

BEFORE THE FEDERAL ELECTION COMMISSION

NRSC
425 2nd St. NE
Washington, D.C. 20002

Complainant,

v.

MUR No. _____

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

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

Respondents.

COMPLAINT

This complaint is filed pursuant to 52 U.S.C. § 30109(a)(1) and will show that there is reason to believe Daniel J. Sullivan and Amber Lee of Amber Lee Strategies have engaged in a coordinated scheme to launch a U.S. Senate candidacy in violation of the Federal Election Campaign Act's prohibition on fraudulent misrepresentation of campaign authority at 52 U.S.C. §30124.

I. Facts

On May 29, 2026, an individual named Daniel J. Sullivan, Jr. from Petersburg, Alaska with no history of Republican Party registration, filed a Declaration of Candidacy to run as a Republican for Alaska's U.S. Senate seat currently held by incumbent Republican Senator Dan Sullivan.¹ In fact, the challenger has a documented history of supporting Democrats, including Senator Sullivan's opponent, Democrat Mary Peltola.²

The challenger's campaign logo and website closely mimics incumbent Senator Sullivan's campaign branding, featuring a near-identical navy blue, white, and yellow color

¹ Alaska Division of Elections, Candidates, <https://www.elections.alaska.gov/candidates> (last visited June 1, 2026).

² See Attachment A listing the challenger's numerous donations to Democrats nationwide, including \$130 to Mary Peltola, \$100 to Alaska Democrat Scott McAdams, and \$50 to Kat Abughazaleh for Illinois, a self-described progressive and democratic socialist.

scheme with near-identical imagery, font and typography, prominent display of the last name “Sullivan,” and the same Alaska North Star over the entire logo.³

Even the press release announcing the candidate’s ballot filing leans into the misappropriation by using the spoof logo and an identical name formulation.⁴ Importantly, the metadata from the Respondent Candidate’s press release identifies Amber Lee, of Amber Lee Strategies, a consulting firm with an exclusively progressive client roster, as its author.⁵ 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 federal PAC that has been a supporter of Mary Peltola, U.S. Senator Sullivan’s Democrat opponent.⁶

II. Summary of the Law

Both the Federal Election Campaign Act and its regulations prohibit any candidate for Federal office⁷ or their agents from “fraudulently misrepresent[ing] himself or any committee or organization under his control as speaking or writing or otherwise acting for or on behalf of any other candidate or political party ... on a manner which is damaging to such other candidate or political party [...]”⁸ In addition, the statute prohibits “willfully and knowingly participat[ing] in or conspir[ing] to participate in any plan, scheme, or design to violate” the above provision.⁹

Indeed, a federal court interpreting this statute found that, “[e]ven absent an express misrepresentation, a representation is fraudulent if it was reasonably calculated to deceive persons of ordinary prudence and comprehension.”¹⁰ In that case, the court made clear that violations of this statute occur when a “jury could reasonably infer that a defendant knew that her conduct was unauthorized and illegal.”¹¹

III. Analysis

As detailed below, the ample information on the public record supports finding reason to believe that Daniel J. Sullivan and Amber Lee/Amber Lee Strategies fraudulently misrepresented the candidacy of an undeclared voter principally to deceive and mislead Alaskan voters to the

³ See Attachment B (comparison of the logos and websites).

⁴ <https://www.sullivanforsenate.com/press>.

⁵ See Attachment C (Metadata on press release). See also, *Senator Dan Sullivan Has a New Challenger in Alaska: Dan Sullivan*, N.Y. TIMES (May 31, 2026).

⁶ Expenditures of Vote Alaska Before Party PAC to Amber Lee Strategies, https://www.fec.gov/data/disbursements/?recipient_name=amber+lee&data_type=processed.

⁷ Respondent’s actions demonstrate he has triggered federal candidacy and we presume that Respondent will file a Statement of Candidacy and a Statement of Organization with the Commission as required by law. We will supplement this Complaint with that information.

⁸ 52 U.S.C. §30124; 11 C.F.R. §110.16(b)(1).

