   
 (if known) **\*Evening Phone No.**

**11. Write Political Affiliation Here:**

**12. I swear or affirm, under penalty of perjury, that:** The information on this form is true, accurate and complete to the best of my knowledge. I further certify that I am a resident of Alaska and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation, and/or parole. I am not registered to vote in another state, or I have taken the necessary steps to cancel that registration. I am or have been a registered voter in Alaska at some other manner in this election.

**\*Voter Signature**  
[REDACTED]

**Signature of Absentee Official**  
[REDACTED] **Date** 11/10/2013

**For Officer Use**  
**District Registered** 35 **Seq#** 27  
**Count Code** ML **Ref#**   
**Purg**

**Absentee Official Identification Pro**  
 Identification pro  
 No identification presented

**WARNING: False statements made by the voter or by the attesting witness on the certificate are punishable by law.**  
 Items are kept confidential by the Division and are not available for public inspection except that confidential addresses may be released to government agencies during election processes as set out in state law.



STATE OF ALASKA VOTER REGISTRATION APPLICATION
Refer to instructions on the reverse side for specific information and identification requirements
Please print clearly in blue or black ink.

1. You MUST complete this section for registration.

[X] Yes [ ] No I am a citizen of the United States.
[X] Yes [ ] No I am at least 18 years old or will be within 90 days of completing this application.
If you checked NO to either question, do not complete this form as you are not eligible to register to vote.

2. Last Name First Name Middle Initial Suffix
SULLIVAN DANIEL JAMES

3. Former Name : (If your name has changed)

4. You MUST provide the Alaska residence address where you claim residency. Do not use PO, PSC, HC or RR.

439 MITKOF HIGHWAY PETERSBURG 99833 ALASKA
House No. Street Name Apt. No. City State

\* [ ] Keep my residence address confidential. (Your mailing address in section 5 must be DIFFERENT from your residence address in section 4 to remain confidential.)

5. Mailing Address : (Address where you receive your mail if different from above)

439 MITKOF HWY
PO BOX 305
PETERSBURG AK 99833 USA

7. [ ] I am a voter with a disability and would like information on alternative voting methods.

8. [ ] I am interested in serving as an election official. (Provide your phone number and/or email address in section 9.)

9. Daytime Phone No:
Evening Phone No:
Email Address:

6. \*AK Voter Number (If known)

10. Identifiers - You MUST provide at least one:

\*SSN or Last 4 of SSN

\*Alaska Driver's License No. or State ID Number

[ ] I have not been issued a Social Security, Alaska Driver's License or State ID number.

11. You MUST provide

\*Date of Birth Month Day Year

12. Gender [X] Male [ ] Female

13. Political Affiliation For political affiliation choices in Alaska, see Instruction number 4 on the reverse side.

Write political affiliation: UNDECLARED

14. I am registered to vote in another state, cancel my registration in:

City: State: County: Zip:

Voter Certificate. Read and Sign: I certify, under penalty of perjury, that the above information I provided on this document is true and correct, I am not registered to vote in another state, or I have provided information to cancel that registration. I further certify that I am a resident of Alaska and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole.

WARNING: If you provide false information on this application you can be convicted of a misdemeanor AS 15.56.050.

\*SIGNATURE:

DATE: 01/19/2022

Your signature must be handwritten signature. A typed or digital signature is not valid.

Registrar/Agency/Official - Check ID and complete this section

Registrar Name Voter No. or SSN OR Agency Name

\*Items are kept confidential by the Division of Elections and are not available for public inspection except that confidential addresses may be released to government agencies or during election processes as set out in state law.

**Absentee In Person Ballot Oath & Affidavit Envelope - Print clearly and press hard - You are making a sworn statement.**

1. You MUST complete this section.  
 Are you a citizen of the United States?  Yes  No  
 Are you at least 18 years old?  Yes  No

2. Last Name: Sullivan First Name: Daniel Middle Initial: J Suffix (Sr., Jr., etc.): Jr  
 District for address: 02-5

3. Name Previously Registered: \_\_\_\_\_

4. Alaska Residence Address Where You Claim Residency: Petersburg Alaska  
 House No. 437 Street Name Mittkof Highway Apt # \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
 \*I-Keep my address confidential. (Mailing address in 5 MUST be different than residence address in 4.)

5. Mailing Address: \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip Code \_\_\_\_\_  
P.O. Box 305

6. \*You MUST provide at least ONE:  
 Social Security No. \_\_\_\_\_ Last 4 Digits of SSN: \_\_\_\_\_  
 AK Driver's License No. \_\_\_\_\_ AK State ID Card No. \_\_\_\_\_  
 [ ] I have not been issued an SSN, AK Driver's License or AK State ID No.

7. \*You MUST provide Date of Birth: \_\_\_\_\_ Gender:  Male  Female  
 Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

8. \*Daytime Phone No. \_\_\_\_\_  
 9. \*Evening Phone No. \_\_\_\_\_

10. \*Alaska Voter Number: \_\_\_\_\_

11. Write Political Affiliation Here: U

12. I swear or affirm, under penalty of perjury, that: The information on this form is true, accurate and complete to the best of my knowledge. I further certify that I am a resident of Alaska and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole. I am not registered to vote in another state, or I have taken the necessary steps to cancel that registration. I am or have been a registered voter in Alaska at some other manner in this election.

**\*Voter Signature** \_\_\_\_\_

District Registered: 02  
 County: \_\_\_\_\_  
 Precinct: \_\_\_\_\_  
 Initials: \_\_\_\_\_

**SIGNATURE OF ELECTOR CANVAS** \_\_\_\_\_ Date: \_\_\_\_\_

**WARNING: False statements made by the voter or by the attesting witness on the certificate are punishable by 1 year in prison and a fine of \$5,000. Confidential addresses may be released to governing agencies.**  
 E-14 (Rev. 03/06/2021) AS 15.05.07 20.6

**Absentee In Person Ballot Oath & Affidavit Envelope - Please print and press hard - You are making a**

1. **You MUST complete this section.**  
 Yes  No I am a citizen of the United States.  
 Yes  No I am at least 18 years old.

2. Last Name: Sullivan First Name: Denise I Middle Initial: I Suffix (Sr., Jr., III, etc.): Jr  
 VN [redacted] For Office Use: [redacted]  
 D/P 2-78 Initials: \_\_\_\_\_

3. Name Previously Registered: \_\_\_\_\_

4. Alaska Residence Address Where You Claim Residency: Mirkof Highway Apt # \_\_\_\_\_ City: Petersburg State: Alaska  
 House No.: 439 Street Name: \_\_\_\_\_  
 If your mailing address is different than your residence address, and you want to keep your residence address confidential, check the following box.  Yes, please keep my address confidential.

5. Mailing Address: P.O. Box 305 City: Petersburg State: AK Zip Code: 99833  
 \*You MUST provide at least ONE

6. Social Security No.: [redacted] Last 4 Digits of SSN: \_\_\_\_\_  
 AK Driver's License No.: \_\_\_\_\_ AK State ID Card No.: \_\_\_\_\_  
 [ ] I have not been issued a SSN, AK Driver's License or AK State ID No.

7. \*You MUST provide Date of Birth: \_\_\_\_\_ Sex:  Male  Female  
 Month Day Year

8. \*Alaska Voter Number: \_\_\_\_\_ (if known)  
 10. \*Daytime Phone No. [redacted]  
 \*Evening Phone No. [redacted]

11. Write Political Affiliation Here: Independent

12. I swear or affirm, under penalty of perjury, that: The information on this form is true, accurate and complete to the best of my knowledge. I further certify that I am a resident of Alaska and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole. I am not registered to vote in another state, or I have taken the necessary steps to cancel that registration. I am or have been a registered voter in Alaska at some time in the last 3 years of my Alaska registration. I have not and will not vote in any other manner in this election.

**\*Voter Signature**  
 [redacted]

This form must be witnessed by a third party witness. Parties that in the best of my knowledge, the applicant is the voter and he/she claims to be an Alaska resident was made for my presence on the date indicated.  
 Date: 10/26/22 Time: 2:45 PM  
 Signature of Election Official: [redacted] District No. \_\_\_\_\_  
 Signature of Voter: [redacted] District No. \_\_\_\_\_

For Review Boat  
 District Registered: 2 Seq: 6  
 Count Code: [redacted] Rejt: \_\_\_\_\_  
 Pur: \_\_\_\_\_

Absentee Official Identification:  Identification: Pr  
 Identification: Pr  
 No Identification Presented

**WARNING: False statements made by the voter or by the attesting witness on the certificate are punishable by law.**  
Items are kept confidential by the Division and are not available for public inspection except that confidential addresses may be released to government agencies during election processes as set out in state law.  
E-4 (Rev. 05/17/2013) AS 15.05 .07, 20.

**STATE OF ALASKA VOTER REGISTRATION APPLICATION**  
 Refer to instructions on the reverse side for specific information and identification requirements  
 Please print clearly in blue or black ink.

|  |                            |   |                      |
|--|----------------------------|---|----------------------|
| <b>1. You MUST complete this section for registration.</b><br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No    I am a citizen of the United States.<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No    I am at least 18 years old or will be within 90 days of completing this application.<br><b>If you checked NO to either question, do not complete this form as you are not eligible to register to vote.</b>                |                            |   |                      |
| <b>2. Last Name</b>  | <b>First Name</b>          | <b>Middle Initial</b>   | <b>Suffix</b>        |
| SULLIVAN   | DANIEL                     | JAMES   |                      |
| <b>3. Former Name :</b> (If your name has changed)   |                            |   |                      |
| <b>4. You MUST provide the Alaska residence address where you claim residency. Do not use PO, PSC, HC or RR.</b>   |                            |   |                      |
| 439 MITKOF HIGHWAY   | PETERSBURG                 | 99833   | ALASKA               |
| <small>House No.</small>   | <small>Street Name</small> | <small>Apt No. City</small>   | <small>State</small> |
| * <input type="checkbox"/> Keep my residence address confidential. (Your mailing address in section 5 must be DIFFERENT from your residence address in section 4 to remain confidential.)  |                            |   |                      |
| <b>5. Mailing Address :</b> (Address where you receive your mail if different from above)  |                            | <b>7.</b> <input type="checkbox"/> I am a voter with a disability and would like information on alternative voting methods.   |                      |
| 439 MITKOF HWY   |                            | <b>8.</b> <input type="checkbox"/> I am interested in serving as an election official.<br><small>(Provide your phone number and/or email address in section 9.)</small> |                      |
| PO BOX 305   |                            |   |                      |
| PETERSBURG   | AK USA                     | 99833   |                      |
| <b>6. *AK Voter Number</b>   |                            | <b>9.</b> Daytime Phone No: _____<br>Evening Phone No: _____<br>Email Address: _____  |                      |
|  |                            |   |                      |
|  |                            |   |                      |
| <b>10. Identifiers - You MUST provide at least one:</b>  |                            | *Alaska Driver's License No. _____<br>or State ID Number _____  |                      |
| *SSN or Last 4 of SSN _____  |                            |   |                      |
| <input type="checkbox"/> I have not been issued a Social Security, Alaska Driver's License or State ID number.   |                            |   |                      |
| <b>11. You MUST provide</b>  |                            | <b>12. Gender</b> <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female  |                      |
| *Date of Birth _____   |                            |   |                      |
| <small>Month    Day    Year</small>  |                            |   |                      |
| <b>13. Political Affiliation</b> For political affiliation choices in Alaska, see instruction number 4 on the reverse side.<br>Write political affiliation: <u>UNDECLARED</u>  |                            |   |                      |
| <b>14. I am registered to vote in another state, cancel my registration in:</b>  |                            |   |                      |
| City: _____  | State: _____               | County: _____   | Zip: _____           |
| <b>Voter Certificate. Read and Sign:</b> I certify, under penalty of perjury, that the above information I provided on this document is true and correct. I am not registered to vote in another state, or I have provided information to cancel that registration. I further certify that I am a resident of Alaska and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole. |                            |   |                      |
| <b>WARNING:</b> If you provide false information on this application you can be convicted of a misdemeanor AS 15.56.050.   |                            |   |                      |
| *SIGNATURE: _____  |                            | DATE: 02/23/2023  |                      |
| Your signature must be handwritten signature. A typed or digital signature is not valid.   |                            |   |                      |
| <b>Registrar/Agency/Official - Check ID and complete this section</b>  |                            |   |                      |
| Registrar Name _____   | Voter No. or SSN _____     | OR  | Agency Name _____    |

\*Items are kept confidential by the Division of Elections and are not available for public inspection except that confidential addresses may be released to government agencies or during election processes as set out in state law.

State: AK Zip Code: 99833

City: Petersburg

P.O. Box 305

Alaska Voter Number (if known):

Date of Birth: \_\_\_\_\_  
Month \_\_\_\_\_ Day \_\_\_\_\_ Year \_\_\_\_\_

Alaska State ID Card No. \_\_\_\_\_

Alaska Driver's License No. \_\_\_\_\_

I have not been issued a SSN, AK Driver's License or AK State ID No.

7. Sex:  Male  Female

8. Daytime Phone No. \_\_\_\_\_

Evening Phone No. \_\_\_\_\_

9. I swear or affirm, under penalty of perjury, that the information on this form is true, accurate and complete to the best of my knowledge. I further certify that I am a resident of Alaska; and I have not been convicted of a felony, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole. I am not registered to vote in another state, or I have taken the necessary steps to cancel that registration. (I am or have been a registered voter in Alaska at some time in the last 4 years or am in the process of becoming a registered voter in this election.)

Voter Signature

\_\_\_\_\_  
Date: \_\_\_\_\_

\_\_\_\_\_  
Attestation

WARNING: False statements made by the voter or by the attesting witness on the certificate are punishable by law.



**entree In-Person Ballot Oath & Affidavit Envelope - Print clearly and press hard - You are making a copy**

**You MUST complete this section**

Are you a citizen of the United States?  Yes  No  
Are you at least 18 years old?  Yes  No

Last Name: Sullivan First Name: Daniel

Middle Initial: I Suffix (Sr., Jr., Etc.): III

Name Previously Registered:

Alaska Residence Address Where You Claim Residency

439 Mitchell Highway Box 305 Petersburg  
House No. Street Name Apt # City State Zip Code

\*Keep my address confidential. (Mailing address in 5 MUST be different than residence address)

Mailing Address: P.O. Box 305 Petersburg AK 99833

**YOU MUST PRINT YOUR PHONE NUMBER**

Social Security No. [REDACTED] Last 4 Digits of SSN: 2833

AK Driver's License No. \_\_\_\_\_ AK State ID Card No. \_\_\_\_\_

[ ] I have not been issued an SSN, AK Driver's License or AK State ID No.

\*You MUST provide Date of Birth: \_\_\_\_\_ Gender:  Male  Female

\*Alaska Voter Number: \_\_\_\_\_ (if known) \_\_\_\_\_

8. \*Daytime Phone No. [REDACTED]

10. \*Evening Phone No. [REDACTED]

Write Political Affiliation Here: Independent

I swear or affirm, under penalty of perjury, that the information on this form is true, accurate and complete to the best of my knowledge. I further certify that I am a resident of Alaska and I have not been convicted of a felony involving moral turpitude, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole. I am not registered to vote in another state, or I have taken the necessary steps to cancel that registration. I am or have been a registered voter in Alaska at some time in the last 4 years or am newly registering. I have not and will not vote in any other manner.

**\*Voter Signature**

[REDACTED SIGNATURE]

Signature of Election Official \_\_\_\_\_ Date \_\_\_\_\_

Voting Location \_\_\_\_\_

District No. \_\_\_\_\_

**WARNING: False statements made by the voter or by the attesting witness on the certificate are punishable by law.**

is are kept confidential by the Division and are not available for public inspection except that confidential addresses may be released to government agencies during election processes as set out in state law.

**entee In-Person Ballot Oath & Affidavit Envelope - Print clearly and press hard - You are making a copy**

**You MUST complete this section**

Are you a citizen of the United States?  Yes  No  
Are you at least 18 years old?  Yes  No

Last Name: Sullivan First Name: Daniel Middle Initial: A Suffix (Sr., Jr., Etc.):

Name Previously Registered:

Alaska Residence Address Where You Claim Residency

439 Mitkof Highway Petersburg AK  
House No. Street Name City State Zip Code

\*I keep my address confidential. (Mailing address in 5 MUST be different than residence address in 4-)

Mailing Address: P.O. Box 305 Petersburg AK 99833  
City State Zip Code

\*You MUST provide at least ONE

Social Security No. 1 Last 4 Digits of SSN [REDACTED]

AK Driver's License No. AK State ID Card No.

I have not been issued an SSN, AK Driver's License or AK State ID No.

\*You MUST provide Date of Birth

Month: [REDACTED] Day: [REDACTED] Year: [REDACTED]

\*Alaska Voter Number

8. Gender  Male  Female

10. \*Daytime Phone No. [REDACTED]  
\*Evening Phone No. [REDACTED]

Write Political Affiliation Here: Indep per elect

I swear or affirm, under penalty of perjury that: The information on this form is true, accurate and complete to the best of my knowledge. I further certify that I am a resident of Alaska and I have not been convicted of a felony involving moral turpitude, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole. I am not registered to vote in another state, or I have taken the necessary steps to cancel that registration. I am or have been a registered voter in Alaska at some time in the last 4 years and am newly registering. I have not and will not vote in any other manner.

**\*Voter Signature**

[REDACTED]

Signature of Election Official \_\_\_\_\_ Date \_\_\_\_\_

**WARNING - False statements made by the voter or by the attesting witness on the certificate are punishable by law. All information received by the Division and is not available for public inspection except that confidential addresses may be released to government agencies in accordance with AS 15.05.02 and AS 15.05.023. AS 15.05.02 and AS 15.05.023.**

VN 02  
District for address on line 4

District Registered 02 Sequence No. 1044

Count Code [REDACTED] Reject Code  
Initials [REDACTED] Purge Date

Absentee Office Use  
Identification Provided  
Identification Provided  
Identification Provided  
Identification Provided

## STATE OF ALASKA VOTER REGISTRATION APPLICATION

Refer to instructions on the reverse side for specific information and Identification requirements

**Please print clearly in blue or black ink.**

|  |                               |   |                      |
|--|-------------------------------|---|----------------------|
| <b>1. You MUST complete this section for registration.</b><br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No    I am a citizen of the United States.<br><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No    I am at least 18 years old or will be within 90 days of completing this application.<br><b>If you checked NO to either question, do not complete this form as you are not eligible to register to vote.</b>  |                               |   |                      |
| <b>2. Last Name</b>  | <b>First Name</b>             | <b>Middle Initial</b>   | <b>Suffix</b>        |
| SULLIVAN   | DANIEL                        | JAMES   |                      |
| <b>3. Former Name :</b> (If your name has changed)   |                               |   |                      |
| <b>4. You MUST provide the Alaska residence address where you claim residency. Do not use PO, PSC, HC or RR.</b>   |                               |   |                      |
| 439 MITKOF HIGHWAY   | PETERSBURG                    | 99833   | ALASKA               |
| <small>House No.      Street Name</small>  | <small>Apt No.    CRy</small> |   | <small>State</small> |
| * <input type="checkbox"/> Keep my residence address confidential. (Your mailing address in section 5 must be DIFFERENT from your residence address in section 4 to remain confidential.)  |                               |   |                      |
| <b>5. Mailing Address :</b> (Address where you receive your mail if different from above)  |                               | <b>7.</b> <input type="checkbox"/> I am a voter with a disability and would like information on alternative voting methods.   |                      |
| PO BOX 305   |                               | <b>8.</b> <input type="checkbox"/> I am interested in serving as an election official.<br><small>(Provide your phone number and/or email address in section 9.)</small> |                      |
| 439 MITKOF HWY   |                               | _____   |                      |
| PETERSBURG   | AK                            | USA   | 99833                |
| <b>6. *AK Voter Number:</b> _____<br><small>(If known)</small>   |                               | <b>9. Daytime Phone No.:</b> _____<br>Evening Phone No.: _____<br>Email Address: _____  |                      |
| <b>10. Identifiers - You MUST provide at least one:</b>  |                               |   |                      |
| *SSN or Last 4 of SSN      _____   |                               | *Alaska Driver's License No. or State ID Number      _____  |                      |
| <input type="checkbox"/> I have not been issued a Social Security, Alaska Driver's License or State ID number.   |                               |   |                      |
| <b>11. You MUST provide</b>  |                               | <b>12. Gender</b> <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female  |                      |
| *Date of Birth      _____<br><small>Month      Day      Year</small>   |                               |   |                      |
| <b>13. Political Affiliation</b> For political affiliation choices in Alaska, see Instruction number 4 on the reverse side.<br>Write political affiliation:      ALASKAN INDEPENDENCE PARTY  |                               |   |                      |
| <b>14. I am registered to vote in another state, cancel my registration in:</b>  |                               |   |                      |
| City: _____  | State: _____                  | County: _____   | Zip: _____           |
| <b>Voter Certificate. Read and Sign:</b> I certify, under penalty of perjury, that the above information I provided on this document is true and correct. I am not registered to vote in another state, or I have provided information to cancel that registration. I further certify that I am a resident of Alaska and I have not been convicted of a felony involving moral turpitude, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole.<br><b>WARNING: If you provide false information on this application you can be convicted of a misdemeanor AS 15.56.050.</b> |                               |   |                      |
| *SIGNATURE: _____  |                               | DATE: 03/17/2025  |                      |
| Your signature must be handwritten signature. A typed or digital signature is not valid.   |                               |   |                      |
| <b>Registrar/Agency/Official - Check ID and complete this section</b>  |                               |   |                      |
| Registrar Name   | Voter No. or SSN              | OR  | Agency Name          |

\* Items are kept confidential by the Division of Elections and are not available for public inspection except that confidential addresses may be released to government agencies or during election processes as set out in state law.



