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File Number:
11,140-14

January 6, 2021

Shelly Heyduk
D: +1 949 823 7968
sheyduk@omm.com

VIA E-MAIL (shareholderproposals@sec.gov)

Office of Chief Counsel
Division of Corporation Finance
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: *Alaska Air Group, Inc.*
Shareholder Proposal of John Chevedden
Securities Exchange Act of 1934 Rule 14a-8

Dear Ladies and Gentlemen:

We submit this letter on behalf of our client, Alaska Air Group, Inc., a Delaware corporation (the "Company"), which requests confirmation that the staff (the "Staff") of the Division of Corporation Finance of the U.S. Securities and Exchange Commission (the "Commission") will not recommend enforcement action to the Commission if, in reliance on Rule 14a-8 under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), the Company omits the enclosed stockholder proposal (the "Proposal") and statement in support thereof (the "Supporting Statement") submitted by John Chevedden (the "Proponent"), from the Company's proxy materials for its 2021 Annual Meeting of Stockholders (the "2021 Proxy Materials").

Pursuant to Rule 14a-8(j) under the Exchange Act, we have:

- filed this letter with the Commission no later than eighty (80) calendar days before the Company intends to file its definitive 2021 Proxy Materials with the Commission; and
- concurrently sent copies of this correspondence to the Proponents.

A copy of the Proposal and Supporting Statement and the Proponent's cover correspondence submitting the Proposal are attached hereto as Exhibit A. Copies of other correspondence with the Proponent regarding the Proposal are attached hereto as Exhibit B. The Company has not received any other correspondence relating to the Proposal.

Pursuant to the guidance provided in Section F of Staff Legal Bulletin No. 14F (October 18, 2011), we ask that the Staff provide any written response to this request to Shelly Heyduk, on behalf of the Company, at sheyduk@omm.com, and to the Proponent by email to John Chevedden, at ***

I. SUMMARY OF THE PROPOSAL

On November 30, 2020, the Company received an email from John Chevedden containing the Proposal and Supporting Statement for inclusion in the Company's 2021 Proxy Materials. The Proposal states as follows:

Political Spending Disclosure

Resolved, Shareholders request that the Company provide a report, updated semiannually, disclosing the Company's:

1. Policies and procedures for making, with corporate funds or assets, contributions and expenditures (direct or indirect) to (a) participate or intervene in any campaign on behalf of (or in opposition to) any candidate for public office, or (b) influence the general public, or any segment thereof, with respect to an election or referendum.
2. Monetary and non-monetary contributions and expenditures (direct and indirect) used in the manner described above, including:

The report shall be presented to the board of directors and posted on the Company's website within 12 months from the date of the annual meeting. This proposal does not encompass lobbying spending.

See [Exhibit A](#) for a complete copy of the Proposal and Supporting Statement. Virtually identical proposals were submitted to the Company in connection with the Company's 2020 annual meeting of stockholders and 2019 annual meeting of stockholders (by the Proponent, in the case of the 2020 annual meeting of stockholders, and by the Proponent on behalf of Mr. Steve Nieman in connection with the 2019 annual meeting of stockholders).

II. EXCLUSION OF THE PROPOSAL

As discussed more fully below, the Company believes that it may properly exclude the Proposal from its 2021 Proxy Materials in reliance on Rule 14a-8(i)(10) because the Company has substantially implemented the Proposal.

The Proposal May Be Excluded Pursuant to Rule 14a-8(i)(10) Because It Has Been Substantially Implemented by the Company

Rule 14a-8(i)(10) Background

Rule 14a-8(i)(10) permits a company to exclude a stockholder proposal from its proxy materials if the company has substantially implemented the proposal. In explaining the scope of a predecessor to Rule 14a-8(i)(10), the Commission said that the exclusion is "designed to avoid the possibility of shareholders having to consider matters which already have been favorably acted upon by the management." See Exchange Act Release No. 12598 (July 7, 1976) (discussing the rationale for adopting the predecessor of Rule 14a-8(i)(10), which provided as a

substantive basis for omitting a stockholder proposal that “the proposal has been rendered moot by the actions of the management”). At one time, the Staff interpreted the predecessor rule narrowly, considering a proposal to be excludable only if it had been “‘fully’ effected” by the company. See Exchange Act Release No. 19135 at § II.B. 5 (Oct. 14, 1982). The Commission later recognized, however, that the Staff’s narrow interpretation of the predecessor rule “may not serve the interests of the issuer’s security holders at large and may lead to an abuse of the security holder proposal process,” in particular by enabling proponents to argue “successfully on numerous occasions that a proposal may not be excluded as moot in cases where the company has taken most but not all of the actions requested by the proposal.” *Id.* Accordingly, the Commission proposed in 1982 and adopted in 1983 a revised interpretation of the rule to permit the omission of proposals that had been “substantially implemented.” See Exchange Act Release No. 20091 at § II.E.6 (Aug. 16, 1983) (indicating that the Staff’s “previous formalistic application of” the predecessor rule “defeated its purpose” because the interpretation allowed proponents to obtain a stockholder vote on an existing company policy by changing only a few words). The Commission later codified this revised interpretation in Exchange Act Release No. 40018 at n.30 (May 21, 1998) (the “1998 Release”). Thus, when a company can demonstrate that it has already taken action to address the underlying concerns and essential objectives of a stockholder proposal, the Staff has concurred that the proposal has been “substantially implemented” and may be excluded. See, e.g., *Exelon Corp.* (avail. Feb. 26, 2010) (permitting exclusion of a proposal requesting a report regarding political contributions where the company’s pre-existing political contribution policies and procedures addressed the stated requirements of the proposal and satisfied its essential objective). See also *General Electric Co.* (avail. Mar. 3, 2015); *Exxon Mobil Corp. (Burt)* (avail. Mar. 23, 2009); *Anheuser-Busch Companies, Inc.* (avail. Jan. 17, 2007); *ConAgra Foods, Inc.* (avail. July 3, 2006); *Johnson & Johnson* (avail. Feb. 17, 2006); *Talbots Inc.* (avail. Apr. 5, 2002); *Exxon Mobil Corp.* (avail. Jan. 24, 2001); *Masco Corp.* (avail. Mar. 29, 1999); and *The Gap, Inc.* (avail. Mar. 8, 1996).

Applying this standard, the Staff has noted that “a determination that a company has substantially implemented the proposal depends upon whether [the company’s] particular policies, practices and procedures compare favorably with the guidelines of the proposal.” *Texaco, Inc.* (avail. Mar. 28, 1991). Even if a company’s actions do not go as far as those requested by the stockholder proposal, they nonetheless may be deemed to “compare favorably” with the requested actions. See, e.g., *Exxon Mobil Corp.* (avail. Mar. 23, 2009) (permitting exclusion of a proposal requesting a report regarding political contributions where the company’s pre-existing political contribution policies and procedures compared favorably to the proposal at issue, despite the disclosures not being as fulsome as the proponent had contemplated, and the analysis not rising to the level of detail that the proponent desired); *Walgreen Co.* (avail. Sept. 26, 2013) (permitting exclusion of a proposal requesting elimination of supermajority voting requirements in the company’s governing documents where the company had eliminated all but one of the supermajority voting requirements.); and *Johnson & Johnson* (avail. Feb. 17, 2006) (permitting exclusion of a proposal that requested the company to confirm the legitimacy of *all* current and future U.S. employees because the company had verified the legitimacy of 91% of its domestic workforce). In other words, a company can satisfy the substantial implementation standard under Rule 14a-8(i)(10) by satisfactorily addressing the

underlying concerns and essential objectives of a stockholder proposal even where the company’s actions do not precisely mirror the terms of such proposal.

