# Alaska Public Offices Commission

## COMPLAINT

| FILING A COMPLAINT<br>*To be accepted, complaint must include* | APOC LAWS ALLEGEDLY VIOLATED<br>*Specify section of law or regulation* | | *APOC case name/number/date* |
|---|---|---|---|
| 1. Complainant's name + contact info<br>2. Respondent's name + contact info<br>3. Laws, regulations allegedly violated<br>4. Description of allegations<br>5. Basis of knowledge of alleged facts<br>6. Documentation to support allegations<br>7. Notarized signature of the complainant<br>8. Proof that complaint *and* all supporting documents were served on respondent | Campaign Disclosure Law | ☒ AS 15.13<br>☐ 2 AAC 50.250-405 | 26-06-CD<br><br>ARRIVED<br>05.28.26<br>APOC - ANCH<br>PM HC FAX ELE |
| | Public Official Financial Disclosure | ☐ AS 39.50<br>☐ 2 AAC 50.680-799 | |
| | Legislative Financial Disclosure | ☐ AS 24.60<br>☐ 2 AAC 50.680–799 | |
| | Lobbying Regulation | ☐ AS 24.45<br>☐ 2 AAC 50.550–590 | |

*If complaint meets requirements for acceptance, APOC will investigate the allegations and notify the respondent of the right to respond. APOC will notify Complainant and Respondent when APOC accepts or rejects a complaint.*

| ☐ APOC<br>☐ Person<br>☐ Party<br>☒ Group | COMPLAINANT | RESPONDENTS *Person or group allegedly violating law* | |
|---|---|---|---|
| | Alaskans for Better Elections | ☒ Person<br>☐ Party<br>☒ Group | **Repeal Now; Aurora Action Network; Advancing Alaska Action** |
| **Address City / Zip** | 510 L St., Ste. 300<br>Anchorage, AK 99501 | **See attached Complaint, page 1** | |
| **Phone/Fax** | 907-222-7932 | | |
| **E-mail** | scott@cashiongilmore.com<br>sam@cashiongilmore.com | | |

| COMPLAINANT'S REPRESENTATIVE | | RESPONDENTS' REPRESENTATIVES |
|---|---|---|
| *If complainant or respondent is political party or group, list contact person. If complainant or respondent is represented by attorney, list name + contact info* | | |
| **Name/Title** | **Scott M. Kendall for Complainant** | **Please see attached Complaint, page 1** |
| **Address** | **510 L Street, Ste. 300** | |
| **Phone/Fax** | **907-222-7932 / 907-222-7938** | |
| **E-mail** | **scott@cashiongilmore.com** | |

| DESCRIPTION or SUMMARY of ALLEGED VIOLATION | *Use extra pages if needed* | ☒ SUPPORTING DOCUMENTS – DESCRIBE: |
|---|---|---|
| **Please see attached supporting information and documentation.** | | **Please see attached complaint and associated exhibits.** |

**PROOF of SERVICE ATTACHED:** ☐ Fax – receipt confirmation ☐ Certified mail – signed receipt ☐ Process server – return of service ☒ E-mail – delivery/read receipt ☐ Other:

**COMPLAINANT'S SWORN STATEMENT: To the best of my knowledge and belief, these statements are true**

Signature _____ Title Scott Kendall Date May 26, 2026

Subscribed and sworn to or affirmed by me at _____ on _____

Signature _____ Title Paralegal

JENNIFER A DUCHARME NOTARY PUBLIC STATE OF ALASKA My Commission Expires April 5, 2029

*APOC COMPLAINTS, RESPONSES, INVESTIGATION REPORTS & COMMISSION ACTIONS ARE PUBLIC DOCUMENTS*

| APOC ANCHORAGE | APOC JUNEAU | APOC COMPLAINT PROCESS: 2 AAC 50.450 - 476 | |
|---|---|---|---|
| 2221 E. NORTHERN LIGHTS #128 | 240 MAIN STREET #500 | FILING COMPLAINTS : 2AAC 50.870 | ANSWERING COMPLAINTS: 2AAC 50.880 |
| ANCHORAGE, AK 99508 | P.O. BOX 110222 | APOC CRITERIA for ACCEPTING COMPLAINTS: 2 AAC 50.870 | |
| 907-276-4176 / FAX 907-276-7018 | JUNEAU, AK 99811 | INVESTIGATIONS & HEARINGS: 2 AAC 50.875-891 | |
| TOLL-FREE 800-478-4176 | 465-4864 / FAX 465-4832 | RULES for REQUESTING EXPEDITED CONSIDERATION: AS15.13.380(c) | |
| WEB: http://doa.alaska.gov/apoc/ | APOC FORMS: http://doa.alaska.gov/apoc/forms_all.html | APOC LAWS: http://doa.alaska.gov/apoc/apoclaws.html | |

Gmail

Todd Cowles <todd@cashiongilmore.com>

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

1 message

**Todd Cowles** <todd@cashiongilmore.com> Tue, May 26, 2026 at 2:09 PM
To: cfrascaAK@gmail.com, Bethany Marcum <bethanymarcum@gmail.com>, Craig Richards <crichards@pioneerlawllc.com>, Julie Pack <jpack@pioneerlawllc.com>
Cc: Scott Kendall <scott@cashiongilmore.com>, Sam Gottstein <sam@cashiongilmore.com>

Please find the following APOC complaint attached for service:

- Complaint Against Repeal Now, Aurora Action Network, and Advancing Alaska Action for Numerous Violations of Campaign Finance Laws (AS 15.13) [45 pages]

Exhibits to the included affidavit are available via the following Dropbox link which will expire on September 25, 2026:

https://www.dropbox.com/scl/fo/dj1fmcokdjhvkqwe10t8e/ANHxbhdyQ-16Lt4k6QC7r88?rlkey=w9ljobaiky4w29ad0jwf8p6we&st=mmdoe7p3&dl=0

A second email will be sent with the affidavit and exhibits in a combined PDF.