**Exhibit C**  
**March 26, 2026 State of Alaska Voter Registration Application of Daniel J. Sullivan**

# STATE OF ALASKA VOTER REGISTRATION APPLICATION

Refer to instructions on the reverse side for specific information and identification requirements

Please print clearly in blue or black ink.

**1. You MUST complete this section for registration.**

- Yes  No I am a citizen of the United States.
- Yes  No I am at least 18 years old or will be within 90 days of completing this application.

If you checked NO to either question, do not complete this form as you are not eligible to register to vote.

|                                 |                             |                            |               |
|---------------------------------|-----------------------------|----------------------------|---------------|
| <b>2. Last Name</b><br>SULLIVAN | <b>First Name</b><br>DANIEL | <b>Middle Initial</b><br>J | <b>Suffix</b> |
|---------------------------------|-----------------------------|----------------------------|---------------|

**3. Former Name :** (If your name has changed)

**4. You MUST provide the Alaska residence address where you claim residency. Do not use PO, PSC, HC or RR.**

|                                      |                             |                      |
|--------------------------------------|-----------------------------|----------------------|
| 439 MITKOF HIGHWAY                   | PETERSBURG                  | ALASKA               |
| <small>House No. Street Name</small> | <small>Apt No. City</small> | <small>State</small> |

\*  Keep my residence address confidential. (Your mailing address in section 5 must be DIFFERENT from your residence address in section 4 to remain confidential.)

**5. Mailing Address :** (Address where you receive your mail if different from above)

PO BOX 305

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PETERSBURG AK 99833

**7.**  I am a voter with a disability and would like information on alternative voting methods.

**8.**  I am interested in serving as an election official. (Provide your phone number and/or email address in section 9.)

**9.** Daytime Phone No.: [REDACTED]

Evening Phone No.: \_\_\_\_\_

Email Address: [REDACTED]

**6. \*AK Voter Number:** \_\_\_\_\_ (If known)

**10. Identifiers - You MUST provide at least one:**

\*SSN or Last 4 of SSN [REDACTED] \*Alaska Driver's License No. or State ID Number [REDACTED]

I have not been issued a Social Security, Alaska Driver's License or State ID number.

**11. You MUST provide**

\*Date of Birth [REDACTED] [REDACTED] [REDACTED]

Month Day Year

**12. Gender**  Male  Female

**13. Political Affiliation** For political affiliation choices in Alaska, see instruction number 4 on the reverse side.

Write political affiliation: UNDECLARED

**14. I am registered to vote in another state, cancel my registration in:**

City: \_\_\_\_\_ State: \_\_\_\_\_ County: \_\_\_\_\_ Zip: \_\_\_\_\_

**Voter Certificate. Read and Sign:** I certify, under penalty of perjury, that the above information I provided on this document is true and correct. I am not registered to vote in another state, or I have provided information to cancel that registration. I further certify that I am a resident of Alaska and I have not been convicted of a felony involving moral turpitude, or having been so convicted, have been unconditionally discharged from incarceration, probation and/or parole.

**WARNING:** If you provide false information on this application you can be convicted of a misdemeanor AS 15.56.050.

\*SIGNATURE: [REDACTED] DATE: 03/26/2026

Your signature must be handwritten signature. A typed or digital signature is not valid.

**Registrar/Agency/Official - Check ID and complete this section**

Registrar Name \_\_\_\_\_ Voter No. or SSN \_\_\_\_\_ OR Agency Name \_\_\_\_\_

\* Items are kept confidential by the Division of Elections and are not available for public inspection except that confidential addresses may be released to government agencies or during election processes as set out in state law.

### Certificate Of Completion

|  |                            |
|--|----------------------------|
| Envelope Id: 3E4B8D14-9A20-8105-8300-35E9FDBF75FF                              | Status: Completed          |
| Subject: Complete with Docusign: 2026-06-10 - Candidate Eligibility Complaints |                            |
| Source Envelope:   |                            |
| Document Pages: 65   | Signatures: 2              |
| Certificate Pages: 4   | Initials: 0                |
| AutoNav: Enabled   | Envelope Originator:       |
| Envelope Stamping: Enabled   | Brian Fontaine             |
| Time Zone: (UTC-08:00) Pacific Time (US & Canada)                              | bfontaine@hwb-law.com      |
|  | IP Address: 206.174.36.146 |


### Record Tracking

|                      |                        |                    |
|----------------------|------------------------|--------------------|
| Status: Original     | Holder: Brian Fontaine | Location: DocuSign |
| 6/10/2026 3:33:29 PM | bfontaine@hwb-law.com  |                    |

### Signer Events

Carmela J. Warfield, Chairman, Alaska Republican Party  
 cwarfieldakgop@gmail.com  
 Chairman  
 Security Level: Email, Account Authentication (None)

### Signature

Signed by:  
  
 Carmela J. Warfield, Chairman, Alaska Republican Party  
 E03699AEBE244D0...  
 Signature Adoption: Pre-selected Style  
 Using IP Address: 66.58.155.43

### Timestamp

Sent: 6/10/2026 3:40:35 PM  
 Viewed: 6/10/2026 4:16:44 PM  
 Signed: 6/10/2026 4:28:25 PM

**Electronic Record and Signature Disclosure:**  
 Accepted: 6/10/2026 4:16:44 PM  
 ID: 910ee587-9294-4ac0-b350-fbd4aa707351

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| <b>In Person Signer Events</b> | <b>Signature</b> | <b>Timestamp</b> |
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| <b>Editor Delivery Events</b> | <b>Status</b> | <b>Timestamp</b> |
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| <b>Agent Delivery Events</b> | <b>Status</b> | <b>Timestamp</b> |
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| <b>Intermediary Delivery Events</b> | <b>Status</b> | <b>Timestamp</b> |
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| <b>Certified Delivery Events</b> | <b>Status</b> | <b>Timestamp</b> |
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| <b>Carbon Copy Events</b> | <b>Status</b> | <b>Timestamp</b> |
|---------------------------|---------------|------------------|

Stacey Stone  
 sstone@hwb-law.com  
 Security Level: Email, Account Authentication (None)  
**Electronic Record and Signature Disclosure:**  
 Not Offered via Docusign



Sent: 6/10/2026 3:40:36 PM  
 Viewed: 6/10/2026 3:45:36 PM

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| <b>Witness Events</b> | <b>Signature</b> | <b>Timestamp</b> |
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| <b>Notary Events</b> | <b>Signature</b> | <b>Timestamp</b> |
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| <b>Envelope Summary Events</b> | <b>Status</b> | <b>Timestamps</b> |
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| Envelope Sent       | Hashed/Encrypted | 6/10/2026 3:40:36 PM |
| Certified Delivered | Security Checked | 6/10/2026 4:16:44 PM |
| Signing Complete    | Security Checked | 6/10/2026 4:28:25 PM |
| Completed           | Security Checked | 6/10/2026 4:28:25 PM |

|                       |               |                   |
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| <b>Payment Events</b> | <b>Status</b> | <b>Timestamps</b> |
|-----------------------|---------------|-------------------|

### Electronic Record and Signature Disclosure

LAW OFFICES OF  
**HOLMES WEDDLE & BARCOTT**  
A PROFESSIONAL CORPORATION

FOUNDED IN 1914

OVER A CENTURY OF SERVICE TO OUR CLIENTS

2550 DENALI STREET, SUITE 500 • ANCHORAGE, ALASKA 99503-2752

TELEPHONE (907) 274-0666 • FAX (907) 277-4657

June 10, 2026

VIA EMAIL AND US MAIL

Ms. Carol Beecher  
Director of Elections  
State of Alaska, Division of Elections  
Court Plaza Building  
240 Main Street, 4th Floor  
Juneau, AK 99801  
[carol.beecher@alaska.gov](mailto:carol.beecher@alaska.gov)

Re: U.S. Senate Candidate Eligibility Complaint Against Daniel J. Sullivan Jr.

Dear Director Beecher:

Daniel J. Sullivan Jr. is ineligible to qualify as a candidate because his Declaration of Candidacy (“Declaration”) has the intent and effect of confusing and misleading Alaska voters and interferes with the state of Alaska’s duty to ensure the integrity, credibility, and neutrality of the ballot and Alaska’s elections. The following statement of grounds submitted pursuant to 6 AAC 25.260 establishes the grounds for his ineligibility. In light of these deficiencies, you must uphold your statutory obligations and conclude that Sullivan is ineligible.

**STATEMENT OF GROUNDS**

- Alaska law provides “[i]t is essential that the nonpartisan nature, integrity, credibility, and impartiality of the administration of elections be maintained.”<sup>1</sup> States have an important interest in “preserving the integrity of its election process”<sup>2</sup> and avoiding “confusion” and “deception” in the context of electoral ballots.<sup>3</sup> The Division of Elections must “prepare all official ballots to “facilitate fairness, simplicity, and clarity in the voting procedure,” and to “reflect most accurately the intent of the voter.”<sup>4</sup> A candidate’s name may not appear on the ballot in a manner that is “confusing or misleading to voters or compromises the fairness or neutrality of the ballot.”<sup>5</sup>

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<sup>1</sup>Alaska Stat. § 15.10.105(b). *See also* Attachment A: Letter of Lieutenant Governor Dahlstrom to Daniel James Sullivan, Jr., June 8, 2026 (noting that “The Division’s obligation to administer elections includes protecting the public confidence that elections are fairly administered and that voters are not misled about the identity of candidates appearing on the ballot.”), available [here](#).

<sup>2</sup> *Eu v. San Francisco Cnty. Democratic Cent. Comm.*, 489 U.S. 214, 231 (1989).

<sup>3</sup> *Jenness v. Fortson*, 403 U.S. 431, 442 (1971).

<sup>4</sup> Alaska Stat. § 15.15.030.

<sup>5</sup> Alaska Admin. Code tit. 6, § 25.212(b)(2).

- Sullivan’s Declaration was not filed in good faith and intended to cause confusion.<sup>6</sup> To safeguard the same principles of electoral fairness that Alaska law enshrines, a nearby state prohibits such candidacies.<sup>7</sup> Sullivan’s candidacy would result in two candidates with the same name and party affiliation appearing on the ballot, creating substantial risk voters will mistakenly attribute his candidacy to the incumbent. This likelihood of confusion—particularly given his use of the same campaign logo, with only minimal alterations—undermines the fairness and neutrality of the ballot. By a preponderance of the evidence, Sullivan is not an eligible candidate.

## COMPLAINANT

Carmela J. Warfield, Chairman  
Alaska Republican Party  
PO Box 110707  
Anchorage, Alaska 99511  
(907) 868-1093

I, Carmela J. Warfield, Chairman of the Alaska Republican Party, declare that the foregoing is true and correct to the best of my knowledge and belief. If necessary, I am prepared to execute a sworn statement as to the factual assertions set forth herein.

Signed: Carmela J. Warfield, Chairman, Alaska Republican Party Date: June 10, 2026  
E03699AEBE2A4D0

Sincerely,

HOLMES WEDDLE & BARCOTT, P.C.



Stacey C. Stone, Esq.

<sup>6</sup> Despite never having registered as affiliated with the Republican Party, Daniel J. Sullivan, Jr.’s Declaration swears he is a registered Republican. (Exhibit B: Declaration of Candidacy of Daniel J. Sullivan). Sullivan is using a materially identical campaign logo to the incumbent officeholder. (Exhibit C: Comparison of campaign logos.) He has hired a Democrat operative who supports Democrat Senate Candidate Mary Peltola to advise his campaign. (Alex DeMarban, “Sen. Dan Sullivan’s namesake challenger says he can legally run and isn’t backing down”, Anchorage Daily News, June 8, 2026 available [here](#).) See generally Exhibit D: June 1, 2026 Letter of NRSC to Lieutenant Governor Dahlstrom and Director Beecher.

<sup>7</sup> See Wash. Rev. Code Ann. §29A.84.320(3). In 2024, two candidates withdrew their candidacies in Washington state to avoid legal exposure under this provision. (Jeanie Lindsay, “Democratic candidate for Washington governor says name doppelgangers out to deceive voters,” Oregon Public Broadcasting, May 13, 2024.)

**EXHIBIT A**

**June 8, 2026 Letter of Lieutenant Governor Dahlstrom to Daniel James Sullivan, Jr**



Lieutenant Governor Nancy Dahlstrom  
STATE OF ALASKA

June 8, 2026

Mr. Daniel James Sullivan, Jr.  
P.O. Box 1656  
Petersburg, AK 99833  
[dan@sullivanforsenate.com](mailto:dan@sullivanforsenate.com)

RE: Evaluation of Your Declaration of Candidacy for United States Senator

Dear Mr. Sullivan:

I am responsible for administering the State's election laws and supervising the Division of Elections. The Division must determine whether your declaration of candidacy was properly filed with a good-faith intention to serve, and in the event it is, how your name should appear on the primary election ballot to avoid voter confusion. I'm troubled by the allegation that you filed for office in coordination with another campaign with the intention of confusing Alaskan voters in a way that will benefit one candidate over another. If true, it suggests that your declaration of candidacy, which was submitted under penalty of perjury, was not genuine and not properly filed. For these reasons, this letter serves as notice that I have requested an investigation of your recent declaration of candidacy for United States Senate before determining whether you can appear on the ballot and, if you can appear, in what manner your name will appear on the ballot. This investigation is necessary and pertinent to an independent review of the propriety of your declaration of candidacy. This investigation is also pertinent to the credible allegations the State has received that you did not declare your candidacy with a good faith purpose to seek office but rather with a purpose to confuse voters and have them mistakenly vote for you rather than the incumbent with the same name and same political party affiliation.

There are credible allegations that you declared your candidacy in coordination with another candidate and campaign out of intention to confuse and manipulate voters by capitalizing on the fact that you share a first and last name with the incumbent senator and have selected the same political party affiliation. Specifically, it was alleged that you filed for office with the intent to use your identical first and last name and newfound affiliation with the Republican Party to confuse or deceive voters who intend to vote for Senator Sullivan into mistakenly voting for you instead. If true, this would be an unprecedented situation. The allegations here, if true, would amount to not only deception of voters but diminish the rights of another candidate solely for the purpose of diverting valid votes and sowing confusion among voters.

Mr. Daniel James Sullivan, Jr.  
June 8, 2026  
Page 2 of 3

We have received and reviewed your June 3 letter responding to these allegations (enclosed). Your letter did not adequately respond to the specific allegations that your candidacy is motivated by an intent to deceive Alaskan voters.

To assist with our investigation into the credible allegations challenging the propriety of your declaration of candidacy, I request that you respond—in an affidavit signed by you under penalty of perjury—to the following questions:

- (1) Have you ever affiliated as a member of the Republican Party before filing your declaration of candidacy? If so, please provide information regarding such affiliation including the date(s) and jurisdiction(s) where you were affiliated with the Republican Party.
- (2) Have you ever held yourself out as being associated or affiliated with the Republican Party before filing your declaration of candidacy for this election?
- (3) What other versions of your name have you used previously when registering with the Division of Elections? Have you always only used the nickname “Dan” and your last name? Why, if you registered under a different name in the past, did you use only “Dan Sullivan” in this instance when requesting ballot access?
- (4) Describe the process for designing your campaign website and logo, including the names of all persons and vendors who assisted in its creation. Please explain whether you intentionally mimicked the campaign website and logo for U.S. Senator Dan Sullivan.
- (5) Have you had any direct or indirect interaction whatsoever with Amber Lee and/or her consulting firm Amber Lee Strategies about your declaration of candidacy? If so, please describe your interactions with Ms. Lee and Amber Lee Strategies.
- (6) Have you had any direct or indirect interaction whatsoever with any other candidate for United States Senate or an agent of such a candidate about your declaration of candidacy?
- (7) Have you had any direct or indirect interaction whatsoever with any agent of the Democratic Party with respect to your declaration of candidacy?

As part of your affidavit, please address whether in the event the State determines your declaration of candidacy to be genuine and proper, and that your name may appear, you would object to your name appearing on the ballot as “**Sullivan, Daniel James Jr. (non-incumbent)**” to distinguish you from incumbent U.S. Senator Dan Sullivan and reduce the risk of voter confusion. Please also address whether you would object to your name appearing without the Republican party designation.

Mr. Daniel James Sullivan, Jr.  
June 8, 2026  
Page 3 of 3

Your response under oath is needed to ensure that we base our final decision on reliable and credible information. The Division's obligation to administer elections includes protecting the integrity, credibility, and impartiality of Alaska's elections. This includes protecting the public confidence that elections are fairly administered and that voters are not misled about the identity of candidates appearing on the ballot. In addition to responding to these questions, your affidavit can also include any other information you believe is relevant to the charge that your declaration of candidacy is intended to confuse or mislead voters or compromise the fairness or neutrality of the ballot.

To facilitate timely consideration of your response, please provide your affidavit on or before noon on Wednesday, June 10, 2026 to [lt.governor@alaska.gov](mailto:lt.governor@alaska.gov) with a copy to [attorney.general@alaska.gov](mailto:attorney.general@alaska.gov)

Sincerely,



Nancy Dahlstrom  
Lieutenant Governor

Enclosure

Dan Sullivan  
P.O Box 1656  
Petersburg, Alaska 99833

[REDACTED]  
[REDACTED]

June 3, 2026

Carol Beecher  
Director of Elections  
Alaska Division of Elections  
240 Main Street, 4th Floor  
Juneau, AK 99801  
[carol.beecher@alaska.gov](mailto:carol.beecher@alaska.gov)  
[elections@alaska.gov](mailto:elections@alaska.gov)

**Re: My Candidacy for Senate**

Dear Director Beecher:

I write in response to the NRSC's letter, dated June 1, 2026, challenging my candidacy for United States Senate in the August 18, 2026 primary election on the ground that I share a first and last name with incumbent Senator Dan Sullivan. I have every right to run for Senate. I am a registered Alaska voter. I filed an accurate and timely declaration of candidacy, and I have the constitutional qualifications: I am older than 30, I have been a U.S. citizen my whole life, and I reside in Alaska. I am running because I am tired of sitting back and watching our current Senator routinely fail to represent the interests of ordinary Alaskans like me. The fact that Senator Sullivan shares my first and last names adds insult to injury, motivating me to raise my hand as an alternative choice for Alaskans. Senator Sullivan and NRSC have no right to exclude me from the ballot simply because we happen to share a name.

In addition to complaining about my name, the NRSC complains that I was not previously a registered Republican. Historically, I affiliated with the Alaskan Independence Party. However, the party was disbanded, and my registration was automatically marked as unaffiliated. I wish to run for office as a Republican to give Alaska voters another choice for what Republican representation in the U.S. Senate can look like. The form itself informed me that "if this is not the party affiliation currently on your voter registration record, it will be changed to reflect what

you provided.” I faithfully followed the instructions on the form provided by your office to indicate as such. And the primary ballot will itself tell voters that my designated affiliation does not imply that the Alaska Republican Party endorses me.

Alaska law requires you to place my name on the August primary ballot as a Republican candidate for U.S. Senate. Section 15.25.060 of the Alaska Statutes provides that you “shall ... place the names of all candidates who have properly filed in groups according to offices” on the primary ballot. It gives you no discretionary authority to exclude me. And when third parties, like the NRSC, question a candidate’s eligibility, Title 6, Section 25.260 of the Alaska Administrative Code provides that your review of their complaint “is limited to the grounds cited in the complaint that are related to candidate *qualifications* addressed in the candidate’s declaration of candidacy.” You are prohibited from considering “other grounds cited in the complaint.” None of the NRSC’s cited grounds are related to my indisputable qualifications to run for and serve as a U.S. Senator from Alaska. You therefore have no authority to exclude me from the ballot.

The NRSC’s letter does not allege that I failed to timely file a complete and accurate declaration of candidacy. Instead, it takes issue with my name and the fact that I filed to run as a Republican. As explained above, I followed the instructions on the form itself to designate myself as a Republican candidate for U.S. Senate, and I listed my legal name—I have no other. It is my right to do so whether the NRSC supports my candidacy or not. As far as I am aware, there is no Alaska or federal law that gives the NRSC the exclusive right to determine who may run as a Republican candidate for U.S. Senate. If such a right did exist, we would not need primary elections at all—the NRSC could just pick our nominees.

As to my name, the NRSC claims it will confuse the voters of Alaska, but Title 6, Section 25.212 of the Alaska Administrative Code says only that a candidate’s name may not be placed on the ballot “*in a manner* that is confusing or misleading to voters or compromises the fairness or neutrality of the ballot.” This regulation instructs your office to ensure the *manner in which* my and Senator Sullivan’s names go on the ballot does not confuse voters. It does not permit your office to exclude me from the ballot based on my legal name. The NRSC’s argument that the regulation does exclude me would deprive me of my right to run for office for no adequate reason. Your office is of course free to take reasonable steps to avoid voter confusion where two individuals with the same name are running for office—for example, by including a middle initial.

In short, I properly met all legal requirements to be placed on the August 18, 2026 primary election ballot as a Republican candidate for U.S. Senate. Your office has no legal basis to exclude my name from the ballot. Doing so would violate my rights and be an affront to Alaska

voters. I wish to give the people of Alaska an alternative choice of representation in the U.S. Senate. Your office may not lawfully deny me the chance to run or Alaska voters the opportunity to vote for me.

