

To: Alaska Public Offices Commission  
From: Alaskans for Better Elections, Complainant

Re: Complaint Against Repeal Now, Aurora Action Network, and Advancing Alaska Action for Numerous Violations of Campaign Finance Laws (AS 15.13)

**Respondents:**<sup>1</sup>

**Repeal Now**

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**Aurora Action Network**

502 6<sup>th</sup> Street  
Hudson, Wisconsin 54016  
Telephone: 202-866-8229  
Email: [Compliance@AXCAPTEAM.com](mailto:Compliance@AXCAPTEAM.com)

**Advancing Alaska Action**

721 Depot Drive  
Anchorage, Alaska 99501  
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**I. SUMMARY OF COMPLAINT**

Although Repeal Now has only been in existence for a little more than a year,<sup>2</sup> it has already committed dozens of errors in its reporting to APOC. Indeed, while Repeal Now purports to be a ballot group supporting efforts to “Repeal rank [sic] choice voting,”<sup>3</sup> its reporting to APOC leaves confusion in its wake. Whether by mistake or (more likely) by design, Repeal Now’s public communications and campaign finance reports are riddled

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<sup>1</sup> This information is intended to satisfy the required contact information for this APOC complaint. It has also been relied upon for service of the complaint, with additional documentation to follow. Additional information about the Respondents is included below.

<sup>2</sup> See Exhibit 1A to Affidavit of Samuel G. Gottstein (May 26, 2026) [hereinafter Gottstein Aff.].

<sup>3</sup> See *id.*

with errors and omissions, the net effect of which is to confuse voters more than inform them.

For example, one would assume that Repeal Now is supporting a current ballot measure.<sup>4</sup> Yet over 99% of Repeal Now’s reported expenditures and debts falsely state that its spending is either in support of a ballot measure that already appeared on the ballot in 2024,<sup>5</sup> or in favor of an ever-changing “numbered” ballot initiative even though ballot initiative numbers have yet to be officially assigned by the State Division of Elections.<sup>6</sup> Additionally, the vast majority of Repeal Now’s financial support is funneled to it via an FEC-registered Super PAC called “Aurora Action Network.”<sup>7</sup> Yet that own entities’ reports are in conflict with those of Repeal Now, creating numerous compliance violations; either some of Aurora Action Network’s or Repeal Now’s reports to APOC are faulty, or both. Repeal Now also has a litany of smaller, but significant, disclosure and disclaimer violations. And Aurora Action Network has falsely (and repeatedly) reported another entity, “Advancing Alaska Action,” as the “true source” for a contribution to Repeal Now.<sup>8</sup>

But Repeal Now’s most significant violation appears to involve it intentionally conspiring with Aurora Action Network to report a false address for its primary source of

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<sup>4</sup> See *id.*

<sup>5</sup> See Exhibits 2A-2Z to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.; *but cf.* Exhibit 2R (listing 24ESEG) to Gottstein Aff.

<sup>6</sup> See Exhibits 2AA-2AD to Gottstein Aff.; *see also* Gottstein Aff. at ¶ 37.

<sup>7</sup> See Exhibit 4E to Gottstein Aff.; Exhibits 5A-5K to Gottstein Aff.; *see also* Exhibits 2A-2AC to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.

<sup>8</sup> See Exhibit 5H at 3 to Gottstein Aff.; Exhibit 5I at 6 to Gottstein Aff.; Exhibit 5J at 6 to Gottstein Aff.; Exhibit 5K at 6 to Gottstein Aff.

contributions. Aurora Action Network has always been based in Hudson, Wisconsin, where its treasurer is located, and has consistently reported that information to APOC.<sup>9</sup> Yet suddenly, Repeal Now has started claiming in disclaimers on its public communications that Aurora Action Network is “based” in Anchorage, Alaska,<sup>10</sup> by relying on the residential address of a person who does not appear to have ever contributed to Aurora Action Network or served as an officer or employee.<sup>11</sup> The reason for utilizing this false address is obvious: Repeal Now wants to list an Alaska address on its required top three contributors’ disclaimers for every communication. Indeed, despite the fact that every single one of Aurora Action Network’s filings with APOC show it to be based in Wisconsin,<sup>12</sup> Repeal Now’s disclaimers continue to falsely state it is based in Anchorage, Alaska.<sup>13</sup>

Repeal Now and Aurora Action Network must correct their prior erroneous filings, and Advancing Alaska Action must disclose its contributors as true sources and file reports with APOC. Repeal Now must correct its reports regarding its expenditures and debts as being in support of a ballot measure that is actually active. Finally, Repeal Now must also

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<sup>9</sup> See Exhibits 5A-5K to Gottstein Aff.

<sup>10</sup> See Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibit 8A to Gottstein Aff.; *see also* Gottstein Aff. at ¶ 58.

<sup>11</sup> See Exhibit 4D to Gottstein Aff.; Exhibits 5A-5K to Gottstein Aff.

<sup>12</sup> See Exhibits 5A-5K to Gottstein Aff.

<sup>13</sup> See Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibit 8A to Gottstein Aff.; *see also* Exhibits 8B-8Y to Gottstein Aff.; Exhibits 9B-9L to Gottstein Aff.

cease deceiving voters by falsely using a residential address in Anchorage on its three largest contributors disclaimers.

Although these allegations are numerous and serious, Complainant believes that a thorough investigation can be completed in advance of the November 2026 election under the normal statutory deadlines, and accordingly does not request to expedite this matter at this time.

## **II. BACKGROUND INFORMATION ABOUT RESPONDENTS**

### **A. Repeal Now**

Repeal Now appears to be a group that supports 24ESEG,<sup>14</sup> a ballot initiative scheduled to appear on the November 2026 ballot.<sup>15</sup> If enacted by voters, 24ESEG would repeal major aspects of Alaska’s current election system.<sup>16</sup> Broadly, 24ESEG would repeal Alaska’s current election regime of: (1) an open primary election system; (2) ranked-choice voting for general elections; and (3) a ban on “dark money” contributions in state and local elections, as well as more detailed and stringent disclaimer policies and higher fines for campaign finance violations.<sup>17</sup>

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<sup>14</sup> See Exhibit 1A to Gottstein Aff.; see also Exhibit 10A to Gottstein Aff. 24ESEG was designated as such by the Lieutenant Governor before Repeal Now registered as a group with APOC. See Exhibits 1A & 10A to Gottstein Aff.