The Company’s Political Contributions Policy and Disclosures

As described above, proposals substantially similar to the Proposal were submitted to the Company in connection with its 2020 and 2019 annual meetings of stockholders (receiving the support of approximately 42.1% and 44.7% of the votes cast at such meetings, respectively). In addition, a proposal seeking disclosure of the Company’s lobbying activities was submitted to the Company in connection with its 2020 annual meeting of stockholders (receiving the support of approximately 52.3% of the votes cast at such meeting). As a result of these proposals and the corresponding voting results, the Company’s Board of Directors and management team have taken concerted actions to improve and expand the Company’s public disclosures and reporting relating to its political contributions and lobbying activities. These actions included the adoption in 2019 by the Company’s Board of Directors of a formal policy regarding political contributions, published to the Governance section of the Company’s Investor Relations website, that set forth the Company’s practices regarding its political contribution, oversight and engagement processes. Following the Company’s 2020 annual meeting of stockholders, the Company undertook a more extensive analysis of public company practices related to public disclosure and board and management oversight of corporate political activities. In response, the Company’s Board of Directors adopted an enhanced policy statement regarding political contributions (the “Policy on Political Contributions and Engagement”) and, on November 13, 2020, the Company substantially expanded the disclosures it makes on its Investor Relations website regarding the Company’s political activities, both direct and indirect, to include disclosure of the Company’s corporate contributions to political candidates, parties and committees, political contributions from the Alaska Air Group, Inc. Political Action Committee (the “AAG PAC”), dues paid to trade associations of greater than \$25,000 and information regarding lobbying activities (together, the “Company Political Contribution Disclosures”). The Company’s Policy on Political Contributions and Engagement and the Company’s Political Contribution Disclosures are available at <https://investor.alaskaair.com/policy-political-contributions> and a copy is attached hereto as Exhibit C.

For the convenience of the Staff, the following table summarizes both the Proposal and relevant portions of the Company’s Policy on Political Contributions and Engagement and Company Political Contribution Disclosures (as set forth in Exhibit C). The Company believes this comparison demonstrates that the Company has substantially implemented the Proposal because policies, procedures and related disclosures described below compare favorably to the guidelines of the Proposal and address the essential objectives of the Proposal.

Proposal Language	Company Policy and Disclosures
The Proposal asks the Company to disclose its policies and procedures for making, with corporate funds and assets, contributions and expenditures (direct and indirect) to (a) participate or intervene in any campaign on behalf of (or in opposition to) any candidate	The Company has adopted and discloses on its corporate website (at the link referenced above) its Policy on Political Contributions and Engagement. In this policy, the Company describes its interests in advocating for policies in support of its

Proposal Language	Company Policy and Disclosures
<p>for public office, or (b) influence the general public, or any segment thereof, with respect to an election or referendum.</p>	<p>business and industry, including through, among other things, participating in trade associations and making political contributions where appropriate and permitted by the law. The policy includes detailed procedures for making political contributions and expenditures, directly and indirectly, including with respect to candidates for public office, political parties, referenda and ballot initiatives. Among other things, the Company's policy sets forth the following policies and procedures:</p> <ul style="list-style-type: none"> • The Company's policy describes that the Company complies with all federal, state and local laws and requirements associated with political engagement. The policy indicates that, consistent with federal campaign finance laws, the Company does not make corporate political contributions to federal candidates, political parties or political committees, but notes that some state and local jurisdictions permit the Company to contribute directly to state and local candidates, political parties, referenda and ballot initiatives and that political contributions may be made indirectly by the AAG PAC as permitted by applicable state and local laws and that federal contributions may also be made indirectly through the AAG PAC. • The policy provides detailed information regarding the AAG PAC, describing that it is non-partisan and organized on a strictly voluntary basis with participation only by eligible employees. The policy further describes how the AAG PAC is overseen, noting that all checks drawn from the AAG PAC must be approved by two AAG PAC Board members. • With respect to any political contribution by the Company, the policy provides that such contributions must be approved by the Company's General Counsel, the Vice President of External Relations, or a designee and must reflect the Company's

Proposal Language	Company Policy and Disclosures
	<p>interests and not those of its individual officers or directors. The policy also specifies factors that must be considered prior to approving any political contribution to a candidate. The policy further provides that the Vice President of External Relations annually determines the budget for political contributions.</p> <ul style="list-style-type: none"> • The policy describes the Company's interest in participating in certain trade associations and provides that the Company's Vice President of External Relations and Government Affairs Department is responsible for oversight of the Company's trade association participation. • The policy also sets forth the Company's policy for participation in the political process by its employees, describing that it may be done voluntarily (without reimbursement by the Company), may not suggest the Company's support or involve any unlawful use of Company resources and that the Company will not pressure or coerce employee participation or favor or disfavor any employee by reason of any political contribution decision. • The policy also sets forth the Company's policies with respect to its lobbying activities, although the Proposal explicitly does not encompass lobbying spending. • The policy also requires oversight by the Governance and Nominating Committee of the Company's Board of Directors, as further detailed below. <p>Based on the above, the Company believes its policies and procedures for political contributions compares favorably with the Proposal and achieves its essential objective.</p>
<p>The Proposal requests that the Company disclose all monetary and non-monetary contributions and expenditures (direct and indirect), including the identity of the recipient</p>	<p>Through active links included in the Company's Policy on Political Contributions and Engagement posted on the Company's website (at the link referenced above), the</p>

Proposal Language	Company Policy and Disclosures
<p>and the amount paid to each, and (b) the title(s) of the person(s) in the Company responsible for decision-making.</p>	<p>Company discloses its direct and indirect political contributions. The Company updates these disclosures semi-annually (generally, August and February of each year). Specifically, the Company discloses:</p> <ul style="list-style-type: none"> • All contributions by the Company to state and local candidates, political committees and political organizations and in regards to ballot measures. This list identifies the recipient (and his/her title, if applicable), the jurisdiction the recipient represents and the amount paid. • All contributions made by the AAG PAC. The list identifies the candidate, the state and district represented and the candidate’s office, the committee or political action committee to which the contribution was directed, the party affiliation and the amount paid. • Payments to trade associations for which the Company paid dues or payments of more than \$25,000 and who spend 10 percent or more of their revenues lobbying. The amount reported by the Company is the non-deductible portion of the payment. <p>In the Proponent’s Supporting Statement, the Proponent specifically identifies three companies that it cites as examples of “a growing number of leading companies” that present trade association information on their websites. The amount of payments disclosed by the Company pursuant to its policy equals or exceeds the amount of payments disclosed by two of the three examples cited by the Proponent. For example:</p> <ul style="list-style-type: none"> • The amount disclosed by Union Pacific pursuant to its policy is the same as the amount disclosed by the Company -- \$25,000 or more and where the trade association spends more than 10% on its lobbying activities. Union Pacific’s policy and disclosures are publicly available under “General Information” in the