Respectfully,

A handwritten signature in cursive script that reads "Daniel J. Sullivan". The signature is written in black ink and is positioned to the right of the word "Respectfully,".

Daniel J. Sullivan

**EXHIBIT B**  
**Declaration of Candidacy of Daniel J. Sullivan**

STATE OF ALASKA DECLARATION OF CANDIDACY  
U.S. CONGRESS

RECEIVED

MAY 29 2026

Director's Office  
Division of Elections

STEP 1

Did you include your \$100 filing fee with this Declaration of Candidacy?

I acknowledge that I am responsible for contacting the Federal Election Commission for federal reporting requirements: 1050 First Street, NE, Washington, DC 20463.

STEP 2 GENERAL INFORMATION (please print or type)

I, Daniel J. Sullivan declare myself to be a candidate for the office of (check one):

UNITED STATES SENATOR  UNITED STATES REPRESENTATIVE

I request that my name be placed on the 2026 PRIMARY ELECTION ballot.

I request that the political affiliation on my voter registration record Republican appear on the ballot.\*

OR I prefer to have nonpartisan or undeclared be designated on the ballot: Nonpartisan  OR Undeclared

\* Note: If this is not the party affiliation currently on your voter registration record, it will be changed to reflect what you provided.

STEP 3 RESIDENCY INFORMATION (please print or type)

My current residence address is: 439 Mittko Highway  
Petersburg, AK 99833

My current mailing address is: P.O. Box 1656  
Petersburg, AK 99833

STEP 4 CONTACT INFORMATION (used for correspondence and website listing)

P.O. Box 1656 Petersburg AK 99833  
(Candidate's Mailing) (City) (State) (Zip Code)

907-213-8197  
(Phone Number)

Sullivan for senate.com dan@sullivanforsenate.com  
(Candidate's Website) (Candidate's Email Address)

STEP 5 BALLOT NAME INFORMATION

I request that my name appear on the ballot in the following manner:

Sullivan Dan  
(Last Name) (First Name) (MI) (Nickname and/or Suffix)

\*The Director of Elections may not include on the ballot as part of candidate's name, any honorary or assumed title or prefix but may include in the candidate's name any nickname or familiar form or proper name of candidate: (AS 15.15 (3)(4))

STEP 6 CERTIFICATION

I, the undersigned, certify that the information in this Declaration of Candidacy is true and complete and that I meet the specific citizenship requirements of this office. I certify that, if elected, I shall be an inhabitant of the state of Alaska. I further certify that, if elected, I will meet the age requirements upon taking the oath of office. I am not a candidate for any other office to be voted upon at the Primary election, nor am I a candidate for this office under any other Declaration of Candidacy. I also acknowledge that should I choose to withdraw my candidacy, my withdrawal must be received by the Director of Elections in writing over my signature at least 52 days before the election.

Subscribed and sworn to before me this 28th day of May, 2026.

[Signature]  
(Candidate's Signature)

907-213-8197  
(Phone Number)

To assist staff in verifying candidate/voter information, please provide one of the following:  
(SSN, ADL, Voter # or DOB) [Redacted]

My commission expires: 12/3/26

ELLAINA MARTINSEN  
Notary Public  
State of Alaska  
My Commission Expires Dec 3, 2029

Privacy Disclaimer:  
Unless otherwise made confidential or protected from disclosure by law, information provided on this form may be subject to disclosure under the Alaska Public Records Act (AS 40.25.100-40.25.295). Failure to provide requested personal information may result in the Division's inability to process relevant portions of this form. Requested information will be used only for purposes directly associated with the processing of this form. For information on how to challenge the accuracy or completeness of personal information maintained by the Division, please send the Division a written request that the personal information be changed. The request must comply with AS 40.25.310 and be sent to the Division of Elections at the following address: Division of Elections, Director's Office, PO Box 110017, Juneau, AK 99811-0017.

**Exhibit C**  
**Comparison of Campaign Logos**

Campaign Logo and Website of U.S. Senator Dan Sullivan



**Campaign Logo and Website of Daniel J. Sullivan, Jr.**



**Exhibit D**  
**June 1, 2026 Letter of NRSC to Lieutenant Governor Dahlstrom and Director Carol Beecher**



---

**Senator Tim Scott**  
**Chairman**

**Jennifer DeCasper**  
**Executive Director**

The Honorable Nancy Dahlstrom  
Lieutenant Governor  
Alaska State Capitol  
120 4th Street, 3rd Floor  
Juneau, AK 99801

Ms. Carol Beecher  
Director of Elections  
Division of Elections  
Court Plaza Building  
240 Main Street, 4th Floor  
Juneau, AK 99801

June 1, 2026

Dear Lt. Gov. Dahlstrom and Director Beecher:

We are writing regarding an urgent matter to protect the integrity of the Alaska voting system from being corrupted by an individual attempting to confuse Alaska voters and rig the election in favor of Democratic Senate Candidate Mary Peltola (“Candidate Peltola”). You are charged with facilitating the “fairness, simplicity, and clarity [of Alaska’s] voting procedure.”<sup>1</sup> In accordance with that authority, you must determine that Daniel J. Sullivan, Jr. of Petersburg, Alaska (“Sham Candidate Sullivan”) is not an eligible candidate for U.S. Senate and therefore must not appear on the August 18, 2026 Alaska primary ballot.

**I. The Lieutenant Governor Has The Legal Authority And Duty To Ensure Confidence In Alaska’s Elections; She Therefore Must Not Certify As Eligible Any Candidates For Office Whose Primary Purpose Is To Confuse Alaska Voters And Rig The Election In Favor Of Another Candidate.**

To be sure, both the United States and Alaska Constitutions guarantee the right of political parties to associate in order to advance their political goals. Furthermore, state ballot access requirements must be crafted in a manner that does not unduly burden a candidate’s right of free expression and political association. However, the law also recognizes that states have a legitimate interest in maintaining orderly elections and jealously guards the right of citizens to cast a ballot free from interference. To that end, Alaska regulations provide that a candidate’s name may not appear on the ballot in a

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<sup>1</sup> Alaska Stat. § 15.15.030.

manner that is “confusing or misleading to voters or compromises the fairness or neutrality of the ballot.”<sup>2</sup>

Alaska law entrusts the Lieutenant Governor with the responsibility to “administer state election laws” and “control and supervise the division of elections.”<sup>3</sup> The Director of Elections is tasked, in turn, with “general administrative supervision over the conduct of state elections.”<sup>4</sup> In particular, the director is responsible for “prepar[ing] all official ballots” in a way that “facilitate[s] fairness, simplicity, and clarity in the voting procedure,” and “reflect[s] most accurately the intent of the voter.”<sup>5</sup>

State and federal law both emphasize the critical role of state law and election officials in ensuring the integrity the electoral process. The state law that establishes the Division of Elections and charges the Lieutenant Governor and Director of Elections makes clear that “[i]t is essential that the nonpartisan nature, integrity, credibility, and impartiality of the administration of elections be maintained.”<sup>6</sup> And the U.S. Supreme Court has upheld a state’s strong interest in “preserving the integrity of its election process”<sup>7</sup> and “public confidence in the integrity of the electoral process,” which “encourages citizen participation in the democratic process.”<sup>8</sup> More specifically, the Supreme Court has even recognized that states have an “important” interest in avoiding voter “confusion” and “deception” in the context of electoral ballots.<sup>9</sup> To that end, Alaska regulations provide that a candidate’s name may not appear on the ballot in a manner that is “confusing or misleading to voters or compromises the fairness or neutrality of the ballot.”<sup>10</sup> You must uphold your statutory obligation to enforce these regulations and protect the principles they safeguard by keeping Sham Candidate Sullivan off the ballot.

It is not just voters who would be harmed if Sham Candidate Sullivan appears on the August ballot. Listing him on the ballot under the label of “Republican” would also infringe on the Republican Party’s freedom of association. Political parties “enjoy freedom of association protected by the First and Fourteenth Amendments”<sup>11</sup>—including “the freedom to identify the people who constitute the association, and to limit the association to those people only.”<sup>12</sup> Yet even though the Republican Party wants nothing to do with Sham Candidate Sullivan, he is trying to hijack Alaska’s voting laws in an effort to trick voters into believing the Party supports his candidacy. The First Amendment does not permit this misuse of state law, and your office should conclude as much.

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<sup>2</sup> Alaska Admin. Code tit. 6, § 25.212.

<sup>3</sup> Alaska Stat. §§ 44.19.020(1), 15.10.105(a).

<sup>4</sup> *Id.* § 15.15.010.

<sup>5</sup> *Id.* § 15.15.030.

<sup>6</sup> *Id.* § 15.10.105(b).

<sup>7</sup> *Eu v. San Francisco Cnty. Democratic Cent. Comm.*, 489 U.S. 214, 231 (1989).

<sup>8</sup> *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 197 (2008).

<sup>9</sup> *Jenness v. Fortson*, 403 U.S. 431, 442 (1971).

<sup>10</sup> Alaska Admin. Code tit. 6, § 25.212.

<sup>11</sup> *Eu*, 489 U.S., at 224 (internal quotation marks omitted).

<sup>12</sup> *California Democratic Party v. Jones*, 530 U.S. 567, 574 (2000).

**II. There Is Clear Evidence At Least One Alaskan Democrat Consultant, Who Is Supporting The Campaign Of Candidate Peltola, Is Also Assisting Sham Candidate Sullivan's Campaign For The Same Senate Seat, Demonstrating Intent To Confuse Alaska Voters In An Attempt To Rig The Election In Candidate Peltola's Favor.**

Although Alaska Democrats tried to conceal this fact, as reported in the *New York Times*, the metadata on the press release announcing Sham Candidate Sullivan's entry into the Alaska Senate race revealed its author was Amber Lee, an Alaskan "Democratic consultant" who is supporting Candidate Peltola for U.S. Senate and in fact is a longtime Peltola supporter.<sup>13</sup> Federal Election Commission records show that Amber Lee's consulting firm, Amber Lee Strategies, has received thousands of dollars for "PAC Strategy Consulting" from a PAC that has been a supporter of Candidate Peltola.<sup>14</sup> This is no surprise. Lee has long been affiliated with Democratic candidates and progressive causes. Her company's website boasts work on behalf of multiple Democratic candidates for the Alaska Legislature and other liberal and progressive interest groups such as the Environmental Defense Fund.<sup>15</sup>

There is no credible explanation for this type of coordination between Sham Candidate Sullivan and Candidate Peltola's consultants other than to exploit Alaska's voting system in order to benefit Candidate Peltola. If Sham Candidate Sullivan were truly seeking to prevail, he would have had no incentive to share the most confidential details of his impending candidacy with Candidate Peltola's Democratic consultant allies. But he is not seeking to prevail. Sham Candidate Sullivan is coordinating with Candidate Peltola's Democrat consultants to help Candidate Peltola win by taking the actions outlined below to promote confusion between Sham Candidate Sullivan and U.S. Senator Dan Sullivan. The incentive and motivation for the Peltola campaign consultants to help Sham Candidate Sullivan with his campaign to confuse Alaskan voters is obvious: If Alaskans are confused and mistakenly vote for Sham Candidate Sullivan when they want to vote for U.S. Senator Dan Sullivan, it directly benefits Candidate Peltola's chance for victory. But of course it would be a victory through cheating. What follows is ample evidence that Sham Candidate Sullivan's actions are purposefully intended to confuse Alaskans and help Candidate Peltola rig the election in her favor.

**III. Sham Candidate Sullivan Has Falsely Claimed That He Is A Republican Which Is Grounds To Disqualify His Candidacy.**

Sham Candidate Sullivan has filed a sworn Declaration of Candidacy for U.S. Senate apparently certifying as "true and complete" that he is a registered Republican

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<sup>13</sup> Jazmine Ulloa, *Palin Lost a Shot at a House Seat, but She Has a Second Chance*, N.Y. TIMES (Sept. 1, 2022); see also Tim Balk, *Senator Dan Sullivan Has a New Challenger in Alaska: Dan Sullivan*, N.Y. TIMES (May 31, 2026); Attachment A (screenshots of press release metadata).

<sup>14</sup> Expenditures of Vote Alaska Before Party PAC to Amber Lee Strategies, [https://www.fec.gov/data/disbursements/?recipient\\_name=amber+lee&data\\_type=processed](https://www.fec.gov/data/disbursements/?recipient_name=amber+lee&data_type=processed).

<sup>15</sup> Amber Lee Strategies, <https://www.amberleestrats.com>.

voter.<sup>16</sup> Yet, as detailed below, the overwhelming evidence on the public record suggests that Sham Candidate Sullivan is not a registered Republican voter and has never been. His Declaration of Candidacy is therefore defective and must not be certified.

Based on the most recent public records, Sham Candidate Sullivan is not registered as affiliated with the Republican Party as his Declaration of Candidacy apparently states. As of the date of this letter, the Alaska Division of Elections “My Voter Portal indicates that Sham Candidate Sullivan’s party affiliation is “undeclared.”<sup>17</sup> As you know, the State of Alaska Voter Registration Application provides voters with an optional field to declare a political affiliation. The form is signed under penalty of perjury. The Registrar Handbook published by the Division of Elections makes clear that “[a]pplicants who ... do not indicate a political affiliation on their registration application will be registered as undeclared.”<sup>18</sup> There is no available evidence on the public record that Sham Candidate Sullivan has filed an updated Voter Registration Application listing his political affiliation as “Republican.” To the contrary, the available evidence suggests that the most recent Voter Registration Form that Sham Candidate Sullivan signed either included a blank party affiliation field or listed his affiliation as “undeclared.”

The Alaska law governing the declaration of candidacy makes clear that the declaration must state “the political party or political group with which the candidate is *registered as affiliated*, or whether the candidate would prefer a nonpartisan or undeclared designation placed after the candidate’s name on the ballot.”<sup>19</sup> The law simply does not allow a candidate to affiliate with a political party on the basis of a declaration of candidacy. Additionally, while the regulations permit candidates who have *already* filed a declaration of candidacy to change political affiliation, that procedure is available only to candidates who have already filed a proper declaration of candidacy.<sup>20</sup> Therefore, Sham Candidate Sullivan’s Declaration of Candidacy is defective and must not be accepted.

#### **IV. Sham Candidate Sullivan’s Attempted Republican Affiliation Is Also Evidence That The Primary Intent of His Candidacy Is To Confuse Alaskans And Rig The Election In Favor Of Candidate Peltola.**

Sham Candidate Sullivan’s attempt to run as a “registered Republican” is further evidence that the true purpose of his candidacy is to confuse Alaskan voters. Most Alaskans know that their current U.S. Senator Dan Sullivan is a registered Republican and he has filed his reelection candidacy as a Republican. Sham Candidate Sullivan has never been a Republican. As the attached letter from Alaska Republican Party Chair Carmela Warfield makes clear, Sham Candidate Sullivan “has no affiliation with the

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<sup>16</sup> Alaska Division of Elections, Candidates, <https://www.elections.alaska.gov/candidates> (last visited June 1, 2026) (listing Daniel J. Sullivan as a “registered Republican”).

<sup>17</sup> Alaska Division of Elections, My Voter Portal, <https://myvoterportal.alaska.gov/voter> (last visited June 1, 2026).

<sup>18</sup> Alaska Division of Elections, Registrar Handbook, at 10 (Revised Oct. 12, 2023).

<sup>19</sup> Alaska Stat. § 15.25.030(a)(5) (emphasis added).

<sup>20</sup> Alaska Admin. Code tit. 6, §25.214(a).

Alaska Republican Party.”<sup>21</sup> The party has disavowed him. And rightly so. The only possible explanation for his sudden desire to affiliate with the Republican Party after a decades of supporting Democrats is to further confuse Alaskans seeking to reelect their incumbent U.S. Senator. Some voters may mistakenly cast a ballot for Sham Candidate Sullivan because they are confused by the identical name and party affiliation on the ballot. This kind of obvious manipulation of the Alaska election system should not be allowed.

Sham Candidate Sullivan has a long public history of supporting Democrats and progressive causes, including Candidate Peltola’s prior campaigns. Over the years, he has donated a total of \$650 to numerous Democrats nationwide, including \$130 to Candidate Peltola, \$100 to Alaska Democrat Scott McAdams, and \$50 to Kat Abughazaleh for Illinois, a self-described progressive and democratic socialist.<sup>22</sup> Sham Candidate Sullivan was also publicly reported as supporting Democrat Mark Begich’s 2014 Senate campaign.<sup>23</sup> The only plausible explanation for someone with this record running for office as a “registered Republican” is to mislead unwitting Alaska voters who intend to cast a ballot for incumbent Republican U.S. Senator Dan Sullivan. This is an obvious and outrageous manipulation of the Alaska election system that should not be allowed.

**V. Sham Candidate Sullivan’s Blatant Use And Copying Of U.S. Senator Dan Sullivan’s Long Established Campaign Logo And Materials Is Both A Violation Of U.S. Trademark Law And Compelling Evidence That The Primary Goal Of His Candidacy Is To Confuse Alaskan Voters And Rig The Election In Favor Of Candidate Peltola.**

Perhaps the most obvious evidence that Sham Candidate Sullivan’s candidacy is primarily about confusing Alaskans is Sham Candidate Sullivan’s own website and campaign materials. It is shocking the extent to which Sham Candidate Sullivan simply stole U.S. Senator Dan Sullivan’s long established campaign logo and campaign branding: same blue and gold color scheme; same font and typography; same prominent display of “Sullivan,” with an identical size of “U.S. Senate” designation; and even the same Alaska North Star over the entire logo.<sup>24</sup> U.S. Senator Dan Sullivan has used the same campaign logo and material for over 13 years. Now Sham Candidate Sullivan, in clear violation of U.S. trademark laws, plastered this stolen campaign logo all over his website and press releases. The only reason Sham Candidate Sullivan would make his campaign logos, websites, and letterhead identical to U.S. Senator Sullivan’s is to confuse Alaskan voters about who he is. He knows this will mislead Alaskans who are supporters

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<sup>21</sup> See Attachment B (Letter of Alaska Republican Party Chair Carmela Warfield).

<sup>22</sup> See Attachment C (FEC records of Sham Candidate Sullivan’s federal political contributions).

<sup>23</sup> Nathaniel Herz, *In GOP Primary, Some Worry Being Dan Sullivan Could Hurt—or Help—Dan Sullivan*, ANCHORAGE DAILY NEWS (July 24, 2014) (quoting a Begich spokesman indicating that he expected Dan Sullivan of Petersburg to vote for Democrat Mark Begich).

<sup>24</sup> See Attachment D (images of campaign logos between the long-established campaign logos, websites and signs of U.S. Senator Dan Sullivan and the stolen and misappropriated logos, website and campaign letterhead used by Sham Candidate Sullivan).

of U.S. Senator Dan Sullivan and cause them to mistakenly support Sham Candidate Sullivan, thereby helping to rig the election in Candidate Peltola's favor.

**VI. Alaskans' Confidence In The Integrity Of Their Electoral System, Especially Ranked Choice Voting, Will Be Significantly Undermined Unless Sham Candidate Sullivan's Declaration Of Candidacy Is Rejected.**

In sum, Sham Candidate Sullivan has taken actions that reveal the primary goal of his candidacy is to create confusion for Alaskan voters. Sham Candidate Sullivan has gone to great lengths in this regard. He has attempted to claim he is a Republican like U.S. Senator Dan Sullivan even though he clearly is not. He has blatantly stolen U.S. Senator Dan Sullivan's long established campaign logo, website and materials in violation of intellectual property laws to further confuse Alaskan voters. Why would Sham Candidate Sullivan go to such lengths? Do these actions suggest a candidacy focused on advancing his own policy views and ideas to benefit Alaskans? Do these actions respect the integrity of the Alaskan voting system? Certainly not. Sham Candidate Sullivan's deceitful and illegal actions are being taken in coordination with a Democratic campaign consultant and supporter of Candidate Peltola's campaign in the obvious hopes that confusion about Sham Candidate Sullivan will siphon votes away from U.S. Senator Dan Sullivan to Sham Candidate Sullivan which will directly benefit Candidate Peltola.

Your office should not countenance such abuse of the Alaskan voting system, particularly when the Declaration of Candidacy itself does not conform to the legal requirements. Sham Candidate Sullivan's sham candidacy threatens to undermine Alaskans' confidence in the newly implemented ranked choice voting ("RCV") system. RCV is the current law of the state, but it has come under significant criticism. One of the main criticisms is that the RCV system could lend itself to abuse and manipulation by nefarious actors who will use it to manipulate outcomes in devious ways that confuse voters and thwart the will of the Alaskan people. Allowing Sham Candidate Sullivan to appear on the ballot only furthers these criticisms and threatens confidence in Alaska's election system.

It is telling that even public RCV advocates such as prominent Alaskan lawyer Scott Kendall have called Sham Candidate Sullivan's candidacy "pathetic." After hearing of Sham Candidate Sullivan's filing, Kendall posted, "I really hope that neither the Dem party nor Peltola are involved in this. It represents politics at its worst—purposefully trying to confuse voters into wasting their ballot. Candidates need to wage a battle of ideas, not resort to cowardly nonsense."<sup>25</sup> What Kendall hoped was not the case has turned out to be true—an Alaskan Democratic consultant and activist supporting the Peltola Campaign was directly involved in this.