***Todd Cowles***
Paralegal
Cashion Gilmore & Lindemuth
510 L Street, Suite 300
Anchorage, AK 99501
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**2026.05.26_1 APOC Complaint_Complaint+Affidavit.pdf**
1324K

Gmail

Todd Cowles <todd@cashiongilmore.com>

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

1 message

**Todd Cowles** <todd@cashiongilmore.com> Tue, May 26, 2026 at 2:11 PM
To: Compliance@axcapteam.com
Cc: Scott Kendall <scott@cashiongilmore.com>, Sam Gottstein <sam@cashiongilmore.com>

Please find the following APOC complaint attached for service:

- Complaint Against Repeal Now, Aurora Action Network, and Advancing Alaska Action for Numerous Violations of Campaign Finance Laws (AS 15.13) [45 pages]

Exhibits to the included affidavit are available via the following Dropbox link which will expire on September 25, 2026:

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A second email will be sent with the affidavit and exhibits in a combined PDF.

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**2026.05.26_1 APOC Complaint_Complaint+Affidavit.pdf**
1324K

Gmail

Todd Cowles <todd@cashiongilmore.com>

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

1 message

**Todd Cowles** <todd@cashiongilmore.com> Tue, May 26, 2026 at 2:12 PM
To: tcdatwyler@gmail.com
Cc: Scott Kendall <scott@cashiongilmore.com>, Sam Gottstein <sam@cashiongilmore.com>

Please find the following APOC complaint attached for service:

- Complaint Against Repeal Now, Aurora Action Network, and Advancing Alaska Action for Numerous Violations of Campaign Finance Laws (AS 15.13) [45 pages]

Exhibits to the included affidavit are available via the following Dropbox link which will expire on September 25, 2026:

https://www.dropbox.com/scl/fo/dj1fmcokdjhvkqwe10t8e/ANHxbhdyQ-16Lt4k6QC7r88?rlkey=w9ljobaiky4w29ad0jwf8p6we&st=mmdoe7p3&dl=0

A second email will be sent with the affidavit and exhibits in a combined PDF.

***Todd Cowles***
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**2026.05.26_1 APOC Complaint_Complaint+Affidavit.pdf**
1324K

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:**[1]

**Repeal Now**
P.O. Box 240382
Anchorage, Alaska 99524
Telephone: 907-440-7000
Emails: cfrascaAK@gmail.com
bethanymarcum@gmail.com
crichards@pioneerlawllc.com
jpack@pioneerlawllc.com

**Aurora Action Network**
502 6th Street
Hudson, Wisconsin 54016
Telephone: 202-866-8229
Email: Compliance@AXCAPTEAM.com

**Advancing Alaska Action**
721 Depot Drive
Anchorage, Alaska 99501
Telephone: 715-338-8544
Email: tcdatwyler@gmail.com

## I. SUMMARY OF COMPLAINT

Although Repeal Now has only been in existence for a little more than a year,[2] 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,"[3] 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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[1] 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.

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

[3] *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.[4] 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,[5] 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.[6] Additionally, the vast majority of Repeal Now's financial support is funneled to it via an FEC-registered Super PAC called "Aurora Action Network."[7] 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.[8]

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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4 *See id.*

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

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

7 *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.

8 *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.[9] Yet suddenly, Repeal Now has started claiming in disclaimers on its public communications that Aurora Action Network is "based" in Anchorage, Alaska,[10] 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.[11] 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,[12] Repeal Now's disclaimers continue to falsely state it is based in Anchorage, Alaska.[13]

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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[9] *See* Exhibits 5A-5K *to* Gottstein Aff.

[10] *See* Exhibits 6B-6C *to* Gottstein Aff.; Exhibit 7A *to* Gottstein Aff.; Exhibit 8A *to* Gottstein Aff.; *see also* Gottstein Aff. at ¶ 58.

[11] *See* Exhibit 4D *to* Gottstein Aff.; Exhibits 5A-5K *to* Gottstein Aff.

[12] *See* Exhibits 5A-5K *to* Gottstein Aff.

[13] *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,[14] a ballot initiative scheduled to appear on the November 2026 ballot.[15] If enacted by voters, 24ESEG would repeal major aspects of Alaska's current election system.[16] 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.[17]

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[14] *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.

[15] *See* Gottstein Aff. at ¶ 98.

[16] *See* Exhibit 10B *to* Gottstein Aff.

[17] *See id.*; *see also* Exhibit 10C *to* Gottstein Aff.

24ESEG is intended to fully repeal 19AKBE, a ballot initiative enacted by voters in 2020.[18] Unlike a recent repeal effort involving a different ballot initiative (22AKHE) from the last statewide election cycle,[19] 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.[20]

Repeal Now first registered as a group with APOC on March 20, 2025.[21] And although Repeal Now *appears* focused on supporting 24ESEG in practice,[22] virtually all of its APOC reports (33 out of 34), and associated expenses and debts (232 out of 234), falsely state otherwise.[23] 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[24] — or in support of either ballot measure "2" or "3."[25] APOC may recall 22AKHE from prior APOC complaints;[26] some of the penalties imposed by APOC

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18 *See* Exhibit 10C *to* Gottstein Aff.

19 *See* Exhibit 10D *to* Gottstein Aff.

20 *See* Exhibits 10B-10C *to* Gottstein Aff.

21 *See* Exhibit 1A *to* Gottstein Aff.

22 *See* Exhibits 6A-6C *to* Gottstein Aff; Exhibit 7A *to* Gottstein Aff.; Exhibits 8A-8Y *to* Gottstein Aff.; Exhibits 9A-9L *to* Gottstein Aff.

