

***From the Desk of
Congressman Mo Brooks, Retired
7610 Foxfire Drive, Huntsville, AL 35802***

Updated April 27, 2026

Investigative Report by Mo Brooks, Retired U.S. Congressman:

A Primer on How to Buy & Influence Legislative Votes: Out of State & Out of Country Gambling Moguls Spending \$45 MILLION to Buy Alabama Legislature, Legalize Casinos & Sports Betting, While Violating Alabama Civil & Criminal Laws

Overview

In an up to **\$45+ MILLION** unprecedented spending avalanche, **Out-of-State & Out-of-Country Gambling Moguls** are buying Alabama legislators and legislative elections in an effort to legalize casino gambling¹ and sports betting,² all while violating Alabama's Fair Campaign Practices Act.

The Players

American Conservative Fund is a political action committee created with the Federal Election Commission on November 18, 2025 by "Brian Smith" (who has a Birmingham area phone number of 205-440-2873³) and located at 3301 Richmond Highway, 1018, Alexandria, VA.⁴ Oddly, Google Maps says a Staples Office Superstore is at this address.⁵

ALL of American Conservative Fund's money (**\$26.6 MILLION**) is Gambling Mogul money laundered through the Gambling Mogul's Win for America PAC.⁶

Draft Kings, Inc., now known as **DK Crown Holdings, Inc.**,⁷ is located in Boston, Massachusetts. Draft Kings has contributed at least \$19.5 million to the Gambling Mogul's effort to purchase Alabama's legislature.

¹ <https://sportsbettingalliance.org/about/>

² <https://sportsbettingalliance.org/about/>

³ American Conservative Fund registration with the Alabama Secretary of State, dated January 12, 2026.

⁴ Win for America Statement of Organization on file with the Federal Election Commission

⁵ Google Maps

⁶ Per FEC filings, "American Conservative Fund Action Georgia" is registered with the FEC, is also located in Alexandria, Virginia 22305, and also has "Brian Smith" as its Treasurer. Much of ACF's \$\$ is further laundered to American Conservative Fund Action Georgia,⁶ which gives Mountain Brook, AL as an address, and gives its email address as americanconservativefund@gmail.com (the name of ACF) on its Section 527 Political Organization filing. Coincidentally, American Conservative Fund's HD 20 mass mailings originate from Georgia (per its bulk rate permit zip code).

⁷ <https://www.globenewswire.com/news-release/2025/12/19/3208467/0/en/DraftKings-Debuts-Predictions-App-Entering-Prediction-Markets.html>

North Alabama PAC is run by Steve Raby, former Democrat Congressional candidate, and the #1 lieutenant of Alabama House Speaker Nathaniel Ledbetter. North Alabama PAC launders \$250,000⁸ in Gambling Mogul & Sports Betting Alliance money to state officials and candidates.⁹

Sports Betting Alliance is a Draft Kings, FanDuel, Fanatics a/k/a FGB Enterprises OpCo,¹⁰ Bet365,¹¹ etc., consortium.¹² The Sports Betting Alliance seeks to legalize sports betting and casino gambling throughout America.¹³

Sports Betting Alliance's address is 2200 Wilson Blvd., Arlington, VA (near the "headquarters" of American Conservative Fund and Win for America in Alexandria, Virginia).

Sports Betting Alliance can legally contribute directly to Alabama candidates, but that would reveal the unsavory, dirty money of out-of-state and international Gambling Moguls that might cost pro-gambling candidates their elections.

So the Sports Betting Alliance launders \$2.15 MILLION via Montgomery's SV&B PAC (\$1.9 million) and Huntsville's North Alabama PAC (\$250,000) to hide from the public the Gambling Mogul nature of its contributions to candidates.

SV&B PAC is run by Montgomery lobbyist Dax Swatek, its Chairperson and Treasurer,¹⁴ and launders Sports Betting Alliance money to legislators. Dax Swatek is lead in the lobbying firm "Swatek, Vaughn, and Bryan".

