

BEFORE THE FEDERAL ELECTION COMMISSION

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

Complainant,

v.

MUR No. _____

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

Sullivan for Senate
P.O. 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 demonstrates that there is reason to believe that Daniel J. Sullivan, Jr., a publicly declared candidate for Alaska’s U.S. Senate seat, has accepted impermissible and/or excessive in-kind contributions in violation of the Federal Election Campaign Act of 1971, as amended (“FECA”) and that Amber Lee or Amber Lee Strategies LLC have made or facilitated excessive or impermissible in-kind contributions to a federal candidate in violation of FECA.

I. Facts

On May 28, 2026, an individual named Daniel J. Sullivan, Jr. from Petersburg, Alaska, who has no history of registration or participation in the Republican Party, signed 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 The Declaration and \$100 filing fee were received by the Alaska Division of Elections on May 29, 2026.²

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

² *Id.*

On May 29, 2026, Respondent candidate published a press release announcing his entrance into the U.S. Senate race.³ According to metadata embedded in the document, the press release was authored by Amber Lee of Amber Lee Strategies LLC, a consulting firm with an exclusively progressive client roster, although the release did not announce this fact.⁴ However, Respondent candidate later conceded in an interview that “Lee helped build the logo for his campaign materials.”⁵

Federal Election Commission records show that Amber Lee’s consulting firm, Amber Lee Strategies LLC, has received thousands of dollars for “PAC Strategy Consulting” from a federal Super PAC that has supported Mary Peltola, U.S. Senator Sullivan’s Democrat opponent.⁶ In addition to consulting fees, Amber Lee Strategies received a total of \$2,307.20 for “website” in 2024 from the same Super PAC.⁷ Amber Lee Strategies’ website lists clients including several Democrat candidates for the Alaska State Legislature and notes that the firm has “Expertise in Marketing, Communications, Campaign, and Digital Strategies.”⁸ Campaign finance disclosures from the state of Alaska show that she has billed other campaigns \$2,500.00 per month at regular 30-day intervals for “Campaign Management.”⁹ In an interview on June 8, 2026, Respondent candidate admitted that “he hasn’t yet paid Lee for her work. ‘We’re still working on those details,’ he said.”¹⁰

On May 28, 2026, records indicate that the campaign website domain, “SullivanforSenate.com” was registered.¹¹ Campaigns must pay to register website domain names, and on some occasions have paid substantial amounts to purchase a domain featuring a candidate’s name from its owner.¹² The Respondent candidate’s website published on this domain contains professional headshot photographs, a professionally written candidate biography with multiple photos, a professionally designed campaign logo that mimics the logo of

³ www.sullivanforsenate.com/press.

⁴ See Attachment A (Metadata embedded in press release). *See also, Senator Dan Sullivan Has a New Challenger in Alaska: Dan Sullivan*, N.Y. TIMES (May 31, 2026).

⁵ Alex DeMarhan, “Sen. Dan Sullivan’s namesake challenger says he can legally run and isn’t backing down”, Anchorage Daily News, June 8, 2026 available here: <https://www.adn.com/politics/2026/06/08/sen-dan-sullivans-namesake-challenger-says-he-can-legally-run-and-isnt-backing-down/>.

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

⁷ See July 25, 2024 and July 30, 2024 expenditures of Vote Alaska Before Party PAC to Amber Lee Strategies for “website” available at: https://www.fec.gov/data/disbursements/?recipient_name=amber+lee&data_type=processed.

⁸ https://www.amberleestrats.com/?_sm_nck=1.

⁹ See, e.g., Campaign Disbursements of Alaska Democrat Legislative Candidate Carolyn Hall available here: <https://aws.state.ak.us/apocreports/Common/View.aspx?ID=43806&ViewType=CD>.

¹⁰ DeMarhan, *supra* note 5.

¹¹ See Attachment B (screenshot of web domain reservation for sullivanforsenate.com).

¹² Kurtis Lee, “\$100,000 for a website domain name? Rand Paul pays up,” L.A. Times, May 6, 2025, available here: <https://www.latimes.com/nation/politics/politicsnow/la-pn-rand-paul-domain-name-20150506-story.html>.

Republican U.S. Senator Dan Sullivan’s campaign, and a privacy policy.¹³ The Respondent candidate also admitted that in addition to Lee, “other people he declined to name” are working on registering his Senate campaign with the FEC.¹⁴

News reports indicate that a Facebook account linked to [sullivanforsenate.com](https://www.sullivanforsenate.com) was also created on May 28, 2026.¹⁵ An Instagram account is also linked to the campaign website.¹⁶

According to the Alaska Department of Commerce, Community, and Economic Development, Amber Lee Strategies is organized as a limited liability company.¹⁷ The public record does not reveal whether the entity is taxed as a corporation or treated as a disregarded entity. Regardless of its corporate form or tax treatment, there no be no doubt that the LLC is a for-profit enterprise that regularly renders campaign management and communications consulting services to federal and state political committees in exchange for compensation. It is not a charity. And Respondent candidate concedes that he retained Lee to provide the campaign services; she is not volunteering her time.