Proposal Language	Company Policy and Disclosures
	<p>Investors section of its corporate website.</p> <ul style="list-style-type: none"> • United Parcel Service applies a higher disclosure threshold for payments to trade associations under its policy than does the Company. As stated in its policy, UPS will disclose the non-deductible portion of payments to trade associations where the total payment exceeded \$50,000. UPS’s policy is available under “ESG” in the Investors section of its corporate website. <p>Based on the above, the Company believes its disclosures of political contributions compares favorably with the Proposal and achieves its essential objective.</p>
<p>The Proposal requests that the Company disclose the title(s) of the person(s) in the Company responsible for decision-making with respect to the Company’s monetary and non-monetary contributions and expenditures (direct and indirect).</p>	<p>As detailed above, the Company’s Policy on Political Contributions and Engagement provides detailed information about the decision-making process for its political contribution activity and the person(s) responsible. For example, as stated in the Company’s policy:</p> <ul style="list-style-type: none"> • Any political contribution made by the Company must be approved by the Company’s General Counsel, Vice President of External Relations, or a designee. • The budget for corporate political contributions to the AAG PAC are determined annually by the Vice President of External Relations, in consultation, as appropriate, with the Company’s Chief Executive Officer and legal counsel to ensure compliance with corporate policy and applicable federal, state and local laws. • The AAG PAC is overseen by a five person board of directors, and its members include the Vice President of External Relations and the Company’s Chief Executive Officer.

Proposal Language	Company Policy and Disclosures
	<ul style="list-style-type: none"> • The Company’s Vice President of External Relations and its Government Affairs Department is responsible for oversight of the Company’s participation in trade associations, and the Vice President of External Relations is responsible for annually reviewing the Company’s participation in these associations and other public advocacy efforts. • The Company’s General Counsel and Vice President of External Relations are responsible for oversight and implementation of the Company’s Policy on Political Contributions and Engagement and for establishing effective reporting and compliance procedures with respect to the Company’s political activities. <p>Based on the above, the Company believes that its existing policy compares favorably with the Proposal and satisfies its essential objective.</p>
<p>The Proposal requests that the Company provide, and semi-annually update, a report disclosing the above policies and that the report be presented to the board of directors and posted on the Company’s website.</p>	<p>As described above, the Company’s Policy on Political Contributions and Engagement and its Company Political Contribution Disclosures are available on the Company’s corporate website at https://investor.alaskaair.com/policy-political-contributions.</p> <p>The Company Political Contribution Disclosures are updated semi-annually (generally, August and February of each year). Currently, the Company makes available information for calendar year 2019 and for mid-year 2020. Full year 2020 information will be updated in February 2021.</p> <p>As stated in its Policy on Political Contributions and Engagement, the Governance and Nominating Committee of the Board of Directors monitors compliance with the policy and receives semi-annual briefings on the Company’s corporate-wide</p>

Proposal Language	Company Policy and Disclosures
	<p>political spending and AAG PAC contributions, including the purpose and benefit of political contributions. The Governance and Nominating Committee may also, by resolution, establish an annual aggregate spending limit for contributions made by the Company and periodically reviews the policy for any changes or updates.</p> <p>Based on the above, the Company believes that its existing policy compares favorably with the Proposal and satisfies its essential objective.</p>

III. CONCLUSION

For the reasons discussed above, the Company believes that it may properly omit the Proposal and Supporting Statement from its 2021 Proxy Materials in reliance on Rule 14a-8(i)(10). As such, we respectfully request that the Staff concur with the Company's view and not recommend enforcement action to the Commission if the Company omits the Proposal and Supporting Statement from its 2021 Proxy Materials.

If we can be of further assistance in this matter, please do not hesitate to contact me at (949) 823-7968.

Sincerely,



Shelly A. Heyduk
of O'MELVENY & MYERS LLP

Attachments

cc: Mr. John Chevedden
Mr. Kyle Levine, Alaska Air Group, Inc.
Ms. Allie Wittenberger, Alaska Air Group, Inc.

Exhibit A

See attached.

From: John Chevedden ***

Sent: Monday, November 30, 2020 8:16 PM

To: Kyle Levine <kyle.levine@alaskaair.com>

Cc: Allie Wittenberger <allie.wittenberger@alaskaair.com>; Celia Watkins <Celia.Watkins@AlaskaAir.com>; Jeanne Gammon <Jeanne.Gammon@AlaskaAir.com>

Subject: Rule 14a-8 Proposal (ALK)``

[EXTERNAL SENDER]

Mr. Levine,

Please see the attached [rule 14a-8 proposal to improve corporate governance and enhance long-term shareholder value at de minimis up-front cost](#) – especially considering the substantial market capitalization of the company.

I expect to forward a broker letter soon so if you acknowledge this proposal in an email message it may very well save you from requesting a broker letter from me.

Sincerely,
John Chevedden

Mr. Kyle Levine
Corporate Secretary
Alaska Air Group, Inc. (ALK)
19300 International Blvd.
Seattle, WA 98188
PH: 206-392-5040
PH: 206-392-5102
FX: 206-392-5807

Dear Mr. Levine,

This Rule 14a-8 proposal is respectfully submitted in support of the long-term performance of our company.

This Rule 14a-8 proposal is intended as a low-cost method to improve company performance – especially compared to the substantial capitalization of our company.

This proposal is for the next annual shareholder meeting. Rule 14a-8 requirements will be met including the continuous ownership of the required stock value until after the date of the respective shareholder meeting and presentation of the proposal at the annual meeting. This submitted format, with the shareholder-supplied emphasis, is intended to be used for definitive proxy publication.

I expect to forward a broker letter soon so if you acknowledge this proposal in an email message it may very well save you from requesting a broker letter from me.

Sincerely,


John Chevedden


Date

cc: Allie Wittenberger <allie.wittenberger@alaskaair.com>
Assistant Corporate Secretary
Celia Watkins <Celia.Watkins@AlaskaAir.com>
PH: 206-431-7218
FX: 302-636-5454
Jeanne Gammon <Jeanne.Gammon@AlaskaAir.com>
Kyle Levine <kyle.levine@alaskaair.com>

[ALK: Rule 14a-8 Proposal, November 30, 2020
[This line and any line above it – *Not* for publication.]

Proposal 4 – Political Spending Disclosure

Resolved, Shareholders request that the Company provide a report, updated semiannually, disclosing the Company's:

1. Policies and procedures for making, with corporate funds or assets, contributions and expenditures (direct or indirect) to (a) participate or intervene in any campaign on behalf of (or in opposition to) any candidate for public office, or (b) influence the general public, or any segment thereof, with respect to an election or referendum.
2. Monetary and non-monetary contributions and expenditures (direct and indirect) used in the manner described above, including:
 - a. The identity of the recipient as well as the amount paid to each; and
 - b. The title(s) of the person(s) in the Company responsible for decision-making.

The report shall be presented to the board of directors and posted on the Company's website within 12 months from the date of the annual meeting. This proposal does not encompass lobbying spending.

