Alaska Department of Law
Office of the Attorney General
Civil Division
1031 West 4th Avenue, Suite 200
Anchorage, Alaska 99501
Via email: cori.mills@alaska.gov

Re: Complaint regarding potential violations of state election and non-profit laws by Salmon State and the Alaska Venture Fund.

Dear Acting Attorney General Mills:

The American Accountability Foundation ("AAF") is a nonprofit research organization that investigates the use of charitable vehicles to influence public policy. AAF has previously referred conduct of the New Venture Fund ("NVF") and the broader Arabella Advisors network to the Internal Revenue Service.[1] This referral concerns conduct of NVF and two of its Alaska-based fiscally sponsored projects, SalmonState and the Alaska Venture Fund ("AVF"), that falls within the Department's regulatory and enforcement authority.[2]

The Department's authority arises from the Attorney General's general supervision of charitable solicitation in Alaska and its statutory enforcement role under AS 45.68 and AS 45.50.[3] Related concerns, most notably ballot-measure contributions and lobbying expenditures, sit with the Alaska Public Offices Commission ("APOC") under AS 15.13 and AS 24.45; AAF requests that those matters be referred to APOC in parallel.

The justification for this referral is simple. NVF, a District of Columbia nonprofit corporation, has solicited millions of dollars, including from Alaskans, for projects that operate exclusively in Alaska, and has let SalmonState and AVF operate for years as functionally independent organizations under its tax-exempt cover, even after the State involuntarily dissolved SalmonState as a domestic nonprofit corporation in March 2018.

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[1]Americans for Public Trust, Complaint to the Internal Revenue Service Concerning the New Venture Fund (Washington, DC: Americans for Public Trust, 2023); American Accountability Foundation, prior complaint to the Internal Revenue Service regarding New Venture Fund support for Sher Edling climate litigation (on file with AAF).
[2]Alaska Stat. § 45.68.010 et seq. (Alaska Charitable Solicitations Act); Alaska Stat. § 10.20 (Alaska Nonprofit Corporation Act); Alaska Stat. § 45.50.471 et seq. (Unfair Trade Practices and Consumer Protection Act).
[3]Alaska Stat. § 44.23.020 (duties and powers of the attorney general); Alaska Stat. § 45.50.495 (investigative authority of attorney general under the Unfair Trade Practices and Consumer Protection Act).

Each project has every attribute of an independent nonprofit, yet neither separately discloses its financial activities. The Department has both the authority and the cause to examine that arrangement.

II. Indefinite Fiscal Sponsorship of De Facto Independent Organizations

A. SalmonState

SalmonState was launched in 2015 as a fiscally sponsored project of NVF. More than ten years later, it is not incorporated in Alaska, yet it operates as an independent nonprofit in substance: raising its own funds, employing its own staff, keeping its own donor list, and presenting itself publicly as a discrete organization. NVF, now through Sunflower Services, provides back-office services (human resources, accounting, compliance) for a percentage of SalmonState's budget.[4]

Despite more than a decade of operation and a multi-million-dollar budget supported by major institutional donors, including the William and Flora Hewlett Foundation, the Wilburforce Foundation, the Gordon and Betty Moore Foundation, and the Campion Foundation, SalmonState remains a project of NVF.[5]

B. The Alaska Department of Commerce dissolution

SalmonState was originally registered as an Alaska domestic nonprofit corporation. The State involuntarily dissolved that corporation in March 2018.[6] SalmonState nevertheless kept operating through the 2018 election cycle and to the present, soliciting Alaskans and running multi-year campaigns under its name.

[4] New Venture Fund, Form 990, tax years 2008–2024, available at https://projects.propublica.org/nonprofits/organizations/205806345.
[5] William and Flora Hewlett Foundation, Grants Database, https://hewlett.org/grants/ (search "SalmonState"); Wilburforce Foundation, Annual Report (Seattle: Wilburforce Foundation, 2023); Wild Salmon Center, Form 990 (2023), Schedule I; Campion Foundation, Form 990 (2019, 2022), Schedule I; see also Suzanne Downing, "Arabella still pulls the strings as left-wing money machine controlling Alaska," Must Read Alaska, September 4, 2025.
[6] Alex DeMarban, "Stand for Alaska adds to allegation of 'dark money' in Ballot Measure 1 campaign," Anchorage Daily News, September 26, 2018; Alaska Department of Commerce, Community, and Economic Development, Division of Corporations, Business and Professional Licensing, entity record for SalmonState (reflecting involuntary dissolution March 2018).