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

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

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

26 *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,[27] and other significant penalties have not yet been paid.[28]

Repeal Now's disclaimers on its communications have changed over time.[29] But since the end of June 2025, Repeal Now's top donor has been an entity called "Aurora Action Network."[30] Repeal Now's prior disclaimers noted that Aurora Action Network is located in Hudson, Wisconsin,[31] 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.[32]

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,[33] even though that address appears to have no plausible connection to the group, and has not been part of

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

28 *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).

29 *See, e.g.*, Exhibits 6A-6C *to* Gottstein Aff.

30 *See* Exhibit 2G *to* Gottstein Aff.

31 *See* Exhibit 6A *to* Gottstein Aff.

32 *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.

33 *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.[34] Additionally, some of the contributions and true sources listed by Repeal Now have not been consistent with other APOC reports,[35] which have themselves been delayed and have at times been inaccurate.[36] 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.[37]

**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.[38] This is the same business address as another one of Repeal Now's largest contributors, "Beautiful America."[39] Aurora

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[34] *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.

[35] *Compare* Exhibits 2A-2AD *to* Gottstein Aff., *and* Exhibits 3A-3D *to* Gottstein Aff., *with* Exhibits 5A-5K *to* Gottstein Aff.

[36] *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.

[37] *See* Exhibits 2J & 2L *to* Gottstein Aff.

[38] *See* Exhibit 4A *to* Gottstein Aff.

[39] *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.[40]

Recently, Repeal Now began using an Alaska residential address for Aurora Action Network in required disclaimers on its communications.[41] This appears to be because Aurora Action Network listed a new address in a recent FEC filing.[42] 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.[43] Furthermore, Aurora Action Network is not — and has never been — an Alaska-based corporation or entity,[44] and no APOC filing uses the residential address in Alaska.[45] 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.[46]

The Alaska address Aurora Action Network used for its FEC filing belongs to Bob Griffin, a prior (and early) contributor to Repeal Now.[47] 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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40 *See* Exhibit 4A *to* Gottstein Aff.

41 *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.

42 *See* Exhibit 4B *to* Gottstein Aff.

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

44 *See* Exhibit 13A *to* Gottstein Aff.

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

46 *See* Exhibits 5I-5K *to* Gottstein Aff.

47 *See* Exhibit 4B *to* Gottstein Aff.; *see also* Exhibit 2A *to* Gottstein Aff.

to have ever donated to the entity.[48] He is, however, currently listed as staff for the Alaska Policy Forum,[49] which has its own history of APOC violations.[50] 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.[51] Of that total, roughly $145,750 — only about 16% — has come from Alaska donors.[52]

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.[53] Jeff Yass is one of the wealthiest people in the world, with an

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48 *See* Exhibits 4A-4F *to* Gottstein Aff.; Exhibits 5A-5K *to* Gottstein Aff.

49 *See* Exhibit 13C *to* Gottstein Aff.

50 *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.

51 *See* Exhibit 4C *to* Gottstein Aff.; *see also* Exhibit 4D *to* Gottstein Aff.

52 *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.

53 *See* Exhibit 4D *to* Gottstein Aff.; *see also* Exhibit 4C *to* Gottstein Aff.

estimated net worth of over $65 billion, who lives in Pennsylvania.[54] Yet his name does not appear on any of Repeal Now's disclaimers.[55]

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.[56] 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,[57] Aurora Action Network has *continued* to correctly list its Hudson, Wisconsin address on *all* of its Statement of Contribution reports with APOC.[58] In fact, *none* of Aurora Action Network's

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[54] *See* https://www.bloomberg.com/billionaires/profiles/jeffrey-s-yass/; https://www.forbes.com/profile/jeff-yass/.

[55] *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.

[56] *See, e.g.*, APOC Complaint 22-04-CD, Order on Expedited Consideration (Oct. 24, 2022).

[57] *See* Exhibit 4B *to* Gottstein Aff.

[58] *See* Exhibits 5A-5K *to* Gottstein Aff.

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

### C. Advancing Alaska Action

Advancing Alaska Action, Inc. is an Alaska nonprofit corporation that was established in January 2025.[65] 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.[66]

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[59] *See* Exhibits 5A-5K *to* Gottstein Aff.; *see also* Exhibits 2A-2AD *to* Gottstein Aff.; Exhibits 3A-3D *to* Gottstein Aff.

[60] *See* Exhibits 5I-5K *to* Gottstein Aff.

[61] *See* Exhibit 4B *to* Gottstein Aff.

[62] *See* Exhibits 6B-6C *to* Gottstein Aff.; Exhibit 7A *to* Gottstein Aff.; Exhibit 8A *to* Gottstein Aff.; *see also* Exhibit 9A *to* Gottstein Aff.

[63] *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/.

[64] *See* Exhibit 5K at 9 *to* Gottstein Aff.; *see also* Exhibit 2AD *to* Gottstein Aff.

[65] *See* Exhibit 14A *to* Gottstein Aff.

[66] *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,[67] along with a lengthy video on YouTube.[68] 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.[69]

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.[70] This is four days after Treg Taylor withdrew a prior personal $4,500 contribution from Aurora Action Network,[71] and his wife Jodi Taylor also withdrew a prior personal $500 contribution from Repeal Now.[72] As a pass through political group, Advancing Alaska Action cannot be a "true source" under Alaska law;[73] nevertheless, Repeal Now has recently listed it as one as well.[74] Advancing Alaska Action has never filed a statement of contributions report.[75]

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67 *See* Exhibit 14C *to* Gottstein Aff.

68 *See* Exhibit 14D *to* Gottstein Aff.; *see also* Exhibit 14B *to* Gottstein Aff.

69 *See* Exhibits 14B & 14E *to* Gottstein Aff.

