

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

LA QUEN NÁAY ELIZABETH
MEDICINE CROW, AMBER LEE, and
KEVIN MCGEE,

Plaintiffs,

vs.

DIRECTOR CAROL BEECHER, in her
official capacity, LT. GOVERNOR
NANCY DAHLSTROM, in her official
capacity, and the STATE OF ALASKA,
DIVISION OF ELECTIONS,

Defendants,

vs.

DR. ARTHUR MATHIAS, PHILLIP
IZON, and JAMIE R. DONLEY,

Intervenors.

FILED in the Trial Courts
State of Alaska Third District

MAY 10 2024
Clerk of the Trial Courts
By _____ Deputy

**PLAINTIFFS' INITIAL
DISCLOSURES**

Case No.: 3AN-24-05615CI

Plaintiffs La Quen Náay Elizabeth Medicine Crow, Amber Lee, and Kevin McGee (hereinafter "Plaintiffs"), by and through counsel, and for their initial disclosures pursuant to Alaska R. Civ. P. 26(a), state and submit the following:

A. Factual Basis of Claims

This case challenges Defendants' determination that the initiative petition designated as 22AKHE qualified for the statewide ballot. One of Plaintiffs' challenges concerns Defendants' violations of their own statutes and regulations during the

validation process. Because the parties have stipulated to facts relevant to that challenge, Plaintiffs do not reiterate the factual bases for those claims here.¹

Plaintiffs also allege that circulators gathering signatures for 22AKHE, with oversight and direction from the Sponsors (Intervenors) of that initiative, engaged in fraudulent and unlawful signature collection methods. These unlawful methods include having more than one circulator per 22AKHE petition booklet, circulators failing to personally witness every signature, and the “orphaning” of unmonitored booklets at locations around Alaska. Plaintiffs further allege that some of the certifications for signatures that were purportedly gathered are unrealistic, inaccurate, and/or impossible, because it is more likely than not that they were not gathered by a single circulator. Plaintiffs ask that all 22AKHE petition booklets (and the signatures contained therein) that were submitted by a circulator who at any point falsely swore to have complied with AS 15.45.130 should not be counted by the Division.

B. Persons Likely to Have Discoverable Information Relevant to Disputed Facts

Plaintiffs reserve the right to identify additional persons who may have discoverable information relevant to disputed facts.

¹ See Order Granting Stipulation for Expedited Deadlines and Resolution (Apr. 23, 2024).

1. Dr. Arthur Mathias
c/o Kevin G. Clarkson
Law Offices of Kevin G. Clarkson
2223 Latona Dr. NE
Keizer, OR 97303
(907) 748-4788
Attorney-Client Privilege Applies

Intervenor Dr. Arthur Mathias is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

2. Phillip Izon II
c/o Kevin G. Clarkson
Law Offices of Kevin G. Clarkson
2223 Latona Dr. NE
Keizer, OR 97303
(907) 748-4788
Attorney-Client Privilege Applies

Intervenor Phillip Izon II is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

3. Jamie R. Donley
c/o Kevin G. Clarkson
Law Offices of Kevin G. Clarkson
2223 Latona Dr. NE
Keizer, OR 97303
(907) 748-4788
Attorney-Client Privilege Applies

Intervenor Jamie R. Donley is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

4. Circulators for submitted 22AKHE petition booklets

Aaron James Pfeil
Adam Nash
Aldean G Kilbourn
Alexander Ray Reno
Allen F Miller
Allen Thornhill
Alvin L Smay
Ameye Carpenter
Amy M Mattson
Andrew Callistini
Angela Marie Pallante Knapp
Anita Meyer
Anita Rentzel
Ann McKim
Anna Bradshaw
Anna Hanson
Anna Seuffert
Annette C O'Connell
Annette Pankoski
Ardith Richards
Aree Newkirk
Arlynda Hermann
Art Mathias
Arthur Cederberg
Aubray D Brown
Azabel Ordaz
Barbara B Tyndall
Barbara Bonk
Barbara Fiscus
Barbara Haney
Barbara Ione Deardorff
Barbara J Seward
Barbara L Leary
Barbara Melland
Beau Roberts
Benjamin E Sherburace
Beth Ehrhart
Bethany Lyn Marcum
Betty J Doggett

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Billie Crow
Bobby L Jenks Jr
Bonnie Kulzer
Brad L Campbell
Bradley P Lamb
Bradly Kent Smith
Brenda Hastie
Brenda J Sage
Bruce A Carter
Bruce Kevin Schulte
Bruce W Smith
Byron E Whitesides
Carl Benston
Carmen Durham
Carol Mikos
Carolee J Gause
Carolyn S Overstreet
Catherine A Rittgers
Catherine Osborne
Catherine Turinsky
Cecelia D Donelson
Cecilia Wisthoff
Charles E Brobst
Charles McCrone
Charles Overby
Chelsea Pohland
Cherie Rudolph
Cherie Ruth Mut
Cheryl Lancaster
Christopher S Thorgesen
Chrystine Jan Pacheco
Chuol Both
Cindy F Stageman
Claire Steffens
Claudia L Koziczowski
Colleen KC Darrell
Colleen Sherman
Connie Wilson
Cory R Montague
Cynthia Saunders
Dan Magone

Daniel Magone
Daniel Massie
Daniel R Michaud
Daniel Reddout
Danny Michael Kern
Danny R Powell
Darlene P Dollimont Svenson
David A Darsey
David E Beistel
David H Johnson
David M Houx
David Merwin
David N Yragvi
David P Clemenson
David Peck
David Sunjay
David Tousignant
Davon Ann Marie Maness
Dawn L Young
Deanna Chesser
Debbie Ann White
Deborah K Rathbun
Deborah Louern
Deborah Williams Riley
Debra G Fannin
Debra L Johnson
Denis E Burgess
Denise A Anderson
Denise J Templeton
Denise Templeton
Dennis Arthur Wink
Dennis G Smith
Dennis P Kempen
Diane Bush
Diane Shrader
Donald C Thompson
Donald Johnson
Donald L Poole
Donna Callistini
Donna Marie Delevante
Dorothy Denison