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Under Alaska law, an involuntarily dissolved nonprofit corporation may continue to exist only for the limited purpose of winding up its affairs.[7] Continued operation as a going concern (fundraising, program staffing, multi-year campaigns, public solicitation) is not a winding-up activity. SalmonState's executive director acknowledged in a 2018 interview with the Anchorage Daily News that, after forming SalmonState as a nonprofit, he learned it did not need to be registered as one. The acknowledgment shows SalmonState chose not to register, operating instead under cover of NVF's out-of-state tax status.

C. Alaska Venture Fund

AVF is also fiscally sponsored by NVF. Its leadership re-approves the arrangement annually and, by public reporting, retains the option to switch sponsors or incorporate independently. It has not done so.[8] AVF operates in every public-facing respect as a distinct organization, with its own branding, programs, and staff. The arrangement serves no genuine incubation purpose; it keeps AVF's activities off independent disclosure rolls while AVF benefits from NVF's tax-exempt status and anonymity.

III. Potential Violations of Alaska Law

A. Deceptive solicitation under AS 45.50.471

AS 45.50.471 prohibits unfair or deceptive acts or practices in trade or commerce, including representations that goods or services come from a source other than their actual source and omissions of material fact.[9] An Alaska donor who gives to "SalmonState" or the "Alaska Venture Fund" reasonably understands that they are supporting an Alaska nonprofit of that name. The donor is not told that no such legal entity exists, that the contribution actually goes to an unregistered District of Columbia corporation, or that the project may be wound down, transferred, or discontinued at the sponsor's discretion.

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[7] Alaska Stat. § 10.20.325 (grounds for involuntary dissolution); Alaska Stat. § 10.20.452 (continued existence for certain purposes); Alaska Stat. § 10.20.455 et seq. (admission of foreign corporation; authority to conduct affairs in the state).

[8] Alaska Venture Fund, "About," https://alaskaventurefund.org/about/; Suzanne Downing, "Arabella still pulls the strings," Must Read Alaska, September 4, 2025.

[9] Alaska Stat. § 45.50.471 (unlawful acts and practices; deceptive solicitation); Alaska Stat. § 45.68.050 (unlawful practices in charitable solicitation, including deceptive acts described in AS 45.50.471); see also AS 45.50.501 (restraining prohibited acts) and AS 45.50.551(b) (civil penalties of not less than $1,000 and not more than $25,000 for each violation).

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The Washington Free Beacon has reported that staff of sponsored projects were prohibited from discussing their ties to the broader network, and that Arabella Advisors classified project account managers as contractors, with the effect of keeping them off NVF's public filings.[10] Where the organizational design is directed at obscuring the relationship between solicitor and sponsor, the AS 45.50.471 inquiry is engaged.

B. Documented ballot-measure activity and APOC matters for referral

APOC filings document NVF's participation in Alaska elections across multiple cycles. Though within APOC's primary jurisdiction, those filings bear on the deceptive-solicitation analysis because they show the scale of NVF's undisclosed presence in Alaska.

In 2016, NVF was the largest donor to the Ballot Measure 1 campaign that established automatic voter registration through the Permanent Fund Dividend application. APOC records reflect NVF contributions of more than $1,000,000 to the supporting committee, representing about 74 percent of the campaign's total cash receipts.[11]

NVF did the same in 2018 with the Stand for Salmon initiative (Ballot Measure 1), contributing $263,318 in cash and in-kind support to the Yes for Salmon committee.[12] Campaign director Ryan Schryver testified at a September 2018 APOC hearing that his paychecks came directly from NVF and he reported to SalmonState.[13]

[10] Andrew Kerr and Joseph Simonson, "Documents Provide Rare Glimpse Into How Arabella Advisors Exerts Centralized Control Over a Vast Left-Wing Advocacy Network," Washington Free Beacon, July 10, 2023, https://freebeacon.com/elections/documents-provide-rare-glimpse-into-how-arabella-advisors-exerts-centralized-control-over-a-vast-left-wing-advocacy-network/.

[11] Alaska Public Offices Commission, Group Registration and Reports for PFD Automatic Voter Registration (2016 Ballot Measure 1); "Alaska Voter Registration via the Permanent Fund Dividend Application, Ballot Measure 1 (2016)," Ballotpedia.