70 *See* Exhibits 5H-5K *to* Gottstein Aff.; *see also* Exhibit 4D *to* Gottstein Aff.

71 *See* Exhibit 4F *to* Gottstein Aff.

72 *See* Exhibit 2O *to* Gottstein Aff.

73 *See* AS 15.13.400(19).

74 *See* Exhibit 2AD *to* Gottstein Aff.

75 *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."[76]

Aurora Action Network, by falsely listing an Anchorage residential address as its "principal place of business" in an FEC filing,[77] 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."[78] Instead, it appears to be a pure and intentional farce to allow Repeal Now to deceive Alaskans about where its contributions come from.[79] 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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[76] AS 15.13.090(a)(2)(C); *see also* AS 15.13.040(e).

[77] *See* Exhibit 4B *to* Gottstein Aff. *But see* Exhibits 5A-5K *to* Gottstein Aff.

[78] AS 15.13.090(a)(2)(C).

[79] *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.[80] 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.[81] 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.[82] The $500 discrepancy should be accounted for, and corrected by one or both entities if necessary.

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80 *See* Exhibits 5A-5K *to* Gottstein Aff.

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

82 *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.[83] 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.[84] 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.[85] 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.[86] But

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[83] *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.

[84] *See* Exhibit 4D *to* Gottstein Aff.

[85] *See* Exhibits 2A-2AD, 3A-3D, 4D-4E, 5A-5K *to* Gottstein Aff.

[86] *See* Exhibits 5H-5K *to* Gottstein Aff.; *see also* Exhibit 4D *to* Gottstein Aff.

Advancing Alaska Action cannot be a "true source" by definition.[87] 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.[88] Additionally, Aurora Action Network has falsely reported that one of its donors, Timothy Mellon, lives in the nonexistent location of "Saratoga," Alaska.[89]

**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.[90] 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."[91] Indeed, it appears obvious that Aurora Action Network is based in

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87 *See* AS 15.13.400(19).

88 *See* AS 15.13.390(a).

89 *See* Exhibit 5K *to* Gottstein Aff.; *see also* Exhibit 2AD *to* Gottstein Aff.

90 AS 15.13.090(a)(2)(C).

91 *See* Exhibits 2A-2AD *to* Gottstein Aff.; Exhibits 3A-3D *to* Gottstein Aff.; Exhibits 5A-5K *to* Gottstein Aff.

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

Moreover, Repeal Now's use of a false disclaimer appears to be intentional.[95] Repeal Now is either relying on Aurora Action Network's false FEC filing,[96] 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.[97] 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.[98]

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92 *See* Exhibits 4A-4B *to* Gottstein Aff.; Exhibits 5A-5K *to* Gottstein Aff.

93 *See* Exhibits 6B-6C *to* Gottstein Aff.; Exhibit 7A *to* Gottstein Aff.; Exhibits 8A-8Y *to* Gottstein Aff.; Exhibits 9A-9L *to* Gottstein Aff.

94 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.

95 *See* Gottstein Aff. at ¶ 58; *see also* Exhibit 7B *to* Gottstein Aff.

96 *See* Exhibit 4B *to* Gottstein Aff.

97 *See* Exhibit 13B *to* Gottstein Aff.; *see also* Gottstein Aff. at ¶ 58; Exhibit 7B *to* Gottstein Aff.

98 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.[99] 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.[100] In fact, Repeal Now has continued this pattern of erroneous filings even after it correctly listed 24ESEG for two expenditures on February 17, 2026.[101]

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

| Latest Filing Date | Original Filing Date | Type | Number of Inaccurate Expenditures & Debts | Number of Days in Violation |
|---|---|---|---|---|
| Apr. 17, 2025 | Apr. 12, 2025 | Amended | 14 | 404[102] |
| Apr. 27, 2025 | Apr. 27, 2025 | Original | 4 | 394[103] |
| May 12, 2025 | May 11, 2025 | Amended | 16 | 379[104] |

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.

99 *See* Exhibit 1A *to* Gottstein Aff.; *see also* Exhibit 10A *to* Gottstein Aff.

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

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

102 *See* Exhibit 2A *to* Gottstein Aff.

103 *See* Exhibit 2B *to* Gottstein Aff.

104 *See* Exhibit 2C *to* Gottstein Aff.

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

105 *See* Exhibit 2D *to* Gottstein Aff.

106 *See* Exhibit 2E *to* Gottstein Aff.

107 *See* Exhibit 2F *to* Gottstein Aff.

108 *See* Exhibit 2G *to* Gottstein Aff.

109 *See* Exhibit 2H *to* Gottstein Aff.

110 *See* Exhibit 2I *to* Gottstein Aff.

111 *See* Exhibit 2J *to* Gottstein Aff.

112 *See* Exhibit 2K *to* Gottstein Aff.

113 *See* Exhibit 2L *to* Gottstein Aff.

114 *See* Exhibit 2M *to* Gottstein Aff.

115 *See* Exhibit 2N *to* Gottstein Aff.

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

116 *See* Exhibit 2O *to* Gottstein Aff.

117 *See* Exhibit 2P *to* Gottstein Aff.

118 *See* Exhibit 2Q *to* Gottstein Aff.

119 *See* Exhibit 2S *to* Gottstein Aff.

120 *See* Exhibit 2T *to* Gottstein Aff.

121 *See* Exhibit 2U *to* Gottstein Aff.

122 *See* Exhibit 2V *to* Gottstein Aff.

123 *See* Exhibit 2W *to* Gottstein Aff.

124 *See* Exhibit 2X *to* Gottstein Aff.

125 *See* Exhibit 2Y *to* Gottstein Aff.