Per Alabama Secretary of State Fair Campaign Practices Act disclosures, the SV&B PAC has, from April 2025 through March 2026, laundered \$1.9 million for the Sports Betting Alliance (98%), laundered \$45,000 for Protective Life (2%), and received no other monies.¹⁵

Win for America. Win for America is a money laundering federal political action committee created on November 5, 2026, with the Federal Election Commission by "Brian Smith" (who has a Birmingham area phone number of 205-440-2873¹⁶) and is located at 3301 Richmond Highway, 1018, Alexandria, VA.¹⁷ Oddly, Google Maps says a Staples Office Superstore is at this address.¹⁸

⁸ Alabama Secretary of State 2/20/26 North Alabama PAC major contribution disclosure.

⁹ Alabama Secretary of State 2/2/26, 3/2/26, 4/2/26 disclosures.

¹⁰ FGB Enterprises OpCo's business is gambling & casino. FGB is a subsidiary of Fanatics. <https://lobbying.wi.gov/Who/PrincipallInformation/2025REG/Information/13113?tab=Profile>

¹¹ BET365 is a British company founded in 2000

¹² <https://www.casino.org/news/draftkings-fanduel-others-send-48m-into-sports-betting-super-pac/>; See also Win for America FEC Q1 2026 disclosure.

¹³ <https://sportsbettingalliance.org/about/>

¹⁴ Alabama Secretary of State June 6, 2004 registration filing.

¹⁵ To be 100% sure, readers should check Alabama Secretary of State records themselves. The records are plentiful, it is possible to miss something, and new disclosures are regularly filed.

¹⁶ American Conservative Fund registration with the Alabama Secretary of State, dated January 12, 2026.

¹⁷ Win for America Statement of Organization on file with the Federal Election Commission

¹⁸ Google Maps

ALL of Win for America's **\$43 MILLION** funding since its November 2025 creation comes from Gambling Moguls in the following amounts: Draft Kings (\$19.5 MILLION), FanDuel (\$19.5 MILLION), and FGB Enterprises a/k/a Fanatics (\$4 MILLION).

Win for America laundered \$26.6 MILLION of its Gambling Mogul funds to the American Conservative Fund.

Win for America (\$43 MILLION) American Conservative Fund (\$26.6 MILLION) Timeline

November 5, 2025. **Win for America** is created with the Federal Election Commission by Brian Smith (who has a Birmingham area code and phone number).

November 18, 2025. **American Conservative Fund** is created with the Federal Election Commission by the same Brian Smith at the same Virginia address as Win for America. On the same day, **Draft Kings** launders \$2 million to Win for America.¹⁹

November 21, 2025. Three days later, **Win for America** launders \$500,000 of Draft Kings' \$2 million to the **American Conservative Fund**.²⁰ This \$500,000 is the American Conservative Fund's only 2025 revenue source.²¹

December, 2025. The American Conservative Fund launders its Gambling Mogul money to numerous other entities, at which point tracking becomes impossible without proper law enforcement tools (like subpoenas, interviews, and grand jury testimony).

ACF paid \$10,000 of its Gambling Mogul laundered money to Swatek Vaughn & Bryan, LLC of Montgomery, AL on 12/29/25 as an administrative cost.

First Quarter, 2026. In Q1 2026, the Gambling Moguls launder another **\$41 million** (of a total \$43 million) to Win for America, which then launders another **\$26.1 MILLION** of it to American Conservative Fund.²² The American Conservative Fund thereafter launders its money to numerous other entities across America, at which point tracking becomes impossible without proper law enforcement tools (like subpoenas, interviews, and grand jury testimony).

January 12, 2026. The **American Conservative Fund** files its Statement of Organization with the Alabama Secretary of State. Same Virginia address. Same Chairperson Brian Smith. This filing is required by Alabama's Fair Campaign Practices Act, Section 17-5-

¹⁹ Win for America disclosure with the Federal Election Commission

²⁰ Win for America & American Conservative Fund disclosures with the Federal Election Commission

²¹ American Conservative Fund disclosures with the Federal Election Commission.

²² Win for America & American Conservative Fund Q1 2026 disclosure filed April 15, 2026.