To date, Daniel J. Sullivan has not filed a Statement of Candidacy with the FEC, has not designated a principal campaign committee despite referring to an entity called Sullivan for Senate on his campaign website, and has not yet filed periodic campaign finance reports.¹⁸ Upon information and belief, the first such report will be due on July 15, 2026. We reserve the right to supplement this Complaint with any additional information that becomes available as a result of any future filings.

II. Summary of the Law

Under the Federal Election Campaign Act, contributions to federal candidates are subject to limits and source prohibitions.¹⁹ The implementing regulations at 11 CFR §100.52(a), (d)(1) make this clear. Specifically, FECA defines a “contribution” as “. . . anything of value made by any person for the purpose of influencing any election for Federal office.”²⁰ Additionally, a

¹³ See generally, <https://www.sullivanforsenate.com/>.

¹⁴ DeMarhan, *supra* note 5.

¹⁵ Azi Paybarah, “A ‘Dan Sullivan’ suddenly appeared in race to unseat Alaska GOP Sen. Dan Sullivan,” Straight Arrow News, June 3, 2026, available at: <https://san.com/cc/dan-sullivan-alaska-senate/>.

¹⁶ https://www.instagram.com/sullivanforsenate?sm_nck=1.

¹⁷ State of Alaska Department of Commerce, Community, and Economic Development, Corporations, Business & Professional Licensing Database records available here: <https://www.commerce.alaska.gov/cbp/main/search/entities> (search for entity name “Amber Lee Strategies”).

¹⁸ Fed. Election Comm’n, Candidate and Committee Profiles, <https://www.fec.gov/data/search/?search=dan+sullivan> (depicting no candidates by the name “Dan Sullivan” running in the 2026 U.S. Senate election in Alaska beyond the incumbent Senator). The Respondent candidate’s website also refers to an entity called “Dan Sullivan for Alaska.” However, the Respondent candidate confirmed in an interview with the Anchorage Daily News that his principal campaign committee will be called “Sullivan for Senate” (DeMarhan, *supra* Note 5).

¹⁹ 52 U.S.C. § 30116(a)(1)(A).

²⁰ 52 U.S.C. § 30101(8)(A)(i).

contribution is defined to include “the payment by any person of compensation for the personal services of another person which are rendered to a political committee.”²¹ A candidate or political committee is prohibited by law from knowingly accepting contributions that exceed the limits or violate the source prohibitions.²²

Moreover, FEC regulations provide that a “loan is a contribution at the time it is made and is a contribution to the extent that it remains unpaid.”²³ Furthermore, a “loan that exceeds the contribution limitations of 52 U.S.C. 30116 and 11 CFR part 110 shall be unlawful whether or not it is repaid.”²⁴

A commercial vendor such as Amber Lee Strategies LLC must follow specific rules when extending credit to federal political committees. Under the regulations, “an extension of credit [to a federal candidate] will not be considered a contribution to the candidate or political committee provided that the credit is extended in the ordinary course of the commercial vendor's business and the terms are substantially similar to extensions of credit to nonpolitical debtors that are of similar risk and size of obligation.”²⁵ When determining whether a loan is extended within the ordinary course of business, the Commission considers three factors: (1) “[w]hether the commercial vendor followed its established procedures and its past practice in approving the extension of credit; (2) [w]hether the commercial vendor received prompt payment in full if it previously extended credit to the same candidate or political committee; and (3) [w]hether the extension of credit conformed to the usual and normal practice in the commercial vendor's trade or industry.”²⁶ Thus, extensions of credit outside the usual and normal practice are not exempt and are therefore considered contributions to the campaign.

In the 2026 election cycle, individuals and LLCs taxed as partnerships may contribute no more than \$3,500.00 for the 2026 primary election to any federal candidate.²⁷ Assuming Amber Lee Strategies is a disregarded entity, the maximum contribution (whether direct or in-kind) that it may make to Sullivan for Senate is \$3,500.00 per election.

Corporate contributions to federal candidates—whether cash or in-kind—are prohibited under federal law.²⁸ If Amber Lee Strategies is taxed as a corporation, any in-kind contributions from the firm to a federal candidate committee are unlawful.

²¹ 52 U.S.C. § 30101(8)(A)(ii).

²² 52 U.S.C. § 30116(f).

²³ 11 C.F.R. §100.52(b)(2).

²⁴ 11 C.F.R. §100.52(b)(1).

²⁵ 11 C.F.R. §116.3(a).

²⁶ *Id.* at §116.3(c).

²⁷ 11 C.F.R. §110.1(e) and (g); see also Fed. Election Comm’n, *Contribution Limits for 2025-2026*, available at: <https://www.fec.gov/resources/cms-content/documents/contribution-limits-chart-2025-2026.pdf>.

²⁸ 52 U.S.C. § 30118. 11 C.F.R. § 114.2(a).

III. Analysis

As detailed below, the ample information on the public record suggests that Amber Lee Strategies LLC extended credit to Daniel J. Sullivan, Jr. outside the ordinary course of business for political campaign consultants and therefore likely made an excessive contribution to a federal candidate. This same record demonstrates that Daniel J. Sullivan, Jr. accepted an impermissible contribution in violation of FECA.