⁹ *Id.*

¹⁰ *FEC v. Novacek*, 739 F. Supp. 2d 957,961 (N.D. Tex. 2010).

¹¹ *Id.*

detriment of another candidate. The fraudulent misrepresentation of campaign authority statute was written precisely to prevent situations such as the one occurring in Alaska's U.S. Senate race.

To establish a violation, the law first requires that an individual is fraudulently acting on behalf of another federal candidate. Here, Respondents are using the identical name, party affiliation and logo of another federal candidate to intentionally mislead and confuse voters. A side-by-side comparison of the two campaign logos presented at Attachment B immediately establishes this to be the case. Respondents are fraudulently impersonating Republican U.S. Senator Dan Sullivan.

The second element necessary to establish a violation of the law is the intent that such fraudulent misrepresentation is reasonably calculated to deceive persons of ordinary prudence and comprehension. As detailed below, there can be no doubt that Respondents launched a copycat candidacy that is "reasonably calculated to deceive persons of ordinary prudence and comprehension." In fact, deception appears to be their primary purpose and thus the requisite intent is also established.

First, the styling of Respondent's campaign logo, website and materials mimic the exact campaign branding of incumbent Republican Senator Dan Sullivan in clear violation of the law. It defies all logic that an individual who specifically stated the purpose of his candidacy was to "Urge[] Alaskans to defeat incumbent" Senator Dan Sullivan would closely associate himself with that candidate by using his well-recognized name and long-standing campaign branding. The only plausible explanation for those tactics is to mislead and confuse Alaska voters when they go to the voting booth exactly as the law prohibits.

Second, the incongruity between the sudden Republican candidacy of an undeclared voter with a long record supporting Democrats can only be reconciled if the Respondent's intent is to mislead and confuse Alaska voters. Respondent candidate's most recent voter registration record indicates his party affiliation is undeclared. He has donated to Mary Peltola, a Democrat he now purportedly seeks to defeat. And he has given hundreds of dollars over the years to other Democrats. Given this record, there is no other explanation for Respondents' actions than an intent to deceive and mislead Alaska voters.

Third, Amber Lee's work to author a press release on behalf of a purported Republican candidate reveals her intent to mislead Alaska voters in violation of the law. Amber Lee is a progressive Democrat campaign consultant who supports an announced Democrat candidate in the U.S. Senate race. She has a long history of working exclusively for progressive causes and candidates. Yet, she is identified as the author of a press release promoting Respondent's Republican candidacy for Senate. In light of these facts, Lee's obvious motivation is to deceive and mislead Alaska voters to boost the Democrat candidate she supports. Moreover, the Commission must consider the fact that Lee is a professional political consultant with years of experience and is presumably well versed in the federal campaign finance law's prohibition of this type of fraud. Although the legal standard for intent does *not* require specific knowledge of the statute, only an intent calculated to deceive, Lee has demonstrated the necessary intent by any reading of the standard.

Fourth, the Respondent candidate's coordination with Lee also reveals his intent to deceive voters of ordinary prudence. No candidate truly seeking to prevail in an election would have any incentive to share the most confidential details of an impending candidacy with an ally of another candidate of the opposite party in the same race. But Respondent candidate is not seeking to prevail; he is seeking to confuse and deceive voters in a manner that is damaging to U.S. Senator Dan Sullivan. Thus, the Commission should conclude that the Respondent's conduct is reasonably calculated to deceive persons of ordinary prudence and comprehension when they enter the ballot booth to cast their vote.

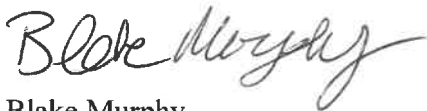
Finally, there can be no doubt that Respondents' conduct is damaging to another federal candidate and thus establishes the third and final element of a violation. He has no visible fundraising apparatus or FEC filings. But by filing to appear on the ballot alongside the incumbent Republican U.S. Senator with the same name and party affiliation, Respondent is attempting to siphon votes away from the incumbent Republican U.S. Senator.