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Drucilla Dickerson
Duane Mark Seward
Dustin Aaronson
Edith M Grunwald
Edna Devries
Eileen L Becker
Elainz S Pfeiffer
Elijah M Verhagen
Elizabeth Chase
Elizabeth Slane
Ella Aileen Cotter
Ernest Christian
Enele Lefano
Eric Hughes
Erin Keeley Goward
Eva E LoForte
Evelyn C Smith
Evelyn E Dutton
Fran Turner
Fred F Braun
Gail A McCann
Gail McBride
Garrett Ennis
Gary J Pempek
Gaye Wright
Gerald W Hooper
Gerald Wayne Million
Gerard Farkas
Gerold Gabel
Gregory Quinton
Gwen E Colliander
Gwen Woodard
Gwendolyn Jennings
Hannah W Ramiskey
Harold P Reitzig
Harry N Young Jr
Helen Paajanen
Hilda Martin
Hosanna Hale
Ian A Newman
Ina E Holden

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Ingrid S Kidd
Irene Quednow
J Patrick Brayton
James A Miller
James Bodensadt
James Crewdson
James Duffield II
James K Spiers
James M Stocker
James Pryor
James R Hornell
Jane E Russo
Jane Smith
Janet Johnson
Janice M Norman
Janice Schultz
Jason Fawcett
Jeanne Pedersen
Jeff Hendricks
Jeffery A Ryle
Jeffery F Whipple
Jeffrey Taylor
Jennifer Cizek
Jennifer Harvey Kindred
Jennifer Hopper
Jennifer House
Jerry J Fogg
Jerry Ward
Jesse Baise
Joan Corr
Joan Henry
Joann S Wallace
Jann Sweet
Joanne V Hardesty
Joaquita Martin
Jodie Angel Gallamore
Jodie Pessolano Gallamore
Joel A Naspinski
John B Whisamore
John D Sturgeon
John Matthew

John P Broham
John Swartz
John Trueblood
John V Miller
Jonathan Hale
Josh Church
Joy J Evans
Joyce E Smith
Joyce Sheppard
Judith L Weir
Judy Bogard
Kaci L Gillham
Kandi D Christian
Karen Eileen Cress
Kari Reese
Karl Coulombe
Katherine Baker
Katherine H Hayes
Kathie A Swiger
Kathleen Gail Fogle
Kathleen P Burgoyne
Kathleen R Rearden
Kathleen Yarr
Kathlyn Dunlap
Kathryn Ann Medcoff
Kathryn E Newman
Kathryn Laba
Kathryn Markert
Kathryn McCollum
Kathy Miller
Katrina M Westby
Kaylynn Miller
Keenan Bruce Zerkel
Keith D Knorr
Keith Webster
Kelly Anderson Riggs
Kelly Nash
Ken Harper
Kevin Hall
Kevin Harden
Kim D Seymour

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Kim R Weaver
Kristin M Myers
Krystie A DePue
Laura Antonsen
Laura L Wymore
Laura Plenert
Laura Saxe
Leah Carling
Lee Hammermeister
Lee Norman
Lenora Niesen
Leonard J Palatino
Leroy Ross
Leslie E Carpenter
Leslie Lance
Lia F Talvi
Linda Berg Smith
Linda C Page
Linda Dolney
Linda Fox
Linda Kathryn Holmstrom
Linda L Hill
Linda M Breiner
Linda M Spohn
Linda Smith
Linda Waggoner
Lindi L Hill
Linn M McCabe
Lisa Houck
Loa Hubbard
Lonny Lofts
Loran B Hollers
Loran R Baxter
Loren D Leman
Lori A Somers
Lori Watts
Lyndsay Bertolda
Lynne Anderson
Mandi Hart
Marcy Fischbein
Margaret E Patrick

Margaret J Kircher
Margaret Nelson
Margaret R Loew
Maria E Holtman
Marilyn L Anderson
Mark M Spohn
Marty Ragan
Marvelle Williams
Mary E Brogiel
Maryann Klimek
Matthew Barth
Max Worhatch IV
Melissa Ann Olson
Michael Alfaro
Michael D Leigh
Michael E Burbridge
Michael J Masters
Michael J Painter
Michael K Olkjer
Michael Lee Carpenter
Micahel M Lachelt
Michael P Johnson
Michele Hartline
Michele Lecours
Michelle A Traxler
Michelle Omvig Powell
Mikaela Emswiler
Mildred Drum
Molly Beich
Monica L Mosier
Monica M Henning
Monique G Duncan
Myong S Jones
Nancy L Kelly
Natalie Martin
Nathan D Helmer
Olivia Tipikin
Patricia B Baum
Patricia M Bouton
Patricia Symbol
Patsy Egon

Patti M Pyles
Patton D Pettijohn
Paul A Bauer
Paul Barow
Paul Joseph Gionet
Paula J Colescott
Paula M Caywood
Peter Emil Siltala
Peter Nolan
Phillip Izon II
Porter Wall
Preston Rudderow
Ralph Edward Junker
Ralph R Ray
Randall G Talvi
Randolph P Richeson
Rhoda L Walker
Rhonda J Lewis
Rhonda M Hinson
Richard D Birdsall
Richard Dickman
Richard Ebersole
Richard James Eide
Rita Trometter
Robert Coulter
Robert G Griffin
Robert M Coulter
Robert McMorrow Sr
Robert Seitz
Roberta K Starkey
Roberta L Ness
Roger A Monson
Roger Cox
Roger D Mechon
Ron Johnson
Ronald G Kruckenberg
Ronald Gillhorn
Ronald T Larkin
Ross Johansson
Ruby Mae Shorey
Ruth Ewig

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Ryan Talvi
S Wyanette Coleman
Sally Duncan
Sandra Graham
Sandra I Blomfield
Sandra J Scherrer
Sarah Anna Hedman
Sean Kalagher
Sharon K Stanfield
Sharon Wessels
Sharyl Yeisley
Sherri R Jackson
Sherry Coburn
Sherry Strizak
Sheryl L Perry
Stacy M Mudry
Stanley Allen Vezey Jr
Stephanie Taylor
Steven K Murphy
Sue Easterly
Susan E Wells
Susan H Lockwood
Susan L Entsminger
Susan Tullo
Sybille Castro Curry
Sylvia Stewart
Tammera Randolph
Tammy Brown
Terrence Shanigan
Terri L Loomis
Terry A Jones
Terry Russell
Theodores Hendricus Albert Ransom
Theresa A Pisa
Thomas A Wisthoff
Thomas R Buzard
Thomas W Deis
Timothy Carnes
Timothy M Byrnes
Tobyanne Ventura
Todd Clark

Todd Hiner
Tom Moseley
Trevor Jepsen
Tuckerman Babcock
Vernon Hurlbert
Vickie L Armstrong
Victoria Gotthardt
Victoria J Askin
Vince Baldauf
Virginia McKee
Vivian Stiver
Wade Deming
Wanda A Huber
Wayne Christian
Wayne H Ogle
Wayne William Woods
William D Robinson
William Gordon Bradford III
William M Bargabos
William Quantick
William R Fordham
Winthrop S Faulkner
Yvonne Ripley
Zachary Young