<sup>15</sup> See Gottstein Aff. at ¶ 98.

<sup>16</sup> See Exhibit 10B to Gottstein Aff.

<sup>17</sup> See *id.*; see also Exhibit 10C to Gottstein Aff.

24ESEG is intended to fully repeal 19AKBE, a ballot initiative enacted by voters in 2020.<sup>18</sup> Unlike a recent repeal effort involving a different ballot initiative (22AKHE) from the last statewide election cycle,<sup>19</sup> Repeal Now — through 24ESEG — seeks to repeal Alaska’s stringent “dark money” ban and other strict campaign finance disclaimer and disclosure requirements in addition to the election system itself.<sup>20</sup>

Repeal Now first registered as a group with APOC on March 20, 2025.<sup>21</sup> And although Repeal Now *appears* focused on supporting 24ESEG in practice,<sup>22</sup> virtually all of its APOC reports (33 out of 34), and associated expenses and debts (232 out of 234), falsely state otherwise.<sup>23</sup> Repeal Now claims that its expenses and debts are made either in support of 22AKHE — a defunct ballot measure that appeared, and failed, on the ballot in November 2024<sup>24</sup> — or in support of either ballot measure “2” or “3.”<sup>25</sup> APOC may recall 22AKHE from prior APOC complaints;<sup>26</sup> some of the penalties imposed by APOC

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<sup>18</sup> See Exhibit 10C to Gottstein Aff.

<sup>19</sup> See Exhibit 10D to Gottstein Aff.

<sup>20</sup> See Exhibits 10B-10C to Gottstein Aff.

<sup>21</sup> See Exhibit 1A to Gottstein Aff.

<sup>22</sup> See Exhibits 6A-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibits 8A-8Y to Gottstein Aff.; Exhibits 9A-9L to Gottstein Aff.

<sup>23</sup> See Exhibits 2A-2AD to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.; *but cf.* Exhibit 2R to Gottstein Aff.

<sup>24</sup> See Exhibits 2A-2Z to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.; *but cf.* Exhibit 2R to Gottstein Aff.

<sup>25</sup> See Exhibits 2AA-2AD to Gottstein Aff.; *see also* Gottstein Aff. at ¶ 37.

<sup>26</sup> See APOC Complaint 23-01-CD (ordering over \$90,000 in civil penalties); APOC Complaint 23-06-CD; APOC Complaint 23-07-CD; APOC Complaint 24-03-CD (ordering over \$156,000 in civil penalties).

for work done in support of 22AKHE are currently on appeal before the Alaska Supreme Court,<sup>27</sup> and other significant penalties have not yet been paid.<sup>28</sup>

Repeal Now’s disclaimers on its communications have changed over time.<sup>29</sup> But since the end of June 2025, Repeal Now’s top donor has been an entity called “Aurora Action Network.”<sup>30</sup> Repeal Now’s prior disclaimers noted that Aurora Action Network is located in Hudson, Wisconsin,<sup>31</sup> which is consistent with all of Aurora Action Network’s Statement of Contribution reports filed with APOC, including reports filed as recently as May 14, 2026.<sup>32</sup>

However, Repeal Now’s disclaimers for Aurora Action Network changed more recently. Repeal Now has begun falsely relying on the address of a residential home in Anchorage, Alaska as Aurora Action Network’s primary place of business,<sup>33</sup> even though that address appears to have no plausible connection to the group, and has not been part of

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<sup>27</sup> See *Alaskans for Honest Elections, et al. v. APOC*, S-19201.

<sup>28</sup> See APOC Complaint 23-01-CD; APOC Complaint 24-03-CD; see also APOC Complaint 23-07-CD (additional penalties will be considered at APOC’s next meeting on June 3, 2026).

<sup>29</sup> See, e.g., Exhibits 6A-6C to Gottstein Aff.

<sup>30</sup> See Exhibit 2G to Gottstein Aff.

<sup>31</sup> See Exhibit 6A to Gottstein Aff.

<sup>32</sup> See Exhibits 5A-5K to Gottstein Aff. Aurora Action Network’s address is also identical to that of another organization, “Beautiful America,” which used to be one of Repeal Now’s three largest contributors. See Exhibits 11A-11B to Gottstein Aff.; see also Exhibits 5A-5J to Gottstein Aff.

<sup>33</sup> See Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibit 8A to Gottstein Aff.; see also Exhibit 4B to Gottstein Aff.

any APOC report filed by either Aurora Action Network or Repeal Now.<sup>34</sup> Additionally, some of the contributions and true sources listed by Repeal Now have not been consistent with other APOC reports,<sup>35</sup> which have themselves been delayed and have at times been inaccurate.<sup>36</sup> For example, Repeal Now has repeatedly claimed that the “true source” of Aurora Action Network’s contributed funds came from contributions that were not actually made to that group until *after* Repeal Now had already received the funds.<sup>37</sup>

#### **B. Aurora Action Network**

Aurora Action Network first registered as a Super PAC with the FEC on June 6, 2025, with a business address in Hudson, Wisconsin.<sup>38</sup> This is the same business address as another one of Repeal Now’s largest contributors, “Beautiful America.”<sup>39</sup> Aurora

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<sup>34</sup> See Exhibits 2A-2AD to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.; Exhibits 5A-5K to Gottstein Aff. Repeal Now apparently has a history of using incurrent addresses for entities; it used an Eagle River PO Box for one of Beautiful America’s sizeable contributions. See Exhibit 3B at 7-8 to Gottstein Aff.

<sup>35</sup> Compare Exhibits 2A-2AD to Gottstein Aff., and Exhibits 3A-3D to Gottstein Aff., with Exhibits 5A-5K to Gottstein Aff.

<sup>36</sup> See Exhibits 2A-2AD to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.; Exhibits 5A-5K to Gottstein Aff. For example, Aurora Action Network has already been assessed penalties for statement of contribution reports. See Exhibits 12A-12B to Gottstein Aff.