[12] Alaska Public Offices Commission, Group Registration and Reports for Yes for Salmon (2018 Ballot Measure 1); "New Venture Fund," Ballotpedia; Alaska Stat. § 15.13.040 (contributions, expenditures, and supplying of services to be reported); Alaska Stat. § 15.13.074(b) (prohibited contributions; the true-source disclosure requirement was added by 2020 Ballot Measure 2 and postdates the conduct described); Alaska Stat. § 15.13.380 (violations; limitations on actions); Alaska Stat. § 15.13.390 (civil penalty; late filing of required reports).

[13] Alaska Public Offices Commission, hearing of September 2018 on complaint concerning Yes for Salmon (testimony of Ryan Schryver); Alex DeMarban, "Stand for Alaska adds to allegation of 'dark money' in Ballot Measure 1 campaign," Anchorage Daily News, September 26, 2018.

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The proceeding surfaced the structural concern at the heart of this referral. Commissioner Tim Dietz asked how an average Alaska voter could ascertain who was funding the campaign when the money moved through NVF. Opposing attorney Matt Singer of Holland & Knight put it more directly after the hearing, telling the Anchorage Daily News that SalmonState is:

"not a real organization. They call themselves SalmonState, but are just a project of New Venture Fund."

The inquiries are complementary: whether the "true source" of the 2016 and 2018 contributions was adequately disclosed under AS 15.13.040 also bears on whether the same conduct violated AS 45.68 and AS 45.50.[14]

C. AVF: opacity by design

AVF presents a distinct concern: AAF has not identified documented express advocacy by AVF, and that is itself the difficulty. AVF's expenditures flow through NVF's consolidated Form 990; it files no separate federal return and makes no specific financial disclosure available to the Department, APOC, or the public. If AVF has engaged in activity that would require AS 45.68 disclosure or APOC registration from an independent Alaska nonprofit, the sponsorship structure hides that activity from state investigators.

Where the aggregated activity includes politically sensitive Alaska expenditures, the consolidation functions as concealment. The Department should examine AVF's fiscal records under AS 45.68.070, and use its investigative authority under AS 45.50.495, to determine whether AVF's spending would have required disclosure if undertaken by an independent Alaska nonprofit.

IV. Relief Requested

AAF respectfully requests that the Department:

1. Open an investigation under AS 45.68 and the Department's general supervisory authority over charitable solicitation, directed at NVF, SalmonState, and AVF, covering 2015 through the present.

[14]Alaska Stat. § 15.13.030 (duties of the Alaska Public Offices Commission); Alaska Stat. § 15.13.045 (investigations and hearings); Alaska Stat. § 24.45 (Regulation of Lobbying); 2 AAC 50.

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2. Investigate whether SalmonState transacted business in Alaska after its March 2018 involuntary dissolution in a manner not authorized by AS 10.20.452, and whether NVF's Alaska activities through SalmonState and AVF, including charitable solicitation, fall within its authority as a registered foreign corporation.[15]

3. Examine, under AS 45.50.471 and AS 45.50.495, whether the fiscal-sponsorship arrangement as implemented by NVF for SalmonState and AVF constitutes an unfair or deceptive act or practice in the solicitation of Alaska donors, including the failure to disclose the legal identity of the entity receiving contributions, the absence of any registered Alaska entity by the name solicited, and the concealment practices reported in connection with NVF's broader fiscal sponsorships.[16]

4. Seek injunctive relief requiring NVF, SalmonState, and AVF to cease soliciting Alaska donors until fully compliant; require corrective disclosure to affected donors; and pursue restitution or disgorgement of contributions raised in violation of the Act.[17]

5. Require, as a condition of any resolution, that NVF disclose the complete budget, compensation structure, and programmatic activity of each fiscally sponsored project that has solicited in Alaska for the period under investigation.

Respectfully submitted,
Thomas Jones, President
American Accountability Foundation

[15]Alaska Stat. § 10.20.325 (grounds for involuntary dissolution); Alaska Stat. § 10.20.452 (continued existence for certain purposes); Alaska Stat. § 10.20.455 et seq. (admission of foreign corporation); Alaska Stat. § 10.20.480 (application for certificate of authority).

[16]Alaska Stat. § 45.50.471 (unlawful acts and practices); Alaska Stat. § 45.50.495 (investigative power of attorney general); Kerr and Simonson, "Documents Provide Rare Glimpse."

[17]Alaska Stat. § 45.50.501 (action by attorney general for injunctive relief and other equitable remedies, including restitution); Alaska Stat. § 45.50.471(b)(36) (violation of AS 45.68 as an unlawful trade practice); Alaska Stat. § 45.68.110 (remedies not exclusive).

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