5(a),²³ and triggers mandatory campaign finance disclosure requirements with the Alabama Secretary of State per Section 17-5-8(b).²⁴

February 2, 2026. Per Secretary of State records, the American Conservative Fund did not file its mandatory financial disclosure with the Alabama Secretary of State for January 2026, thereby violating the Fair Campaign Practices Act.²⁵

Section 17-5-19 states that an intentional failure to file a required Fair Campaign Practices Act disclosure is a criminal offense with penalties up to a year in jail and fines up to \$2,000.²⁶

March 2, 2026. Per Secretary of State records, the American Conservative Fund did not file its mandatory financial disclosure with the Alabama Secretary of State for February 2026, thereby again breaching the Fair Campaign Practices Act and constituting a second criminal offense.

Early March, 2026. No later than early March, 2026, the American Conservative Fund launches a barrage of TV, mailer and other campaign communications that attack and disparage various candidates for the Alabama legislature while glorifying and promoting various other competitor candidates for the Alabama legislature. Each of these political and campaign activities is governed by the disclosure requirements of the Fair Campaign Practices Act.

House District 20 candidate Mo Brooks has personally seen and/or read many American Conservative Fund's political communications.²⁷ All violate Alabama's Fair

²³ Section 17-5-5 "(a) The treasurer or designated filing agent of each political action committee that anticipates either receiving contributions or making expenditures during the calendar year in an aggregate amount exceeding one thousand dollars (\$1,000) **shall file** with the Secretary of State a statement of organization, within 10 days after its organization or within 10 days after the date on which it has information that causes the committee to anticipate it will receive contributions or make expenditures in an aggregate amount in excess of one thousand dollars (\$1,000)".

²⁴ Section 17-5-8 "(b) The treasurer, designated filing agent, or candidate **shall file** with the Secretary of State periodic reports of contributions and expenditures at the following times once . . . a political action committee files its statement of organization under Section 17-5-5:"

²⁵ Section 17-5-8(b) "(1) Regardless of whether a candidate has opposition in any election, monthly reports not later than the second business day of the subsequent month, beginning 12 months before the date of any primary, special, runoff, or general election for which a political action committee or principal campaign committee receives contributions or makes expenditures with a view toward influencing the election's result. A monthly report **shall include** all reportable transactions for the previous full month period. Reports shall be required as provided in subdivisions (2) and (3)."

²⁶ **Section 17-5-19:** (a) Except as otherwise provided in this section, a person who intentionally violates any provision of this chapter shall be guilty, upon conviction, of a Class A misdemeanor.

(b) A person who intentionally violates any reporting requirement of Sections 17-5-4, 17-5-5, or 17-5-8 shall be guilty, upon conviction, of a Class A misdemeanor

²⁷ Mo Brooks has copies of 10+ such mailers that fail to meet Fair Campaign Practices Act "identification" requirements. None give the name, street address, city or state of the mailing. All list "Advocacy Partners 30096" at the bulk rate mail permit holder. 30096 is a Duluth, Georgia zip code.

Campaign Practices Act Section 17-5-2 (a)(8)²⁸ and Section 17-5-8(d) identification requirements.²⁹

American Conservative Fund mailers supporting Senator Jabo Waggoner disclose an ACF address of 60 Chelsea Corners PMB, Chelsea, AL 35043.³⁰

April 2, 2026. Per Secretary of State records, the American Conservative Fund did not file its mandatory financial disclosure with the Alabama Secretary of State for March 2026, thereby breaching the Fair Campaign Practices Act and constituting a third criminal offense.

Week of April 6, 2026. Mo Brooks contacted the Alabama Secretary of State's³¹ office, which confirmed that a failure by the American Conservative Fund to disclose its campaign finance activity violates the Fair Campaign Practices Act. The Alabama Secretary of State's office advised Mo Brooks to file a formal complaint against the American Conservative Fund for violations of Alabama's Fair Campaign Practices Act, which Mo Brooks did.

April 10, 2026. Mo Brooks advised Alabama Attorney General Steve Marshall of the American Conservative Fund's conduct and requested that Marshall consider the situation and either (a) demand that the American Conservative Fund immediately comply with Alabama's Fair Campaign Practices Act and/or (b) investigate and, as appropriate, prosecute the American Conservative Fund for criminal violations of Alabama's Fair Campaign Practices Act.