<sup>37</sup> See Exhibits 2J & 2L to Gottstein Aff.

<sup>38</sup> See Exhibit 4A to Gottstein Aff.

<sup>39</sup> See Exhibit 4A to Gottstein Aff.; Exhibits 11A-11B to Gottstein Aff. Repeal Now appears to have incorrectly listed an Eagle River PO Box for at least one of Beautiful America’s sizeable contributions. See Exhibit 3B at 7-8 to Gottstein Aff.

Action Network's custodian of records and treasurer is also listed at the same address, and its bank account is based at a bank in Lino Lakes, Minnesota.<sup>40</sup>

Recently, Repeal Now began using an Alaska residential address for Aurora Action Network in required disclaimers on its communications.<sup>41</sup> This appears to be because Aurora Action Network listed a new address in a recent FEC filing.<sup>42</sup> But Aurora Action Network still lists its treasurer and custodian of records at its Hudson, Wisconsin address, and its bank account remains in Lino Lakes, Minnesota.<sup>43</sup> Furthermore, Aurora Action Network is not — and has never been — an Alaska-based corporation or entity,<sup>44</sup> and no APOC filing uses the residential address in Alaska.<sup>45</sup> In fact, Aurora Action Network *continues* to correctly report its Wisconsin address in its statements of contributions filed with APOC as recently as May 14, 2026.<sup>46</sup>

The Alaska address Aurora Action Network used for its FEC filing belongs to Bob Griffin, a prior (and early) contributor to Repeal Now.<sup>47</sup> Mr. Griffin is *not* Aurora Action Network's treasurer, does not appear to be an employee of the entity, and does not appear

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<sup>40</sup> See Exhibit 4A to Gottstein Aff.

<sup>41</sup> See Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibit 8A to Gottstein Aff.; *see also* Exhibit 9A to Gottstein Aff.; *see also* Gottstein Aff. at ¶ 58.

<sup>42</sup> See Exhibit 4B to Gottstein Aff.

<sup>43</sup> See Exhibit 4B to Gottstein Aff.; *see also* Exhibits 5A-5K to Gottstein Aff.

<sup>44</sup> See Exhibit 13A to Gottstein Aff.

<sup>45</sup> See Exhibits 5A-5K to Gottstein Aff.; *see also* Exhibit 13B to Gottstein Aff.

<sup>46</sup> See Exhibits 5I-5K to Gottstein Aff.

<sup>47</sup> See Exhibit 4B to Gottstein Aff.; *see also* Exhibit 2A to Gottstein Aff.

to have ever donated to the entity.<sup>48</sup> He is, however, currently listed as staff for the Alaska Policy Forum,<sup>49</sup> which has its own history of APOC violations.<sup>50</sup> The sole purpose of using Mr. Griffin’s address appears to be falsely portraying Aurora Action Network as an “Alaskan” entity for Repeal Now’s mandatory disclaimers, and to obscure from voters the fact that Aurora Action Network *and* the sources of the vast majority of the funds contributed to Repeal Now are from Outside Alaska.

Through March 2026, according to FEC filings, Aurora Action Network has received nearly \$900,000 in contributions.<sup>51</sup> Of that total, roughly \$145,750 — only about 16% — has come from Alaska donors.<sup>52</sup>

By far, Aurora Action Network’s largest contributor is Jeff Yass; he has contributed \$675,000 through March 2026, which constitutes over 75% of the contributed funds raised by the entity to date.<sup>53</sup> Jeff Yass is one of the wealthiest people in the world, with an

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<sup>48</sup> See Exhibits 4A-4F to Gottstein Aff.; Exhibits 5A-5K to Gottstein Aff.

<sup>49</sup> See Exhibit 13C to Gottstein Aff.

<sup>50</sup> See generally *Alaska Pol’y F. v. APOC*, 583 P.3d 701 (Alaska 2026). The Alaska Policy Forum has indicated that it intends to file a petition for writ of certiorari to the United States Supreme Court later this summer.

<sup>51</sup> See Exhibit 4C to Gottstein Aff.; see also Exhibit 4D to Gottstein Aff.

<sup>52</sup> See Exhibit 4D to Gottstein Aff. One donor, former Alaska Attorney General Treg Taylor, withdrew his \$4,500 contribution on October 17, 2025. See Exhibit 4F to Gottstein. This withdrawal does not appear to have been reported to APOC. See Exhibits 5A-5K to Gottstein Aff. Additionally, his wife Jodi Taylor, who had directly contributed to Repeal Now, also withdrew her \$500 direct contribution on the same day. See Exhibit 2O to Gottstein Aff.

<sup>53</sup> See Exhibit 4D to Gottstein Aff.; see also Exhibit 4C to Gottstein Aff.

estimated net worth of over \$65 billion, who lives in Pennsylvania.<sup>54</sup> Yet his name does not appear on any of Repeal Now’s disclaimers.<sup>55</sup>

Whether or not Aurora Action Network will now falsely claim to be based at Mr. Griffin’s residential address in Anchorage, there is *zero* evidence that *any* of the entity’s business is actually conducted at that address. There is no indication that any of Aurora Action Network’s employees live or work at that address, that there is any dedicated phone line for its work at that location, or that its address has changed on any of its bank accounts or other governing documents.<sup>56</sup> We also do not know whether Aurora Action Network “changed” its address only after being asked to do so by Repeal Now, or what the communications may have been. Any investigation will need to review all communications between the two entities.

Moreover, even after belatedly filing a change of address with the FEC,<sup>57</sup> Aurora Action Network has *continued* to correctly list its Hudson, Wisconsin address on *all* of its Statement of Contribution reports with APOC.<sup>58</sup> In fact, *none* of Aurora Action Network’s

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<sup>54</sup> See <https://www.bloomberg.com/billionaires/profiles/jeffrey-s-yass/>; <https://www.forbes.com/profile/jeff-yass/>.

<sup>55</sup> See Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibit 8A to Gottstein Aff.; see also Exhibit 4B to Gottstein Aff. Jeff Yass’s name does appear in Repeal Now’s and Aurora Action Network’s APOC reports, since he is the “true source” of much of Aurora Action Network’s contributions. See Exhibits 2A-2AD to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.