The above-listed circulators are likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

5. Sylvia's Quilt Depot
Sylvia Stewart
1261 Seward Meridian Suite E
Wasilla, AK 99654
(907) 376-6468

Sylvia Stewart is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

6. Duane's Antique Market
Duane E. Hill
1233 E 76th Avenue
Anchorage, AK 99518
(907) 349-7078

Duane E. Hill is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

7. Top Fundraising Solutions, LLC
Mikaela Emswiler
[REDACTED]
Anchorage, AK 99507

Mikaela Emswiler is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

8. Catherine Rittgers

Catherine Rittgers is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

9. Carol Beecher
Director
Division of Elections
Court Plaza Building
240 Main Street, 4th Floor
Juneau, AK 99801
(907) 465-4611

Attorney-Client Privilege Applies

Director Carol Beecher is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

10. Michaela Thompson
Division of Elections
2525 Gambell Street, Suite 105
Anchorage, AK 99503
(907) 270-2700
Attorney-Client Privilege Applies

Michaela Thompson is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE.

11. Alec "Allison" Dill

Alec "Allison" Dill is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE. Alec "Allison" Dill's mailing address and phone number are included as part of a confidential disclosure subject to the protective order in this case.

12. Alexander Susky

Alexander Susky is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE. Alexander Susky's mailing address and phone number are included as part of a confidential disclosure subject to the protective order in this case.

13. Angela Chiappetta

Angela Chiappetta is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE. Angela Chiappetta's mailing address and phone number are included as part of a confidential disclosure subject to the protective order in this case.

14. Brooke Reinsch

Brooke Reinsch is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE. Brooke Reinsch's mailing address and phone number are included as part of a confidential disclosure subject to the protective order in this case. Additionally, Brooke Reinsch's signed affidavit will be disclosed once it is received.

15. Dawn Dunbar

Dawn Dunbar is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE. Dawn Dunbar's phone number is included as part of a confidential disclosure subject to the protective order in this case.

16. Derek Applin

Derek Applin is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE. Derek Applin's mailing address and phone number are included as part of a confidential disclosure subject to the protective order in this case.

17. Gregory Lee

Gregory Lee is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE. Gregory Lee's mailing address and phone number are included as part of a confidential disclosure subject to the protective order in this case.

18. Marcie Wilson

Marcie Wilson is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE. Marcie Wilson's mailing address and phone number are included as part of a confidential disclosure subject to the protective order in this case.

19. Valerie Kenny

Valerie Kenny is likely to have discoverable information regarding Plaintiffs' claims related to gathering signatures for 22AKHE. Valerie Kenny's phone number is included as part of a confidential disclosure subject to the protective order in this case.

20. Any witnesses identified through further discovery.

21. Any and all witnesses necessary to authenticate or lay foundation for any records used in this litigation.

22. All necessary expert witnesses.

23. Any and all necessary rebuttal witnesses.

24. All witnesses on any other party's witness list.

C. Persons Known To Have Made Written Or Recorded Statements Which Are Not Privileged

Please see Plaintiffs' responses above.

D. Documents

Please see bates stamped records PLTFS 000001 – PLTFS 001603, some of which are marked and/or designated as “CONFIDENTIAL.”

Please also see the parties’ stipulation and exhibits, Defendants’ confidential unredacted submitted 22AKHE petition booklets, and the exhibits to Plaintiffs’ complaint.

Additionally, please see posts on X (formerly Twitter) and videos on YouTube for the following accounts: @907Honest (X); @RankedchoiceEdu (X); @tropictundra (X); @swarmintelusa (X); @907honest (YouTube); and @RankedChoiceEDU (YouTube). These documents, materials, and/or posts are in the Intervenor’s control.

Plaintiffs will supplement its disclosures if more documents and/or materials become available.

E. Photographs, Diagrams and Videotapes

Please see Plaintiffs’ responses above.

F. Insurance Agreement

Plaintiffs are self insured.

G. Categories of Damages Claimed

Plaintiffs seek declaratory relief regarding Defendants' decision to qualify 22AKHE for the ballot. To that end, Plaintiffs seek attorneys' fees and costs consistent with Alaska law and the Alaska Civil Rules.

H. Identity of Potentially Responsible Persons

This is not a fault-based action.

Respectfully submitted this 30th day of April, 2024.

CASHION GILMORE & LINDEMUTH
Attorneys for Plaintiffs

By: /s/ Scott M. Kendall
Scott M. Kendall
Alaska Bar No. 0405019
Jahna M. Lindemuth
Alaska Bar No. 9711068
Samuel G. Gottstein
Alaska Bar No. 1511099

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via email on April 30, 2024, on the following:

Thomas Flynn
Lael Harrison
State of Alaska Department of Law
Office of the Attorney General
thomas.flynn@alaska.gov
lael.harrison@alaska.gov

Kevin G. Clarkson
kclarkson@gci.net

CASHION GILMORE & LINDEMUTH

By: /s/ Todd Cowles

2. Attached as Exhibit 1 is a true and correct copy of a photograph that I took of a 22AKHE petition booklet at Big Valley Bingo on October 19, 2023. That photograph shows a 22AKHE petition booklet without a front page.

3. Attached as Exhibit 2 is a true and correct copy of a photograph that I took of the back page of 22AKHE petition booklet 0357 at Big Valley Bingo on November 17, 2023.

4. Attached as Exhibit 3 is a true and correct copy of a photograph that I took of 22AKHE petition booklet 0140 at Big Valley Bingo on November 17, 2023.

5. On October 19, 2023, I observed 22AKHE petition booklet 0502 at Sylvia's Quilt Depot located at 1261 S Seward Meridian Parkway #E in Wasilla, Alaska. When I arrived at Sylvia's Quilt Depot, I asked the person working there if they had a 22AKHE petition booklet, and she provided it. But when I asked the person working there if she was supposed to be the witness for signatures, she said that she did not know, and that somebody had come by and left the booklet there.

6. On December 6, 2023, I observed 22AKHE petition booklet 0502 at Sylvia's Quilt Depot located at 1261 S Seward Meridian Parkway #E in Wasilla, Alaska. It was under a display on the front counter.

7. Attached as Exhibits 4-6 are true and correct copies of photographs that I took of 22AKHE petition booklet 0502 at Sylvia's Quilt Depot on December 6, 2023.