Permitting this behavior to stand risks negative consequences not just for Alaska but for America. The outcome of the Alaska Senate race may decide which party controls

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<sup>25</sup> Scott Kendall, X (May 30, 2026), [https://x.com/scooterkendall/status/2060564395990904893?s=46&t=\\_\\_Lw5960Yx05vFb22409nA](https://x.com/scooterkendall/status/2060564395990904893?s=46&t=__Lw5960Yx05vFb22409nA).

the United States Senate. National Democrats, led by Senate Minority Leader Chuck Schumer, have said that their path to the Senate majority includes electing Candidate Peltola in Alaska.

It is clear from all the evidence that Sham Candidate Sullivan is taking these actions to proactively confuse Alaskan voters and rig the voting system to the obvious benefit of Democrat Candidate Peltola's campaign. His work with a Candidate Peltola Democratic activist and supporter is further proof of this. Such a fraud on the Alaskan election system is exactly what the Lieutenant Governor is authorized by both state and federal law to prevent. Alaska cannot allow its electoral process to be used for any political party's advantage. You are the officials charged with safeguarding the process and integrity of Alaskan elections. You have the responsibility under the law to ensure a fair, simple and clear process that prevents Alaskan voters from being deceived or confused into voting for an individual they did not intend to support.

We are confident that your office will immediately recognize Sham Candidate Sullivan's sham candidacy for what it is and determine that Sham Candidate Sullivan has not satisfied the basic eligibility requirements for a declaration of candidacy as required by Alaska law. However, in the event that your office does not deem Sham Candidate Sullivan's Declaration of Candidacy defective, the NRSC reserves the right to pursue all available legal remedies to ensure that the Alaska electoral process remains fair. To that end, we have sent preservation demands to Sham Candidate Sullivan, Ms. Lee and the campaign of Candidate Peltola to ensure that any records of their apparent coordination in furtherance of this scheme to commit fraud on Alaskan voters are preserved in the event of future litigation.<sup>26</sup>

Thank you for your prompt consideration of this request.

Sincerely,



Blake Murphy  
General Counsel  
NRSC

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<sup>26</sup> See Attachment E (Preservation Notices to Daniel J. Sullivan, Amber Lee, Amber Lee Strategies, and Alaskans for Mary).

**ATTACHMENT A**



FOR IMMEDIATE RELEASE  
May 29, 2026  
[Press@sullivanforsenate.com](mailto:Press@sullivanforsenate.com)

## Dan Sullivan Challenges Dan Sullivan for U.S. Senate Seat

*Urges Alaskans to defeat incumbent,  
elect a Sullivan who Stands up for Alaska*

Alaska — Today, Dan Sullivan officially filed his candidacy for the United States Senate, launching a campaign focused on unseating the incumbent, putting Alaska first, and restoring accountability, common sense, and public service to Washington, D.C.

"For too long, Senator Sullivan has failed to put Alaska first," Dan Sullivan said. "When you truly care about a people and a place, you have a duty to make every sacrifice within your power to protect them. That's why I'm running."

Sullivan grew up in a large Catholic family as the youngest of five children. His father, Dan and Katherine Sullivan, instilled traditional American values, responsibility, and a commitment to serving others. Dan's father, Dan Sullivan, is a forester and a conservationist. Dan's father, Dan Sullivan, is a forester and a conservationist. Dan's father, Dan Sullivan, is a forester and a conservationist.

The hardships of his youth, Sullivan spent his childhood in the forest, and his father, Dan Sullivan, is a forester and a conservationist. Dan's father, Dan Sullivan, is a forester and a conservationist. Dan's father, Dan Sullivan, is a forester and a conservationist.

As reported in the New York Times, the metadata on the press release announcing Sham Candidate Sullivan's entry into the Senate race revealed its author was Amber Lee, an Alaskan "Democratic Consultant" who supports Candidate Peltola for U.S. Senate. FEC records show Amber Lee's consulting firm has received thousands of dollars for "PAC Strategy Consulting" from a PAC that supported Candidate Peltola.

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|-------------------|---|
| File Name         | Sullivan_Release_052926.pdf                         |
| Document Type     | PDF document  |
| PDF Version       | 1.3   |
| Page Count        | 3   |
| Page Size         | 9.5 x 11 inches                                     |
| Title             | Sullivan_Release_v3                                 |
| Author            | Amber Lee   |
| Subject           |   |
| PDF Producer      | macOS Version 14.1 (Build 22H272) Quartz PDFContext |
| Contact Creator   | Word  |
| Creation Date     | May 28, 2026 at 11:58 AM                            |
| Modification Date | May 28, 2026 at 11:58 AM                            |

Longtime Peltola Advisor

**ATTACHMENT B**



**STATEMENT FROM ALASKA REPUBLICAN PARTY  
CHAIRMAN CARMELA J. WARFIELD**

Alaskans deserve elections that are fair, transparent, and free from deliberate attempts to mislead voters.

The recent filing of a second candidate named “Dan Sullivan” for the United States Senate raises serious concerns about voter confusion and the integrity of Alaska’s election process. By all appearances, this candidacy is being promoted for the purpose of misleading voters rather than presenting a legitimate campaign, and every Alaskan should be concerned regardless of party affiliation.

This situation highlights yet another flaw in Alaska’s failed Ranked Choice Voting system. Time and again, Alaskans have witnessed political gamesmanship, voter confusion, ballot exhaustion, and tactics designed to manipulate outcomes rather than allow voters to make clear and informed choices. Alaska voters deserve an election system that rewards honesty and transparency.

Let me be absolutely clear:

**The Alaska Republican Party has unanimously and enthusiastically endorsed Senator Dan Sullivan for re-election to the United States Senate.**

Senator Sullivan has earned the trust of Alaskans through years of dedicated service, fighting for our military, veterans, resource development, energy independence, fishermen, and working families. His record is clear, and Alaskans know exactly who he is and what he stands for.

Any effort to exploit a candidate’s name recognition in order to confuse voters is an insult to Alaska voters and undermines confidence in our elections. Further, even this candidate’s very campaign website, down to the styling of the font used, appears to be copied from Senator Sullivan’s. As of Friday, when this sham candidate filed, he was still registered as undeclared and has no affiliation with the Alaska Republican Party, which only heighten serious concerns about the legitimacy and good faith of his candidacy. To my knowledge, he has never attended Republican Party events or meetings and has had no affiliation with the Alaska Republican Party.

As Alaska’s chief elections officer, the Lieutenant Governor has a responsibility to ensure that Alaska’s elections are conducted fairly and that voters are protected from deceptive practices. Alaska law is clear that candidate names may not appear on a ballot in a way that confuses or misleads voters or undermines the fairness or neutrality of the ballot.

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[www.alaskagop.net](http://www.alaskagop.net)

We call upon the Lieutenant Governor and the Division of Elections to thoroughly review this filing, examine all relevant facts and circumstances, and determine that this candidacy does not comply with either the letter or spirit of Alaska election law. It is our position that it does not.

We also call on Mary Peltola to publicly condemn these tactics of voter confusion, ballot gimmicks, and political gamesmanship. If this candidacy is backed by Democrat interests, Alaskans deserve to know where she stands.

This is not a partisan issue. Every candidate, every political party, and every Alaskan should agree that elections should be won by earning votes, not by confusing voters.

The Alaska Republican Party will continue to stand for election integrity, transparency, and accountability. We will work tirelessly to ensure that every voter understands that Senator Dan Sullivan always puts Alaska First and is the Alaska Republican Party's unanimously endorsed candidate for the United States Senate.

This election should be decided by the people of Alaska based on the issues, the candidates, and their records.

Alaska deserves better.

Alaska voters deserve better.

And Alaskans, including Senator Dan Sullivan, deserve a fair election.

**Carmela J. Warfield**  
Chairman, Alaska Republican Party

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[www.alaskagop.net](http://www.alaskagop.net)

## **ATTACHMENT C**

| Contributor   | Recipient   | Party Affiliation | Address                                      | Date       | Amount  |
|---------------|---|-------------------|--|------------|---------|
| SULLIVAN, DAN | EARMARKED FOR KAT FOR ILLINOIS (C00900449)                          | D-IL              | BOX 305, PETERSBURG, AK                      | 10/29/2025 | \$50.00 |
| SULLIVAN, DAN | EARMARKED FOR MONICA TRANEL FOR MONTANA (C00845008)                 | D-MT              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 10/25/2024 | \$50.00 |
| SULLIVAN, DAN | CONTRIBUTION TO ACTBLUE   | D-PAC             | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 10/25/2024 | \$5.00  |
| SULLIVAN, DAN | EARMARKED FOR ALASKA DEMOCRATIC PARTY - FEDERAL ACCOUNT (C00191247) | D-AK              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 8/31/2024  | \$25.00 |
| SULLIVAN, DAN | EARMARKED FOR ALASKA DEMOCRATIC PARTY - FEDERAL ACCOUNT (C00191247) | D-AK              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 8/11/2024  | \$20.00 |
| SULLIVAN, DAN | EARMARKED FOR MARY PELTOLA FOR ALASKA (C00812388)                   | D-AK              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 8/11/2024  | \$30.00 |
| SULLIVAN, DAN | EARMARKED FOR MONTANANS FOR TESTER (C00412304)                      | D-MT              | 439 MITKOF HIGHWAY PO BOX 305, PETERBURG, AK | 8/10/2024  | \$50.00 |

|                     |  |       |  |            |                 |
|---------------------|--|-------|--|------------|-----------------|
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>TIM RYAN FOR<br>OHIO (C00777771)              | D-OH  | 439 MITKOF<br>HIGHWAY PO<br>BOX 305,<br>PETERBURG,<br>AK | 10/9/2022  | \$50.00         |
| SULLIVAN,<br>DAN    | CONTRIBUTION<br>TO ACTBLUE                                     | D-PAC | 439 MITKOF<br>HIGHWAY PO<br>BOX 305,<br>PETERBURG,<br>AK | 10/9/2022  | \$5.00          |
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>MARY PELTOLA<br>FOR ALASKA<br>(C00812388)     | D-AK  | 439 MITKOF<br>HIGHWAY PO<br>BOX 305,<br>PETERBURG,<br>AK | 8/17/2022  | \$100.00        |
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>PETERS FOR<br>MICHIGAN<br>(C00437889)         | D-MI  | PO BOX 305,<br>PETERBSURG,<br>AK                         | 10/13/2020 | \$50.00         |
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>HIRAL FOR<br>CONGRESS<br>(C00649897)          | D-AZ  | PO BOX 305,<br>PETERBSURG,<br>AK                         | 4/28/2020  | \$15.00         |
| SULLIVAN,<br>DAN    | EARMARKED FOR<br>ALYSE FOR<br>ALASKA<br>(C00665711)            | D-AK  | PO BOX 305,<br>PETERBSURG,<br>AK                         | 3/22/2020  | \$100.00        |
| SULLIVAN,<br>DANIEL | EARMARKED FOR<br>SCOTT MCADAMS<br>FOR US SENATE<br>(C00484949) | D-AK  | PO BOX 305,<br>PETERSBURG,<br>AK                         | 9/1/2010   | \$100.00        |
| <b>TOTAL</b>        |  |       |  |            | <b>\$650.00</b> |

**ATTACHMENT D**

**U.S. Senator Dan Sullivan's Longstanding Campaign Logo/Website**



**Sham Candidate Sullivan's Stolen Logo and Website**



**WE NEED A SULLIVAN WHO STANDS UP FOR ALASKA**

**ATTACHMENT E**



Senator Tim Scott  
Chairman

Jennifer DeCasper  
Executive Director

Ms. Holly Giarraputo  
Treasurer  
Alaskans for Mary  
PO BOX 90031  
Anchorage, AK 99509

VIA Email: [holly@campaigncompliance.net](mailto:holly@campaigncompliance.net)

June 1, 2026

Re: Preservation of Records Notice

Dear Ms. Giarraputo:

I write as General Counsel to the NRSC, the national party committee, which has sent the attached letter to Alaska's Lieutenant Governor and Director of Elections concerning the defective U.S. Senate candidacy of Daniel J. Sullivan. The facts surrounding this matter, including metadata from the press release announcing Mr. Sullivan's candidacy containing the name of Peltola ally and consultant Amber Lee, demonstrate that Mr. Sullivan coordinated his candidacy with Alaskans for Mary, Mary Peltola and/or their agents. They also demonstrate that Mr. Sullivan's government filings may not be complete and truthful. The NRSC reserves its rights to pursue all available legal remedies concerning this matter.

In the event of litigation or other administrative complaints concerning this matter, we believe that Alaskans for Mary, Mary Peltola and their agents (collectively "the Campaign") would have relevant evidence. As such, we hereby request that the Campaign take all measures to preserve such evidence in the event of future legal action. Specifically, please preserve any and all records concerning the following:

- **Records related to Campaign communications with or about Mr. Daniel J. Sullivan or his agents.** Please preserve all records relating to Campaign communications with or about Mr. Daniel J. Sullivan or agents of Mr. Sullivan regarding his Declaration of Candidacy, Voter Registration Application, party affiliation, communications plans, website development or other materials related to Sullivan's U.S. Senate campaign. Please also preserve any schedules and travel records detailing meetings with Mr. Daniel J. Sullivan. Finally please preserve any accounting and financial records detailing any consulting work performed or financed by Alaskans for Mary on behalf of Mr. Sullivan or his campaign including bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.

425 SECOND STREET NORTHEAST • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR BY NRSC. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.



Senator Tim Scott  
Chairman

Jennifer DeCasper  
Executive Director

- **Records related to Campaign communications with Amber Lee, agents of Amber Lee Strategies.** Please preserve any and all records relating to your communications with Amber Lee and representatives and agents of Amber Lee Strategies regarding the candidacy of Mr. Daniel J. Sullivan, his Declaration of Candidacy, Voter Registration Application, party affiliation or communications plans, website development or other materials related to Sullivan's U.S. Senate campaign. Please also preserve any travel records including schedules, transportation receipts, or other expense reports detailing meetings with Ms. Lee or representatives of Amber Lee Strategies. Finally, please preserve any accounting and financial records detailing any consulting work performed by Amber Lee or Amber Lee Strategies on behalf of Mr. Sullivan and or his campaign that were paid for by Mary Peltola or Alaskans for Mary, including bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.

Such records may include physical records, including letters, files or notes, as well as electronically stored information such as e-mail messages, text messages, open-source messaging apps such as Signal, WhatsApp, Telegram, data contained in instant message applications (such as Google Chat, Slack, Microsoft Teams), private social media messaging including messages sent via Facebook, X, Instagram and similar platforms, call logs and phone records or auto-generate transcripts from meeting platforms (Zoom, Google Meet, Teams, etc.), voicemails, computer files, Microsoft Word documents, Excel documents, scanned PDFs, facsimiles, personal calendars, day-timers, appointment books and diaries, and any other information or data stored electronically, such as in cloud-based storage or on disks, CD-ROMs, hard drives, or thumb-drives, including those stored on handheld electronic devices. The type of records you should retain should be construed broadly. We ask that you preserve all such information and records in your possession, custody and control at present and on an ongoing basis including by disabling any auto-delete or disappearing message settings immediately. Thank you for your prompt attention to this matter.

Sincerely,

Blake Murphy  
General Counsel  
NRSC

Enclosure (Letter to Letter to Lt. Gov. Dahlstrom and Director Beecher)

425 SECOND STREET NORTHEAST • WASHINGTON, D.C. 20002 • (202) 675-6000

PAID FOR BY NRSC. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.

DOE 121  
Exc. 121



Senator Tim Scott  
Chairman

Jennifer DeCasper  
Executive Director

Ms. Amber Lee  
c/o Amber Lee Strategies LLC  
2136 Sorbus Way  
Anchorage, AK 99508

VIA Email: [amber@amberleestrategies.com](mailto:amber@amberleestrategies.com)

June 1, 2026

Re: Preservation of Records Notice

Dear Ms. Lee:

I write as General Counsel to the NRSC, the national party committee, which has sent the attached letter to Alaska's Lieutenant Governor and Director of Elections concerning the defective U.S. Senate candidacy of Daniel J. Sullivan. The facts surrounding this matter, including metadata from the press release announcing Mr. Sullivan's candidacy that indicates you served as the document author, demonstrate that Mr. Sullivan coordinated his candidacy with Mary Peltola and her allies. They also suggest that Mr. Sullivan's government filings may not be complete and truthful. The NRSC reserves its right to pursue all available legal remedies concerning this matter.

In the event of litigation concerning this matter, we believe that you and your consulting firm would have relevant evidence. As such, we hereby request that you take all measures to preserve such evidence in the event of future legal action. Specifically, please preserve any and all records concerning the following:

- **Records related to your communications with or about Mr. Daniel J. Sullivan or his agents.** Please preserve all records relating to your communications with or about Mr. Daniel J. Sullivan or agents of Mr. Sullivan regarding his Declaration of Candidacy, Voter Registration Application, party affiliation, communications plans, website development or other materials related to Sullivan's U.S. Senate campaign. Please also preserve any accounting and financial records detailing any consulting work undertaken by you or your firm on behalf of Daniel J. Sullivan including schedules, travel records, transportation receipts, bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.
- **Records related to your communications and interactions with Mary Peltola Alaskans for Mary and their agents.** Please preserve all records relating to your communications with Mary Peltola, Alaskans for Mary, and their agents regarding the

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PAID FOR BY NRSC. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.

DOE 122  
Exc. 122



**Senator Tim Scott**  
**Chairman**

**Jennifer DeCasper**  
**Executive Director**

candidacy of Mr. Daniel J. Sullivan, his Declaration of Candidacy, Voter Registration Application, party affiliation, communications plans, website development or other materials related to Sullivan's U.S. Senate campaign. Please also preserve any accounting and financial records detailing any consulting work undertaken by you or your firm on behalf of Alaskans for Mary on behalf of or in support of Daniel J. Sullivan including schedules, transportation receipts, expense reports, bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.

Such records may include physical records, including letters, files or notes, as well as electronically stored information such as e-mail messages, text messages, open-source messaging apps such as Signal, WhatsApp, Telegram, data contained in instant message applications (such as Google Chat, Slack, Microsoft Teams), private social media messaging including messages sent via Facebook, X, Instagram and similar platforms, call logs and phone records or auto-generate transcripts from meeting platforms (Zoom, Google Meet, Teams, etc.), voicemails, computer files, Microsoft Word documents, Excel documents, scanned PDFs, facsimiles, personal calendars, day-timers, appointment books and diaries, and any other information or data stored electronically, such as in cloud-based storage or on disks, CD-ROMs, hard drives, or thumb-drives, including those stored on handheld electronic devices. The type of records you should retain should be construed broadly. We ask that you preserve all such information and records in your possession, custody and control at present and on an ongoing basis, including by disabling any auto-delete or disappearing message settings immediately. Thank you for your prompt attention to this matter.

Sincerely,

Blake Murphy  
General Counsel  
NRSC

Enclosure (Letter to Letter to Lt. Gov. Dahlstrom and Director Beecher)

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PAID FOR BY NRSC. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.



Senator Tim Scott  
Chairman

Jennifer DeCasper  
Executive Director

Mr. Daniel J. Sullivan  
PO Box 1656  
Petersburg, AK 99833

VIA Email: dan@sullivanforsenate.com

June 1, 2026

Re: Preservation of Records Notice

Dear Mr. Sullivan:

I write as General Counsel to the NRSC, the national party committee, which has sent the attached letter to Alaska's Lieutenant Governor and Director of Elections concerning your defective Declaration of Candidacy for U.S. Senate. The facts surrounding this matter, including metadata from the press release announcing your candidacy, indicate that you received material assistance from consultants affiliated with Mary Peltola. They also suggest that your candidate filings may not be complete and truthful. The NRSC reserves its rights to pursue all available legal remedies concerning this matter.

Because litigation or other administrative complaints concerning this matter are foreseeable, we hereby request that you take all measures to preserve relevant evidence. Specifically, please preserve any and all records concerning the following:

- **Records related to your communications with or about Amber Lee or Amber Lee Strategies.** Please preserve any and all records relating to your communications with or about your 2026 Senate Candidacy with Ms. Amber Lee or representatives of Amber Lee Strategies including records pertaining to the preparation of your Declaration of Candidacy, Voter Registration Application, party affiliation, communications plans, website development or other materials related to your U.S. Senate campaign. Please also preserve any accounting and financial records detailing any consulting work undertaken by Ms. Lee or Amber Lee Strategies on behalf of you or your campaign including bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.
- **Records related to your communications with Mary Peltola, Alaskans for Mary, and their agents.** Please preserve any and all records relating to your communications with Mary Peltola, Alaskans for Mary and or their agents regarding your 2026 Senate Candidacy, including records related to the preparation of your Declaration of Candidacy,

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PAID FOR BY NRSC. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S COMMITTEE.

DOE 124  
Exc. 124



Senator Tim Scott  
**Chairman**

Jennifer DeCasper  
**Executive Director**

Voter Registration Application, party affiliation, communications plans, website development or other materials related to your U.S. Senate campaign. Please also preserve any records including schedules, transportation receipts, or other expense reports related to meetings or discussions with Mary Peltola, Alaskans for Mary, and their agents. Finally, please preserve any accounting and financial records detailing any payments made by Mary of Alaska on behalf of you or your campaign, including bank records, invoices, and other financial and transactional records including transactions on electronic payment platforms such as Venmo, Zelle, PayPal, etc.