126 *See* Exhibit 2Z *to* Gottstein Aff.

| Latest Filing Date | Original Filing Date | Type | Number of Inaccurate Expenditures & Debts | Number of Days in Violation |
|---|---|---|---|---|
| Apr. 30, 2026 | Apr. 30, 2026 | Original | 12 | 26[127] |
| May 12, 2026 | May 11, 2026 | Amended | 7 | 14[128] |
| May 19, 2026 | Apr. 30, 2026 | Amended | 12 | 7[129] |
| May 23, 2026 | May 23, 2026 | Original | 9 | 3[130] |

Repeal Now must be required to correct all of their inaccurate reports so that it is identifying a current ballot initiative.[131]

**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.[132] 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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127 *See* Exhibit 2AA *to* Gottstein Aff.

128 *See* Exhibit 2AB *to* Gottstein Aff.

129 *See* Exhibit 2AC *to* Gottstein Aff.

130 *See* Exhibit 2AD *to* Gottstein Aff.

131 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.

132 *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.[133] 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.[134] 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.[135] 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.[136] The $5,000 discrepancy

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

134 *See* Exhibits 2J, 3C, 4E, 5C, 5H *to* Gottstein Aff.

135 *See* Exhibits 2J & 2L *to* Gottstein Aff.

136 *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.[137]

- Repeal Now filed four quarterly reports for 2025.[138] 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.[139] Aurora Action Network has then in turn contributed tens of thousands of dollars to Repeal Now.[140] 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.[141] 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.[142] 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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137 *See* Exhibits 2A-2AC *to* Gottstein Aff.

138 *See* Exhibits 3A-3D *to* Gottstein Aff.

139 *See* Exhibit 4D *to* Gottstein Aff.

140 *See* Exhibits 5A-5K *to* Gottstein Aff.

141 *See* Exhibits 2F-2AC *to* Gottstein Aff.; *see* Exhibit 4D *to* Gottstein Aff.

142 *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.[143] But Advancing Alaska Action cannot be a "true source" by definition.[144] And Repeal Now recently inaccurately listed Advancing Alaska Action as a true source for one of Aurora Action Network's recent sizable contributions.[145] 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.[146] Additionally, Repeal Now has falsely reported that one of Aurora Action Network's donors, Timothy Mellon, lives in the nonexistent location of "Saratoga," Alaska.[147]

**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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143 *See* Exhibits 5H-5K *to* Gottstein Aff.; *see also* Exhibit 4D *to* Gottstein Aff.

144 *See* AS 15.13.400(19).

145 *See* Exhibit 2D *to* Gottstein Aff.

146 *See* AS 15.13.390(a).

147 *See* Exhibit 2AD *to* Gottstein Aff.; *see also* Exhibit 5K *to* Gottstein Aff.

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

Repeal Now reports raising over $650,000 to date.[150] 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.[151] The fact that four current gubernatorial campaigns employ her for her services speak for herself.[152]

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.[153]

### 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.[154] Repeal Now has also recently reported that Advancing Alaska Action is the true source of those

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148 *See* Exhibit 2AC *to* Gottstein Aff.

149 *See* Exhibits 15A-15B *to* Gottstein Aff.; *see also* Gottstein Aff. at ¶ 118.

150 *See* Exhibit 2AC *to* Gottstein Aff.

151 *See* Exhibits 15A-15B *to* Gottstein Aff.; *see also* Gottstein Aff. at ¶ 118.

152 *See* Gottstein Aff. at ¶ 118.

153 *See* Gottstein Aff. at ¶ 58; *see also* Exhibit 7B *to* Gottstein Aff.

154 *See* Exhibits 5H-5K *to* Gottstein Aff.; *see also* Exhibit 4D *to* Gottstein Aff.

funds.[155] But Advancing Alaska Action itself cannot be a "true source" by definition.[156] Moreover, Advancing Alaska Action has not filed a single statement of contributions 15-5 form with APOC.[157]

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.[158] 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,[159] only for Advancing Alaska Action to make a $5,000 contribution to Aurora Action Network just four days later on October 21, 2025.[160]

**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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155 *See* Exhibit 2D *to* Gottstein Aff.

156 *See* AS 15.13.400(19).

157 *See* Gottstein Aff. at ¶ 114.

158 *See* AS 15.13.390(a); *see also* AS 15.13.390(a)(3).

159 *See* Exhibits 2O & 4F *to* Gottstein Aff.

160 *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.

CASHION GILMORE & LINDEMUTH
Attorneys for Complainant, Alaskans for Better Elections

DATE: May 26, 2026

By: _____
Scott Kendall
Alaska Bar No. 0405019
Samuel G. Gottstein
Alaska Bar No. 1511099

# AFFIDAVIT OF SAMUEL G. GOTTSTEIN

STATE OF ALASKA )
) ss
THIRD JUDICIAL DISTRICT )

I, Samuel G. Gottstein, being first duly sworn and deposed, hereby state as follows:

1. I am an attorney representing Complainant Alaskans for Better Elections in an APOC Complaint against Repeal Now, Aurora Action Network, and Advancing Alaska Action.

2. Attached as Exhibit 1A is a true and correct copy of Repeal Now's amended group registration form, dated March 20, 2025.