Inasmuch as Win for America is a political action committee that transferred political money to the American Conservative Fund political action committee, likely with the intent that such sums be spent to influence Alabama legislative elections, there is the basis for an investigation and possible prosecution of the American Conservative Fund and Win for America for unlawful PAC-to-PAC transfers.³²

Per Section 17-5-19, PAC-to-PAC transfers are a Class A misdemeanor with a potential 12 month jail time and fines up to \$2,000 per violation.

²⁸Section 17-5-2 "(8) IDENTIFICATION. The full name and complete address."

²⁹ Section 17-5-8 "(d) Each report under this section ***shall disclose*** all of the following: (2) The identification of each person who has made contributions to the committee or candidate within the calendar year in an aggregate amount greater than one hundred dollars (\$100), together with the amount and date of all the contributions; provided, however, in the case of a political action committee, identification shall mean the name and city of residence of each person who has made contributions within the calendar year in an aggregate amount greater than one hundred dollars (\$100)."

³⁰ Source: Mailers to Stephanie Smith of Alabama Policy Institute

³¹ A problematic situation. Gambling Moguls laundered, via the SV&B PAC, \$15,000 on December 29, 2025 to Secretary of State Wes Allen, which prompts concern about whether this conflict affects the Secretary of State's investigation and civil prosecution of the American Conservative Fund?

³² Section 17-5-15 "(b) It shall be unlawful for any political action committee or tax exempt political organization under 26 U.S.C. § 527 ... or any person authorized to make an expenditure on behalf of such political action committee or 527 organization, to make a contribution, expenditure, or any other transfer of funds to any other political action committee or 527 organization..."

In addition to criminal penalties, the Fair Campaign Practices Act authorizes the Alabama Secretary of State to impose civil fines for each violation of the Fair Campaign Practices Act.³³

The Gambling Mogul's American Conservative Fund is spending non-disclosed campaign activity money in these and other Alabama elections:

Senate District 4 (Cullman Co., pro-Garland Gudger mailers, etc.)

Senate District 16 (Jefferson County, pro-Jabo Waggoner mailers, etc.)

Senate District 34 (Mobile County, anti-Rusty Glover mass mailers, etc., estimated by Glover at \$400,000-\$500,000)³⁴

House District 1 (Florence area; pro-Phillip Pettus, anti-Maurice McCaney, mass mailers)

House District 13 (pro-Greg Barnes, anti-Mike Elliot, mass mailers)

House District 20 (Huntsville; pro-James Lomax, anti-Mo Brooks mailers, TV ads, text messages, phone banks, internet ads, etc.; a minimum of \$500,000³⁵ campaigning in and attempting to influence the Alabama House District 20 election)

³³ Section 17-5-19.1 Civil Penalties.

(a) The Secretary of State ***shall levy*** a civil penalty against any person who fails to timely file a report required by this chapter and who does not remedy the filing of the report pursuant to subsection (h). ...

(b) The schedule of civil penalties shall be as follows:

(1) The lesser of three hundred dollars (\$300) or 10 percent of the amount of contributions or expenditures not properly reported for a first offense in an election cycle.

(2) The lesser of six hundred dollars (\$600) or 15 percent of the amount of contributions or expenditures not properly reported for a second offense in an election cycle.

(3) The lesser of one thousand two hundred dollars (\$1,200) or 20 percent of the amount of contributions or expenditures not properly reported for a third or subsequent offense in an election cycle.

(c) A fourth failure to timely or accurately file a report in an election cycle shall create a rebuttable presumption of intent to violate the reporting requirements of this chapter. The Secretary of State shall notify the Attorney General and the appropriate district attorney of all persons who violate the filing requirements four or more times in an election cycle.