The Respondent candidate has publicly conceded that as of June 8, 2026, he had not yet paid Amber Lee Strategies for any consulting work performed on behalf of his U.S. Senate campaign and that the parties are “still working on [] details” concerning the terms of their engagement weeks after the campaign publicly launched. This is, to put it lightly, atypical and is not consistent with the ordinary course of business for political communications consultants. It is not the usual and normal practice in the trade of political communications consulting for vendors to leave the terms of their engagement undefined even after performing services on behalf of a campaign client. Rather, it is the usual and normal practice in this industry for vendors to require a written agreement stipulating an agreed rate and terms of payment before commencing work.

Moreover, it is standard in this industry for vendors to require payment in full within 30 days of rendering services. Indeed, Amber Lee has typically billed her state campaign clients every 30 days for campaign services.²⁹ Based upon the volume of work Amber Lee completed for the Respondent candidate’s campaign launch on May 28, 2026, it appears that she had been rendering services to the Respondent candidate for at least several weeks preceding the campaign launch date. If Amber Lee Strategies LLC were following the standard practice for the industry, the firm would have issued at least one invoice to the Respondent candidate and received payment as the regulations require. Yet, as of June 8, 2026, the Respondent candidate conceded he had not yet paid Amber Lee for any services or even finalized the terms of the engagement.³⁰

In addition, there is reason to believe that Amber Lee Strategies’ contribution to the Respondent candidate was either excessive or impermissible. Based on public disclosures of payments made by other federal and state political committees to Amber Lee Strategies, the approximate fair-market value of the communications, website design, and other consulting services that the firm has already provided to the Respondent candidate without compensation is at least \$5,000.00, and likely greater. Even if Amber Lee Strategies is a disregarded entity or taxed as a partnership, the amount of its contribution far exceeds the \$3,500.00 per election limit. If, by contrast, Lee’s firm is taxed as a corporation, the violation is even more serious, as its contribution in the form of an extension of credit constitutes an impermissible corporate contribution to the Respondent candidate and the entire amount must be refunded.

Taken together, these facts give rise to a reasonable inference that a violation has occurred. Nevertheless, we reserve the right to amend this Complaint with additional factual

²⁹ See, e.g., Campaign Disbursements of Alaska Democrat Legislative Candidate Carolyn Hall available here: <https://aws.state.ak.us/apocreports/Common/View.aspx?ID=43806&ViewType=CD>.

³⁰ DeMarhan, *supra* note 5.

information once the Respondent candidate and committee file the appropriate disclosures with the Commission to more precisely quantify the amount of the impermissible contributions at issue.

IV. Prayer for Relief

For the foregoing reasons, the Commission should find reason to believe that Daniel J. Sullivan, Jr. and Sullivan for Senate have accepted impermissible or excessive contributions from Amber Lee Strategies LLC. Should the Commission determine that Sullivan for Senate and Daniel J. Sullivan, Jr. have accepted impermissible or excessive contributions and that Amber Lee Strategies LLC has made impermissible or excessive contributions, the parties should be sanctioned to the fullest extent of the law.

Respectfully submitted,

Andrew Pardue 06/10/2026


Andrew Pardue
Deputy General Counsel
NRSC

ATTACHMENT A

Sullivan_Release_052926.pdf
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Search

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 14.2.1 (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



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 youngest of five children. His father, Dan and Katherine Sullivan, instilled traditional American values, responsibility, and a commitment to serving others. Sullivan carries these values with him today and principles he has found lacking in the current political climate.

The shacshave his songs Sullivan Sullivan spent his childhood summers in the woods and conditioning on having baby them instructed in the art of forestry. Those experiences shaped his understanding of the outdoors and gave him a deep appreciation for the value of hard work and self-reliance.

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

Domain Information

Name: SULLIVANFORSENATE.COM

Registry Domain ID: 3104905448_DOMAIN_COM-VRSN

Domain Status:

[clientDeleteProhibited](#)

[clientRenewProhibited](#)

[clientTransferProhibited](#)

[clientUpdateProhibited](#)

Nameservers:

CONNECT1.SQUARESPACEDNS.COM

CONNECT2.SQUARESPACEDNS.COM

Dates

Registry Expiration: 2027-05-28 20:24:33 UTC

Registrar Expiration: 2027-05-28 15:24:33 UTC

Updated: 2026-06-04 08:49:36 UTC

Created: 2026-05-28 20:24:33 UTC

DESCRIPTION OF ATTACHED DOCUMENT

Title or Type of Document: Certificate of Acknowledgement

Document Date: 06/10/2026

Number of Pages (including notarial certificate): 9



YAKSIN MAURA MOLINA
Notary Public - State of Florida
Commission # HH617041
Expires on December 2, 2028

State of Florida

County of Marion-Oaks

This foregoing instrument was acknowledged before me by means of online notarization, this 06/10/2026 by Andrew Pardue.

A handwritten signature in blue ink, appearing to read "YAKSIN MAURA MOLINA".

Yaksin Maura Molina

Personally Known OR Produced Identification

Type of Identification Produced DRIVER LICENSE

Notarized remotely online using communication technology via Proof.