Supporting Statement

As a long-term shareholder of Alaska Air, I support transparency and accountability in corporate electoral spending. This includes any activity considered intervention in a political campaign under the Internal Revenue Code, such as direct and indirect contributions to political candidates, parties, or organizations, and independent expenditures or electioneering communications on behalf of federal, state, or local candidates.

Disclosure is in the best interest of the company and its shareholders. The Supreme Court recognized this in its 2010 *Citizens United* decision, which said, “[D]isclosure permits citizens and shareholders to react to the speech of corporate entities in a proper way. This transparency enables the electorate to make informed decisions and give proper weight to different speakers and messages.”

The Alaska Air disclosed policy on corporate political spending is deficient because the company does not disclose any of its election-related spending from corporate funds. Publicly available records show Alaska Air has contributed at least \$480,000 in corporate funds since the 2010 election cycle (CQMoneyLine: <http://moneyline.cq.com>; National Institute on Money in State Politics: <http://www.followthemoney.org>).

However, relying on publicly available data does not provide a complete picture of the Company's electoral spending. For example, the Company's payments to trade associations that may be used for election-related activities are undisclosed and unknown. This proposal asks the Company to disclose all of its electoral spending, including payments to trade associations and other tax-exempt organizations, which may be used for electoral purposes. This would bring our Company in line with a growing number of leading companies, including Norfolk Southern, Union Pacific, and United Parcel Service, which present this information on their websites.

The Company's Board and shareholders need comprehensive disclosure to fully evaluate the use of corporate assets in elections.

Now more than ever shareholders need more complete disclosure since the 2020 epidemic of tightly controlled online shareholder meetings are the Death Valley of shareholder engagement and management transparency.

Please vote for this important corporate governance advancement:

Political Spending Disclosure – Proposal 4

[The line above – *Is* for publication. Please assign the correct proposal number in 2 places.]

Notes:

This proposal is believed to conform with Staff Legal Bulletin No. 14B (CF), September 15, 2004 including (emphasis added):

Accordingly, going forward, we believe that it would not be appropriate for companies to exclude supporting statement language and/or an entire proposal in reliance on rule 14a-8(l)(3) in the following circumstances:

- the company objects to factual assertions because they are not supported;
- the company objects to factual assertions that, while not materially false or misleading, may be disputed or countered;
- the company objects to factual assertions because those assertions may be interpreted by shareholders in a manner that is unfavorable to the company, its directors, or its officers; and/or
- the company objects to statements because they represent the opinion of the shareholder proponent or a referenced source, but the statements are not identified specifically as such.

We believe that it is appropriate under rule 14a-8 for companies to address these objections in their statements of opposition.

See also: Sun Microsystems, Inc. (July 21, 2005).

The stock supporting this proposal will be held until after the annual meeting and the proposal will be presented at the annual meeting. Please acknowledge this proposal promptly by email

Exhibit B

See attached.

From: [Allie Wittenberger](#)
To: "John Chevedden"
Cc: [Jeanne Gammon](#); [Kyle Levine](#)
Subject: RE: Rule 14a-8 Proposal (ALK)``
Date: Friday, December 4, 2020 8:58:00 AM

Mr. Chevedden,

Upon review of your proposal, we believe that the proposal has been substantially implemented under the company's new publicly disclosed Policy on Political Contributions and Engagement.

You can access the policy on our website: <https://investor.alaskaair.com/policy-political-contributions>

Given the updates to our policy and disclosures, we ask that you consider withdrawing your proposal.

Please let me know if you'd like to discuss our updated policy in relation to your proposal.

Regards,
Allie Wittenberger

From: Allie Wittenberger
Sent: Tuesday, December 1, 2020 4:59 AM
To: John Chevedden *** ; Kyle Levine <kyle.levine@alaskaair.com>
Cc: Celia Watkins <Celia.Watkins@AlaskaAir.com>; Jeanne Gammon <Jeanne.Gammon@AlaskaAir.com>
Subject: RE: Rule 14a-8 Proposal (ALK)``

Dear Mr. Chevedden,

This confirms our receipt of your 14a-8 proposal "Political Spending Disclosure." We will review and advise if there are any procedural deficiencies before December 11, 2020.

Best regards,
Allie

From: John Chevedden ***
Sent: Monday, November 30, 2020 8:16 PM
To: Kyle Levine <kyle.levine@alaskaair.com>
Cc: Allie Wittenberger <allie.wittenberger@alaskaair.com>; Celia Watkins <Celia.Watkins@AlaskaAir.com>; Jeanne Gammon <Jeanne.Gammon@AlaskaAir.com>
Subject: Rule 14a-8 Proposal (ALK)``

[EXTERNAL SENDER]

Mr. Levine,

Please see the attached rule 14a-8 proposal to improve corporate governance and enhance long-term shareholder value at de minimis up-front cost – especially considering the substantial market capitalization of the company.

I expect to forward a broker letter soon so if you acknowledge this proposal in an email message it may very well save you from requesting a broker letter from me.

Sincerely,
John Chevedden

From: Allie Wittenberger <allie.wittenberger@alaskaair.com>
Sent: Wednesday, December 9, 2020 3:30 PM
To: Heyduk, Shelly <sheyduk@omm.com>
Cc: Jeanne Gammon <Jeanne.Gammon@AlaskaAir.com>; Kyle Levine <kyle.levine@alaskaair.com>
Subject: FW: Rule 14a-8 Proposal (ALK) blb

[EXTERNAL MESSAGE]

Here it is.

From: John Chevedden ***
Sent: Wednesday, December 9, 2020 3:23 PM
To: Allie Wittenberger <allie.wittenberger@alaskaair.com>
Subject: Rule 14a-8 Proposal (ALK) blb

[EXTERNAL SENDER]

Dear Ms. Wittenberger,
Please see the attached broker letter.
Please confirm receipt.
Sincerely,
John Chevedden



December 9, 2020

JOHN R CHEVEDDEN

To Whom It May Concern:

This letter is provided at the request of Mr. John R. Chevedden, a customer of Fidelity Investments.

Please accept this letter as confirmation that as of market close on December 8, 2020, Mr. Chevedden has continuously owned no fewer than the share quantities of the securities shown in the table below, since September 1, 2019.

Security Name	CUSIP	Symbol	Share Qty.
Linde Plc.	G5494J103	LIN	40.000
Alaska Air Group Inc.	011659109	ALK	100.000
Fiserv Inc.	337738108	FISV	100.000

These securities are registered in the name of National Financial Services LLC, a DTC participant (DTC number: 0226) and Fidelity Investments subsidiary. Please note that this information is unaudited and not intended to replace your monthly statements or official tax documents.

I hope this information is helpful. For questions regarding this request please contact the account owner directly. For any other issues or general inquiries, please call your Private Client Group at 800-544-5704. Thank you for choosing Fidelity Investments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Rohrer".

Kevin Rohrer
Operations Specialist

Our File: W900142-07DEC20

From: [Allie Wittenberger](#)
To: [John Chevedden](#)
Subject: RE: Rule 14a-8 Proposal (ALK) blb
Date: Wednesday, December 9, 2020 5:17:00 PM

Thank you, Mr. Chevedden.

This email acknowledges receipt.

Following up on my previous email, Please let me know if you'd like to discuss our updated policy in relation to your proposal.