<sup>56</sup> See, e.g., APOC Complaint 22-04-CD, Order on Expedited Consideration (Oct. 24, 2022).

<sup>57</sup> See Exhibit 4B to Gottstein Aff.

<sup>58</sup> See Exhibits 5A-5K to Gottstein Aff.

APOC reports, or Repeal Now’s, list an Anchorage address for Aurora Action Network.<sup>59</sup> This is true even for Statement of Contribution reports filed as recently as April 10 and 28, and May 14, 2026,<sup>60</sup> all of which were after the FEC filing purporting to adopt the false Alaska address.<sup>61</sup> The only place the Alaska address is used is on Repeal Now’s top three disclaimers.<sup>62</sup> Additionally, Aurora Action Network listed one of its true sources for \$50,000 — billionaire Timothy Mellon<sup>63</sup> — as being based in “Saratoga” Alaska, even though no such location exists.<sup>64</sup>

### **C. Advancing Alaska Action**

Advancing Alaska Action, Inc. is an Alaska nonprofit corporation that was established in January 2025.<sup>65</sup> It purports to be a sister organization of another nonprofit, although details are scarce as to what sorts of activities the other nonprofit is engaged in.<sup>66</sup>

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<sup>59</sup> See Exhibits 5A-5K to Gottstein Aff.; *see also* Exhibits 2A-2AD to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.

<sup>60</sup> See Exhibits 5I-5K to Gottstein Aff.

<sup>61</sup> See Exhibit 4B to Gottstein Aff.

<sup>62</sup> See Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibit 8A to Gottstein Aff.; *see also* Exhibit 9A to Gottstein Aff.

<sup>63</sup> See <https://fortune.com/2025/10/30/timothy-mellon-billionaire-wealth-the-reclusive-wyoming-billionaire-revealed-as-the-130-million-donor-funding-military-pay-during-the-federal-shutdown/>.

<sup>64</sup> See Exhibit 5K at 9 to Gottstein Aff.; *see also* Exhibit 2AD to Gottstein Aff.

<sup>65</sup> See Exhibit 14A to Gottstein Aff.

<sup>66</sup> See Exhibit 14B at 4 (“Advancing Alaska Action is linked with the Advancing Alaska Foundation, an organization that states on its website that its mission is ‘empowering survivors of sexual assault’ and ‘improving outcomes in our education system.’”) to Gottstein Aff.

Advancing Alaska Action’s purpose is unclear, but it appears to have posted numerous photos of former Alaska Attorney General Treg Taylor on the internet,<sup>67</sup> along with a lengthy video on YouTube.<sup>68</sup> This generated some press coverage in September 2025, along with speculation that the materials were included for an independent expenditure group to support Treg Taylor’s candidacy for Governor.<sup>69</sup>

Relevant here, Aurora Action Network has repeatedly listed Advancing Alaska Action as the “true source” of a \$5,000 donation that it reported occurring on October 21, 2025.<sup>70</sup> This is four days after Treg Taylor withdrew a prior personal \$4,500 contribution from Aurora Action Network,<sup>71</sup> and his wife Jodi Taylor also withdrew a prior personal \$500 contribution from Repeal Now.<sup>72</sup> As a pass through political group, Advancing Alaska Action cannot be a “true source” under Alaska law;<sup>73</sup> nevertheless, Repeal Now has recently listed it as one as well.<sup>74</sup> Advancing Alaska Action has never filed a statement of contributions report.<sup>75</sup>

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<sup>67</sup> See Exhibit 14C to Gottstein Aff.

<sup>68</sup> See Exhibit 14D to Gottstein Aff.; see also Exhibit 14B to Gottstein Aff.

<sup>69</sup> See Exhibits 14B & 14E to Gottstein Aff.

<sup>70</sup> See Exhibits 5H-5K to Gottstein Aff.; see also Exhibit 4D to Gottstein Aff.

<sup>71</sup> See Exhibit 4F to Gottstein Aff.

<sup>72</sup> See Exhibit 2O to Gottstein Aff.

<sup>73</sup> See AS 15.13.400(19).

<sup>74</sup> See Exhibit 2AD to Gottstein Aff.

<sup>75</sup> See Gottstein Aff. at ¶ 114.

### **III. ALLEGATIONS**

#### **A. Alleged Violations By Aurora Action Network.**

##### **i. Falsely and deceptively changing its address to an Alaska address.**

Whenever a group like Repeal Now communicates, AS 15.13.090 requires that certain disclaimers be included. Chief among them is the requirement to list a group’s “three largest contributors,” including their “city and state of residence or principal place of business.”<sup>76</sup>

Aurora Action Network, by falsely listing an Anchorage residential address as its “principal place of business” in an FEC filing,<sup>77</sup> has distorted the required disclaimer in AS 09.13.090(a)(2)(C). There is no indication that *any* employees or contributors do any “business” at a residential address in Anchorage, let alone that it is Aurora Action Network’s “principal place of business.”<sup>78</sup> Instead, it appears to be a pure and intentional farce to allow Repeal Now to deceive Alaskans about where its contributions come from.<sup>79</sup> APOC Staff should thoroughly investigate all of Aurora Action Network’s communications with Repeal Now, its governing documents, and its bank statements, to see what its actual connection is to a residential address in Anchorage.

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<sup>76</sup> AS 15.13.090(a)(2)(C); *see also* AS 15.13.040(e).

<sup>77</sup> *See* Exhibit 4B to Gottstein Aff. *But see* Exhibits 5A-5K to Gottstein Aff.

<sup>78</sup> AS 15.13.090(a)(2)(C).

<sup>79</sup> *See* Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibits 8A-8X to Gottstein Aff.; Exhibits 9A-9J to Gottstein Aff.

**ii. Delayed and inaccurate reporting.**

Aurora Action Network has filed many amended and delayed statement of contribution 15-5 forms with APOC.<sup>80</sup> And some of them, when compared to Repeal Now's filed reports, appear to be inaccurate. In fact, given the discrepancies between the filings, either Aurora Action Network or Repeal Now (or both) have filed inaccurate reports with APOC. The best (and perhaps only) way to resolve the apparent discrepancies is for APOC Staff to review the relevant bank statements for both entities to determine if one or both of them have failed to accurately report contributions.