³⁴ <https://1819news.com/news/item/dark-money-push-polling-allegations-cause-clash-in-mobile-area-state-senate-race>

³⁵ Lomax has received \$58,500 from the Sports Betting Alliance, laundered via the SV&B PAC & North Alabama PAC, plus \$10,000 more from other gambling interests. Gambling Moguls' money helping Lomax is conservatively estimated to exceed \$500,000. Inasmuch as the American Conservative Fund refuses to file disclosure reports that comply with Alabama's Fair Campaign Practices Act, there is no way (short of law enforcement tools like subpoenas) to determine with certainty where ACF's \$26.6 million or WFA's \$43 million is going. So "reverse engineering" must be done. ACF has paid for over \$250,000 in advertising with WHNT, WAAY & WAFF TV (WZDX is unknown). ACF has paid for at least 11 mass mailers in HD 20 (estimated to exceed \$100,000 in total cost) ACF is non-stop running ads on the internet and various TV "cable providers". ACF is non-stop engaged in telephone banking and text messaging. Someone, likely ACF, is paying for door-to-door workers for Lomax campaign. The list goes on and on

House District 85 (Dothan; pro-Rick Rehm, anti-David Money; on-line ads & mass mailers)

House District 95 (Baldwin County, pro-Frances Holk-Jones, anti-Elijah Davidson, mass mailers)³⁶

House District 96 (Baldwin County, anti-Danielle Duggar ads, estimated value of \$150,000)

All of the above ACF spending violates Alabama's Fair Campaign Practices Act, thus prompting the need for criminal investigations and, as appropriate, prosecutions.

NOTE: *These American Conservative Fund campaign expenditure "estimates" would not be estimates if the ACF complied with Fair Campaign Practices Act disclosure requirements.*

A Mo Brooks FYI: *I helped word, maneuvered into passage position, and voted for the Fair Campaign Practices Act. As such, the American Conservatives Fund conduct runs afoul of this legislator's intent in working on and helping pass the Fair Campaign Practices Act.*³⁷

Sports Betting Alliance \$2.15 MILLION Laundering Timeline

Out-of-state and international Gambling Moguls launder \$2.15 million through the Sports Betting Alliance³⁸, \$1.9 million is laundered through Montgomery's "SV&B PAC". \$250,000 is laundered through Huntsville's and Steve Raby's "North Alabama PAC" (Raby is a House Speaker Nathaniel Ledbetter lieutenant). The money laundering beneficiaries are typically Alabama legislative candidates. Per Alabama Secretary of State Fair Campaign Practices Act disclosures, the money laundering trail since April 10, 2025 is:

April 10, 2025: Sports Betting Alliance launders \$250,000 to SV&B PAC.

May 12, 2025: Sports Betting Alliance launders \$250,000 to SV&B PAC.

November 5, 2025: Sports Betting Alliance launders \$250,000 to SV&B PAC.

December 30, 2025: Sports Betting Alliance launders \$250,000 to SV&B PAC.

February 12, 2026: Sports Betting Alliance launders \$250,000 to SV&B PAC.

³⁶ <https://1819news.com/news/item/alabama-house-candidate-elijah-davidson-wants-pac-transparency-gift-ban>

³⁷ Acts 1988, 1st Ex. Sess., No. 88-873

³⁸ The Sports Betting Alliance includes BET365, a British company founded in 2000. Interestingly, the Alabama legislature passed HB 214 on March 17, 2026, making it illegal for any Alabama state or local candidate to directly or indirectly receive contributions by "foreign nationals" (defined to include foreign businesses like BET365). The Act's effective date is October 1, 2026. This begs the question of whether James Lomax, the sponsor of HB 214, will refund his \$23,500 in contributions from the Sports Betting Alliance because it is tainted because BET365, a foreign British company, is one of the Sports Betting Alliance's Gambling Mogul principles.

February 20, 2026: Sports Betting Alliance launders \$250,000 to North Alabama PAC.

April 6, 2026: Sports Betting Alliance \$650,000 to SV&B PAC.

The only other money laundered through the SV&B PAC during this time frame is \$45,000 from Protective Life,³⁹ which means 98% of SV&B PAC contributions come from the Sports Betting Alliance and 2% comes from Protective Life.

Since the monies are co-mingled, there is no way the public can determine for certain which laundered money went where but the odds are 98% certain that, if a candidate received money via the SV&B PAC over the past year, it was money laundered on behalf of the Sports Betting Alliance.

The “North Alabama PAC” is operated out of Huntsville by House Speaker Ledbetter’s lieutenant, Steve Raby.

The Sports Betting Alliance is purchasing the good graces or votes of dozens and dozens of Alabama legislators. Go to the Alabama Secretary of State website to determine whether your representative or senator is among those whose “influence” the Sports Betting Alliance seeks to purchase.