Such records may include physical records, including letters, files or notes, as well as electronically stored information such as e-mail messages, text messages, open-source messaging apps such as Signal, WhatsApp, Telegram, data contained in instant message applications (such as Google Chat, Slack, Microsoft Teams), private social media messaging including messages sent via Facebook, X, Instagram and similar platforms, call logs and phone records or auto-generate transcripts from meeting platforms (Zoom, Google Meet, Teams, etc.), voicemails, computer files, Microsoft Word documents, Excel documents, scanned PDFs, facsimiles, personal calendars, day-timers, appointment books and diaries, and any other information or data stored electronically, such as in cloud-based storage or on disks, CD-ROMs, hard drives, or thumb-drives, including those stored on handheld electronic devices. The type of records you should retain should be construed broadly. We ask that you preserve all such information and records in your possession, custody and control at present and on an ongoing basis, including by disabling any auto-delete or disappearing message settings immediately. Thank you for your prompt attention to this matter.

Sincerely,

Blake Murphy  
General Counsel  
NRSC

Enclosure (Letter to Letter to Lt. Gov. Dahlstrom and Director Beecher)

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DOE 125  
Exc. 125

### Certificate Of Completion

Envelope Id: 3E4B8D14-9A20-8105-8300-35E9FDBF75FF Status: Completed  
 Subject: Complete with Docusign: 2026-06-10 - Candidate Eligibility Complaints  
 Source Envelope:  
 Document Pages: 65 Signatures: 2 Envelope Originator:  
 Certificate Pages: 4 Initials: 0 Brian Fontaine  
 AutoNav: Enabled bfontaine@hwb-law.com  
 Envelope Stamping: Enabled IP Address: 206.174.36.146  
 Time Zone: (UTC-08:00) Pacific Time (US & Canada)


### Record Tracking

Status: Original Holder: Brian Fontaine Location: DocuSign  
 6/10/2026 3:33:29 PM bfontaine@hwb-law.com

### Signer Events

Carmela J. Warfield, Chairman, Alaska Republican Party  
 cwarfieldakgop@gmail.com  
 Chairman  
 Security Level: Email, Account Authentication (None)

### Signature

Signed by:  
  
ED3996AE8E2A10D...  
 Signature Adoption: Pre-selected Style  
 Using IP Address: 66.58.155.43

### Timestamp

Sent: 6/10/2026 3:40:35 PM  
 Viewed: 6/10/2026 4:16:44 PM  
 Signed: 6/10/2026 4:28:25 PM

**Electronic Record and Signature Disclosure:**  
 Accepted: 6/10/2026 4:16:44 PM  
 ID: 910ee587-9294-4ac0-b350-fbd4aa707351

| In Person Signer Events | Signature | Timestamp |
|-------------------------|-----------|-----------|
|-------------------------|-----------|-----------|

| Editor Delivery Events | Status | Timestamp |
|------------------------|--------|-----------|
|------------------------|--------|-----------|

| Agent Delivery Events | Status | Timestamp |
|-----------------------|--------|-----------|
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| Intermediary Delivery Events | Status | Timestamp |
|------------------------------|--------|-----------|
|------------------------------|--------|-----------|

| Certified Delivery Events | Status | Timestamp |
|---------------------------|--------|-----------|
|---------------------------|--------|-----------|

| Carbon Copy Events | Status | Timestamp |
|--------------------|--------|-----------|
|--------------------|--------|-----------|

Stacey Stone  Sent: 6/10/2026 3:40:36 PM  
 sstone@hwb-law.com Viewed: 6/10/2026 3:45:36 PM  
 Security Level: Email, Account Authentication (None)  
**Electronic Record and Signature Disclosure:**  
 Not Offered via Docusign

| Witness Events | Signature | Timestamp |
|----------------|-----------|-----------|
|----------------|-----------|-----------|

| Notary Events | Signature | Timestamp |
|---------------|-----------|-----------|
|---------------|-----------|-----------|

| Envelope Summary Events | Status | Timestamps |
|-------------------------|--------|------------|
|-------------------------|--------|------------|

|                     |                  |                      |
|---------------------|------------------|----------------------|
| Envelope Sent       | Hashed/Encrypted | 6/10/2026 3:40:36 PM |
| Certified Delivered | Security Checked | 6/10/2026 4:16:44 PM |
| Signing Complete    | Security Checked | 6/10/2026 4:28:25 PM |
| Completed           | Security Checked | 6/10/2026 4:28:25 PM |

| Payment Events | Status | Timestamps |
|----------------|--------|------------|
|----------------|--------|------------|

### Electronic Record and Signature Disclosure



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Office of the Lieutenant Governor

DIVISION OF ELECTIONS  
Office of the Director  
240 Main Street, Suite 400  
PO Box 110017  
Juneau, Alaska 99811-0017  
Main: 907.465.4611

June 10, 2026

Mr. Daniel J. Sullivan  
P.O. Box 1656  
Petersburg, AK 99833


Dear Mr. Sullivan:

The Division of Elections received the two attached complaints regarding your eligibility for the office of United States Senator. The Division previously received a letter raising the same concerns with your candidacy, to which you responded. The Lieutenant Governor then opened an investigation and requested your sworn answers to specific questions by noon today. You responded with another letter.

Based on a review of the evidence presented and in the Division's possession, the Division has determined that the preponderance of evidence does not support your eligibility for the office of United States Senator.

Under 6 AAC 25.260, you may provide any additional information and evidence to respond to these complaints and support your eligibility by 5:00pm, June 11, 2026. The Division will then issue a final determination, with or without another response from you.

Sincerely,

  
Carol Beecher  
Director

cc: Lt. Governor Nancy Dahlstrom



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Office of the Lieutenant Governor

DIVISION OF ELECTIONS  
Office of the Director  
240 Main Street, Suite 400  
PO Box 110017  
Juneau, Alaska 99811-0017  
Main: 907.465.4611

June 15, 2026

Mr. Daniel J. Sullivan  
P.O. Box 1656  
Petersburg, AK 99833

Dear Mr. Sullivan:

On Wednesday, June 10, I advised you that the Division of Elections had received two complaints regarding your eligibility for the office of United States Senator. In that letter, I forwarded these complaints which were filed by Stacey C. Stone on behalf of Carmela Warfield, the Chairman of the Alaska Republican Party.

I notified you that based on a review of the evidence presented and in the Division's possession, the Division has determined that the preponderance of evidence does not support your eligibility for the office of United States Senator. Pursuant to 6 AAC 25.260, I offered you the opportunity to submit additional information and evidence to respond to these complaints and support your eligibility by 5:00 p.m., June 11, 2026. You did not submit additional information and evidence to respond to the complaints.

It is my final determination under 6 AAC 25.260 that the preponderance of the evidence does not support your eligibility for the office of United States Senator. This letter will briefly summarize the basis for my final determination.

Alaska Statute 15.25.060 requires me to "place the names of all candidates who have properly filed" a declaration of candidacy on the primary election ballot. Declarations of candidacy are filed under oath and state, among other things, that the filer is in fact a candidate for the office for which the declaration is filed. 6 AAC 25.212 forbids me from placing a name on the primary election ballot "in a manner that is confusing or misleading to voters or compromises the fairness or neutrality of the ballot."

On review of the complaints and other information in the Division's possession, I conclude that your declaration of candidacy was not properly filed with the Division because it was not filed in order to declare an actual good-faith candidacy for the office of United States Senator, but was instead filed with a purpose to confuse or mislead and to thereby compromise the ballot's fairness or neutrality. I highlight several facts that taken together bring me to this conclusion.

- (1) You requested to access the ballot under the name "Dan Sullivan" even though it appears from Division records that you have never registered to vote or sought ballot access under this name. Our records indicate that you are registered to vote under the name "Daniel J. Sullivan, Jr." That you chose the occasion of your declaration of candidacy for U.S. Senate to seek ballot access under a name you have not used in your interactions with the Division suggests—and in

combination with the additional facts I outline in this letter leads me to conclude—that you are seeking to confuse yourself with another candidate in the race, the incumbent Senator Dan Sullivan, rather than distinguish yourself from him. Indeed, you yourself appeared to be confused when you initially emailed the Division asking to be listed on the ballot as “Dan S. Sullivan.” “S” is Senator Sullivan’s middle initial, not yours.

- (2) You requested to be designated on the ballot as affiliated with the Republican Party. Until two days before you filed your declaration of candidacy, you had never—according to the Division’s records—been affiliated with the Republican Party in Alaska. Of course, under Alaska law, you are free to change your party affiliation. This said, that you chose to change your affiliation to the same political party—one you’d never affiliated with before—as the incumbent Senator immediately before filing a declaration of candidacy in which you asked to access the ballot under the same name – in a shortened form you’d never used before - as the incumbent Senator strongly suggests an intent to confuse yourself with the incumbent Senator rather than to distinguish yourself from him.
- (3) Your public campaign website (<https://www.sullivanforsenate.com/>) uses a format, color scheme and overall theme similar to the public website for Senator Sullivan’s campaign (<https://dansullivanforalaska.com/>). While the Division takes no position on whether you have appropriated the intellectual property of Senator Sullivan’s campaign, the similarity—particularly in light of the other facts I outline in this letter—appears to be deliberate. This again suggests an intention not to distinguish yourself from the incumbent Senator as any candidate genuinely seeking office would do, but to confuse Alaskans as to which “Dan Sullivan” is which.
- (4) A political consultant you have admitted is working with your campaign is a known longtime supporter of Democratic candidates including the primary Democratic challenger to Senator Sullivan. This consultant’s work on your behalf is, in isolation, innocuous. Alongside the other facts I have catalogued in this letter, however, it suggests a determined effort and a deliberate attempt to use the similarity of your name to confuse Alaska voters in the upcoming primary election.

In light of these unique, and to my knowledge utterly unprecedented facts (circumstances unlike any previously presented to the Division), I am forced to conclude that your declaration of candidacy, in which you stated under oath that you “declare myself to be a candidate for the office of United States Senator” was not filed in good faith for the purpose of genuinely pursuing election as Alaska’s U.S. Senator. Rather, these facts force the conclusion that your declaration of candidacy was filed with the purpose of confusing or misleading the electorate and compromising the fairness of the ballot by attempting to access the ballot under a version you have never used (“Dan Sullivan”) and with a party affiliation (Republican) that you have never before professed. Indeed, I conclude that the preponderance of the evidence is that you chose this new nickname and party affiliation because that name and party affiliation happen to be the name and party affiliation of another candidate in the race.

A declaration of candidacy filed for the purpose of confusing or misleading voters and compromising the fairness of the ballot is not properly filed as required by Alaska Statute 15.25.060. As such, I am unable to maintain your declaration of candidacy and I am de-certifying your candidacy for United States Senator. This decision is made pursuant to 15.25.042 and 6 AAC 25.260 along with other relevant provisions of law. Pursuant to 6 AAC 25.260(i), my determination in this matter is final. Although you

have 30 days to appeal this decision, if you intend to challenge the decision and seek judicial relief in Alaska Superior Court to be placed on the ballot, be aware ballots are printed on June 28.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Carol Beecher', with a long horizontal flourish extending to the right.

Carol Beecher  
Director

cc: Lt. Governor Nancy Dahlstrom

RECEIVED

JUN 23 2026

LAW-CIVIL-ANC

Jeffrey W. Robinson, ABA No. 0805038  
Bryn R. Pallesen, ABA No. 1810104  
Zoe A. Eisberg, ABA No. 1911094  
BALLARD SPAHR LLP  
1600 A Street, Suite 304  
Anchorage, Alaska 99501  
Telephone: 907-277-9511  
Email: robinsonjw@ballardspahr.com  
pallesenb@ballardspahr.com  
eisbergz@ballardspahr.com

Attorneys for Appellant Daniel J. Sullivan, Jr.

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

DANIEL J. SULLIVAN, JR.,

Appellant,

Case No. 3AN-26-\_\_\_\_\_ CI

v.

STATE OF ALASKA, DIVISION OF  
ELECTIONS,

Appellee.

**NOTICE OF APPEAL**

Appellant Daniel J. Sullivan, Jr., whose address is P.O. Box 1656, Petersburg, Alaska 99833, by and through undersigned counsel, hereby gives notice, pursuant to Alaska Appellate Rule 602(a)(2), AS 22.10.020(d), and AS 44.62.305, that he is appealing from the final decision of the Alaska Division of Elections dated June 15, 2026, a true and correct copy of which is attached hereto. Pursuant to Alaska Appellate Rule 602(a)(2) and 602(b), this appeal is taken to the Superior Court of the State of Alaska, in the Third Judicial District at Anchorage.

Pursuant to Alaska Appellate Rule 602(c), filed herewith is a statement of points on appeal; the filing fee required by Administrative Rule 9; and the cost bond required by Alaska Appellate Rule 602(e) and 204(c)(1).

DATED: June 22, 2026

BALLARD SPAHR LLP  
Attorneys for Appellant Daniel J. Sullivan,  
Jr.

By /s/ Jeffrey W. Robinson  
Jeffrey W. Robinson, ABA No. 0805038  
Bryn R. Pallesen, ABA No. 1810104  
Zoe A. Eisberg, ABA No. 1911094

I hereby certify that on June 22, 2026,  
a true and correct copy of the foregoing was served via  
email / First Class Mail on:

Alaska Department of Law  
Office of the Attorney General  
P.O. Box 110300  
Juneau, AK 98111-0300  
(attorney\_general@alaska.gov)

Carol Beecher  
Director  
Alaska Division of Elections  
P.O. Box 110017  
Juneau, AK 98111-0017  
(carol.beecher@alaska.gov)

Rachel Witty  
Civil Division Director  
Alaska Department of Law  
1031 West 4th Avenue, Suite 200  
Anchorage, AK 99501  
(rachel.witty@alaska.gov)

Christopher O. Murray  
First & Fourteenth, PLLC  
2 North Cascade Avenue, Suite 1430  
Colorado Springs, CO 80903  
(chris@first-fourteenth.com)

Michael Francisco  
First & Fourteenth, PLLC  
800 Connecticut Avenue, NW  
Washington, D.C. 20006  
(michael@first-fourteenth.com)

/s/ Alexa A. Robertson



THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

Office of the Lieutenant Governor

DIVISION OF ELECTIONS  
Office of the Director  
240 Main Street, Suite 400  
PO Box 110017  
Juneau, Alaska 99811-0017  
Main: 907.465.4611

June 15, 2026

Mr. Daniel J. Sullivan  
P.O. Box 1656  
Petersburg, AK 99833

Dear Mr. Sullivan:

On Wednesday, June 10, I advised you that the Division of Elections had received two complaints regarding your eligibility for the office of United States Senator. In that letter, I forwarded these complaints which were filed by Stacey C. Stone on behalf of Carmela Warfield, the Chairman of the Alaska Republican Party.

I notified you that based on a review of the evidence presented and in the Division's possession, the Division has determined that the preponderance of evidence does not support your eligibility for the office of United States Senator. Pursuant to 6 AAC 25.260, I offered you the opportunity to submit additional information and evidence to respond to these complaints and support your eligibility by 5:00 p.m., June 11, 2026. You did not submit additional information and evidence to respond to the complaints.

It is my final determination under 6 AAC 25.260 that the preponderance of the evidence does not support your eligibility for the office of United States Senator. This letter will briefly summarize the basis for my final determination.

Alaska Statute 15.25.060 requires me to "place the names of all candidates who have properly filed" a declaration of candidacy on the primary election ballot. Declarations of candidacy are filed under oath and state, among other things, that the filer is in fact a candidate for the office for which the declaration is filed. 6 AAC 25.212 forbids me from placing a name on the primary election ballot "in a manner that is confusing or misleading to voters or compromises the fairness or neutrality of the ballot."

On review of the complaints and other information in the Division's possession, I conclude that your declaration of candidacy was not properly filed with the Division because it was not filed in order to declare an actual good-faith candidacy for the office of United States Senator, but was instead filed with a purpose to confuse or mislead and to thereby compromise the ballot's fairness or neutrality. I highlight several facts that taken together bring me to this conclusion.

- (1) You requested to access the ballot under the name "Dan Sullivan" even though it appears from Division records that you have never registered to vote or sought ballot access under this name. Our records indicate that you are registered to vote under the name "Daniel J. Sullivan, Jr." That you chose the occasion of your declaration of candidacy for U.S. Senate to seek ballot access under a name you have not used in your interactions with the Division suggests—and in

combination with the additional facts I outline in this letter leads me to conclude—that you are seeking to confuse yourself with another candidate in the race, the incumbent Senator Dan Sullivan, rather than distinguish yourself from him. Indeed, you yourself appeared to be confused when you initially emailed the Division asking to be listed on the ballot as “Dan S. Sullivan.” “S” is Senator Sullivan’s middle initial, not yours.

- (2) You requested to be designated on the ballot as affiliated with the Republican Party. Until two days before you filed your declaration of candidacy, you had never—according to the Division’s records—been affiliated with the Republican Party in Alaska. Of course, under Alaska law, you are free to change your party affiliation. This said, that you chose to change your affiliation to the same political party—one you’d never affiliated with before—as the incumbent Senator immediately before filing a declaration of candidacy in which you asked to access the ballot under the same name – in a shortened form you’d never used before - as the incumbent Senator strongly suggests an intent to confuse yourself with the incumbent Senator rather than to distinguish yourself from him.
- (3) Your public campaign website (<https://www.sullivanforsenate.com/>) uses a format, color scheme and overall theme similar to the public website for Senator Sullivan’s campaign (<https://dansullivanforalaska.com/>). While the Division takes no position on whether you have appropriated the intellectual property of Senator Sullivan’s campaign, the similarity—particularly in light of the other facts I outline in this letter—appears to be deliberate. This again suggests an intention not to distinguish yourself from the incumbent Senator as any candidate genuinely seeking office would do, but to confuse Alaskans as to which “Dan Sullivan” is which.
- (4) A political consultant you have admitted is working with your campaign is a known longtime supporter of Democratic candidates including the primary Democratic challenger to Senator Sullivan. This consultant’s work on your behalf is, in isolation, innocuous. Alongside the other facts I have catalogued in this letter, however, it suggests a determined effort and a deliberate attempt to use the similarity of your name to confuse Alaska voters in the upcoming primary election.

In light of these unique, and to my knowledge utterly unprecedented facts (circumstances unlike any previously presented to the Division), I am forced to conclude that your declaration of candidacy, in which you stated under oath that you “declare myself to be a candidate for the office of United States Senator” was not filed in good faith for the purpose of genuinely pursuing election as Alaska’s U.S. Senator. Rather, these facts force the conclusion that your declaration of candidacy was filed with the purpose of confusing or misleading the electorate and compromising the fairness of the ballot by attempting to access the ballot under a version you have never used (“Dan Sullivan”) and with a party affiliation (Republican) that you have never before professed. Indeed, I conclude that the preponderance of the evidence is that you chose this new nickname and party affiliation because that name and party affiliation happen to be the name and party affiliation of another candidate in the race.

A declaration of candidacy filed for the purpose of confusing or misleading voters and compromising the fairness of the ballot is not properly filed as required by Alaska Statute 15.25.060. As such, I am unable to maintain your declaration of candidacy and I am de-certifying your candidacy for United States Senator. This decision is made pursuant to 15.25.042 and 6 AAC 25.260 along with other relevant provisions of law. Pursuant to 6 AAC 25.260(i), my determination in this matter is final. Although you

have 30 days to appeal this decision, if you intend to challenge the decision and seek judicial relief in Alaska Superior Court to be placed on the ballot, be aware ballots are printed on June 28.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Carol Beecher', with a long horizontal flourish extending to the right.

Carol Beecher  
Director

cc: Lt. Governor Nancy Dahlstrom

Jeffrey W. Robinson, ABA No. 0805038  
Bryn R. Pallesen, ABA No. 1810104  
Zoe A. Eisberg, ABA No. 1911094  
BALLARD SPAHR LLP  
1600 A Street, Suite 304  
Anchorage, Alaska 99501  
Telephone: 907-277-9511  
Email: robinsonjw@ballardspahr.com  
pallesenb@ballardspahr.com  
eisbergz@ballardspahr.com

Attorneys for Appellant Daniel J. Sullivan, Jr.

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

DANIEL J. SULLIVAN, JR.,

Appellant,

Case No. 3AN-26-\_\_\_\_\_ CI

v.

STATE OF ALASKA, DIVISION OF  
ELECTIONS,

Appellee.

**STATEMENT OF POINTS  
ON APPEAL**

Appellant Daniel J. Sullivan, Jr., whose address is P.O. Box 1656, Petersburg, Alaska 99833, by and through undersigned counsel, and pursuant to Alaska Appellate Rule 602(c)(1)(A), hereby provides the following Statement of Points on Appeal:

(1) Whether the Division of Elections violated Alaska law and the United States Constitution when it excluded Mr. Sullivan from the ballot despite his meeting every lawful qualification and procedural requirement to run for the office of United States Senator, based on a standardless “good faith” requirement that appears nowhere in Alaska or federal law.

DATED: June 22, 2026

BALLARD SPAHR LLP  
Attorneys for Appellant Daniel J. Sullivan,  
Jr.