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8. On October 27, 2023, and November 11, 2023, I observed two 22AKHE petition booklets at Tudor Bingo located at 1436 E Tudor Road in Anchorage, Alaska. They appeared to be the same booklets on both occasions.

9. Attached as Exhibit 7 is a true and correct copy of a photograph that I took of 22AKHE petition booklet 0968 at Tudor Bingo on November 11, 2023.

10. Attached as Exhibit 8 is a true and correct copy of a photograph that I took of 22AKHE petition booklet 0967 at Tudor Bingo on November 11, 2023.

11. On October 27, November 11, December 2, and December 16, 2023, I observed 22AKHE petition booklets at Duane's Antique Market, located at 1233 E 76th Avenue in Anchorage, Alaska.

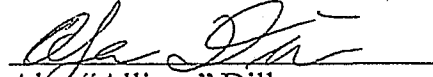
12. Attached as Exhibit 9 is a true and correct copy of a photograph that I took showing multiple 22AKHE petition booklets at Duane's Antique Market on October 27, 2023.

13. Attached as Exhibit 10 is a true and correct copy of a photograph that I took showing 22AKHE petition booklet 0836 at Duane's Antique Market on November 11, 2023.

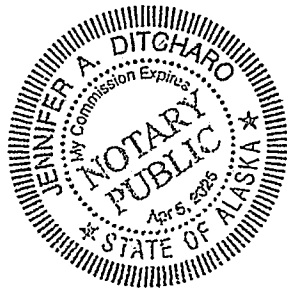
///

///

FURTHER YOUR AFFIANT SAYETH NAUGHT.


Alec "Allison" Dill

SUBSCRIBED AND SWORN to before me on this 4th day of
April, 2024, at Anchorage, Alaska.




Notary Public in and for Alaska
My Commission Expires: 4/5/25

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22AKHE petition booklet 0140, along with another 22AKHE petition booklet with a missing page. The video also shows that an employee was unable to answer questions about the petition booklets, and that no one was monitoring the petition booklets.

3. Attached as Exhibit 2 is a true and correct copy of a video that I took of two 22AKHE petition booklets at Big Valley Bingo on October 19, 2023. That video shows 22AKHE petition booklet 0140.

4. Attached as Exhibit 3 is a true and correct copy of a video that I took of two 22AKHE petition booklets at Big Valley Bingo on November 17, 2023. That video shows 22AKHE petition booklets 0140 and 0357; booklet 0357 was missing its first page. The video also shows that both petition booklets were left unattended and unmonitored.

5. On October 19, 2023, I observed 22AKHE petition booklet 0502 at Sylvia's Quilt Depot located at 1261 S Seward Meridian Parkway #E in Wasilla, Alaska. When I arrived at Sylvia's Quilt Depot, I asked the person working there if they had a 22AKHE petition booklet, and she provided it. But when I asked the person working there if she was supposed to be the witness for signatures, she said that she did not know, and that somebody had come by and left the booklet there.

6. On December 6, 2023, I observed 22AKHE petition booklet 0502 at Sylvia's Quilt Depot located at 1261 S Seward Meridian Parkway #E in Wasilla, Alaska. It was under a display on the front counter.

7. On October 27, 2023, and November 11, 2023, I observed two 22AKHE petition booklets at Tudor Bingo located at 1436 E Tudor Road in Anchorage, Alaska. They appeared to be the same booklets on both occasions.

8. Attached as Exhibit 4 is a true and correct copy of a video that I took of two 22AKHE petition booklets at Tudor Bingo on October 27, 2023.

9. Attached as Exhibit 5 is a true and correct copy of a video that I took of two 22AKHE petition booklets at Tudor Bingo on November 11, 2023. That video clearly shows 22AKHE petition booklet number 0968.

10. On October 27, November 11, December 2, and December 16, 2023, I observed 22AKHE petition booklets at Duane's Antique Market, located at 1233 E 76th Avenue in Anchorage, Alaska.

11. Attached as Exhibit 6 is a true and correct copy of a video that I took of three 22AKHE petition booklets at Duane's Antique Market on October 27, 2023. That video shows 22AKHE petition booklet numbers 0679 and 1401.

12. Attached as Exhibit 7 is a true and correct copy of a video that I took at Duane's Antique Market on October 27, 2023. That video shows a male employee that is not witnessing the signing of the booklets, and says that another person comes by to pick up and drop off the booklets.

13. Attached as Exhibit 8 is a true and correct copy of a video that I took showing two 22AKHE petition booklets, including booklet 0836, at Duane's Antique

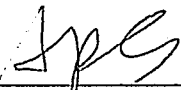
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Market on November 11, 2023. That video also shows a sign on the main entrance indicating that people could sign the petition booklets there.

14. Attached as Exhibit 9 is a true and correct copy of a video that I took showing 22AKHE petition booklets 0836 and 1401, at Duane's Antique Market on December 2, 2023.

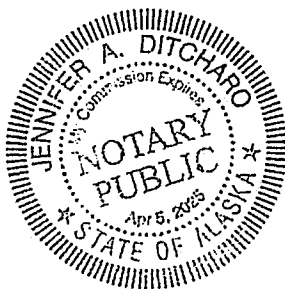
15. Attached as Exhibit 10 is a true and correct copy of a video that I took showing 22AKHE petition booklets 0836 and 1401, at Duane's Antique Market on December 16, 2023.

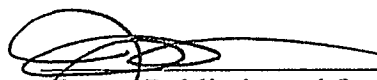
FURTHER YOUR AFFIANT SAYETH NAUGHT.



Alexander Susky

SUBSCRIBED AND SWORN to before me on this 4th day of April, 2024, at Anchorage, Alaska.





Notary Public in and for Alaska
My Commission Expires: 4/5/25

MAY 10 2024

Clerk of the Trial Courts
By _____ Deputy

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

LA QUEN NÁAY ELIZABETH
MEDICINE CROW, AMBER LEE, and
KEVIN MCGEE,

Plaintiffs,

vs.

DIRECTOR CAROL BEECHER, in her
official capacity, LT. GOVERNOR
NANCY DAHLSTROM, in her official
capacity, STATE OF ALASKA
DIVISION OF ELECTIONS, and
ALASKANS FOR HONEST
ELECTIONS,

Defendants.

AFFIDAVIT OF
ANGELA CHIAPPETTA

Case No.: 3AN-24-05615CI

WASHINGTON D.C.