Thank you,
Allie Wittenberger

From: John Chevedden ***
Sent: Wednesday, December 9, 2020 3:23 PM
To: Allie Wittenberger <allie.wittenberger@alaskaair.com>
Subject: Rule 14a-8 Proposal (ALK) blb

[EXTERNAL SENDER]

Dear Ms. Wittenberger,
Please see the attached broker letter.
Please confirm receipt.
Sincerely,
John Chevedden

From: [John Chevedden](#)
To: [Allie Wittenberger](#)
Subject: Rule 14a-8 Proposal (ALK)
Date: Wednesday, December 9, 2020 8:10:40 PM

[EXTERNAL SENDER]

Please advise when the dollar figures will be reported.

From: [Allie Wittenberger](#)
To: [John Chevedden](#)
Subject: RE: Rule 14a-8 Proposal (ALK)
Date: Thursday, December 10, 2020 5:32:00 AM

We plan to update the reports semiannually in August and February.

-----Original Message-----

From: John Chevedden ***
Sent: Wednesday, December 9, 2020 8:11 PM
To: Allie Wittenberger <allie.wittenberger@alaskaair.com>
Subject: Rule 14a-8 Proposal (ALK)

[EXTERNAL SENDER]

Please advise when the dollar figures will be reported.

From: [John Chevedden](#)
To: [Allie Wittenberger](#)
Subject: Rule 14a-8 Proposal (ALK)
Date: Thursday, December 10, 2020 5:34:33 PM

[EXTERNAL SENDER]

When will dollar figures be included.

From: [Allie Wittenberger](#)
To: [John Chevedden](#)
Subject: RE: Rule 14a-8 Proposal (ALK)
Date: Friday, December 11, 2020 6:53:00 AM

Mr. Chevedden,

All of the reports included on the site include dollar figures. This includes dues paid to trade associations, PAC Contributions, contributions to state and local candidates, political committees and political organizations and in regards to ballot measures.

These figures will be updated semiannually in February and August.

In an effort to better understand your question, can you please be more specific to what you are referring to?

Thank you,
Allie

-----Original Message-----

From: John Chevedden ***
Sent: Thursday, December 10, 2020 5:34 PM
To: Allie Wittenberger <allie.wittenberger@alaskaair.com>
Subject: Rule 14a-8 Proposal (ALK)

[EXTERNAL SENDER]

When will dollar figures be included.

From: [Allie Wittenberger](#)
To: [John Chevedden](#)
Subject: RE: Rule 14a-8 Proposal (ALK)
Date: Wednesday, December 23, 2020 8:22:00 AM

Mr. Chevedden,

I'm following up on my last email to see if you have any further questions and if you've considered withdrawing your proposal based on the additional disclosures that we've already incorporated on our governance website.

Thank you,
Allie Wittenberger

-----Original Message-----

From: Allie Wittenberger
Sent: Friday, December 11, 2020 6:54 AM
To: John Chevedden ***
Subject: RE: Rule 14a-8 Proposal (ALK)

Mr. Chevedden,

All of the reports included on the site include dollar figures. This includes dues paid to trade associations, PAC Contributions, contributions to state and local candidates, political committees and political organizations and in regards to ballot measures.

These figures will be updated semiannually in February and August.

In an effort to better understand your question, can you please be more specific to what you are referring to?

Thank you,
Allie

-----Original Message-----

From: John Chevedden ***
Sent: Thursday, December 10, 2020 5:34 PM
To: Allie Wittenberger <allie.wittenberger@alaskaair.com>
Subject: Rule 14a-8 Proposal (ALK)

[EXTERNAL SENDER]

When will dollar figures be included.

From: John Chevedden ***
Sent: Monday, January 4, 2021 6:12 PM
To: Allie Wittenberger <allie.wittenberger@alaskaair.com>
Subject: Rule 14a-8 Proposal (ALK)

[EXTERNAL SENDER]

Dear Ms. Wittenberger,
I just forwarded the ALK policy to an expert for his review.
John Chevedden

Exhibit C

See attached.



Policy on Political Contributions and Engagement

[Executive Leadership](#) [Board Of Directors](#) [Committee Composition](#) [Governance Documents](#)

Political Contributions

Policy on Political Contributions and Engagement

At Alaska Air Group, Inc. (the “Company”) our purpose is “creating an airline people love.” Alaska Airlines and its regional partners serve more than 115 destinations across the United States and North America, providing essential air service for our guests along with moving crucial cargo shipments, such as food, medicine, mail and e-commerce deliveries. With hubs in Seattle; San Francisco; Los Angeles; Portland, Oregon; and Anchorage, Alaska, along with operations across the country, the policy decisions of federal, state and local governments impact Alaska Air Group, Inc. and the Company’s stakeholders. This includes changes to existing law, new laws, and new policy initiatives affecting not only the business directly, but our employees, retirees and the communities we serve, as well as our shareholders. Accordingly, Alaska Air Group, Inc. believes that it is appropriate and necessary to participate and engage in the policy making and political processes at the federal, state, and local levels.

Our success depends on our ability to provide safe air transportation, develop relationships with guests by providing exceptional customer service and low fares, and maintain a low-cost structure to compete effectively. We strive to achieve our objectives as a socially responsible company that values not only performance but also our people, the communities we serve, and the environment. Public policy affects our ability to accomplish these goals, meet customer needs, and provide shareholder value. As a highly regulated entity, it is in the best interests of our key stakeholders, including employees, guests and shareholders, for the Company to advocate for policies in support of our business and a strong, competitive industry. This includes direct advocacy, indirect advocacy through participation in trade associations, public communications and media efforts, and making political contributions where appropriate and permitted by law.

Alaska Air Group, Inc. takes our role as a good corporate citizen seriously and complies with all federal, state and local laws and requirements associated with political engagement. All political contributions made by the Company’s Political Action Committee (Alaska Air Group, Inc. Political Action Committee) or the Company must: (i) comply with all applicable laws and regulations in the jurisdictions in which the contributions are made; and (ii) adhere to this Policy and the Alaska Air Group Companies Code of Conduct and Ethics.

Any political contribution made by the Company must be approved by the Company's General Counsel, Vice President of External Relations, or a designee. All political contributions must reflect the Company's interests and not those of its individual officers or directors. No political contribution will be given or offered in anticipation or recognition of, or in exchange for, an official act.

In making the decision to approve a political contribution to a candidate, the Company's General Counsel, Vice President of External Relations, or designees shall consider the following factors: (i) the candidate's qualifications; (ii) the candidate's voting record and views on policies and issues important to the Company; (iii) whether the candidate represents a geographic area where the Company has a major business presence, holds a leadership position, or serves on a committee with jurisdiction over policies and regulations important to the Company; and (iv) the financial impact and electoral importance of making a contribution.

The Company's Board of Directors has adopted this Policy on Political Contributions and Engagement to ensure that any such contributions are made in a manner consistent with the Company's purpose and/or shareholder interests.

We intend to publish a list of contributions twice annually on the Company's website, and to update this Policy as appropriate.