In sum, Respondents have engaged in a knowing and willful scheme to fraudulently misrepresent a federal candidacy with the intent to deceive Alaska voters of ordinary prudence to damage Senator Dan Sullivan's reelection prospects. Accordingly, there is a clear basis for the Commission to find reason to believe that the Respondents have violated 52 U.S.C. §30124.

IV. Prayer for Relief

The Commission should find reason to believe that Daniel J. Sullivan and Amber Lee knowingly and willfully violated 52 U.S.C. §30124 and conduct an immediate investigation. Furthermore, the Commission should sanction to the fullest extent of the law all violations that it finds, should enjoin Respondents from engaging in this conduct in the future, and should impose such additional remedies as are necessary and appropriate to ensure compliance with the Federal Election Campaign Act. Finally, should the Commission determine that the conduct at issue in this matter was knowing and willful, it should exercise its authority under 52 U.S.C. §30109(a)(5)(C) to refer this matter to the U.S. Department of Justice for further review.

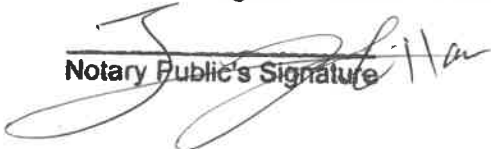
Respectfully submitted,

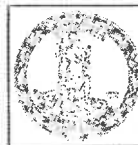


Blake Murphy
General Counsel
NRSC

Commonwealth of Virginia
City/County of Arlington

This instrument was acknowledged before me
on 6th day of June, 2026 by Blake Murphy


Notary Public's Signature



Junyong Han
Commonwealth of Virginia
Notary Public
Commission No. 7984615
My Commission expires 11/30/2026

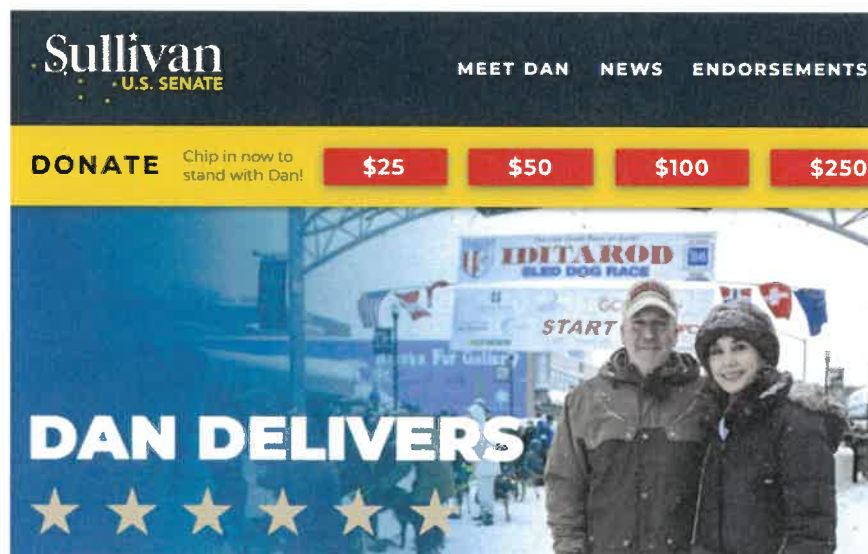
ATTACHMENT A

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

ATTACHMENT B

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



Respondent's Logo and Website



WE NEED A SULLIVAN WHO STANDS UP FOR ALASKA

ATTACHMENT C



FOR IMMEDIATE RELEASE
May 29, 2026
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 son of Dan and Katherine Sullivan, instilled traditional American values, responsibility, and a commitment to serving others. He has found lacking in

The shacshave his songs Sullivan Sullivan spent his childhood on having saby them instructi forestry. Those experiences shaped his understand and gave him a deep appreciation for the value of hard work and self-reliance.

File Name	Sullivan_Release_052926.pdf
Document Type	PDF document
PDF Version	1.3
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Author	Amber Lee
Subject	
PDF Producer	macOS Version 14.0 (Build 22H1222) 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.