)
) ss
)

I, ANGELA CHIAPPETTA, being first duly sworn, depose and state as follows:

1. On August 16, 2023, I went to Duane's Antique Market located at 1233 E 76th Avenue in Anchorage, Alaska. I observed 22AKHE petition booklet 0835 at Duane's Antique Market on that date.

2. Attached as Exhibit 1 is a true and correct copy of a video that I took at Duane's Antique Market on August 16, 2023. That video shows a person who identified

himself as "Duane" (who was in jeans) leaving the store. That video also shows that 22AKHE petition booklet 0835 was left unattended.

3. Attached as Exhibits 2-3 are true and correct copies of photographs that I took of 22AKHE petition booklet 0835 at Duane's Antique Market on August 16, 2023.

4. Attached as Exhibit 4 is a true and correct copy of a photograph that I took of a younger women who appeared to be working at Duane's Antique Market on August 16, 2023. She was in a different part of the building from 22AKHE petition booklet 0835.

5. No one was observing or monitoring the petition booklet. No one was personally circulating the booklet or asking customers for signatures, or asking customers if they are registered to vote in Alaska. Instead, it appeared that anyone was free to manipulate the booklet in any manner whatsoever without oversight by a circulator.

6. On August 25, 2023, I went to GF Sherman Signs located at 43420 Kalifornsky Beach Road in Soldotna, Alaska. I observed 22AKHE petition booklet 0608 at GF Sherman Signs on that date.

7. Attached as Exhibits 5-7 are true and correct copies of photographs that I took on August 25, 2023 at GF Sherman Signs. Those photographs show that 22AKHE petition booklet 0608.

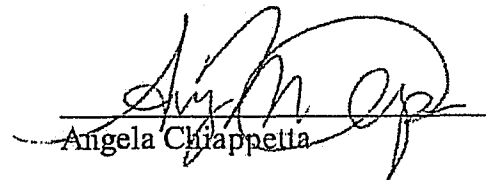
8. I went to the Alaska State Fair on September 1 and 2, 2023. During my time at the Alaska State Fair, I took photographs and videos and observed additional 22AKHE petition booklets.

9. Attached as Exhibit 8 is a true and correct copy of a video that I took on September 1, 2023, at the Mat-Su Republican Women's "booth." That video shows 22AKHE petition booklet 0694, which had "Natalie Martin" written on the first page. That video also shows that "Natalie" was not present at that time.

10. Attached as Exhibit 9 is a true and correct copy of a video that I took on September 2, 2023, at the Mat-Su Republican Women's "booth." That video shows that a person who identified herself as "Nan" was monitoring one of the 22AKHE petition booklets.

11. Attached as Exhibits 10 and 11 are true and correct copies of photographs that I took on September 2, 2023, at the Mat-Su Republican Women's "booth." Those photographs show that "Nan," who was identified in Exhibit 9, was gathering signatures in 22AKHE petition booklet 0696.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


Angela Chiappetta

SUBSCRIBED AND SWORN to before me on this 29 day of April, 2024, at Washington DC.

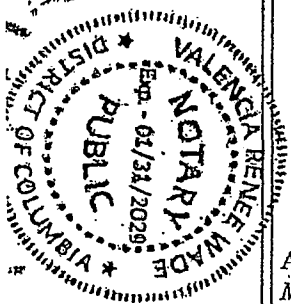

Notary Public in and for Washington DC
My Commission Expires: 1-31-2029

AFFIDAVIT OF ANGELA CHIAPPETTA
Medicine Grow, et al., vs. Beecher, et al., 3AN-24-05615CI

Page 3 of 3

PLTFS 001485

Cashion Gilmore & Lindemuth
510 L Street, Suite 601
Anchorage, Alaska 99501
(907) 222-7932 fax (907) 222-7938



Clerk of the Trial Courts
By _____ Deputy

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

LA QUEN NÁAY ELIZABETH
MEDICINE CROW, AMBER LEE, and
KEVIN MCGEE,

Plaintiffs,

VS.

AFFIDAVIT OF DAWN DUNBAR

**DIRECTOR CAROL BEECHER, in her
official capacity, LT. GOVERNOR
NANCY DAHLSTROM, in her official
capacity, STATE OF ALASKA
DIVISION OF ELECTIONS, and
ALASKANS FOR HONEST
ELECTIONS,**

Defendants.

Case No.: 3AN-24-05615CI

STATE OF ALASKA)
) ss
THIRD JUDICIAL DISTRICT)

I, DAWN DUNBAR, being first duly sworn, depose and state as follows:

1. On October 23, 2023, I observed two 22AKHE petition booklets at Tudor Bingo located at 1436 E Tudor Road in Anchorage, Alaska. They were located on a table in between the two registers to the left of the entrance.

2. Attached as Exhibits 1, 2, and 3 are true and correct copies of photographs that I took of the 22AKHE petition booklets at Tudor Bingo on October 23, 2023. Those photographs show 22AKHE petition booklet numbers 0967 and 0968.

AFFIDAVIT OF DAWN DUNBAR
Medicine Crow, et al., vs. Beecher, et al., 3AN-24-05615CI

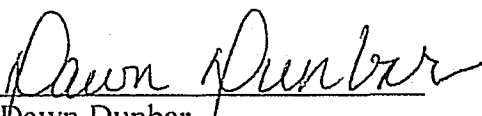
Cashion Gilmore & Lindemuth
510 L Street, Suite 601
Anchorage, Alaska 99501
(907) 222-7932 fax (907) 222-7938

3. When I was in Tudor Bingo, I observed that both booklets were unattended, and were not being watched by any petition circulator. There was no one personally circulating the booklets or asking customers for signatures, or asking customers if they are registered to vote in Alaska. Instead, it appeared that anyone was free to manipulate and observe the booklets in any manner whatsoever without oversight by a circulator.

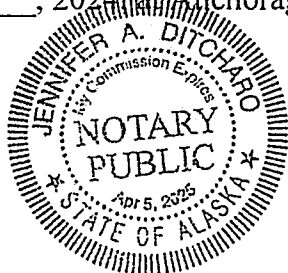
4. After observing these unattended 22AKHE petition booklets, I called the State Division of Elections. I told the Division employee that I spoke what the specific petition numbers of the booklets I observed were, along with where they could be found.

5. I returned to Tudor Bingo periodically after October 23, 2023. Both 22AKHE petition booklets remained in the same locations for weeks. I remember this because it was after I had already called the State Division of Elections to tell them that these particular booklets had been left in Tudor Bingo unattended.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


Dawn Dunbar

SUBSCRIBED AND SWORN to before me on this 3rd day of April, 2024, in Anchorage, Alaska.