Corporate Contributions to Candidates, Committees, Political Organizations & Ballot Measures

Consistent with federal campaign finance laws, the Company does not make corporate political contributions to federal candidates, political parties, or political committees. However, some state and local jurisdictions permit companies to contribute to state and local candidates, political parties, referenda and ballot initiatives. Political contributions at the state and local levels may be made directly by the company or the Company's Political Action Committee ("PAC"), to the extent permitted by applicable state and local laws.

The budget for corporate political contributions is determined annually by the Vice President of External Relations, in consultation, as appropriate, with the Company's Chief Executive Officer and legal counsel to ensure compliance with corporate policy and applicable federal, state and local laws.

The Alaska Air Group, Inc. Governance and Nominating Committee of the Board of Directors receives semi-annual briefings on corporate-wide political spending.

Click [here](#) for a list of the company's mid-year political 2020 contributions to state and local candidates, political committees and political organizations and in regards to ballot measures. The Company does not make independent expenditures or electioneering communications, as such terms are defined in the Federal Election Campaign Act or applicable Federal Election Commission ("FEC") regulations. Prior year reports back to 2019 are available for download.

Alaska Air Group, Inc. Political Action Committee

With regards to federal contributions, the Company has established a non-partisan separate segregated fund or PAC. The Alaska Air Group, Inc. Political Action Committee (“AAG PAC”) is registered with the FEC. AAG PAC is non-partisan and organized on a strictly voluntary basis. Only eligible employees are asked to consider supporting AAG PAC.

AAG PAC’s political contributions are reported monthly to the FEC. To find detailed information about AAG PAC contributions visit the FEC’s website at <http://www.fec.gov>.

The AAG PAC is overseen by the five person AAG PAC Board of Directors (“AAG PAC Board”). The AAG PAC Board is briefed and consulted on all contributions on a quarterly basis. The AAG PAC Treasurer is registered with the FEC and, along with the Vice President of External Relations (who is an AAG PAC Board Member), oversees the administration of AAG PAC. The Company Chief Executive Officer also serves as an AAG PAC Board Member. All checks drawn from AAG PAC account must be approved by two sitting AAG PAC Board Members. Additionally, AAG PAC has implemented internal and external controls to ensure it is properly managed and complies with all federally mandated contribution limits and restrictions.

The Alaska Air Group, Inc. Governance and Nominating Committee of the Board of Directors receives semi-annual briefings on AAG PAC contributions.

For a list of all the AAG PAC mid-year 2020 contributions click [here](#). Prior year reports back to 2019 are available for download. For years prior to 2019 information is available on the FEC website: <http://www.fec.gov>.

Trade Associations

Alaska Air Group, Inc. participates in and pays annual dues to trade and industry associations, such as Airlines for America (“A4A”), the Regional Airline Association (“RAA”) and the United States Chamber of Commerce. Our involvement with these organizations allows us to promote the airline industry, gain insight into key issues for our business, and to advocate alongside our peer companies for government policies that support an efficient, safe, competitive, and responsible air transportation industry and business environment.

Our participation in A4A and RAA also allows us to benefit from the opportunity to share technical expertise and operational knowledge in support of safety, an improved customer experience, environmental protection, and overall efficiency.

The Company is also a member of other associations and various chambers of commerce and similar organizations at the federal, state and local levels which may engage in public advocacy. The Company’s participation in trade associations may be subject to reporting under applicable lobbying laws – for example, the Company reports certain payments to trade associations as “lobbying expenses” on the Company’s federal quarterly lobbying reports. The Company is committed to complying with all applicable lobbying laws and to reporting trade association activities, donations, and membership as required by such laws. Participation as a member of a trade association comes with the understanding that we may not always agree with all of the

positions of the organizations or other members. However, we believe that the associations take positions that address issues in a collective industry manner and often advance positions consistent with the interests of the Company and other key stakeholders.

The Company's Vice President of External Relations and Government Affairs Department is responsible for oversight of the Company's participation in trade associations. In this capacity the Vice President shall annually review the Company's participation in trade associations and other public advocacy efforts, and shall review and discuss the same with Company management.

For a list of Alaska Air Group, Inc.'s 2019 payments to trade associations for which the Company paid dues or payments of more than \$25,000 and who spend 10 percent or more of their revenues lobbying click here.

Voluntary Political Participation by Employees

Alaska Air Group, Inc. values the right of employees to voluntarily participate in the political process, such as through personal contributions or by volunteering their personal time to candidate or organizations of their choice. These activities, however, must not suggest the Company's support and must not involve any unlawful use of the Company's resources.

The Company will not reimburse employees in any way for personal political contributions, including but not limited to political contributions to the AAG PAC. Moreover, the Company will not pressure or coerce employees to make personal political contributions and will not favor or disfavor any employee by reason of the amount of their political contribution or decision not to make a political contribution.

The Company expects all officers and employees to comply with applicable federal campaign finance laws.

Lobbying

Alaska Air Group, Inc. engages in lobbying in the United States at the federal, state, and local levels. The Company has a Government Affairs Department comprised of government affairs professionals who consult with and are assisted by subject-matter experts within and external to the Company. These employees and contracted lobbyists with the Company engage in lobbying activities and advocate on behalf of Alaska Air Group, Inc.

All expenditures associated with Alaska Air Group, Inc.'s lobbying activities are reported as required by state and federal law. The Company is registered under the Lobbying Disclosure Act and therefore reports quarterly to the Secretary of the U.S. Senate and the Clerk of the U.S. House. These reports are publicly available and provide information on activities and issues the Company is advocating on through communication with covered officials. These reports disclose the Company's lobbying expenditures, as well as issues and legislation that the Company communicated on with covered officials. These reports also identify in-house and third-party lobbyists who are registered to lobby on behalf of the Company. The Company also files publicly available reports as required by states and localities for any lobbying activities at the state or local level.

U.S. House of Representatives Lobbying Disclosures: <https://lobbyingdisclosure.house.gov/>

U.S. Senate Lobbying Disclosures:

https://www.senate.gov/legislative/Public_Disclosure/LDA_reports.htm

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Compliance in the Government Relations Program and Oversight by the Board of Directors

As outlined in this Policy, Alaska Air Group, Inc. is committed to compliance with all applicable laws and internal policies. The Company's General Counsel and Vice President of External Relations, are responsible for oversight and implementation of this Policy, and for establishing effective reporting and compliance procedures designed to ensure that the Company's political activities (including all political contributions and participation in trade associations) are conducted and disclosed in accordance with applicable law. The Company's General Counsel and Vice President of External Relations, or their designee, shall also regularly consult with legal counsel to ensure compliance with applicable federal, state, and local laws.

The Governance and Nominating Committee (the "Committee") of the Board of Directors monitors compliance with this Policy. Management reports semi-annually to the Committee regarding political contributions made by the Company and the AAG PAC pursuant to this Policy, including the purpose and benefit of political contributions. The Committee may, by resolution, establish an annual aggregated spending limit for contributions made by the Company. The Committee shall periodically review this Policy and shall be responsible for any changes or updates.