3. Attached as Exhibit 2A is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated April 17, 2025.

4. Attached as Exhibit 2B is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated April 27, 2025.

5. Attached as Exhibit 2C is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated May 12, 2025.

6. Attached as Exhibit 2D is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated May 23, 2025.

7. Attached as Exhibit 2E is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated June 8, 2025.

8. Attached as Exhibit 2F is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated June 23, 2025.

9. Attached as Exhibit 2G is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated July 7, 2025.

10. Attached as Exhibit 2H is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated July 15, 2025.

11. Attached as Exhibit 2I is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated July 26, 2025.

12. Attached as Exhibit 2J is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated August 9, 2025.

13. Attached as Exhibit 2K is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated September 11, 2025.

14. Attached as Exhibit 2L is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated September 13, 2025.

15. Attached as Exhibit 2M is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated September 26, 2025.

16. Attached as Exhibit 2N is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated October 11, 2025.

17. Attached as Exhibit 2O is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated October 22, 2025.

18. Attached as Exhibit 2P is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated November 21, 2025.

19. Attached as Exhibit 2Q is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated February 8, 2026.

20. Attached as Exhibit 2R is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated February 17, 2026.

21. Attached as Exhibit 2S is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated February 26, 2026.

22. Attached as Exhibit 2T is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated March 3, 2026.

23. Attached as Exhibit 2U is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated March 14, 2026.

24. Attached as Exhibit 2V is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated March 24, 2026.

25. Attached as Exhibit 2W is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated April 3, 2026.

26. Attached as Exhibit 2X is a true and correct copy of the first of Repeal Now's two independent expenditures form 15-6, dated April 9, 2026.

27. Attached as Exhibit 2Y is a true and correct copy of the second of Repeal Now's two independent expenditures form 15-6, dated April 9, 2026.

28. Attached as Exhibit 2Z is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated April 30, 2026.

29. Attached as Exhibit 2AA is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated April 30, 2026.

30. Attached as Exhibit 2AB is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated May 12, 2026.

31. Attached as Exhibit 2AC is a true and correct copy of Repeal Now's amended independent expenditures form 15-6, dated May 19, 2026.

32. Attached as Exhibit 2AD is a true and correct copy of Repeal Now's independent expenditures form 15-6, dated May 23, 2026.

33. Attached as Exhibit 3A is a true and correct copy of Repeal Now's amended first quarterly report for 2025, dated April 17, 2025.

34. Attached as Exhibit 3B is a true and correct copy of Repeal Now's second quarterly report for 2025, dated July 10, 2025.

35. Attached as Exhibit 3C is a true and correct copy of Repeal Now's third quarterly report for 2025, dated October 10, 2025.

36. Attached as Exhibit 3D is a true and correct copy of Repeal Now's amended fourth quarterly report for 2025, dated January 10, 2026.

37. As of today, the State of Alaska, Division of Elections has not yet identified which ballot number 24ESEG will be assigned for the November 2026 general election.

38. Attached as Exhibit 4A is a true and correct copy of Aurora Action Network's statement of organization, which was filed with the Federal Election Commission ("FEC") on June 6, 2025.

39. Attached as Exhibit 4B is a true and correct copy of Aurora Action Network's statement of organization, which was filed with the FEC on April 7, 2026.

40. Attached as Exhibit 4C is a true and correct copy of Aurora Action Network's overview and financial summary, which is available on the FEC's website, as of April 27, 2026.

41. Attached as Exhibit 4D is a true and correct copy of Aurora Action Network's receipts, which is available on the FEC's website, as of April 27, 2026.

42. Attached as Exhibit 4E is a true and correct copy of Aurora Action Network's disbursements to Repeal Now, which is available on the FEC's website, as of April 27, 2026.

43. Attached as Exhibit 4F is a true and correct copy of Aurora Action Network's refund of contribution to Treg Taylor, which occurred on October 17, 2025. This refund was noted on the FEC's website as of April 27, 2026.

44. Attached as Exhibit 5A is a true and correct copy of the first of Aurora Action Network's two statement of contributions form 15-5, dated July 7, 2025.

45. Attached as Exhibit 5B is a true and correct copy of the second of Aurora Action Network's two statement of contributions form 15-5, dated July 7, 2025.

46. Attached as Exhibit 5C is a true and correct copy of the first of Aurora Action Network's five amended statement of contributions form 15-5, dated November 10, 2025. This statement of contributions form 15-5 was originally filed on October 24, 2025.

47. Attached as Exhibit 5D is a true and correct copy of the second of Aurora Action Network's five amended statement of contributions form 15-5, dated

November 10, 2025. This statement of contributions form 15-5 was originally filed on October 24, 2025.

48. Attached as Exhibit 5E is a true and correct copy of the third of Aurora Action Network's five amended statement of contributions form 15-5, dated November 10, 2025. This statement of contributions form 15-5 was originally filed on October 24, 2025.

49. Attached as Exhibit 5F is a true and correct copy of the fourth of Aurora Action Network's five amended statement of contributions form 15-5, dated November 10, 2025. This statement of contributions form 15-5 was originally filed on October 24, 2025.

50. Attached as Exhibit 5G is a true and correct copy of the fifth of Aurora Action Network's five amended statement of contributions form 15-5, dated November 10, 2025. This statement of contributions form 15-5 was originally filed on October 24, 2025.

51. Attached as Exhibit 5H is a true and correct copy of Aurora Action Network's amended statement of contributions form 15-5, dated February 12, 2026.

52. Attached as Exhibit 5I is a true and correct copy of Aurora Action Network's statement of contributions form 15-5, dated April 10, 2026.

53. Attached as Exhibit 5J is a true and correct copy of Aurora Action Network's statement of contributions form 15-5, dated April 28, 2026.

54. Attached as Exhibit 5K is a true and correct copy of Aurora Action Network's statement of contributions for 15-5, dated May 14, 2026.

55. Attached as Exhibit 6A is a true and correct copy of Repeal Now's website (repealnowak.com) as it existed on February 10, 2026, according to what I accessed on the Wayback Machine. The Wayback Machine, which can be found at https://web.archive.org, is an internet archive which allows a user to input a specific web address or "URL" to see what prior versions of that website, if any, are contained within the internet archive database. Some websites have many archived pages, and some have only a few. Each archived page indicates a specific date and time that its content was captured and remains available as part of the internet archive, which is how I was able to determine how repealnowak.com appeared as of February 10, 2026. I saved the information from the Wayback Machine, contained in Exhibit 6A, on April 27, 2026.