Notary Public in and for Alaska
My Commission Expires: 4/5/25

MAY 10 2024

Clerk of the Trial Courts
By _____ Deputy

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

LA QUEN NÁAY ELIZABETH
MEDICINE CROW, AMBER LEE, and
KEVIN MCGEE,

Plaintiffs,

vs.

AFFIDAVIT OF DEREK APPLIN

DIRECTOR CAROL BEECHER, in her
official capacity, LT. GOVERNOR
NANCY DAHLSTROM, in her official
capacity, STATE OF ALASKA
DIVISION OF ELECTIONS, and
ALASKANS FOR HONEST
ELECTIONS,

Defendants.

Case No.: 3AN-24-_____CI

STATE OF ALASKA)
) ss
THIRD JUDICIAL DISTRICT)

I, DEREK APPLIN, being first duly sworn, depose and state as follows:

1. I have experience gathering signatures for ballot initiatives as a circulator, both in Alaska and in at least three other states (Texas, Ohio, and Arizona). I am familiar with what rules a circulator needs to follow when gathering signatures in Alaska. I have also led trainings for circulators of petition booklets in Alaska, and have also served as a team leader for circulators.

AFFIDAVIT OF DEREK APPLIN
Medicine Crow, et al., vs. Beecher, et al., 3AN-24-_____CI

Page 1 of 5

PLTFS 001499

2. When gathering signatures for ballot initiatives, I have been told that I must personally witness every signature, and that I cannot leave any petition booklets unattended. This should be common knowledge for any person in charge of petition booklets in Alaska, because at least one person may attend a training that is run by the State Division of Elections. Circulators should also be aware of this information, and should be told by those in charge of the petition. It is also common knowledge for professional signature gatherers in Alaska.

3. On August 4, 2023, I went to Duane's Antique Market located at 1233 E 76th Avenue in Anchorage, Alaska. I observed a 22AKHE petition booklet, booklet 0835, at Duane's Antique Market on that date.

4. Attached as Exhibit 1 is a true and correct copy of a video that I took of 22AKHE petition booklet 0835 on August 4, 2023. The booklet was sitting in front of the entrance to Duane's Antique Market.

5. Attached as Exhibit 2 is a true and correct copy of a video that I took while in Duane's Antique Market on August 4, 2023.

6. Attached as Exhibit 3 is a true and correct copy of a photograph that I took of the 22AKHE petition booklet at Duane's Antique Market on August 4, 2023.

7. Attached as Exhibit 4 is a true and correct copy of a photograph that I took of 22AKHE petition booklet 0835 at Duane's Antique Market on August 4, 2023.

8. When I went to Duane's Antique Market on August 4, 2023, I encountered two individuals. One was a younger man who appeared to be in his mid- to late-20s with

facial hair, and he stated that he worked there. I also observed another person who carried items in and out of the store.

9. When speaking with those individuals, I was told that the 22AKHE petition booklet was present throughout the day. The younger man gave me the impression that the booklet was largely left unattended, as he himself was not closely monitoring it while he was working in the store.

10. Initially, the younger man told me that the petition was in support of ranked-choice voting. Later, he changed his position, and told me that he knew very little about the petition, and had not received any information about it.

11. When I was in Duane's Antique Market, I observed that the book was unattended, and was not being watched by any petition circulator. I also observed that no one was paying attention to the petition booklet. There was no one personally circulating the booklet or asking customers for signatures, or asking customers if they are registered to vote in Alaska. Instead, it appeared that anyone was free to manipulate the booklet in any manner whatsoever without oversight by a circulator.

12. I went to the Alaska State Fair on August 19, 21, and 28, 2023. During my time at the Alaska State Fair, I took photographs and videos and observed additional 22AKHE petition booklets.

13. On August 19, 2023, I observed booklet 0950 at the Mat-Su Republican Women's "booth."

14. Attached as Exhibit 5 is a true and correct copy of a video that I took at the Mat-Su Republican Women's "booth" at the Alaska State Fair on August 19, 2023.

15. On August 21, 2023, I observed 22AKHE petition booklet numbers 0684 and either 0615 or 0616 at the Alaska Outdoor Access Alliance "booth."

16. Attached as Exhibit 6 is a true and correct copy of a photograph that I took at the Alaska Outdoor Access Alliance "booth" at the Alaska State Fair on August 21, 2023.

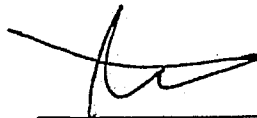
17. Attached as Exhibit 7 is a true and correct copy of a photograph that I took at the Alaska Outdoor Access Alliance "booth" at the Alaska State Fair on August 21, 2023. This picture appears to show either 22AKHE petition booklet 0615 or 0616.

18. On August 28, 2023, I observed 22AKHE petition booklet number 0894 at the Alaska Outdoor Access Alliance "booth."

19. Attached as Exhibit 8 is a true and correct copy of a photograph that I took at the Alaska Outdoor Access Alliance "booth" at the Alaska State Fair on August 28, 2023.

20. Attached as Exhibit 9 is a true and correct copy of a video that I took at the Alaska Outdoor Access Alliance "booth" at the Alaska State Fair on August 28, 2023. I observed that 22AKHE petition booklet 0894 was left unattended and unmonitored at that location, and I was not asked if I was an Alaskan voter.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



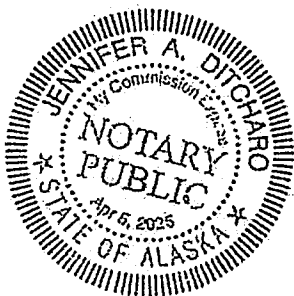
Derek Applin

SUBSCRIBED AND SWORN to before me on this 2nd day of April, 2024, at Anchorage, Alaska.



Notary Public in and for Alaska

My Commission Expires: 4/5/25



Cashion Gilmore & Lindemuth
510 L Street, Suite 601
Anchorage, Alaska 99501
(907) 222-7932 fax (907) 222-7938

MAY 10 2024

Clerk of the Trial Courts
By _____ Deputy

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

LA QUEN NÁAY ELIZABETH
MEDICINE CROW, AMBER LEE, and
KEVIN MCGEE,

Plaintiffs,

vs.

AFFIDAVIT OF GREGORY LEE

DIRECTOR CAROL BEECHER, in her
official capacity, LT. GOVERNOR
NANCY DAHLSTROM, in her official
capacity, STATE OF ALASKA
DIVISION OF ELECTIONS, and
ALASKANS FOR HONEST
ELECTIONS,

Defendants.