Prior Years

2019 2019 Corporate Contributions
2019 AAG PAC Contributions

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Mid-Year 2020 Political Contributions to State and Local Candidates, Political Committees and Political Organizations and in regards to Ballot Measures

California Political Contributions			
Name/PAC	Title	Representing	Contribution
Autumn Burke	Assemblymember (Dist. 62)	State of California	\$1,000.00
Anthony Rendon	Assembly Speaker (Dist. 63)	State of California	\$1,700.00
Mike McGuire	State Senator (Dist. 2)	State of California	\$1,000.00
Total			\$3,700.00

2020 Mid-Year: Alaska Air Group PAC Contributions

State	District	Candidate	Committee or PAC	Office	Party	Amount
			Airlines for America PAC			\$ 5,000
AK		Lisa Murkowski	Denali PAC	Federal Leadership PAC	R	\$ 2,500
AK	At-Large	Don Young	Alaskans for Don Young	U.S. House	R	\$ 2,000
CA	3	John Garamendi	Garamendi for Congress	U.S. House	D	\$ 1,000
CA	11	Mark DeSaulnier	Mark DeSaulnier for Congress	U.S. House	D	\$ 1,000
CA	12	Nancy Pelosi	Nancy Pelosi for Congress	U.S. House	D	\$ 2,500
CA	35	Norma Torres	Norma Torres for Congress	U.S. House	D	\$ 1,000
CA	42	Ken Calvert	Ken Calvert for Congress	U.S. House	R	\$ 1,000
CA	46	Lou Correa	Lou Correa for Congress	U.S. House	D	\$ 1,000
ID		Jim Risch	Jim Risch for US Senate	U.S. Senate	R	\$ 2,000
KS	3	Sharice Davids	Sharice for Congress	U.S. House	D	\$ 1,000
MO	6	Sam Graves	Graves for Congress	U.S. House	R	\$ 1,000
MT		Steve Daines	Steve Daines for Montana	U.S. Senate	R	\$ 1,000
OR	3	Earl Blumenauer	Blumenauer for Congress	U.S. House	D	\$ 2,000
SC	6	Jim Clyburn	Friends of Jim Clyburn	U.S. House	D	\$ 1,000
TX		John Cornyn	Texans for Senator John Cornyn	U.S. Senate	R	\$ 1,000
UT		Mike Lee	Mike Lee for US Senate	U.S. Senate	R	\$ 1,000
WA		Patty Murray	People for Patty Murray	U.S. Senate	D	\$ 1,000
WA	1	Suzan DelBene	DelBene for Congress	U.S. House	D	\$ 1,000
WA	2	Rick Larsen	Citizens to Elect Rick Larsen	U.S. House	D	\$ 1,500
WA	3	Jaime Herrera Beutler	Jaime for Congress	U.S. House	R	\$ 1,000
WA	4	Dan Newhouse	Dan Newhouse for Congress	U.S. House	R	\$ 1,000
WA	6	Derek Kilmer	People for Derek Kilmer	U.S. House	D	\$ 1,000
WA	9	Adam Smith	Adam Smith for Congress	U.S. House	D	\$ 1,000

Trade Association Participation

2019

During 2019, Alaska Air Group paid dues to the following trade associations of more than \$25,000 and who spend 10 percent or more of their revenues lobbying: Airlines for America, Regional Airline Association, Association of Washington Business and the U.S. Chamber of Commerce.

Based on the information the Company has received in 2019, the following amount of Alaska Air Group dues or payments that were used for lobbying was:

- ❖ Airlines for America: \$611,800
- ❖ Regional Airline Association: \$ 7,985
- ❖ Association of Washington Business: \$34,125
- ❖ U.S. Chamber of Commerce: \$ 9,000

2019 Political Contributions to State and Local Candidates, Political Committees and Political Organizations and in regards to Ballot Measures

Washington State Political Contributions			
Candidate/PAC/Org.	Candidate for:	Representing	Contribution
Dave Somers	County Executive	Snohomish County	\$1,000.00
Ty Trenary	Sheriff	Snohomish County	\$250.00
Dow Constantine	County Executive	King County	\$1,000.00
Claudia Balducci	County Councilmember (Dist. 6)	King County	\$500.00
Jeanne Kohl-Welles	County Councilmember (Dist. 4)	King County	\$500.00
Joe McDermott	County Councilmember (Dist. 8)	King County	\$500.00
Grant Degginger	Commission (Pos. 2)	Port of Seattle	\$4,000.00
Sam Cho	Commission (Pos. 2)	Port of Seattle	\$1,000.00
Fred Felleman	Commission (Pos. 3)	Port of Seattle	\$1,000.00
Jennifer Robertson	City Councilmember	City of Bellevue	\$250.00
John Stokes	City Councilmember	City of Bellevue	\$250.00
Peter Kwon	City Councilmember	City of SeaTac	\$1,000.00
Stan Tombs	City Councilmember	City of SeaTac	\$1,000.00
Erin Sitterley	City Councilmember/Mayor	City of SeaTac	\$1,000.00
Tina Orwall	State Representative (Dist. 33)	Washington State	\$1,000.00
Mark Schoesler	State Senator (Dist. 9)	Washington State	\$1,000.00
John Braun	State Senator (Dist. 20)	Washington State	\$1,000.00
Curtis King	State Senator (Dist. 14)	Washington State	\$1,000.00
JT Wilcox	State Representative (Dist. 2)	Washington State	\$1,000.00
Tom Dent	State Representative (Dist. 13)	Washington State	\$1,000.00
Ed Orcutt	State Representative (Dist. 20)	Washington State	\$1,000.00
Drew Stokesbary	State Representative (Dist. 31)	Washington State	\$1,000.00
Jay Inslee	Governor	Washington State	\$2,000.00
Civic Alliance for a Sound Economy (Seattle Chamber PAC)			\$20,000.00
Enterprise Washington			\$12,500.00
Democratic Governors Association			\$7,500.00
Republican State Leadership Committee			\$4,000.00
Reagan Fund			\$8,000.00
Washington State Democratic Party			\$7,000.00
Washington State Republican Party			\$7,000.00
No on I-976			\$65,000.00*
Approve I-1000			\$25,000.00*
Total			\$179,250.00

* Special issue campaign contribution

(continued on next page)

Oregon Political Contributions			
Name	Candidate for:	Representing	Contribution
Betsy Johnson	State Senator (Dist. 16)	State of Oregon	\$5,000.00
Elizabeth Steiner-Hayward	State Senator (Dist. 17)	State of Oregon	\$1,000.00
Nancy Nathanson	State Representative (Dist. 13)	State of Oregon	\$1,000.00
Werner Reschke	State Representative (Dist. 56)	State of Oregon	\$2,000.00
Brad Witt	State Representative (Dist. 31)	State of Oregon	\$1,000.00
Rick Lewis	State Representative (Dist. 18)	State of Oregon	\$1,000.00
Lee Beyer	State Senator (Dist. 6)	State of Oregon	\$2,000.00
Total			\$13,000.00