The following discrepancies exist between Aurora Action Network's and Repeal Now's filings with APOC:

- There are different dates for a sizeable contribution Aurora Action Network made to Repeal Now in June 2025.<sup>81</sup> At some point that month, Damien Stella contributed \$30,000 to Aurora Action Network, who then in turn contributed \$27,000 to Repeal Now. The dates of Aurora Action Network's contribution to Repeal Now are not consistent.
- There are different amounts for one or more contributions that Aurora Action Network made to Repeal Now on July 31, 2025.<sup>82</sup> The \$500 discrepancy should be accounted for, and corrected by one or both entities if necessary.

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<sup>80</sup> See Exhibits 5A-5K to Gottstein Aff.

<sup>81</sup> See Exhibits 2G, 3B, 4D-4E, 5A, 5H-5K to Gottstein Aff.

<sup>82</sup> See Exhibits 2J, 3C, 4E, 5C, 5H to Gottstein Aff.

- There are different amounts for a sizable contribution that Aurora Action Network made to Repeal Now on October 20, 2025.<sup>83</sup> The \$5,000 discrepancy should be accounted for, and corrected by one or both entities if necessary.
- Aurora Action Network's largest contributor, who has contributed over 75% of its funds through March 2026, is Jeff Yass.<sup>84</sup> Since Jeff Yass has started contributing tens of thousands of dollars to Aurora Action Network, some, but not all, of his contributions have been accounted for, and some have been passed through to Repeal Now.<sup>85</sup> The amounts and dates of some of Jeff Yass's sizable contributions are not clear, and reports filed by Aurora Action Network and Repeal Now are in conflict, and which means they cannot both be true. It is possible that the only way APOC will be able to reconcile these discrepancies is to subpoena banking records or other documentation from Jeff Yass to establish the correct amounts and dates for these significant transactions.

**iii. True source violations.**

Aurora Action Network has repeatedly reported that Advancing Alaska Action is the true source of a \$5,000 contribution that it received on October 21, 2025.<sup>86</sup> But

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<sup>83</sup> See Exhibits 3D, 4E, 5E to Gottstein Aff. Repeal Now does not appear to have ever filed the required independent expenditure form 15-6 for these funds. See Exhibits 2A-2AC to Gottstein Aff.

<sup>84</sup> See Exhibit 4D to Gottstein Aff.

<sup>85</sup> See Exhibits 2A-2AD, 3A-3D, 4D-4E, 5A-5K to Gottstein Aff.

<sup>86</sup> See Exhibits 5H-5K to Gottstein Aff.; see also Exhibit 4D to Gottstein Aff.

Advancing Alaska Action cannot be a “true source” by definition.<sup>87</sup> Aurora Action Network should not only be required to disclose the *actual* “true source” behind Advancing Alaska Action’s contribution, but it should also be subject to civil penalties, and be required to demonstrate that this inaccurate reporting was not intentional.<sup>88</sup> Additionally, Aurora Action Network has falsely reported that one of its donors, Timothy Mellon, lives in the nonexistent location of “Saratoga,” Alaska.<sup>89</sup>

**iv. Other violations of AS 15.13.**

Any other violations of AS 15.13. et seq. that are discovered during this proceeding.

**B. Alleged Violations By Repeal Now.**

**i. Improper disclaimers.**

Repeal Now is required by AS 15.13.090(a)(2)(C) to disclaim its “three largest contributors,” along with their “city and state of residence or principal place of business,” for every communication.<sup>90</sup> The primary source of this requirement comes from AS 15.13.040(e)(5).

Neither Aurora Action Network nor Repeal Now ever filed a single report with APOC claiming that Anchorage, Alaska is Aurora Action Network’s “principal place of business.”<sup>91</sup> Indeed, it appears obvious that Aurora Action Network is based in

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<sup>87</sup> See AS 15.13.400(19).

<sup>88</sup> See AS 15.13.390(a).

<sup>89</sup> See Exhibit 5K to Gottstein Aff.; see also Exhibit 2AD to Gottstein Aff.

<sup>90</sup> AS 15.13.090(a)(2)(C).

<sup>91</sup> See Exhibits 2A-2AD to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.; Exhibits 5A-5K to Gottstein Aff.

Wisconsin.<sup>92</sup> Yet Repeal Now has listed Anchorage, Alaska for that very purpose on dozens of communications, including at least one radio advertisement.<sup>93</sup> That is false and misleading, and a clear violation of AS 15.13.090.<sup>94</sup>

Moreover, Repeal Now's use of a false disclaimer appears to be intentional.<sup>95</sup> Repeal Now is either relying on Aurora Action Network's false FEC filing,<sup>96</sup> or there are some other communications between the two entities requesting that Aurora Action Network utilize the false Alaska address. But either way, falsely listing the Alaska residential address is a farcical and intentional play by Repeal Now to deceive Alaskans about the source of its contributions.<sup>97</sup> APOC Staff should thoroughly investigate all of Aurora Action Network's communications with Repeal Now, its governing documents, and its bank statements, to determine if there is any bona fide connection to a residential address in Anchorage, and whether this violation is as intentional as it appears to be.<sup>98</sup>

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<sup>92</sup> See Exhibits 4A-4B to Gottstein Aff.; Exhibits 5A-5K to Gottstein Aff.

<sup>93</sup> See Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibits 8A-8Y to Gottstein Aff.; Exhibits 9A-9L to Gottstein Aff.

<sup>94</sup> Complainant believes that, given the sheer number of Repeal Now's inaccurate communications, and the number of days where Repeal Now has relied on inaccurate disclaimers, Repeal Now likely faces tens of thousands of dollars in maximum civil penalties for these communications alone. See AS 15.13.390(a)(4); Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibits 8A-8Y to Gottstein Aff.; Exhibits 9A-9L to Gottstein Aff.; see also Exhibit 7B to Gottstein Aff.

<sup>95</sup> See Gottstein Aff. at ¶ 58; see also Exhibit 7B to Gottstein Aff.