By /s/ Jeffrey W. Robinson  
Jeffrey W. Robinson, ABA No. 0805038  
Bryn R. Pallesen, ABA No. 1810104  
Zoe A. Eisberg, ABA No. 1911094

I hereby certify that on June 22, 2026,  
a true and correct copy of the foregoing was served via  
email / First Class Mail on:

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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT AT ANCHORAGE

DANIEL J. SULLIVAN, JR., )  
 )  
Appellant, )  
v. )  
 )  
STATE OF ALASKA, DIVISION OF )  
ELECTIONS, )  
 )  
Appellee. )

Case No. 3AN-26-07485CI

**ORDER ON ADMINISTRATIVE APPEAL**

On June 22, 2026, Appellant Daniel J. Sullivan, Jr. (“Mr. Sullivan”) filed this appeal seeking review of the State of Alaska, Division of Elections’ Final Decision regarding his eligibility as a candidate for the office of United States (“U.S.”) Senator.

Petersburg resident Mr. Sullivan filed a Declaration for Candidacy for the U.S. Senate seat currently held by Senator Daniel S. Sullivan (“Senator Sullivan”).<sup>1</sup> In his Declaration, Mr. Sullivan certified that he met the qualifications for office set forth in the U.S. Constitution and the Alaska statutory requirements.<sup>2</sup> After receiving formal Complaints from the Alaska Republican Party,<sup>3</sup> the Division of Elections (“Division”) decided to exclude Mr. Sullivan’s name from the primary election ballot because it determined his declaration was not filed “in order to declare an actual good-faith candidacy for the office of United States Senator.”<sup>4</sup> Mr. Sullivan has filed an appeal to this Court alleging the Division’s decision is contrary to the expressed qualifications enumerated in the Constitution of the United States. Because the Court has determined the Division’s decision to exclude Mr. Sullivan from the primary ballot was based on a “good-faith” requirement that does not appear in the U.S. Constitution, the Alaska

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<sup>1</sup> R. 011.

<sup>2</sup> R. 011.

<sup>3</sup> R.60, 86. In addition to the Formal Complaints by the state Republican Party, the Director and Lieutenant Governor received an informal complaint from the NRSC asserting Mr. Dan J. Sullivan was a sham candidate whose declaration of candidacy was defective. R. 101.

<sup>4</sup> R. 128.

Statutes, or the implementing regulations adopted by the Division, the Division's decision must be reversed.

## I. FACTUAL AND PROCEDURAL BACKGROUND

In Alaska, the Division is responsible for providing the public with instructions and forms to file for elected office.<sup>5</sup> This year, the Division provided the public with a candidate packet and instructions for United States Senator candidacy, including a section articulating the candidate filing requirements.<sup>6</sup> The filing deadline for candidates intending to run for U.S. Senator was Monday, June 1, 2026.<sup>7</sup>

Mr. Sullivan is a United States Citizen, is over thirty years of age, and is a long-time resident of Petersburg, Alaska.<sup>8</sup> On May 29, 2026, Mr. Sullivan filed his notarized declaration of candidacy for the office of U.S. Senator with the Division.<sup>9</sup> In his declaration of candidacy, Mr. Sullivan filled in the ballot name information section under Step 5, and requested that his name appear on the ballot as "Sullivan, Dan."<sup>10</sup> Mr. Sullivan indicated his party affiliation as Republican.<sup>11</sup>

On July 11, 2025, incumbent Senator Sullivan had filed his own declaration for candidacy for the office of U.S. Senator.<sup>12</sup> In his declaration for candidacy, Senator Sullivan requested that his name appear on the ballot as "Sullivan, Dan."<sup>13</sup> Senator Sullivan also indicated his party affiliation as Republican.<sup>14</sup>

On June 1, 2026, Division Director Carol Beecher ("Director Beecher" or "Director") sent a letter to Mr. Sullivan confirming the receipt of, and certifying, his declaration of candidacy.<sup>15</sup> The letter stated that on the 2026 Primary Election Ballot, Mr. Sullivan's

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<sup>5</sup> R. 001.

<sup>6</sup> R. 003.

<sup>7</sup> R. 003.

<sup>8</sup> R. 011, 048, 058.

<sup>9</sup> R. 010-011.

<sup>10</sup> R. 011.

<sup>11</sup> *Id.*

<sup>12</sup> R. 009.

<sup>13</sup> *Id.*

<sup>14</sup> *Id.*

<sup>15</sup> R. 016-017.

name would appear as “Sullivan, Dan J. (Registered Republican).”<sup>16</sup> Division Director Beecher had sent a similar letter to Senator Sullivan on July 16, 2025, likewise confirming the receipt of, and certifying, his Declaration of candidacy.<sup>17</sup> In that confirmation, Director Beecher indicated that Senator Sullivan’s name would appear as “Sullivan, Dan (Registered Republican).”<sup>18</sup>

On June 1, 2026, Director Beecher emailed both Mr. Sullivan and Senator Sullivan separately to confirm how each candidate would prefer their names to appear on the ballot to reduce confusion for voters.<sup>19</sup>

The same day, the National Republican Senatorial Committee (“NRSC”) sent a letter to Director Beecher, and Lieutenant Governor Nancy Dahlstrom (“Lieutenant Governor”), making various allegations regarding the intentions of Mr. Sullivan in filing his declaration of candidacy for U.S. Senator.<sup>20</sup> The letter asserted that Mr. Sullivan had filed his declaration of candidacy with the intention of confusing and misleading voters. Mr. Sullivan was not a historic member of the Alaska Republican Party (“ARP”) and had worked with a campaign strategist that the NRSC alleged previously worked with Democratic candidate Mary Pelota. They further alleged Mr. Sullivan had requested his name appear on the ballot in the same format as Senator Sullivan, and used similarly-styled campaign materials to Senator Sullivan.<sup>21</sup> On June 3, 2026, Mr. Sullivan responded to the NRSC’s letter by filing a letter addressed to Director Beecher stating that he had no intention to confuse or mislead the voters and that his candidacy was genuine.<sup>22</sup>

On June 8, 2026, Director Beecher emailed Mr. Sullivan to follow-up on her inquiry regarding Mr. Sullivan’s name appearance preference in a manner that would avoid voter confusion.<sup>23</sup> Mr. Sullivan responded the same day, stating initially that he would prefer to

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<sup>16</sup> *Id.*

<sup>17</sup> R. 019-020.

<sup>18</sup> *Id.*

<sup>19</sup> R. 047, 053.

<sup>20</sup> R. 022-046.

<sup>21</sup> *Id.*

<sup>22</sup> R. 048-050.

<sup>23</sup> R. 052.

appear as Dan S. Sullivan, and then sent a follow-up email asking to be listed as Dan J. Sullivan.<sup>24</sup>

On June 8, 2026, the Lieutenant Governor apparently sent a letter to Mr. Sullivan alerting him to an investigation triggered by the NRSC's June 1, 2026 letter.<sup>25</sup> The Lieutenant Governor's letter requested that Mr. Sullivan answer seven questions in a signed affidavit regarding his candidacy.<sup>26</sup> On June 10, 2026, Mr. Sullivan responded to the Lieutenant Governor's letter, indicating he had not received the letter from her office, but instead received a copy from a reporter.<sup>27</sup> Mr. Sullivan's letter rebutted the NRSC's allegations against him. He asserted that his candidacy is genuine as he had "considered running...for over a decade," that his family are long-time Alaska Republicans, and that he had no contact with any agent of the campaign of Mary Peltola.<sup>28</sup>

On June 10, 2026, the Chair of the ARP, through counsel, filed two candidate eligibility complaints pursuant to AS 15.25.042 and 6 AAC 25.260.<sup>29</sup> The first complaint alleged that Mr. Sullivan misrepresented his party affiliation in his declaration when he stated his intent to register as a Republican.<sup>30</sup> The second complaint alleged that Mr. Sullivan's declaration of candidacy was filed for the unlawful purpose of creating confusion for voters and not to properly seek office.<sup>31</sup>

On that same day Director Beecher received the ARP complaints, she sent the Division's preliminary decision to Mr. Sullivan, informing him that "[b]ased on a review of the evidence presented and in the Division's possession, the Division has determined that the preponderance of the evidence does not support your eligibility for the Office of United States Senator."<sup>32</sup> Director Beecher indicated that Mr. Sullivan could provide any additional evidence in response to the ARP's complaints and in support of his eligibility

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<sup>24</sup> *Id.*

<sup>25</sup> R. 054-056.

<sup>26</sup> *Id.*

<sup>27</sup> R. 057-059.

<sup>28</sup> *Id.*

<sup>29</sup> R. 060-085.

<sup>30</sup> *Id.*

<sup>31</sup> R. 086-126.

<sup>32</sup> R. 127.

by 5:00 pm the following day, June 11, 2026, prior to the Division issuing a final determination.<sup>33</sup>

On June 15, 2026, Director Beecher issued the Division's final determination regarding Mr. Sullivan's eligibility for office. The Division found Mr. Sullivan's declaration of candidacy was not properly filed because "it was not filed in order to declare an actual good-faith candidacy for the office of the United States Senator."<sup>34</sup> The Division's determination found that Mr. Sullivan's declaration was "instead filed with a purpose to confuse or mislead and to thereby compromise the ballot's fairness or neutrality."<sup>35</sup>

On June 22, 2026, following the final determination by the Division, Mr. Sullivan filed this administrative appeal with the Alaska Superior Court.<sup>36</sup> At the parties' request, this Court granted expedited consideration, and has proceeded on an extremely accelerated schedule. The Court heard oral argument on June 24, 2026.

While the Division had previously indicated that ballots were scheduled to be certified on June 28, 2026, the Division has subsequently clarified that the latest ballots can be printed and still adhere to their statutory duty, is June 30, 2026 at 12:00 pm.<sup>37</sup>

## II. ARGUMENTS OF THE PARTIES

### A. Appellant Mr. Sullivan

In this appeal, Mr. Sullivan makes several principal arguments. First, he argues the Division lacks the authority to reject his candidacy based on a "good-faith" requirement. This argument has several components. In his view, the Division's decision must be grounded in the declaration of candidacy, but was not. Alaska Statute 15.25.030(a) describes the requirements for a declaration of candidacy, and it says

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<sup>33</sup> R. 127.

<sup>34</sup> R. 128-130.

<sup>35</sup> *Id.*

<sup>36</sup> As part of his statement of the facts, Mr. Sullivan references a legal opinion drafted by legislative Counsel for Representative Andrew Gray. That opinion was filed with the State of Alaska after the Division made its final determination regarding Mr. Sullivan's eligibility on June 15. Thus, the legal opinion was not considered by the Division and is therefore not included in the administrative record, and this Court does not here consider it as part of its analysis.

<sup>37</sup> *Aff. Carol Beecher.*

nothing about “good-faith.” Further, he asserts the Director’s review is limited by the regulations the Division has promulgated. That review is described and circumscribed by 6 AAC 25.260(c). Mr. Sullivan further asserts the text of regulation 6 AAC 25.250(c) is clear and unambiguous; it does not allow the Division to consider the candidate’s mental state, “good-faith” or “bad-faith”. Finally, he asserts the Division’s review of complaints is limited to issues concerning the candidate’s constitutionally enumerated qualifications.

Second, Mr. Sullivan argues the Division’s decision actually violated its specific duties. He says the Division’s duty permits review for challenges to facial defects, or explicit statutory mechanisms. Further, the Division is charged with preparing and providing a ballot that contains all names of qualified candidates, and by excluding him it failed to do so.

Finally, Mr. Sullivan argues the Division violated Article 1, Section 3 of the U.S. Constitution when it imposed a “good-faith” requirement. He describes that requirement as a qualification, and notes that established legal precedent does not permit the States to adopt additional qualifications which do not appear in the Constitution.

## **B. Appellee The Division of Elections**

The Division makes several arguments in response to the appeal. First, the Division relies upon the Doctrine of Laches and claims that Mr. Sullivan waited too long to bring his appeal, and it should be dismissed as untimely.

Second, the Division argues its decision was correct because Mr. Sullivan’s declaration was not properly filed. It says the filing was improper because the candidate’s aim is to confuse, mislead or otherwise frustrate the conduct of the election.

Third, the Division argues the Constitution doesn’t require it to put a candidate on the ballot where evidence shows he is seeking to compromise the fairness of ballot. It urges the statutory requirement to determine “proper filing” requires more than simple preparation of a list of all candidates that have filed a declaration. It notes that various courts around the country require the candidates to file in “good-faith”. The Division

argues that election procedures designed to protect integrity and reliability of the election process are permissible.

Finally, the Division argues that its determination of “good-faith” (or not) is perfectly permissible as part of its authority to regulate the time, place and manner of elections.

### **C. Reply Arguments**

In his Reply, Mr. Sullivan argues the Division has drastically departed from its approach to previous complaints about candidate qualifications. According to Mr. Sullivan, the Division previously refused to step outside the four corners of the election laws. He notes the Division previously found a candidate (then sitting Representative Eastman) who was affiliated with an alleged extremist organization (the Oath Keepers) to be qualified where he met the constitutional and statutory requirements for the office.

Similarly, Mr. Sullivan notes the Division found qualified a convicted felon (Eric Hafner) serving a lengthy prison sentence outside Alaska. In that case, once again, the candidate met the constitutional and statutory requirements for the office.

In effect, Mr. Sullivan alleges that he has been singled out for different treatment. He says he is the only person who has been subjected to the Division’s “good-faith” requirement, despite the fact that he meets the constitutional qualifications for the office of U.S. Senator.

### **D. Amicus Arguments**

#### **1. *Dustin Darden***

The Court considers the amicus brief of Mr. Dustin Darden, a separate declared candidate for U.S. Senate in Alaska. Mr. Darden argues that the Division’s removal of Mr. Sullivan affects candidates and voters in the State of Alaska.

Mr. Darden argues that the State of Alaska must create a stable rule regarding eligibility criteria that informs candidates of the necessary qualification in advance of filing. Mr. Darden asserts that “with no clear rule, every future candidate is at risk of the same

treatment.” Finally, Mr. Darden asserts that issues of election accessibility ought to be determined promptly in a public forum.

## **2. Alaska Republican Party**

The Court considers the ARP’s brief in amicus status. ARP argues that Director Beecher acted under plain statutory authority when she de-certified Mr. Sullivan’s “sham candidacy.” ARP asserts that because Mr. Sullivan failed to respond to the Director’s seven questions, she had no choice but to find Mr. Sullivan ineligible for office.

ARP asserts that Mr. Sullivan failed to exhaust his administrative procedures when he did not respond to Director Beecher’s preliminary determination as to his eligibility. ARP argues that the language of the regulatory scheme implies such an exhaustion requirement, and if it does not, that this Court should “judicially create” one. ARP then argues that even if the Court were to consider the merits of Mr. Sullivan’s appeal, it should uphold the Director’s decision.

Finally, ARP asserts that the Director’s actions do not violate the Qualifications Clause of Article I of the U.S. Constitution because the action was taken pursuant to Alaska’s lawful authority to enforce ballot access rules.

## **III. STANDARD OF REVIEW**

In Alaska, appellate review of an agency decision involves the application of four principal standards of review, depending on the nature of the issue.<sup>38</sup> The substantial evidence standard applies to questions of fact; the reasonable basis standard applies to questions of law involving agency expertise; the substitution of judgment standard applies to questions of law where no expertise is involved; and the reasonable and not arbitrary standard applies to review of administrative regulations.<sup>39</sup>

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<sup>38</sup> *Alyeska Pipeline Serv. Co. v. State*, 288 P.3d 736, 739 (Alaska 2012) (citing *Alaskan Crude Corp. v. State, Dep’t of Nat. Res., Div. of Oil & Gas*, 261 P.3d 412, 419 (Alaska 2011)).

<sup>39</sup> *City of Soldotna v. State*, 556 P.3d 1158, 1163 (Alaska 2024).

Under the “reasonable basis” standard, the court defers to agency interpretations that involve agency expertise or their own regulations.<sup>40</sup> A court will uphold the decision of an agency unless it is “plainly erroneous and inconsistent with the regulation.”<sup>41</sup> An agency decision will involve expertise when the decision; requires technical or scientific expertise,<sup>42</sup> is made pursuant to explicitly delegated agency authority,<sup>43</sup> the agency is better positioned to make determinations due to its specialized knowledge,<sup>44</sup> involves creating standards to be used in the case before it, or resolves policy questions that are inseparable from the facts of the case.<sup>45</sup>

The substitution of judgment standard applies two questions of law where no agency expertise is involved. Under this standard, the court reviews the administrative determination *de novo*. Generally, courts acting in an appellate role on decisions from administrative agencies consider only the administrative record.<sup>46</sup> In cases where *de novo* review is granted, the reviewing court substitutes its judgment for that of the agency, particularly when interpreting constitutional provisions or pure issues of law.<sup>47</sup> That is, the court is not bound by the agency’s legal conclusions while exercising its independent judgment, and instead adopts the law most persuasive in light of precedent, reason, and policy.<sup>48</sup>

In its review, the Superior Court has appellate jurisdiction over final decisions of administrative agencies. Pursuant to AS 44.62.570(b), the scope of review is limited to: (1) whether the agency has proceeded without, or in excess of, jurisdiction; (2) whether there was a fair hearing; and (3) whether there was a prejudicial abuse of discretion.<sup>49</sup>

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<sup>40</sup> *Alaska Ctr. for the Env't v. State*, 80 P.3d 231, 242-243 (Alaska, 2003).

<sup>41</sup> *Id.*

<sup>42</sup> *Sitka Tribe of Alaska v. State*, 540 P.3d 893, 901 (Alaska, 2023).

<sup>43</sup> *Bullock v. State*, 19 P.3d 1209, 1213-1214 (Alaska, 2001).

<sup>44</sup> *Weaver Bros. v. Alaska Transp. Comm'n*, 588 P.3d 819, 821 (Alaska, 1978).

<sup>45</sup> *Gunderson v. Univ. of Alaska*, 922 P.2d 229, 223 (Alaska 1996).

<sup>46</sup> A.S. § 22.10.020(d). Under Alaska law, the Superior Court has discretion to conduct a trial *de novo* in appeals from administrative agencies. Alaska R. App. P. 609(b)(1).

<sup>47</sup> *Native Vill. of Elim v. State*, 990 P.2d 1 (Alaska 1999) (emphasizing that the Court “interprets constitutional and legal issues *de novo*, applying reason, practicality, and common sense while considering the plain meaning and intent of the law”) (citing *Moore v. State, Dep't of Transp. and Pub. Facilities*, 875 P.2d 765, 767-68 (Alaska 1994)).

<sup>48</sup> *Jones v. State, Dep't of Revenue*, 441 P.3d 966, 972 (Alaska 2019).

<sup>49</sup> AS § 44.62.570(b).

Abuse of discretion is established if the agency has not proceeded in the manner required by law, the order is not supported by the findings, or the findings are not supported by the evidence.<sup>50</sup> Under this same statute, the superior court may enter judgment setting aside, modifying, remanding, or affirming the agency's decision without limiting or controlling the discretion legally vested in the agency.<sup>51</sup>

Here, Mr. Sullivan and the Division differ over which standard of review should apply. Mr. Sullivan argues for a substitution of judgment standard because the court applies its independent judgment to issues of constitutional law. The Division argues that it has evaluated Mr. Sullivan's declaration of candidacy and that the court should apply the reasonable basis standard. The Division further argues that this is not a question of law, because it has interpreted administrative regulations 6 AAC 25.212 and 6 AAC 25.260 to determine that, by preponderance of the evidence, Mr. Sullivan has entered his candidacy to confuse voters. Under the reasonable basis standard, the Division argues that the court must defer to its interpretation because this interpretation involves agency expertise. On the other hand, Mr. Sullivan requests the court to review the matter *de novo*.

The court does not find the Division's argument persuasive and does not apply a reasonable basis standard. Pursuant to 6 AAC 25.260(j), the court recognizes that the Division Director can start an investigation either with or without the submission of a complaint.<sup>52</sup> The Division Director's review is limited to the grounds cited in the complaint that are related to candidate qualifications.<sup>53</sup>

Here, the Division received two complaints.<sup>54</sup> Neither complaint contained grounds relating to Mr. Sullivan's age, status as a citizen, or his Alaskan residency.<sup>55</sup> Reasonable

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<sup>50</sup> *Shears v. Myers*, 280 P.3d 552, 556 (Alaska 2012).

<sup>51</sup> AS § 44.62.570(b).

<sup>52</sup> 6 AAC 25.260(j).

<sup>53</sup> See U.S. Const. art. I, § 36.

<sup>54</sup> R. 086-087.

<sup>55</sup> The complaint states that Mr. Sullivan is "ineligible to qualify as a candidate because his Declaration of Candidacy... has the intent and effect of confusing and misleading Alaska voters and interferes with the state of Alaska's duty to ensure the integrity, credibility, and neutrality of the ballot and Alaska's elections." R. 086. The first complaint argues "a candidate's name may not appear on the ballot in a manner that is

basis review does not apply because the Division's final decision imposes an additional requirement for candidacy that involves a fundamental question of statutory construction and law, rather than localized administrative expertise.

As noted above, where an agency decision involves a question of law, the standard that applies is the substitution of judgment standard.<sup>56</sup> Determining the qualifications of a candidate for federal office and interpreting the U.S. Constitution are core legal questions within the unique expertise of the judiciary. Consequently, the Superior Court must independently evaluate the legal merits of the Division's decisions without giving deference to the agency's legal formulation.

#### **IV. DISCUSSION**

##### **A. The Doctrine of Laches: Did Mr. Sullivan Timely Pursue his Appeal?**

The Division argues that the equitable Doctrine of Laches should bar Mr. Sullivan's appeal to the Superior Court. The Division argues that Mr. Sullivan waited to file his appeal of the Division's administrative decision for 7 days. According to the Division, the delay between June 15 when the Division issued its final determination, and June 22 when this appeal was filed, was prejudicial and should bar this appeal. The Division further argues that Mr. Sullivan became aware as early as June 1 of the Division's concerns regarding his eligibility, and therefore his delay is even more unreasonable. The Division asserts it was prejudiced by the delay in filing because the delay has prevented the Division and the Court from responsibly addressing important election law issues.