Case No.: 3AN-24-05615CI

STATE OF WASHINGTON)
) ss
KING COUNTY)

I, GREGORY LEE, being first duly sworn, depose and state as follows:

1. I have been gathering signatures for ballot initiatives as a circulator for approximately 10 years. I have gathered signature for ballot initiatives in Alaska and in at least four other states (California, Washington, Colorado, and Arkansas). Combined, I believe that I have gathered signatures for over 200 petitions.

AFFIDAVIT OF GREGORY LEE
Medicine Crow, et al., vs. Beecher, et al., 3AN-24-05615CI

Page 1 of 2

2. I am familiar with what rules a circulator needs to follow when gathering signatures in Alaska. Although each State has its own specific rules and requirements, which primarily concern where signatures can be gathered, some of them are the same. For example, in all of the States that I have worked in, including Alaska, circulators must always witness every person who signs a petition. This requirement is common knowledge for every circulator. Additionally, because of this requirement for a circulator to witness each and every signature, a circulator cannot leave petition booklets at a business under any circumstances. A professional circulator that got caught doing so would be terminated. Finally, a circulator cannot give petition booklets to others for them to gather signatures; if a circulator signs a petition booklet, they must have personally witnessed each and every signature that has been gathered in that booklet.

3. On October 21, 2023, I observed two 22AKHE petition booklets at Tudor Bingo located at 1436 E Tudor Road in Anchorage, Alaska. They were located on a table between two registers to the left of the entrance.

4. Attached as Exhibits 1-5 are true and correct copies of photographs that I took of the 22AKHE petition booklets at Tudor Bingo on October 21, 2023. Those photographs show 22AKHE petition booklet numbers 0967 and 0968, as well as where they were located.

5. When I was in Tudor Bingo, I observed that both booklets were unattended, and were not being watched by any petition circulator. There was no one

personally circulating the booklets or asking customers for signatures, or asking customers if they are registered to vote in Alaska. Instead, it appeared that anyone was free to manipulate and observe the booklets in any manner whatsoever without oversight by a circulator.

6. On October 30, November 14, and November 27, 2023, I observed two 22AKHE petition booklets at Big Valley Bingo located at 2431 E Old Matanuska Road in Wasilla, Alaska. They were located on a table in front of the entrance.

7. Attached as Exhibits 6-9 are true and correct copies of photographs that I took of the 22AKHE petition booklets at Big Valley Bingo on October 30, 2023. Those photographs show 22AKHE petition booklet number 0140, as well as another 22AKHE petition booklet that was missing its front page.

8. Attached as Exhibit 10 is a true and correct copy of a video that I took of the 22AKHE petition booklets at Big Valley Bingo on October 30, 2023. That video shows 22AKHE petition booklet number 0140, as well as another 22AKHE petition booklet that was missing its front page. That video also shows that no circulator was monitoring the booklets or asking customers if they are registered to vote in Alaska. Instead, it appeared that anyone was free to manipulate and observe the booklet in any manner whatsoever without oversight by a circulator.

9. Attached as Exhibit 11 is a true and correct copy of a video that I took of the 22AKHE petition booklets at Big Valley Bingo on October 30, 2023. That video shows my conversation with a person working at Big Valley Bingo who knew nothing

about the petition booklets, and was not monitoring them or asking customers if they are registered to vote in Alaska.

10. Attached as Exhibit 12 is a true and correct copy of a video that I took at Big Valley Bingo on October 30, 2023. That video shows a person working at Big Valley Bingo who explaining that "a guy" came and dropped the 22AKHE petition booklets off at that location.

11. Attached as Exhibit 13 is a true and correct copy of a video that I took of the 22AKHE petition booklets at Big Valley Bingo on October 30, 2023. That video shows 22AKHE petition booklet number 0140, as well as another 22AKHE petition booklet that was missing its front page, just sitting near the front entrance without any monitoring by anyone.

12. Attached as Exhibits 14 and 15 are true and correct copies of photographs that I took outside Big Valley Bingo on November 14, 2023. Those photographs show that Big Valley Bingo was promoting 22AKHE, and indicating to passersby that they could sign the petition booklets there.

13. Attached as Exhibits 16-19 are true and correct copies of photographs that I took of the 22AKHE petition booklets at Big Valley Bingo on November 14, 2023. Those photographs show 22AKHE petition booklet number 0140, as well as another 22AKHE petition booklet that was missing its front page.

14. Attached as Exhibit 20 is a true and correct copy of a video that I took of the 22AKHE petition booklets at Big Valley Bingo on November 14, 2023. That video

shows 22AKHE petition booklet number 0140, as well as another 22AKHE petition booklet that was missing its front page, just sitting near the front entrance without being monitored by anyone, let alone a circulator.

15. Attached as Exhibit 21 is a true and correct copy of a video that I took of the 22AKHE petition booklets at Big Valley Bingo on November 27, 2023. That video shows 22AKHE petition booklet number 0140, as well as another 22AKHE petition booklet that was missing its front page, just sitting near the front entrance without any monitoring by anyone.

16. Attached as Exhibit 22 is a true and correct copy of a video that I took of the 22AKHE petition booklets at Big Valley Bingo on November 27, 2023. That video shows my conversation with a person working at Big Valley Bingo who could not tell me anything about the petition booklets, and was not monitoring them or asking customers if they are registered to vote in Alaska.

17. On October 30 and November 14, 2023, I observed 22AKHE petition booklet 0502 at Sylvia's Quilt Depot located at 1261 S Seward Meridian Parkway #E in Wasilla, Alaska.

18. When I went to Sylvia's Quilt Depot on October 30, 2023, I observed 22AKHE petition booklet 0502 lying on the front counter. I was initially told by an employee that "Sylvia" was the person collecting signatures for 22AKHE, but that she was in her office, and therefore was not physically observing the petition booklet. I was later told that anybody who works at Sylvia's can collect signatures for that booklet.

The employee also stated that they had already filled up one full petition booklet of signatures.

19. When I went to Sylvia's Quilt Depot on November 14, 2023, I observed 22AKHE petition booklet 0502 lying on the front counter. I was told that the 22AKHE petition booklet had been dropped off, that "Sylvia" would return it, and that this was their second booklet. Specifically, I was told that another booklet had been brought to them after the first one was turned in.

20. On November 17, 2023, I went to Duane's Antique Market located at 1233 E 76th Avenue in Anchorage, Alaska. I observed two 22AKHE petition booklets at Duane's Antique Market on that date.