<sup>96</sup> See Exhibit 4B to Gottstein Aff.

<sup>97</sup> See Exhibit 13B to Gottstein Aff.; see also Gottstein Aff. at ¶ 58; Exhibit 7B to Gottstein Aff.

<sup>98</sup> Repeal Now also appears to be incorrectly listing its third largest contributor as well. See Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibit 8A to Gottstein Aff.; see also Exhibit 9A to Gottstein Aff. This is because Repeal Now reported the true

**ii. Inaccurate Reports to APOC.**

In practice, Repeal Now appears to be solely focused on supporting 24ESEG.<sup>99</sup> However, Repeal Now seems to have either inaccurately referenced a prior ballot initiative, 22AKHE — *or* referenced a changing and unassigned ballot initiative number — 232 out of 234 times on its independent expenditure reports.<sup>100</sup> In fact, Repeal Now has continued this pattern of erroneous filings even after it correctly listed 24ESEG for two expenditures on February 17, 2026.<sup>101</sup>

This means that the following twenty-nine (29) independent expenditure reports filed by Repeal Now are inaccurate:

<b>Latest Filing Date</b>	<b>Original Filing Date</b>	<b>Type</b>	<b>Number of Inaccurate Expenditures &amp; Debts</b>	<b>Number of Days in Violation</b>
Apr. 17, 2025	Apr. 12, 2025	Amended	14	404 <sup>102</sup>
Apr. 27, 2025	Apr. 27, 2025	Original	4	394 <sup>103</sup>
May 12, 2025	May 11, 2025	Amended	16	379 <sup>104</sup>

source of a \$10,000 contribution as “Jim Lot Turner.” *See* Exhibit 2Z to Gottstein Aff. This was confirmed by a subsequent statement of contribution form 15-5 filed by Mr. Turner. *See* Exhibit 15A to Gottstein Aff. Yet Repeal Now is reporting the true source of the contribution as “LOT Inc.,” which is contrary to its reports and Mr. Turner’s statement of contribution form. *See* Exhibit 15A to Gottstein Aff.; Exhibits 6B-6C to Gottstein Aff.; Exhibit 7A to Gottstein Aff.; Exhibit 8A to Gottstein Aff.; Exhibit 9A to Gottstein Aff. Repeal Now should also be required to correct this error on its disclaimers.

<sup>99</sup> *See* Exhibit 1A to Gottstein Aff.; *see also* Exhibit 10A to Gottstein Aff.

<sup>100</sup> *See* Exhibits 2A-2AD to Gottstein Aff.; *but cf.* Exhibit 2R to Gottstein Aff.

<sup>101</sup> *See* Exhibits 2S-2AD to Gottstein Aff.; *see also* Exhibit 2R to Gottstein Aff.

<sup>102</sup> *See* Exhibit 2A to Gottstein Aff.

<sup>103</sup> *See* Exhibit 2B to Gottstein Aff.

<sup>104</sup> *See* Exhibit 2C to Gottstein Aff.

<b>Latest Filing Date</b>	<b>Original Filing Date</b>	<b>Type</b>	<b>Number of Inaccurate Expenditures &amp; Debts</b>	<b>Number of Days in Violation</b>
May 23, 2025	May 23, 2025	Original	15	368 <sup>105</sup>
June 8, 2025	June 8, 2025	Original	10	352 <sup>106</sup>
June 23, 2025	June 23, 2025	Amended	6	352 <sup>107</sup>
July 7, 2025	July 3, 2025	Amended	11	323 <sup>108</sup>
July 15, 2025	July 14, 2025	Amended	12	315 <sup>109</sup>
July 26, 2025	July 26, 2025	Original	10	304 <sup>110</sup>
Aug. 9, 2025	Aug. 9, 2025	Original	12	290 <sup>111</sup>
Sept. 11, 2025	Aug. 26, 2025	Amended	3	257 <sup>112</sup>
Sept. 13, 2025	Sept. 13, 2025	Original	6	255 <sup>113</sup>
Sept. 26, 2025	Sept. 26, 2025	Original	6	242 <sup>114</sup>
Oct. 11, 2025	Oct. 11, 2025	Original	2	227 <sup>115</sup>

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<sup>105</sup> See Exhibit 2D to Gottstein Aff.

<sup>106</sup> See Exhibit 2E to Gottstein Aff.

<sup>107</sup> See Exhibit 2F to Gottstein Aff.

<sup>108</sup> See Exhibit 2G to Gottstein Aff.

<sup>109</sup> See Exhibit 2H to Gottstein Aff.

<sup>110</sup> See Exhibit 2I to Gottstein Aff.

<sup>111</sup> See Exhibit 2J to Gottstein Aff.

<sup>112</sup> See Exhibit 2K to Gottstein Aff.

<sup>113</sup> See Exhibit 2L to Gottstein Aff.

<sup>114</sup> See Exhibit 2M to Gottstein Aff.

<sup>115</sup> See Exhibit 2N to Gottstein Aff.

<b>Latest Filing Date</b>	<b>Original Filing Date</b>	<b>Type</b>	<b>Number of Inaccurate Expenditures &amp; Debts</b>	<b>Number of Days in Violation</b>
Oct. 22, 2025	Oct. 22, 2025	Original	9	216 <sup>116</sup>
Nov. 21, 2025	Nov. 21, 2025	Original	4	186 <sup>117</sup>
Feb. 8, 2026	Feb. 8, 2026	Original	8	107 <sup>118</sup>
Feb. 26, 2026	Jan. 7, 2026	Amended	3	89 <sup>119</sup>
Mar. 3, 2026	Mar. 3, 2026	Original	3	84 <sup>120</sup>
Mar. 14, 2026	Mar. 14, 2026	Amended	5	73 <sup>121</sup>
Mar. 24, 2026	Mar. 24, 2026	Amended	9	63 <sup>122</sup>
Apr. 3, 2026	Apr. 3, 2026	Original	4	53 <sup>123</sup>
Apr. 9, 2026	Apr. 9, 2026	Original	6	47 <sup>124</sup>
Apr. 9, 2026	Apr. 9, 2026	Original	8	47 <sup>125</sup>
Apr. 30, 2026	Apr. 20, 2026	Amended	6	26 <sup>126</sup>

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<sup>116</sup> See Exhibit 2O to Gottstein Aff.