California Political Contributions			
Name/PAC	Candidate for:	Representing	Contribution
Autumn Burke	Assemblymember (Dist. 62)	State of California	\$4,700.00*
Kevin Mullin	Assemblymember (Dist. 22)	State of California	\$4,700.00*
Toni Atkins	State Senate President Pro-Tempore (Dist. 39)	State of California	\$1,300.00
Anthony Rendon	Assembly Speaker (Dist. 63)	State of California	\$1,300.00
Ben Allen	State Senator (Dist. 26)	State of California	\$1,000.00
Robert Hertzberg	State Senator (Dist. 18)	State of California	\$1,000.00
Scott Weiner	State Senator (Dist. 11)	State of California	\$1,000.00
Marc Berman	State Representative (Dist. 24)	State of California	\$1,300.00
Tom Daly	State Representative (Dist. 69)	State of California	\$1,000.00
Lorena Gonzalez	State Representative (Dist. 80)	State of California	\$1,300.00
Phil Ting	State Representative (Dist. 19)	State of California	\$1,300.00
David Chiu	State Representative (Dist. 17)	State of California	\$1,300.00
Mike Gipson	State Representative (Dist. 64)	State of California	\$1,000.00
Asian Pacific Islander Caucus			\$2,500.00
LGBTQ Caucus			\$10,000.00
Total			\$34,700.00

* In-kind contribution value (fundraiser)

2019: Alaska Air Group PAC Contributions

State	District	Candidate	Committee or PAC	Office	Party	Amount
			Airlines for America PAC			\$ 5,000
			New Democrat Coalition Action Fund		D	\$ 2,500
			Regional Airline Association PAC			\$ 2,500
AK	At-Large	Don Young	Alaskans for Don Young	U.S. House	R	\$ 2,000
AK		Lisa Murkowski	Lisa Murkowski for US Senate	U.S. Senate	R	\$ 3,000
AK		Dan Sullivan	Alaskans for Dan Sullivan	U.S. Senate	R	\$ 5,000
AL	3	Mike Rogers	Mike Rogers for Congress	U.S. House	R	\$ 1,000
AZ		Kyrsten Sinema	Sinema for Arizona	U.S. Senate	D	\$ 2,500
AZ	8	Debbie Lesko	Debbie Lesko for Congress	U.S. House	R	\$ 1,000
CA		Dianne Feinstein	Fund for the Majority PAC	Federal Leadership PAC	D	\$ 1,000
CA	1	Doug LaMalfa	Doug LaMalfa Committee	U.S. House	R	\$ 1,000
CA	2	Jared Huffman	Huffman for Congress	U.S. House	D	\$ 1,000
CA	3	John Garamendi	Garamendi for Congress	U.S. House	D	\$ 1,000
CA	11	Mark DeSaulnier	Mark DeSaulnier for Congress	U.S. House	D	\$ 1,000
CA	14	Jackie Speier	Jackie Speier for Congress	U.S. House	D	\$ 2,000
CA	23	Kevin McCarthy	McCarthy Victory Fund	U.S. House	R	\$ 2,500
CA	24	Salud Carbajal	Salud Carbajal for Congress	U.S. House	D	\$ 1,000
CA	26	Julia Brownley	Julia Brownley for Congress	U.S. House	D	\$ 1,000
CA	32	Grace Napolitano	Napolitano for Congress	U.S. House	D	\$ 1,000
CA	35	Norma Torres	Norma Torres for Congress	U.S. House	D	\$ 1,000
CA	37	Karen Bass	Karen Bass for Congress	U.S. House	D	\$ 1,000
CA	42	Ken Calvert	Ken Calvert for Congress Committee	U.S. House	R	\$ 1,000
CA	46	Lou Correa	Lou Correa for Congress	U.S. House	D	\$ 1,000
HI		Mazie Hirono	Pineapple PAC	Federal Leadership PAC	D	\$ 2,000
HI		Brian Schatz	Schatz for Senate	U.S. Senate	D	\$ 2,000
HI	1	Ed Case	Case for Congress	U.S. House	D	\$ 1,000
ID		Mike Crapo	Crapo Victory Committee	U.S. Senate	R	\$ 2,000
ID	1	Russ Fulcher	Russ Fulcher for Idaho	U.S. House	R	\$ 1,000
ID	2	Mike Simpson	Simpson for Congress	U.S. House	R	\$ 1,000
IL	5	Mike Quigley	Quigley for Congress	U.S. House	D	\$ 1,000
LA	6	Garret Graves	Garret Graves for Congress	U.S. House	R	\$ 1,500
MD	5	Steny Hoyer	Hoyer's Majority Fund	U.S. House	D	\$ 1,500

2019: Alaska Air Group PAC Contributions

ME		Susan Collins	Collins for Senator	U.S. Senate	R	\$ 1,000
MI		Gary Peters	Peters for Michigan	U.S. Senate	D	\$ 1,000
MI	10	Paul Mitchell	Friends of Paul Mitchell	U.S. House	R	\$ 1,000
MI	14	Brenda Lawrence	Brenda Lawrence for Congress	U.S. House	D	\$ 1,000
MO	6	Sam Graves	Graves for Congress	U.S. House	R	\$ 1,500
MS		Rodger Wicker	Wicker for Senate	U.S. Senate	R	\$ 2,500
MS	2	Bennie Thompson	Friends of Bennie Thompson	U.S. House	D	\$ 1,000
MT		Steve Daines	Steve Daines for Montana	U.S. Senate	R	\$ 2,000
NC	4	David Price	Price for Congress	U.S. House	D	\$ 1,000
NV		Jackie Rosen	Rosen for Nevada	U.S. Senate	D	\$ 1,000
NY		Chuck Schumer	Friends of Schumer	U.S. Senate	D	\$ 2,500
NY	24	John Katko	Katko for Congress	U.S. House	R	\$ 1,000
OR	1	Suzanne Bonamici	Bonamici for Congress	U.S. House	D	\$ 2,000
OR	2	Greg Walden	New Pioneers PAC	Federal Leadership PAC	R	\$ 1,500
OR	2	Greg Walden	Walden for Congress	U.S. House	R	\$ 1,500
OR	3	Earl Blumenauer	Blumenauer for Congress	U.S. House	D	\$ 2,000
OR	4	Peter DeFazio	DeFazio for Congress	U.S. House	D	\$ 4000
OR	5	Kurt Schrader	Kurt Schrader for Congress	U.S. House	D	\$ 2,000
PA	11	Lloyd Smucker	Smucker for Congress	U.S. House	R	\$ 1,000
SC	6	Jim Clyburn	Friends of Jim Clyburn	U.S. House	D	\$ 1,000
SD		John Thune	Heartland Values PAC	Federal Leadership PAC	R	\$ 1,000
WA		Patty Murray	People for Patty Murray	U.S. Senate	D	\$ 1,500
WA	1	Suzan DelBene	Evergreen PAC	Federal Leadership PAC	D	\$ 1,500
WA	1	Suzan DelBene	DelBene for Congress	U.S. House	D	\$ 2,500
WA	2	Rick Larsen	Citizens to Elect Rick Larsen	U.S. House	D	\$ 3,500
WA	3	Jaime Herrera Beutler	Jaime for Congress	U.S. House	R	\$ 1,000
WA	4	Dan Newhouse	Dan Newhouse for Congress	U.S. House	R	\$ 2500
WA	5	Cathy McMorris Rodgers	Cathy McMorris Rodgers for Congress	U.S. House	R	\$ 5,000
WA	6	Derek Kilmer	People for Derek Kilmer	U.S. House	D	\$ 2,000
WA	9	Adam Smith	Adam Smith for Congress	U.S. House	D	\$ 2,500
WA	10	Denny Heck	Denny Heck for Congress	U.S. House	D	\$ 3,000