Laches is an equitable remedy that bars a claim for relief where a party's own undue delay prejudiced the opposing party.<sup>57</sup> Laches has two independent elements: (1)

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'confusing or misleading to voters or compromises the fairness or neutrality of the ballot.'" *Id.* The second complaint claims Mr. Sullivan's declaration "was not filed in good faith and intended to cause confusion" as his name would create "substantial risk voters will mistakenly attribute his candidacy to the incumbent." R. 087.

<sup>56</sup> *City of Soldotna*, 556 P.3d at 1163.

<sup>57</sup> *City & Borough of Juneau v. Breck*, 706 P.2d 313, 315 (Alaska 1985).

that the plaintiff has unreasonably delayed in bringing the action, and (2) that this unreasonable delay has caused undue harm or prejudice to the defendant.<sup>58</sup>

Here, Mr. Sullivan's "delay" in filing his appeal with the Superior Court does not persuade the court to invoke the equitable Doctrine of Laches. The Division issued its final determination regarding Mr. Sullivan's eligibility on Monday, June 15. Mr. Sullivan filed his appeal one week later, a timeline that on its own does not constitute unreasonable delay. Taking into account that June 19 is Juneteenth, a state and federal holiday, Mr. Sullivan had a mere four working days to draft and file his appeal with the Court. This accelerated timeline does not constitute an unreasonable delay on the part of Mr. Sullivan, even in the face of the June 28 ballot deadline.

Further, the Division's argument that Mr. Sullivan's delay should be calculated based on the timeframe when he first became aware of the Division's concerns regarding his eligibility on June 1 is unavailing. Mr. Sullivan had no administrative appeal to bring to the Superior Court until the Division had issued a final determination regarding his eligibility on June 15. Further, Mr. Sullivan had no means of anticipating the Division would remove his name from the ballot. Thus, he had no obligation to preemptively seek relief for an unknown decision.

However, even if Mr. Sullivan had unreasonably delayed in bringing his appeal to the Superior Court, the Division has failed to demonstrate that a delay caused it undue harm or prejudice. The Division asserts that Mr. Sullivan's delay has forced the Division to defend the appeal, assemble the administrative record, draft its briefs, and protect the ballot certification process on an expedited basis. The Division itself is responsible for setting deadlines by which candidates can apply to run for office. Mr. Sullivan did not deviate from the timelines set by the Division, and should not be punished for appealing its decision. That is his right. While the expedited timeline of this appeal is certainly unusual, the Division fails to show how being tasked with this tight turnaround has caused

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<sup>58</sup> *Moore v. State*, 553 P.2d 8, 15 (Alaska 1976).

prejudice. Indeed, the examples of work it lists are all routine tasks that the Division would do for any administrative appeal and does not warrant the application of Laches.

The Division further asserts that not only has Mr. Sullivan's delay prejudiced it, but that this court has likewise been prejudiced by being forced to "steamroll through ... delicate legal issues" to meet expedited deadlines on matters of great importance. While the court appreciates the Division's concern for its deliberative process, expedited timelines for consideration do not present adequate reason to halt consideration altogether. The court has an obligation to the people of Alaska, in every case it considers, to ensure the faithful execution of the law. This obligation is heightened in the context of elections, not diminished. The court accepted the expedited timeline agreed to by the parties and has duly considered the issues presented in this appeal. The Doctrine of Laches is not a bar to the appeal in this case.

**B. Does Mr. Sullivan Meet the Candidate Qualifications for U.S. Senate as Laid out by the U.S. Constitution?**

Mr. Sullivan argues that the U.S. Constitution imposes three, and only three, qualifications for candidacy for U.S. Senate. Mr. Sullivan argues he meets these three qualifications, and was properly certified as a candidate. In addition to the requirements imposed by the U.S. Constitution, the Division asserts that it may create a "good-faith" requirement for U.S. Senate candidacy under the U.S. Constitution, Article I, § 4. Mr. Sullivan argues that he meets the constitutional requirements and that there is no "good-faith" requirement as articulated by the Division.

The qualification clause of Article I, § 3 of the U.S. Constitution declares:

[n]o Person shall be a Senator who shall not have attained to the Age of thirty Years, and been nine Years a Citizen of the United States, and who shall not, when elected, be an Inhabitant of that State for which he shall be chosen.<sup>59</sup>

The Division of Elections is tasked with administering elections in Alaska and determining whether persons are eligible for public office. State law mandates that, "[t]he

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<sup>59</sup> U.S. Const., art. 1, 3, cl. 3.

director shall provide general administrative supervision over the conduct of state elections, and may adopt regulations under AS 44.62 (Administrative Procedure Act) necessary for the administration of state elections.”<sup>60</sup> When a person seeks to become a candidate for public office in a primary election, the person files a declaration of candidacy with the Division providing information set out in statute.<sup>61</sup> This includes information relevant to whether the person is qualified to serve in public office such as whether they are a citizen, where they reside, and their age.<sup>62</sup> Alaska law further requires that, “[i]f the director receives a complaint regarding the eligibility of a candidate for a particular office, the director shall determine eligibility under regulations adopted by the director.”<sup>63</sup>

Alaska Statute 15.25.030(a) provides that “[a] person who seeks to become a candidate in the primary election or a special primary election shall execute and file a declaration of candidacy” and that declaration must meet the enumerated substantive requirements.<sup>64</sup> An applicant becomes a candidate following the certification of their declaration of candidacy by the Division Director.

Here, the Division provided the public a document outlining the qualifications for U.S. Senator as: “30 years of age; citizen of the United States for 9 years; and an inhabitant of the state from which elected.”<sup>65</sup> After Mr. Sullivan filed his declaration of candidacy, Division staff prepared a checklist indicating he met all the Division’s initial filing requirements as of June 1, 2026.<sup>66</sup> On the same day, Director Beecher prepared a letter addressed to Mr. Sullivan in Petersburg, Alaska certifying Mr. Sullivan’s declaration of candidacy.<sup>67</sup> This sequence of events indicates the Division initially accepted Mr. Sullivan’s declaration of candidacy as complete, and that he met the necessary requirements, thereby making him a candidate for purposes of AS 15.25.030. The

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<sup>60</sup> AS 15.15.010.

<sup>61</sup> AS 15.25.030.

<sup>62</sup> *Id.*

<sup>63</sup> AS 15.25.042(a).

<sup>64</sup> AS 15.25.030(a).

<sup>65</sup> R. 001.

<sup>66</sup> R. 013.

<sup>67</sup> R. 016.

Division's letter further confirmed that "o[O]n the 2026 Primary Election ballot, your name will appear as follows: Sullivan, Dan J (Registered Republican)."<sup>68</sup>

Regarding the constitutional sufficiency of Mr. Sullivan's declaration, the Division's candidacy form does not provide the applicant a designated place to state their age or their citizenship and its length.<sup>69</sup> The form does require the applicant to certify that they meet the specific citizenship and age requirements of the office, which Mr. Sullivan did.<sup>70</sup>

Mr. Sullivan asserted his status as a lifelong U.S. Citizen, a resident of Alaska, and over the age of thirty in a letter to the Division on June 3, 2026.<sup>71</sup> Mr. Sullivan reiterated his qualifications in a second letter to the Lieutenant Governor on June 10, 2026.<sup>72</sup> The factual contentions in these letters, being a part of the agency record and this Court's review, are uncontested by the Division. Thus, based on a review of the administrative record, the court finds that Mr. Sullivan fully satisfies the constitutional qualifications for U.S. Senate, that he timely completed the necessary filing forms, and that the Division properly certified him as a candidate for the office of U.S. Senate prior to its final determination.

### **C. Does the Division's Final Decision Violate the U.S. Constitution?**

Mr. Sullivan argues that the Division violated the U.S. Constitution by imposing a "good-faith" qualification requirement. Mr. Sullivan asserts that the Division may not lawfully add qualifications, such as "good-faith", that do not appear in the Constitution. The Division asserts that it has the authority to impose a "good-faith" requirement under

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<sup>68</sup> *Id.*

<sup>69</sup> R. 004. Based on this Court's review of the Division's declaration of candidacy form for 2026, it appears that the form does not fully comport with the statutory requirements laid out in AS 15.25.030. The statute requires that "[t]he declaration ... must state in substance: ... (8) the length of residency in the state and in the district of the candidate; (9) that the candidate will meet the specific citizenship requirements of the office for which the person is a candidate; ... (11) that the candidate will meet the specific age requirements of the office for which the person is a candidate." The 2026 declaration of candidacy form does not require a candidate to state in substance their length of residency in the state or district, that the candidate has been a citizen of the United States for at least nine years as required by the Constitution, or that the candidate will be thirty years of age at the start of their prospective term. The declaration does ask a candidate to certify to that information, but in this Court's view, certifying to a fact is not the same as stating that fact in substance.

<sup>70</sup> R. 011, 004.

<sup>71</sup> R. 048.

<sup>72</sup> R. 057-059.

Article I, Section 4 of the U.S. Constitution. The Division argues that the Constitution does not require it to put candidates on the ballot where evidence shows that the Candidate is seeking to compromise the fairness of an election.

As previously stated, Article I, Section 3, Clause 3 of the U.S. Constitution outlines the three requirements for candidacy for U.S. Senate. The U.S. Supreme Court found in *U.S. Term Limits v. Thornton* “that the Framers intended the Constitution to be the exclusive source of qualifications for Members of Congress, and that the Framers thereby ‘divested’ States of any power to add qualifications.”<sup>73</sup> The Supreme Court further noted the unanimity among the courts which had considered the issue of extrinsically imposed eligibility requirements – not a single court had upheld a state’s attempt to add candidate qualifications.<sup>74</sup> Thus, the qualifications for serving in the U.S. Senate are exclusively established by Article I, Section 3 of the U.S. Constitution.<sup>75</sup> Individual states, and indeed Congress, possess no authority to add to, subtract from, or otherwise increase these qualifications.<sup>76</sup>

The term “qualifications” is undefined by the Constitution and is therefore accorded its plain meaning. The Oxford English Dictionary defines qualifications as “[a] quality, accomplishment, or set of skills that makes someone fit for a particular job, office, or function.”<sup>77</sup> The U.S. Supreme Court stated that “qualifications relate to the fitness or capacity of the party for a particular pursuit or profession.”<sup>78</sup>

Director Beecher stated in her final determination that Mr. Sullivan was ineligible for office. However, as discussed above, Mr. Sullivan’s declaration of candidacy met the qualifications under Article 1, § 3 of the Constitution. The Director determined that Mr.

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<sup>73</sup> 514 U.S. 779, 800—01 (1995).

<sup>74</sup> *Id.* at 783 (“Allowing individual States to adopt their own qualifications for congressional service would be inconsistent with the Framers’ vision of a uniform National Legislature representing the people of the United States. If the qualifications set forth in the text of the Constitution are to be changed, that text must be amended.”).

<sup>75</sup> *Gralike v. Cook*, 191 F.3d 911, 922 (8th Cir. 1999).

<sup>76</sup> *U.S. Term Limits*, 514 U.S. at 798-800.

<sup>77</sup> Oxford English Dictionary (3d ed.); see also Black’s Law Dictionary 1360 (9th ed) (defining “qualified” as “[p]ossessing the necessary qualifications; capable or competent”).

<sup>78</sup> *Cummings v. Missouri*, 71 U.S. 277, 319, (1866).

Sullivan's declaration "was not filed in order to declare an actual good-faith candidacy."<sup>79</sup> Director Beecher in essence found that Mr. Sullivan lacked a particular quality or fitness, specifically a "good-faith" intention, and for this reason alone de-certified his candidacy for office.<sup>80</sup> Because the Director relied on a qualification outside of the three qualifications specified in Article I of the U.S. Constitution, the court finds that the Division's "good-faith" requirement is unlawful under Section 3. As a qualification for candidacy, the Division's "good-faith" standard is a plain violation of Article I, § 3 and the U.S. Supreme Court's finding in *Powell* and its progeny.<sup>81</sup>

Rather than a qualification, the Division asserts that its "good-faith" standard is a permissible regulation under Article I, § 4 of the U.S. Constitution, which authorizes states to regulate "[t]imes, Places and Manner of holding Elections."<sup>82</sup> Supposing the "good-faith" requirement is in fact a regulation of the "manner" in which elections take place and not a qualification, the issue is whether the application of the Division's "good-faith" test is articulated in Alaska law.

#### **D. The Division's Time, Place, and Manner Argument**

The Division argues it has the right to impose a "good-faith" requirement on candidates for public office because it relates to the "Time, Place and Manner" of holding elections. The source of the Division's authority is the United States Constitution, Article I, Section 4, which provides:

The times, places and manner of holding elections for Senators and representatives, shall be prescribed in each state by the legislature thereof.<sup>83</sup>

Since the Constitution delegates the authority to state legislatures, the Division's authority must then come from Alaska statutes. Alaska Statute 15.25.030 describes the method by which a person may become a candidate: by filing a declaration of candidacy.

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<sup>79</sup> R. 128.

<sup>80</sup> R. 129.

<sup>81</sup> See *Powell v. McCormack*, 395 U.S. 486 (1969); *U.S. Term Limits*, 514 U.S. 798.

<sup>82</sup> U.S. Const. art. I, § 4.

<sup>83</sup> U.S. Const. art. I, §4.

The declaration is to be filed with the Division. The time and manner of filing are stated in AS 15.25.040. However, Alaska statutes are silent on the issue of “good-faith” asserted by the Division. Stated differently, the Alaska Legislature has not included a motive or “good-faith” requirement in any of the election statutes passed by the legislature under the “time place and manner” authority it is delegated by the U.S. Constitution.

Nonetheless, the legislature has provided authority for the Director to determine eligibility of a candidate for particular office. That authority comes from AS 15.25.042(a):

If the director receives a complaint regarding the eligibility of a candidate for a particular office, the director shall determine eligibility under regulations adopted by the director.<sup>84</sup>

To implement the statutory mandate to determine a candidate’s eligibility following a complaint, the Division adopted 6 AAC 25.260. That regulation states that the Director’s review:

[I]s limited to the grounds cited in the complaint that are related to candidate qualifications addressed in the candidate’s declaration of candidacy. The director may not consider other grounds cited in the complaint, including grounds related to issues under the authority of the Alaska Public Offices Commission under AS 15.13.<sup>85</sup>

After receiving a complaint:

[T]he director will review any evidence relevant to the issues identified in the complaint which is in the custody of the division, including the candidate's registration record or declaration of candidacy, and including, in the discretion of the director, any other document of public record on file with the state.<sup>86</sup>

Upon completing that review, the director then determines whether, by a preponderance of the evidence, the information contained in the public record “supports or does not

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<sup>84</sup> AS 15.25.042(a).

<sup>85</sup> 6 AAC 25.260(c).

<sup>86</sup> *Id.* § 25.260(d).

support the eligibility of the candidate.”<sup>87</sup> Despite the above, “[n]othing in [6 AAC 25.260] limits the authority of the director to evaluate a candidate's eligibility for office.”<sup>88</sup>

### **E. The Division’s “Good-Faith” Requirement Does not Appear in the Constitution, Statutes, or Regulations**

Despite the Division’s assertion that Mr. Sullivan may be excluded from the ballot because he lacks “good-faith”, there is no statute which provides such a criterion. The concept of “good-faith”, or pure motive, or bona fide intent is simply absent. Further, while the legislature has provided authority for the Division to establish regulations to evaluate complaints, the Division has self-imposed a clear limitation on what may be considered.

As noted above, when reviewing a complaint, the Division “is limited to the grounds cited in the complaint that are related to candidate qualifications addressed in the candidate’s declaration of candidacy.” Significantly, this regulation was revised in 2024 to focus on the candidate’s declaration. Previously, the regulation more broadly focused on the U.S. and State Constitutions, and the Alaska statutes:

The director will review only those issues in the complaint related to candidate qualifications established by the United States Constitution, the Alaska Constitution, or the Alaska Statutes.<sup>89</sup>

Thus, it is clear the Director knows how to draft regulations to address candidate eligibility, and has made changes to those regulations when necessary. But the regulations do not contain a “good-faith” element. Moreover, the language of the regulations is restrictive. The regulations limit the Director’s review to the declaration of candidacy.

The Division seeks to include in the candidacy certification process for Mr. Sullivan a “good-faith” standard that it articulates for the first time. However, the statutory requirements to run for an Alaskan office do not contain an explicit “good-faith” standard. Under AS 15.25.030, candidates must fulfill specific procedural requirements depending on their path to the ballot, and none of these procedural requirements indicate a “good-

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<sup>87</sup> *Id.*

<sup>88</sup> *Id.* § 25.260(j).

<sup>89</sup> 6 AAC 25.260(c) (effective February 24, 2022 to July 10, 2024).

faith” requirement. Thus, there are no enumerated statutory or regulatory requirements for U.S. Senate candidates who otherwise qualify under the U.S. Constitution.

Under the circumstances, the Division’s assertion that it may examine the “good-faith” intent of the candidate as part of its authority to address the time, place, and manner of holding elections is without merit.

Regardless, the Division asserts that aspects of the U.S. Constitution and the regulatory code grant it an implicit authority to review in-depth candidate qualifications and assess for “good-faith”.

#### **F. The Scope of the Division’s Authority**

Mr. Sullivan argues that the Division exceeded the scope of its authority when it removed him from the ballot. He contends that the Division’s authority is limited to determining whether a candidate satisfies the legal qualifications for office. He argues, if a candidate is otherwise qualified,<sup>90</sup> concerns about voter confusion must be addressed through ballot design or regulation of the manner in which the candidate’s name appears on the ballot, not by excluding the candidate entirely.<sup>91</sup>

The Court agrees that the Division’s authority must be analyzed under two separate regulatory provisions. First, 6 AAC 25.260 governs complaints regarding a candidate’s eligibility. Under that regulation, the Division Director may investigate a candidate’s eligibility after receiving a complaint and may also evaluate a candidate’s eligibility in the absence of a complaint.<sup>92</sup> But that authority is not unlimited. The regulation limits the Director’s review to grounds cited in the complaint that are related to candidate qualifications addressed in the candidate’s declaration of candidacy.<sup>93</sup> The regulation also limits the Director’s review to evidence relevant to those issues that is in the Division’s

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<sup>90</sup> See AS 15.25.060; *Fowler v. City of Anchorage*, 583 P.2d, 817, 820 (Alaska 1978) (“shall” expresses a mandatory requirement); *Alaska Democratic Party v. Beecher*, 572 P.3d 556, 567 (Alaska 2025) (affirming Division’s decision to fulfill statutory mandate in manner that favored candidates’ right of access to the ballot).

<sup>91</sup> 6 AAC 25.212.

<sup>92</sup> 6 AAC 25.260(j).

<sup>93</sup> 6 AAC 25.260(c).

custody, including the candidate's registration record, declaration of candidacy, and other public records on file with the State.<sup>94</sup>

Second, 6 AAC 25.212 governs the appearance of a candidate's name on the ballot.<sup>95</sup> That regulation provides that, subject to AS 15.15.030 and the limitations in the regulation itself, a candidate's name will appear on the ballot in the manner requested by the candidate in the candidate's filing paperwork.<sup>96</sup> It also provides that a candidate's name may not appear in a manner that is confusing or misleading to voters or compromises the fairness or neutrality of the ballot.<sup>97</sup> A decision under that regulation is made by the Director based on a preponderance of the evidence and may be directly challenged in Superior Court.<sup>98</sup>

These provisions give the Division authority to review candidate qualifications and to regulate the manner in which a candidate's name appears on the ballot. But, they do not create a free-standing authority to exclude an otherwise qualified candidate from the ballot based solely on speculation that the candidate's name or candidacy may confuse voters. The distinction matters. A question about whether a candidate satisfies the constitutional and statutory qualifications for office is an eligibility question. A question about whether the candidate's requested name format is confusing or misleading is a ballot-presentation question.

The Division may address both, but it must do so within the authority granted by statute and regulation. When a candidates' rights are subjected to severe restrictions, regulation must be narrowly drawn to advance a state interest of compelling importance.<sup>99</sup> The Alaska Supreme Court has applied this standard in ballot access cases, holding that the state must show a compelling interest in order to justify infringements of these rights.<sup>100</sup> Restrictions on ballot access impinge not only on the rights of potential

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<sup>94</sup> 6 AAC 25.260(c), (d), (j).

<sup>95</sup> 6 AAC 25.212.

<sup>96</sup> 6 AAC 25.212(a).

<sup>97</sup> 6 AAC 25.212(b)(2).

<sup>98</sup> 6 AAC 25.260(d).

<sup>99</sup> *Guerin v. State*, 537 P.3d 770, 783 (Alaska 2023) (citing *Vogler v. Miller*, 651 P.2d. 1, 3 (Alaska 1982)).

<sup>100</sup> *Sonneman v. State*, 969 P.2d 632, 638 (Alaska 1998) (citing *Vogler*, 660 P.2d at 1193 (Alaska 1983)).

candidates, but on those of the voters as well.<sup>101</sup> The Division's actions here likewise limit the rights of potential candidates and must therefore be done narrowly within the legislative statutes and regulations of the agency.