<sup>117</sup> See Exhibit 2P to Gottstein Aff.

<sup>118</sup> See Exhibit 2Q to Gottstein Aff.

<sup>119</sup> See Exhibit 2S to Gottstein Aff.

<sup>120</sup> See Exhibit 2T to Gottstein Aff.

<sup>121</sup> See Exhibit 2U to Gottstein Aff.

<sup>122</sup> See Exhibit 2V to Gottstein Aff.

<sup>123</sup> See Exhibit 2W to Gottstein Aff.

<sup>124</sup> See Exhibit 2X to Gottstein Aff.

<sup>125</sup> See Exhibit 2Y to Gottstein Aff.

<sup>126</sup> See Exhibit 2Z to Gottstein Aff.

<b>Latest Filing Date</b>	<b>Original Filing Date</b>	<b>Type</b>	<b>Number of Inaccurate Expenditures &amp; Debts</b>	<b>Number of Days in Violation</b>
Apr. 30, 2026	Apr. 30, 2026	Original	12	26 <sup>127</sup>
May 12, 2026	May 11, 2026	Amended	7	14 <sup>128</sup>
May 19, 2026	Apr. 30, 2026	Amended	12	7 <sup>129</sup>
May 23, 2026	May 23, 2026	Original	9	3 <sup>130</sup>

Repeal Now must be required to correct all of their inaccurate reports so that it is identifying a current ballot initiative.<sup>131</sup>

**iii. Delayed, inaccurate, and missing reporting.**

Repeal Now has filed many amended and delayed independent expenditure 15-6 forms, along with quarterly reports, with APOC.<sup>132</sup> And some of them, when compared to Aurora Action Network’s filed reports, are apparently inaccurate. In fact, given the discrepancies between the filings, either Aurora Action Network or Repeal Now (or both) have filed inaccurate reports with APOC. The best way to resolve the apparent discrepancies is for APOC Staff to review the relevant bank statements for both entities to determine if one or both of them have failed to accurately report contributions.

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<sup>127</sup> See Exhibit 2AA to Gottstein Aff.

<sup>128</sup> See Exhibit 2AB to Gottstein Aff.

<sup>129</sup> See Exhibit 2AC to Gottstein Aff.

<sup>130</sup> See Exhibit 2AD to Gottstein Aff.

<sup>131</sup> In total, Complainant believes that Repeal Now faces over \$275,000 in maximum civil penalties just for these numerous inaccurate reports. See AS 15.13.390(a)(1); Exhibits 2A-2AC to Gottstein Aff.

<sup>132</sup> See Exhibits 2A-2AC to Gottstein Aff.; Exhibits 3A-3D to Gottstein Aff.

The following discrepancies exist between Aurora Action Network's and Repeal Now's filings with APOC:

- There are different dates for a sizeable contribution Aurora Action Network made to Repeal Now in June 2025.<sup>133</sup> At some point that month, Damien Stella contributed \$30,000 to Aurora Action Network, who then in turn contributed \$27,000 to Repeal Now. But the dates of Aurora Action Network's contribution to Repeal Now are not consistent.
- There are different amounts for one or more contributions that Aurora Action Network made to Repeal Now on July 31, 2025.<sup>134</sup> The \$500 discrepancy should be accounted for, and corrected by one or both entities if necessary.
- Repeal Now has repeatedly post-dated "true source" contributions.<sup>135</sup> Specifically, there are at least seven (7) instances where Repeal Now is claiming to have received funds from a true source on one day, while at the same time claiming that the "true source" did not contribute the underlying funds until after the date of the reported contribution. This post-dating has the effect of falsely attributing donors as the true source of funds in clear violation of Alaska law.
- There are different amounts for a sizable contribution that Aurora Action Network made to Repeal Now on October 20, 2025.<sup>136</sup> The \$5,000 discrepancy

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<sup>133</sup> See Exhibits 2G, 3B, 4D-4E, 5A, 5H-5K to Gottstein Aff.

<sup>134</sup> See Exhibits 2J, 3C, 4E, 5C, 5H to Gottstein Aff.

<sup>135</sup> See Exhibits 2J & 2L to Gottstein Aff.

<sup>136</sup> See Exhibits 3D, 4E, 5E to Gottstein Aff.

should be accounted for, and corrected by one or both entities if necessary. Moreover, Repeal Now failed to include this sizable contribution — no matter its size — on any independent expenditure 15-6 form.<sup>137</sup>

- Repeal Now filed four quarterly reports for 2025.<sup>138</sup> But it has not timely filed its first quarterly report for 2026. This failure should be promptly corrected.
- Aurora Action Network’s largest contributor, who has contributed over 75% of its funds through March 2026, is Jeff Yass.<sup>139</sup> Aurora Action Network has then in turn contributed tens of thousands of dollars to Repeal Now.<sup>140</sup> Since Jeff Yass has started contributing tens of thousands of dollars to Aurora Action Network, some, but not all, of his contributions have been accounted for, and some have been passed through to Repeal Now.<sup>141</sup> The amounts and dates of some of Jeff Yass’s sizable contributions are not clear, and the timing and amounts that have been reported by Aurora Action Network and Repeal Now cannot both be true.<sup>142</sup> It is possible that the only way APOC will be able to reconcile these discrepancies is to subpoena banking documents from Jeff Yass to establish the correct amounts and dates for these very large transactions.

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<sup>137</sup> See Exhibits 2A-2AC to Gottstein Aff.

<sup>138</sup> See Exhibits 3A-3D to Gottstein Aff.

<sup>139</sup> See Exhibit 4D to Gottstein Aff.

<sup>140</sup> See Exhibits 5A-5K to Gottstein Aff.

<sup>141</sup> See Exhibits 2F-2AC to Gottstein Aff.; see Exhibit 4D to Gottstein Aff.

<sup>142</sup> See Exhibits 2A-2AC, 3A-3D, 4D-4E, 5A-5K to Gottstein Aff.