56. Attached as Exhibit 6B is a true and correct copy of Repeal Now's website (repealnowak.com) as it existed on April 21, 2026, according to what I accessed on the Wayback Machine on April 27, 2026.

57. Attached as Exhibit 6C is a true and correct copy of Repeal Now's website (repealnowak.com) as of April 27, 2026. I took screenshots of Repeal Now's website on that day.

58. I remember seeing Repeal Now's campaign communications with a "paid for by" disclaimer that lists the same three largest contributors as can be found in Exhibit 6A on April 5, 2026. I also remember seeing Repeal Now's new "paid for by" disclaimer that resembles the one that exists for Exhibits 6B and 6C on April 15, 2026. I therefore believe that Repeal Now changed its "paid for by" disclaimer

sometime after April 5, 2026, but before April 15, 2026. And although I remember seeing Repeal Now's new "paid for by" disclaimer before April 15, 2026, I cannot remember or recall the specific date that I first noticed the change.

59. Attached as Exhibit 7A is a true and correct copy of an audio recording of a Repeal Now radio advertisement from KASH 107.5 FM, which was recorded on May 14, 2026.

60. Attached as Exhibit 7B is a true and correct copy of Repeal Now's radio ad buy from KASH 107.5 FM. It shows that Repeal Now's ad buy was placed on April 24, 2026, and is set to run from May 4 to October 30, 2026. As shown on Exhibit 2AC, KASH 107.5 FM is just one radio station of many where Repeal Now has placed ad buys.

61. Attached as Exhibit 8A is a true and correct copy of a screenshot of Repeal Now's Facebook page that I took on May 20, 2026. In addition to providing a disclaimer on its main Facebook page, Repeal Now also lists its website.

62. Attached as Exhibit 8B is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on April 16, 2026. I took this screenshot on May 20, 2026.

63. Attached as Exhibit 8C is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on April 18, 2026. I took this screenshot on May 20, 2026.

64. Attached as Exhibit 8D is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on April 20, 2026. I took this screenshot on May 20, 2026.

65. Attached as Exhibit 8E is a true and correct copy of a screenshot of the first of two posts made by Repeal Now on its Facebook page on April 22, 2026. I took this screenshot on May 20, 2026.

66. Attached as Exhibit 8F is a true and correct copy of a screenshot of the second of two posts made by Repeal Now on its Facebook page on April 22, 2026. I took this screenshot on May 20, 2026.

67. Attached as Exhibit 8G is a true and correct copy of a screenshot of the first of two posts made by Repeal Now on its Facebook page on April 23, 2026. I took this screenshot on May 20, 2026.

68. Attached as Exhibit 8H is a true and correct copy of a screenshot of the second of two posts made by Repeal Now on its Facebook page on April 23, 2026. I took this screenshot on May 20, 2026.

69. Attached as Exhibit 8I is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on April 24, 2026. I took this screenshot on May 20, 2026.

70. Attached as Exhibit 8J is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on April 25, 2026. I took this screenshot on May 20, 2026.

71. Attached as Exhibit 8K is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on April 27, 2026. I took this screenshot on May 20, 2026.

72. Attached as Exhibit 8L is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on April 29, 2026. I took this screenshot on May 20, 2026.

73. Attached as Exhibit 8M is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on May 1, 2026. I took this screenshot on May 20, 2026.

74. Attached as Exhibit 8N is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on May 3, 2026. I took this screenshot on May 20, 2026.

75. Attached as Exhibit 8O is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on May 5, 2026. I took this screenshot on May 20, 2026.

76. Attached as Exhibit 8P is a true and correct copy of a screenshot of the first of two posts made by Repeal Now on its Facebook page on May 7, 2026. I took this screenshot on May 20, 2026.

77. Attached as Exhibit 8Q is a true and correct copy of a screenshot of the second of two posts made by Repeal Now on its Facebook page on May 7, 2026. I took this screenshot on May 20, 2026.

78. Attached as Exhibit 8R is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on May 11, 2026. I took this screenshot on May 20, 2026.

79. Attached as Exhibit 8S is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on May 13, 2026. I took this screenshot on May 20, 2026.

80. Attached as Exhibit 8T is a true and correct copy of a screenshot of the first of two posts made by Repeal Now on its Facebook page on May 15, 2026. I took this screenshot on May 20, 2026.

81. Attached as Exhibit 8U is a true and correct copy of a screenshot of the second of two posts made by Repeal Now on its Facebook page on May 15, 2026. I took this screenshot on May 20, 2026.

82. Attached as Exhibit 8V is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on May 17, 2026. I took this screenshot on May 20, 2026.

83. Attached as Exhibit 8W is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on May 18, 2026. I took this screenshot on May 20, 2026.

84. Attached as Exhibit 8X is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on May 20, 2026. I took this screenshot on May 20, 2026.

85. Attached as Exhibit 8Y is a true and correct copy of a screenshot of a post made by Repeal Now on its Facebook page on May 21, 2026. I took this screenshot on May 22, 2026.

86. Attached as Exhibit 9A is a true and correct copy of a screenshot Repeal Now's (@repealnowak) account on x.com (formerly Twitter) that I took on April 28, 2026. Repeal Now's X account refers to repealnowak.com as its website.

87. Attached as Exhibit 9B is a true and correct copy of a post made by Repeal Now (@repealnowak) on x.com on April 15, 2026. I took this screenshot on April 28, 2026.

88. Attached as Exhibit 9C is a true and correct copy of a post made by Repeal Now (@repealnowak) on x.com on April 16, 2026. I took this screenshot on April 28, 2026.