In toto, 75 members of Alabama’s legislature have received, on average, \$8,240 each from Gambling Moguls’ money laundered through the Sports Betting Alliance, Win for America PAC and North Alabama PAC.

The Secretary of State’s website research steps are: Go to sos.alabama.gov, click “Elections” tab, then click “Campaign Finance” icon, then click “View electronic filings” tab, then click “PAC Search” icon, then type in “SV&B PAC” in the “Committee Name” box, then click “name begins with” circle, then click the “Search” box, then click on “SV&B PAC” name, then browse away.

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Legalized Gambling Harms

While the pros and cons of legalized gambling are well-known, I emphasize downsides to warn the public where Alabama is headed if Gambling Moguls succeed.

- 1. Legalized sports betting corrupts professional and college athletics. More legalized sports betting means more NCAA & pro sports corruption.**

³⁹ To be 100% sure, readers should check Alabama Secretary of State & FEC records themselves concerning any disclosure information herein. The records are plentiful and it is possible to miss something, so the situation could be worse. After all, the motive of the Gambling Moguls is to hide and launder, not disclose, and hiding and laundering is what they have done.

Exhibit A. NBA Indictments. Numerous NBA players and coaches were indicted in 2025 for “rig(ging) sports gambling outcomes” and obtaining and using insider information that gave them a gambling advantage.⁴⁰

Exhibit B. NCAA Basketball Indictments. 26 NCAA basketball players and outside “fixers” were indicted in 2026 for rigging NCAA basketball games. The Fixers paid players \$10K, \$20K and \$30K to rig and lose games so Fixers could reap huge profits on large bets.⁴¹

Expanded sports betting turns more athletic contests into “fix-it” gambling opportunities, corrupting NCAA sporting events.

2. **Gambling is not just about a gambler losing money.** Gambling is also about gambling addiction and the devastating effects that addiction and financial loss have on spouses and children.⁴² The studies confirming this damage are numerous.

3. **Physical casinos harm metropolitan areas.** Studies confirm that community casinos are a bad economic bet, increase crime (prostitution and theft in particular), organized crime threats, suicide rates, bankruptcy rates, and social services costs (and, hence, taxes).⁴³

On a larger scale, turning Alabama into Las Vegas East for out-of-state Gambling Moguls is far more damaging to Alabama’s economy than a lottery because out-of-state Gambling Moguls remove their profits from Alabama, which shrinks Alabama’s economic base, which decreases citizens’ discretionary income that otherwise helps keep some small businesses afloat, which tax revenues because of decreased economic activity, and bankrupts families as gambling addicted family members lose money they cannot afford to lose, which increases society’s demand for social services, which force higher taxes.

4. **Gambling Moguls seize undue political influence.** Alabama’s gambling history reveals that gambling facility owners quickly garner the wealth to dominate local politics and become political kingpins. See Milton McGregor (Victory Land), Paul Bryant, Jr. (Greene Track), Poarch Creek Indians (Atmore casino), etc. “Money is the mother’s milk of politics”, “the house always wins”, and gambling facility owners quickly dominate local politics and become powerful state-wide king-makers.

Citizens see the reverse: declining influence over their own governments. For more information, Google gambling-related indictments of Alabama legislators.

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Dear reader,

⁴⁰ <https://www.justice.gov/usao-edny/pr/current-and-former-national-basketball-association-players-and-four-other-individuals>

⁴¹ <https://www.justice.gov/usao-edpa/pr/26-people-charged-alleged-bribery-and-point-shaving-scheme-fix-ncaa-cba-mens>

⁴² <https://lifetimerecoverycenter.com/how-gambling-addiction-affects-the-family-unit/>

⁴³ <https://www.stoppredatorygambling.org/wp-content/uploads/2024/12/2024-CASINO-IMPACTS-FACT-SHEET.docx-11-06-24.docx-.pdf>

Use this information as you believe best. Publish it. Post it. Talk about it. Vote.

Campaign finance disclosures happen regularly, so you should update what I've given to ensure nothing is missed and full accuracy is distributed.

Your servant,

Mo Brooks