**iv. True source violations.**

Aurora Action Network has repeatedly reported that Advancing Alaska Action is the true source of a \$5,000 contribution that it received on October 21, 2025.<sup>143</sup> But Advancing Alaska Action cannot be a “true source” by definition.<sup>144</sup> And Repeal Now recently inaccurately listed Advancing Alaska Action as a true source for one of Aurora Action Network’s recent sizable contributions.<sup>145</sup> Repeal Now should not only be required to disclose the *actual* “true source” behind Aurora Action Network’s contribution, but it should also be subject to civil penalties, and be required to demonstrate that this inaccurate reporting was not intentional.<sup>146</sup> Additionally, Repeal Now has falsely reported that one of Aurora Action Network’s donors, Timothy Mellon, lives in the nonexistent location of “Saratoga,” Alaska.<sup>147</sup>

**v. Other violations of AS 15.13.**

Any other violations of AS 15.13. et seq. that are discovered during this proceeding.

**vi. Repeal Now is a sophisticated filer.**

Finally, as this investigation proceeds, and if civil penalties are recommended, APOC Staff should consider Repeal Now’s operation. Repeal Now is not a modestly-

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<sup>143</sup> See Exhibits 5H-5K to Gottstein Aff.; see also Exhibit 4D to Gottstein Aff.

<sup>144</sup> See AS 15.13.400(19).

<sup>145</sup> See Exhibit 2D to Gottstein Aff.

<sup>146</sup> See AS 15.13.390(a).

<sup>147</sup> See Exhibit 2AD to Gottstein Aff.; see also Exhibit 5K to Gottstein Aff.

funded grassroots campaign.<sup>148</sup> In fact, Repeal Now has hired one of the most experienced and sophisticated APOC compliance professionals in Alaska.<sup>149</sup>

Repeal Now reports raising over \$650,000 to date.<sup>150</sup> It has more than adequate resources to ensure compliance with Alaska law. Indeed, Repeal Now has engaged the services of Cheryl Frasca, an APOC compliance expert with experience working on dozens of campaigns, including multiple current campaigns.<sup>151</sup> The fact that four current gubernatorial campaigns employ her for her services speak for herself.<sup>152</sup>

What this means is that Repeal Now's violations are unlikely to be the result of carelessness or a lack of familiarity with Alaska's campaign disclaimer and disclosure requirements. Rather, it makes it far more likely that Repeal Now has acted intentionally or recklessly to obscure the source of its contributions from voters.<sup>153</sup>

### **C. Alleged Violations By Advancing Alaska Action.**

#### **i. True source violations.**

Aurora Action Network has repeatedly reported that Advancing Alaska Action is the true source of a \$5,000 contribution that it received on October 21, 2025.<sup>154</sup> Repeal Now has also recently reported that Advancing Alaska Action is the true source of those

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<sup>148</sup> See Exhibit 2AC to Gottstein Aff.

<sup>149</sup> See Exhibits 15A-15B to Gottstein Aff.; see also Gottstein Aff. at ¶ 118.

<sup>150</sup> See Exhibit 2AC to Gottstein Aff.

<sup>151</sup> See Exhibits 15A-15B to Gottstein Aff.; see also Gottstein Aff. at ¶ 118.

<sup>152</sup> See Gottstein Aff. at ¶ 118.

<sup>153</sup> See Gottstein Aff. at ¶ 58; see also Exhibit 7B to Gottstein Aff.

<sup>154</sup> See Exhibits 5H-5K to Gottstein Aff.; see also Exhibit 4D to Gottstein Aff.

funds.<sup>155</sup> But Advancing Alaska Action itself cannot be a “true source” by definition.<sup>156</sup> Moreover, Advancing Alaska Action has not filed a single statement of contributions 15-5 form with APOC.<sup>157</sup>

Advancing Alaska Action should not only be required to disclose the “true source” behind its \$5,000 contribution to both Aurora Action Network and Repeal Now by filing a (late) statement of contributions, but Advancing Alaska Action should also be subject to civil penalties, and be required to show how its inaccurate reporting was not intentional.<sup>158</sup> Additionally, APOC Staff should investigate the suspicious timing between the refund of Treg and Jodi Taylor’s \$5,000 in combined contributions to Aurora Action Network and Repeal Now on October 17, 2025,<sup>159</sup> only for Advancing Alaska Action to make a \$5,000 contribution to Aurora Action Network just four days later on October 21, 2025.<sup>160</sup>

**ii. Other violations of AS 15.13.**

Any other violations of AS 15.13. et seq. that are discovered during this proceeding.

**IV. CONCLUSION**

This Complaint documents a bizarre (and intentional) series of actions taken by the Respondents that quite clearly are aimed at accomplishing two things.

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<sup>155</sup> See Exhibit 2D to Gottstein Aff.

<sup>156</sup> See AS 15.13.400(19).

<sup>157</sup> See Gottstein Aff. at ¶ 114.

<sup>158</sup> See AS 15.13.390(a); see also AS 15.13.390(a)(3).

<sup>159</sup> See Exhibits 2O & 4F to Gottstein Aff.

<sup>160</sup> See Exhibits 5H-5K to Gottstein Aff.; see also Exhibit 4D to Gottstein Aff.

First, Respondents are intentionally deceiving voters regarding the location of Aurora Action Network, the pass-through organization for nearly all of Repeal Now's funding. By claiming Aurora Action Network is based at an Anchorage, Alaska address, Repeal Now can fool any voter who only hears or reads their disclaimers into believing their campaign is locally funded.


Second, Respondents seem fixated on obscuring the fact that one man — billionaire Jeff Yass — is almost single-handedly financing their campaign. Rather than just donate directly, they have set up an artificial conduit for Jeff Yass to sanitize his contributions, thereby keeping his name out of Repeal Now's campaign disclaimers. However, along the way, this Rube Goldberg financial reporting machine has caused literally dozens of violations, serving only to further obscure Alaska voters' view of Repeal Now's finances.

APOC Staff must fully investigate these matters. Only by reviewing Respondents' original banking documents (and those of their large donors) — and any communications among the Respondents — will APOC Staff be able to unravel the mess these reports have created, and whether the violations are as intentional as they appear.

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DATE: May 26, 2026

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