**G. The Division Could Have Promulgated a Regulation on “Good-Faith”, But Did Not**

As noted previously, upon receipt of a complaint, the Director may only determine candidate eligibility under regulations adopted by the Director. If the Director was concerned that so-called “sham candidates” might file declarations for the purpose of confusing or misleading voters, she certainly could have done so. But, the Director did not promulgate such a regulation.

Instead, when the Director promulgated a new standard for addressing complaints regarding candidate eligibility in 2024, the standard was narrowed. Instead of limiting the Director's review to the candidate's qualifications under the U.S. and Alaska Constitutions, and Alaska statutes, the Director must now focus on the qualifications addressed in the candidate's declaration of candidacy.

At oral argument, the Division's counsel acknowledged the unprecedented nature of the situation presented by this case – two candidates with the same name. But many other states have faced this situation, and Alaska could have predicted this situation would eventually arise. Similarly, several other states have addressed the issue of “good-faith” in candidate applications. Given that potential, and the limitation on the Director's review of eligibility complaints, the Division should have addressed such concerns by regulation. Having failed to do so, it may not now assert a new requirement, standard, limitation, or qualification after presentation of the candidate's declaration. All potential candidates are entitled to notice of what rules and regulations will govern this election.<sup>102</sup>

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<sup>101</sup> *Id.*

<sup>102</sup> In 1992, the Alaska Attorney General issued an Opinion in 1992 regarding the Alaska Republican Party's effort to enforce its prior registration requirement. The party sought to impose a new rule requiring candidates to be registered as party members for at least six months to be eligible. The Opinion notes that any such rule would not be enforceable by the director because only the regulations adopted by the director could be used to address eligibility. “Additionally, they do not put candidates on notice that, after they have

## H. Summary of Constitutional, Statutory, and Regulatory Analysis

In sum, the court concludes the Division's application of a "good-faith" test to Mr. Sullivan's declaration of candidacy is not supported by the U.S. Constitution, Alaska statutes, or the Division's implementing regulations. As such, the Division's decision to exclude Mr. Sullivan from the primary ballot is without a legal basis.

## V. THE DIVISION'S EVALUATION OF THE COMPLAINTS

Because the Division asserts that it pursued its regulatory process and concluded the preponderance of the evidence favored disqualification, the court will alternatively evaluate the Division's findings. As discussed previously, the Division could evaluate Mr. Sullivan's legal eligibility under 6 AAC 25.260 and could regulate the manner of his name's appearance under 6 AAC 25.212.<sup>103</sup> The absence of a "good-faith" regulation narrows the court's evaluation to whether the Division's decision follows authority that exists.<sup>104</sup> That means this Court's review is limited to whether the Division had a valid basis, supported by a preponderance of the evidence, to conclude that Mr. Sullivan's candidacy was invalid.<sup>105</sup>

When reviewing *de novo*, the court finds the Division's finding is not supported by the record. The Division's concerns around Mr. Sullivan's candidacy stem from a letter sent on June 1, 2026 by the NRSC, which complained to the Division that they believed Mr. Sullivan was a "sham candidate" made to confuse Alaskan voters.<sup>106</sup> This letter was publicized to the public and within the custody of the Division to consider Mr. Sullivan's candidacy eligibility.

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filed for office, the state might declare them ineligible for a particular party's nomination even though they are statutorily and constitutionally eligible for the particular office." 1992 Alaska Op. Atty. Gen. (Inf.) 217 (Alaska A.G.), 1992 WL 564972 (October 27, 1992).

<sup>103</sup> See *supra* Section D.

<sup>104</sup> See 6 AAC 25.260.

<sup>105</sup> 6 AAC 25.260(d).

<sup>106</sup> R. 022-046.

In response, Mr. Sullivan sent a letter on June 3, 2026, stating that he had no intention to confuse or mislead voters and that his candidacy was genuine.<sup>107</sup> He stated he met all three qualifications for candidacy in Alaska.<sup>108</sup>

However, the Lieutenant Governor further requested Mr. Sullivan to respond to another seven questions, requiring him to respond in a signed affidavit on June 8, 2026.<sup>109</sup> These questions were related to his affiliation to the Republican Party, whether he had a nickname, his website, and any interactions he could have with the Democratic Party or other political consulting firms.<sup>110</sup> Those questions may have related to the Division's concern about motive or voter confusion, but none of these questions directly concern the constitutional qualifications for senate candidacy.<sup>111</sup> Nor do they establish Mr. Sullivan failed to provide the information required by law in his declaration of candidacy.

Mr. Sullivan did not respond to these questions with a signed affidavit but sent a letter back addressing these concerns.<sup>112</sup> But, nothing in the cited statutes or regulations required him to respond to those questions by affidavit as a condition of ballot access. The Division had authority to request additional information relevant to candidate eligibility and it could consider a failure to respond where the requested information concerned eligibility.<sup>113</sup> But, the Division could not treat Mr. Sullivan's failure to answer questions about motive, consulting relationships, or campaign in order to disqualify him for candidacy eligibility. These questions have little or no bearing on his candidacy eligibility.<sup>114</sup>

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<sup>107</sup> R. 048-050.

<sup>108</sup> R. 009.

<sup>109</sup> R. 054-056.

<sup>110</sup> *Id.*

<sup>111</sup> R. 055.

<sup>112</sup> R. 057-059.

<sup>113</sup> See 6 AAC 25.260(j).

<sup>114</sup> The questions are listed as followed:

- (1) Have you ever affiliated as a member of the Republican Party before filing your declaration of candidacy? If so, please provide information regarding such affiliation including the date(s) and jurisdiction(s) where you were affiliated with the Republican Party.
- (2) Have you ever held yourself out as being associated or affiliated with the Republican Party before filing your declaration of candidacy for this election?
- (3) What other versions of your name have you used previously when registering with the Division of Elections?

On June 10, 2026, the ARP filed their two complaints with the Division, alleging that Mr. Sullivan misrepresented his party affiliation and his candidacy was meant to confuse voters.<sup>115</sup> Those complaints triggered the Division's review under 6 AAC 25.260.<sup>116</sup> But, the scope of that review remained limited to grounds related to candidate qualifications addressed in the declaration of candidacy.<sup>117</sup> The declaration of candidacy made two issues potentially relevant here: Mr. Sullivan's requested party designation and the manner in which he requested his name to appear on the ballot.<sup>118</sup> The remaining allegations concerning motive, campaign strategy, or possible political coordination did not independently establish that Mr. Sullivan lacked the legal qualifications to run for U.S. Senate.<sup>119</sup>

Applying the preponderance of the evidence standard to the record, the court concludes that the Division's decision was not supported by the evidence before it.<sup>120</sup> Under preponderance of the evidence, a party must persuade the factfinder that the asserted fact is probably true.<sup>121</sup> The record does not show that it was more likely than not that Mr. Sullivan failed to satisfy the constitutional or statutory qualifications for office.

First, the record does not show that Mr. Sullivan was ineligible based on party affiliation. Mr. Sullivan stated he became an unaffiliated after his original party affiliation,

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Have you always only used the nickname "Dan" and your last name? Why, if you registered under a different name in the past, did you use only "Dan Sullivan" in this instance when requesting ballot access? (4) Describe the process for designing your campaign website and logo, including the names of all persons and vendors who assisted in this creation. Please explain whether you intentionally mimicked the campaign website and logo for U.S. Senator Dan Sullivan. (5) Have you had any direct or indirect interaction whatsoever with Amber Lee and/or her consulting firm Amber Lee Strategies about your declaration of candidacy? If so, please describe your interactions with Ms. Lee and Amber Lee Strategies. (6) Have you had any direct or indirect interaction whatsoever with any other candidate for United States Senate or an agent of such a candidate about your declaration of candidacy? (7) Have you had any direct or indirect interaction whatsoever with any agent of the Democratic Party with respect to your declaration of candidacy?

R. 055.

<sup>115</sup> R. 060-085.

<sup>116</sup> 6 AAC 25.260.

<sup>117</sup> *Id.* § 25.260(c).

<sup>118</sup> R. 060-061.

<sup>119</sup> See R. 055.

<sup>120</sup> 6 AAC 25.260(d).

<sup>121</sup> *Saxton v. Harris*, 395 P.2d 71, 73 (Alaska 1964).

the Alaska Independence Party, was terminated and disbanded in 2026.<sup>122</sup> He chose to run as a Republican because of his conservative views.<sup>123</sup> An individual may change his party affiliation at any time and a recent party affiliation does not, by itself, establish that a candidate is ineligible.<sup>124</sup> While Mr. Sullivan has not been registered with the Republican Party prior to filing his candidacy, that timing does not prove that Mr. Sullivan falsely represented his political beliefs or lacked the legal ability to request a Republican designation if otherwise permitted by Alaska election law. Indeed, Mr. Sullivan claims that he believes in conservative principles and Republican viewpoints.<sup>125</sup> The Division did not identify evidence to refute his claims.

Second, ARP's complaint alleging Mr. Sullivan's name would cause confusion does not overcome the fact that Mr. Sullivan responded to the Division's email about how he would prefer his name to be presented on the ballot to prevent voter confusion.<sup>126</sup> Mr. Sullivan initially requested to appear as "Dan S. Sullivan," which created an understandable concern because that formulation closely resembled the incumbent Senator's name.<sup>127</sup> But, Mr. Sullivan quickly corrected that request and asked to be listed as "Dan J. Sullivan."<sup>128</sup> He has continued to request that formulation. Mr. Sullivan's full legal name is Daniel James Sullivan, and he asserts that he is commonly known as Dan Sullivan.<sup>129</sup> The record does not contain evidence sufficient to disprove that assertion or to show that no ballot-name format could address any potential confusion.

Furthermore, the court notes that Mr. Sullivan addressed the three requirements of candidacy for U.S. Senator for the State of Alaska properly. He is over the age of 30.<sup>130</sup> He is a lifelong U.S. citizen which puts him over the requirement of at least 9 years of

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<sup>122</sup> See Alaska Div. of Elections, *Alaska Division of Elections Receives Notice of Alaskan Independence Party Dissolution* (Jan. 14, 2026), <https://www.elections.alaska.gov/alaska-division-of-elections-receives-notice-of-alaska-independence-party-dissolution/>.

<sup>123</sup> R. 048, 058.

<sup>124</sup> AS 15.07.050(c) (allowing voters to mark their party choice on a voter registration application).

<sup>125</sup> R. 058.

<sup>126</sup> R. 052.

<sup>127</sup> *Id.*

<sup>128</sup> *Id.*

<sup>129</sup> R.058.

<sup>130</sup> R. 048, 058.

U.S. citizenship.<sup>131</sup> Mr. Sullivan is a resident of Alaska, with a residential address in Petersburg, Alaska.<sup>132</sup>

The Division cites to several cases for the proposition that states have the authority, under state or federal law, to limit candidates. In *Planas v Planas*, a candidate for state representative was disqualified from the ballot where his name mirrored the name of an existing and well known candidate.<sup>133</sup> The District Court of Appeal of Florida, Third District, held it was lawful to disqualify a would-be candidate where the candidate designated a name on his ballot application that “ha[d] not been adopted by him ... and under which [he] ha[d] not transacted private and official business.”<sup>134</sup> There, the court held the appellant had not acted in the “good faith and ... honest purpose,” required of candidates.<sup>135</sup> However, in *Planas*, the court relied on the fact that the appellant’s stated name was not actually his name for private purposes, and thus determined that his candidacy was not in good faith.<sup>136</sup>

In *State v. Marsh*, a potential candidate intended to list his name on the ballot as Fred Johnson.<sup>137</sup> Another potential candidate who had previously filed was named Fred H. Johnson. As a result, the Nebraska Supreme Court held that the Secretary of State was justified in removing the potential candidate because his true name was Arthur Fred Johnson, Arthur F. Johnson, or A. Fred Johnson, rather than his listed ballot name of Fred Johnson.<sup>138</sup> The court found such a tactic would be a “patent fraud” as “electors are entitled to have their identification of candidates unobscured by trickery or fraud.”<sup>139</sup>

The same line of reasoning is given in *None of the Above v. Hardy*, where the Louisiana Court of Appeal found a candidate attempting to be on the ballot as “None of the Above” was “misleading and deceptive.”<sup>140</sup> The court reasoned that plaintiff had

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<sup>131</sup> *Id.*

<sup>132</sup> R. 004, 048, 058.

<sup>133</sup> *Planas v. Planas*, 937 So.2d 745, 745 (Fla. Dist. Ct. App. 2006).

<sup>134</sup> *Id.*

<sup>135</sup> *Id.*

<sup>136</sup> *Id.*

<sup>137</sup> *State v. Marsh*, 120 Neb. 297, 232 N.W. 104, 104 (1930).

<sup>138</sup> *Id.*

<sup>139</sup> *Id.*

<sup>140</sup> *None Of The Above v. Hardy*, 377 So. 2d 385, 386-87 (La. Ct. App. 1979).

changed his name a month after qualifying, and admitted he had “no hope of being a serious candidate. His sole purpose was to arouse interest in the adoption of a None of the Above option by the legislature.” As a result, he violated the statute which required his name to not be deceptive.<sup>141</sup>

However, Mr. Sullivan’s case here is factually different from all of the Division’s cited cases. Here, Mr. Sullivan filed his declaration of candidacy using a name that he has gone by throughout his life.<sup>142</sup> Mr. Sullivan’s use of the nickname Dan, rather than Daniel, is likewise longstanding.<sup>143</sup> He did not change his name recently and has stated his goal is to represent the Alaskan people.<sup>144</sup> Thus, the Division’s assertion that Mr. Sullivan’s filing is not in “good-faith” cannot be fairly compared to any of the Division’s cited cases.

Finally, the court is not convinced that the Division’s remedy of removing Mr. Sullivan from the ballot is the correct course of action to rectify the situation. The Division’s power is subject to the limitations in AS 15.15.030 and 6 AAC 25.212. Regulation 6 AAC 25.212, does not impose a broad, generalized obligation on the Department to design ballots to reduce voter confusion.<sup>145</sup> Instead, the regulation establishes a specific, restrictive standard regarding how a candidate’s name is presented, prohibiting any name format that is confusing or misleading to voters.<sup>146</sup>

Alaska Statute 15.15.030 gives the Director authority to prepare ballots in a manner that promotes fairness, simplicity, and clarity in the voting procedure.<sup>147</sup> That statute supports ballot-design solutions, including appropriate name formatting, instructions, and other matters of ballot form.<sup>148</sup> This statutory authority grants the Director discretion over the size of the ballot, the type of print, and the necessary instructional

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<sup>141</sup> *Id.* at 387.

<sup>142</sup> R. 058.

<sup>143</sup> *Id.*

<sup>144</sup> R. 057-058.

<sup>145</sup> See 6 AAC 25.212.

<sup>146</sup> 6 AAC 25.212(b)(2) (“A candidate’s name may not appear on a ballot in a manner that is confusing or misleading to voters or compromises the fairness or neutrality of the ballot.”)

<sup>147</sup> See AS 15.15.130.

<sup>148</sup> *Id.*

notes to voters, an authority Mr. Sullivan argues the Division should use to prevent voter confusion via ballot design instead of exclusion of a candidate.

In Alaska, the Director may determine whether a candidate's proposed name presentation violates this standard based on a "preponderance of the evidence." There is nothing affirmative in either the regulation or statute that allows the Division to exclude a candidate. That is, while 6 AAC 25.212(b)(2) allows the Director to restrict the manner in which a candidate's name appears to prevent voter confusion, the regulation does not outline a mechanism for completely excluding an otherwise qualified candidate from the ballot solely because they share a similar name with another candidate; rather, the restriction targets the "manner" of the name's appearance.

Likewise, AS 15.15.030 gives the Director authority to prepare ballots in a manner that promotes fairness, simplicity, and clarity in the voting procedure.<sup>149</sup> That statute supports ballot-design solutions, including appropriate name formatting, instructions, and other matters of ballot form.<sup>150</sup> It does not authorize the removal of a candidate who satisfies the legal qualifications for office.

The court does not minimize the Division's concern that voters should not be misled. Alaska election law gives the Division tools to address that concern. The Division may regulate the way a candidate's name appears on the ballot if the requested manner is confusing or misleading.<sup>151</sup> In fact, the Division has suggested such a clarification, by suggesting Mr. Sullivan's name to appear on the ballot as "Sullivan, Dan J. (Registered Republican)" and the incumbent senator as "Sullivan, Dan (Registered Republican)."<sup>152</sup> The Division has even asked for clarification from the candidates themselves to avoid voter confusion.<sup>153</sup>

The Division may also design the ballot to facilitate fairness, simplicity, and clarity. But those tools are different from the complete exclusion of a candidate. Where a less

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<sup>151</sup> 6 AAC 25.212(b)(2).

<sup>152</sup> Compare R. 016, with R. 019.

<sup>153</sup> R. 052-053.

drastic ballot-presentation remedy is available, and where the candidate otherwise satisfies the legal qualifications for office, the Division must identify clear statutory or regulatory authority before removing the candidate from the ballot which it has not done.<sup>154</sup>

For these reasons, the court concludes that the Division abused its discretion by removing Mr. Sullivan from the ballot. The record does not establish by a preponderance of the evidence that Mr. Sullivan is legally ineligible to run for U.S. Senate. Nor do the cited statutes or regulations authorize exclusion of an otherwise qualified candidate based solely on concerns that can be addressed through ballot-name regulation or ballot design.

## VI. ALASKA POLICY IN FAVOR OF BALLOT ACCESS

Alaska Supreme Court precedent favors resolving any question about eligibility in Dan J Sullivan's favor. In fact, that Court recently re-emphasized its policy in *Beecher*.<sup>155</sup> There, the Court emphasized:

Restrictions on ballot access infringe on the constitutionally protected rights of not only candidates, but voters as well. "The right to vote is integral to the functioning of our democracy: '[t]he right of the citizen to cast [a] ballot and thus participate in the selection of those who control [the] government is one of the fundamental prerogatives of citizenship and should not be impaired or destroyed by strained statutory constructions.'"<sup>156</sup>

*Beecher* involved a challenge brought by the Alaska Democratic Party against the Division relating to the Division's placement of the fifth-place finisher in the primary election on the general election ballot. Reviewing one of its prior decisions, the court noted,

Crucially, we resolved the question in favor of allowing the candidate to appear on the ballot because of "our clear policy favoring open access to the ballot" where the "election code does not clearly prohibit it."<sup>157</sup>

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<sup>154</sup> See *supra* Section IV, E.

<sup>155</sup> *Alaska Democratic Party v Beecher*, 572 P.3d 556, 566 (Alaska 2025).

<sup>156</sup> *Id.* (citing *Vogler v. Miller*, 651 P.2d 1, 3 (Alaska 1982) (citing *Williams v. Rhodes*, 393 U.S. 23, 30, 89 S. Ct. 5, 21 L.Ed.2d 24 (1968), and quoting *Guerin v. State*, 537 P.3d 770, 783-84 (Alaska 2023) (alterations in original) (quoting *Carr v. Thomas*, 586 P.2d 622, 626 (Alaska 1978)).

<sup>157</sup> *Beecher*, 572 P.3d at 566 (quoting *O'Callaghan v State*, 826 P.2d 1132, 1137 (Alaska 1992)).

Reviewing a second prior decision, the Court again emphasized the policy in such cases:

“[W]here there is a statutory ambiguity as to whether or not a candidate is eligible to run for office, the statute should be construed in favor of eligibility” as long as the statute can be reasonably interpreted that way.<sup>158</sup>

In the *Beecher* court’s phrasing, there is a presumption in favor of candidate eligibility.<sup>159</sup>

Here, the Division has utilized a previously unidentified criteria, “good-faith”, to exclude Mr. Sullivan from the primary ballot. This exclusion is contrary to the Alaska Supreme Court’s well-established presumption in favor of candidate eligibility.

## VII. CONCLUSION

In summary, the Division’s decision to exclude Mr. Sullivan from the primary ballot because it determined his declaration was not filed “in order to declare an actual good-faith candidacy for the office of United States Senator”<sup>160</sup> was not based upon the constitutional requirements of Article I, § 3, the Alaska statutes governing elections, or regulations promulgated by the Division. Instead, the decision was based upon a new, previously unstated, “good-faith” criteria. In addition, the Director’s assertion that Mr. Sullivan seeks to confuse or misguide voters is not supported by a preponderance of evidence. Instead, the Division accepted at face-value the assertions of the complaint, and disregarded Mr. Sullivan’s assertions.

The Final Decision of the Division of Elections is VACATED. Mr. Dan J. Sullivan is declared to be an eligible candidate for the office of United States Senator. The Division shall include his name and affiliation with the Republican Party on the ballot for the August 18, 2026, primary election.

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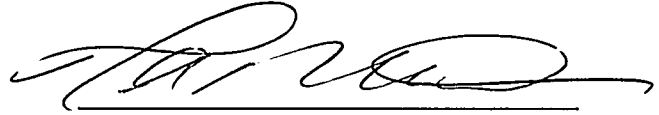
<sup>158</sup> *Beecher*, 572 P.3d at 566 (quoting *Municipality of Anchorage v Mjos*, 179 P.3d 941, 943 (Alaska 2008)).

<sup>159</sup> *Beecher*, 572 P.3d at 566.

<sup>160</sup> R. 128.

IT IS SO ORDERED.

DATED at Anchorage, Alaska this 26<sup>th</sup> day of June, 2026.

A handwritten signature in black ink, appearing to read 'T. Matthews', written over a horizontal line.

Thomas A. Matthews  
Superior Court Judge

# Alaska Trial Courts

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