89. Attached as Exhibit 9D is a true and correct copy of a post made by Repeal Now (@repealnowak) on x.com on April 18, 2026. I took this screenshot on April 28, 2026.

90. Attached as Exhibit 9E is a true and correct copy of a post made by Repeal Now (@repealnowak) on x.com on April 20, 2026. I took this screenshot on April 28, 2026.

91. Attached as Exhibit 9F is a true and correct copy of a post made by Repeal Now (@repealnowak) on x.com on April 22, 2026. I took this screenshot on April 28, 2026.

92. Attached as Exhibit 9G is a true and correct copy of a post made by Repeal Now (@repealnowak) on x.com on April 22, 2026. I took this screenshot on April 28, 2026.

93. Attached as Exhibit 9H is a true and correct copy of two posts made by Repeal Now (@repealnowak) on x.com on April 23, 2026. I took this screenshot on April 28, 2026.

94. Attached as Exhibit 9I is a true and correct copy of a post made by Repeal Now (@repealnowak) on x.com on April 24, 2026. I took this screenshot on April 28, 2026.

95. Attached as Exhibit 9J is a true and correct copy of a post made by Repeal Now (@repealnowak) on x.com on April 27, 2026. I took this screenshot on April 28, 2026.

96. Attached as Exhibit 9K is a true and correct copy of two posts made by Repeal Now (@repealnowak) on x.com on May 21, 2026. I took this screenshot on May 22, 2026.

97. Attached as Exhibit 9L is a true and correct copy of a post made by Repeal Now (@repealnowak) on x.com on May 22, 2026. I took this screenshot on May 22, 2026.

98. Attached as Exhibit 10A is a true and correct copy of the Lieutenant Governor's certification of 24ESEG, dated February 14, 2025. 24ESEG is scheduled to appear on the Statewide General Election Ballot on November 3, 2026.

99. Attached as Exhibit 10B is a true and correct copy of the ballot language for 24ESEG.

100. Attached as Exhibit 10C is a true and correct copy of a letter from the State Department of Law to the Lieutenant Governor about 24ESEG dated February 14, 2025.

101. Attached as Exhibit 10D is a true and correct copy of a letter from April Simpson, who works in the Office of the Lieutenant Governor for the State of Alaska. The letter includes the ballot summary for 22AKHE as it appeared on the general election ballot in November 2024.

102. Attached as Exhibit 11A is a true and correct copy of Beautiful America's amended statement of contributions form 15-5, dated July 11, 2025.

103. Attached as Exhibit 11B is a true and correct copy of Beautiful America's statement of contributions form 15-5, dated November 14, 2025.

104. Attached as Exhibit 12A is a true and correct copy of a letter from John Grover Whitlock, an APOC paralegal, to Aurora Action Network, dated December 8, 2025.

105. Attached as Exhibit 12B is a true and correct copy of a receipt for payment by Aurora Action Network from December 2025.

106. Attached as Exhibit 13A is a true and correct copy of a screenshot that I took on May 20, 2026, after searching the State of Alaska's Corporations database for "Aurora Action Network."

107. Attached as Exhibit 13B is a true and correct copy of a printout of 11790 Cange Street, Anchorage, Alaska, on Google Street View. The photo appears to be from July 2025, and it was printed on May 20, 2026.

108. Attached as Exhibit 13C is a true and correct copy of a screenshot that I took of the Alaska Policy Forum's "APF Staff" webpage on May 20, 2026.

109. Attached as Exhibit 14A is a true and correct copy of Advancing Alaska Action, Inc.'s Articles of Incorporation, which were filed with the State of Alaska on January 23, 2025.

110. Attached as Exhibit 14B is a true and correct copy of an Anchorage Daily News Article, titled "Former Alaska attorney general Treg Taylor is 10th Republican to enter governor's race," authored by Iris Samuels, which was published on September 17, 2025.

111. Attached as Exhibit 14C is a true and correct copy of screenshots from Advancing Alaska Action's www.flickr.com account, which I took on April 29, 2026.

112. Attached as Exhibit 14D is a true and correct copy of a recorded screenshare of a video posted by Advancing Alaska Action on YouTube at the following address: https://www.youtube.com/watch?v=Tf2eJoPr4YI. The video was posted approximately eight months again, and the recording (Exhibit 14D) was captured on May 20, 2026.

113. Attached as Exhibit 14E is a true and correct copy of an article in The Alaska Current, titled "Opinion: Treg Taylor isn't getting the best reception his money (or

the state's) can buy," authored by Matt Acuña Buxton, which was published on September 26, 2025.

114. As of today, it does not appear that Advancing Alaska Action has filed any statement of contributions form 15-5 with APOC.

115. Attached as Exhibit 15A is a true and correct copy of Jim L. Turner's statement of contributions form 15-5, dated April 21, 2026.

116. Attached as Exhibit 16A is a true and correct copy of a screenshot showing the number of registered groups where Cheryl Frasca has filed with APOC.

117. Attached as Exhibit 16B is a true and correct copy of a screenshot showing the number of candidate campaigns where Cheryl Frasca has been the treasurer.

118. Currently, it appears that Cheryl Frasca is listed as the "APOC Reporting Administrator" for four current gubernatorial campaigns: (1) Bronson/Church; (2) Bernadette Wilson; (3) Matt Heilala; and (4) Adam Crum.

FURTHER AFFIANT SAYETH NAUGHT.

Samuel G. Gottstein
Alaska Bar No. 1511099

SUBSCRIBED AND SWORN to before me on this 26th day of May, 2026, at Anchorage, Alaska.

JENNIFER A. DITCHARO
NOTARY
PUBLIC
STATE OF ALASKA
My Commission Expires April 5, 2029

Notary Public in and for Alaska
My Commission Expires: 4/5/29