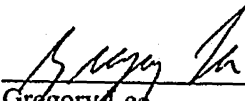
21. Attached as Exhibit 23 is a true and correct copy of a video that I took of the two 22AKHE petition booklets at Duane's Antique Market on November 17, 2023. That video shows 22AKHE petition booklet 0836, along with what appeared to be another 22AKHE petition booklet lying on a table. That video also shows a conversation that I had with a couple of people who appeared to be employees. Both of those apparent employees stated that the 22AKHE petition booklets were just dropped off at the business, and that no one needed to personally witness signatures in those booklets.

22. On November 14, 2023, at approximately 1:30pm, I received a phone call from Mikaela Emswiler. Ms. Emswiler was returning my call from earlier that day.

This conversation was recorded on an iPhone. Included as Exhibit 24 is a true and correct copy of the audio from that call.

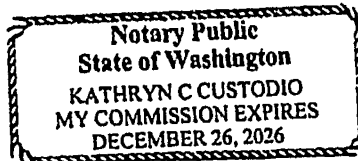
23. On November 20, 2023, I returned to Tudor Bingo to look for 22AKHE petition booklets. I did not observe any 22AKHE petition booklets at Tudor Bingo on that date.

FURTHER YOUR AFFIANT SAYETH NAUGHT.



Gregory Lee

SUBSCRIBED AND SWORN to before me on this 25th day of April, 2024, at Seattle, Washington.





Notary Public in and for Washington
My Commission Expires: 12-26-26

3. On August 19, 2023, I observed 22AKHE petition booklet 0630 at the Mat-Su Republican Women's "booth."

4. Attached as Exhibit 1 is a true and correct copy of a video that I took at the Mat-Su Republican Women's "booth" at the Alaska State Fair on August 19, 2023. That video shows that 22AKHE petition booklet 0630, along with another 22AKHE petition booklet, was unattended and not being watched by any petition circulator. I also observed that no one was specifically paying attention to the petition booklets or sitting at the table, even though people were providing signatures. No one was personally circulating the booklet or asking people for signatures, and no one was being asked if they are registered to vote in Alaska. Instead, it appeared that anyone was free to manipulate the booklet in any manner whatsoever without oversight by a circulator.

5. On August 21, 2023, I observed 22AKHE petition booklet number 0616 at the Alaska Outdoor Access Alliance "booth."

6. Attached as Exhibit 2 is a true and correct copy of a video that I took at the Alaska Outdoor Access Alliance "booth" at the Alaska State Fair on August 21, 2023. That video shows 22AKHE petition booklet number 0616.

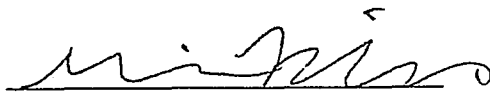
7. On August 21, 2023, I observed 22AKHE petition booklet 0690 at the Mat-Su Republican Women's "booth."

8. Attached as Exhibit 3 is a true and correct copy of a video that I took at the Mat-Su Republican Women's "booth" at the Alaska State Fair on August 21, 2023. That video shows an older gentlemen trying to collect signatures for 22AKHE petition booklet

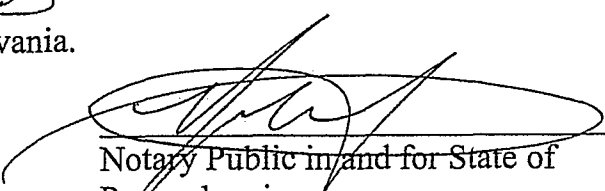
0690. The video also shows that the older gentleman admitted that he had not personally collected all of the signatures in that booklet.

9. On April 2, 2024, I reviewed a redacted version of 22AKHE petition booklet 0690. Attached as Exhibit 4 is a true and correct copy of the redacted version of 22AKHE petition booklet 0690 that I reviewed. The person who signed 22AKHE petition booklet 0690 as the circulator is "Kathy McCollum." Kathy McCollum is not the person I observed gathering signatures for that petition booklet in Exhibit 3.

FURTHER YOUR AFFIANT SAYETH NAUGHT.


Marcie Wilson

SUBSCRIBED AND SWORN to before me on this 19th day of April, 2024, at Willow Grove, Pennsylvania.


Notary Public in and for State of
Pennsylvania
My Commission Expires: 07/27/2025

Commonwealth of Pennsylvania - Notary Seal
NICOLE HAYS - Notary Public
Montgomery County
My Commission Expires July 27, 2025
Commission Number 1250845

Cashion Gilmore & Lindemuth
510 L Street, Suite 601
Anchorage, Alaska 99501
(907) 222-7932 fax (907) 222-7938

2. When I was in Tudor Bingo, I observed that both booklets were unattended, and were not being monitored by any petition circulator. In fact, it was very obvious that they were not being monitored by anyone at all. This is because I remember seeing writing in one of the petition booklets where someone had written that they were in favor of ranked-choice voting. Had the booklets been monitored, that would not have been possible. It appeared that anyone was free to manipulate and observe the booklets in any manner whatsoever without oversight by a circulator.

3. Although Tudor Bingo staff were nearby the petition booklets, they were not paying attention to or monitoring the booklets. No one was personally asking customers for signatures, or asking customers if they are registered to vote in Alaska.

4. The two 22AKHE petition booklets remained at Tudor Bingo for at least a week, if not longer. I never observed them to be monitored by a petition circulator.

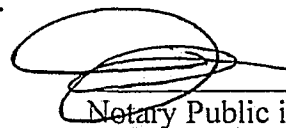
FURTHER YOUR AFFIANT SAYETH NAUGHT.


Valerie Kenny

SUBSCRIBED AND SWORN to before me on this 12th day of

April, 2024 at Anchorage, Alaska.





Notary Public in and for Alaska
My Commission Expires: 4/5/25

MAY 10 2024

Clerk of the Trial Courts
Deputy

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

LA QUEN NÁAY ELIZABETH
MEDICINE CROW, AMBER LEE, and
KEVIN MCGEE,

Plaintiffs,

vs.

DIRECTOR CAROL BEECHER, in her
official capacity, LT. GOVERNOR
NANCY DAHLSTROM, in her official
capacity, STATE OF ALASKA
DIVISION OF ELECTIONS, and
ALASKANS FOR HONEST
ELECTIONS,

Defendants.

AFFIDAVIT OF BROOKE REINSCH

Case No.: 3AN-24-_____ CI

STATE OF MISSOURI)
) ss
COLE COUNTY)

I, BROOKE REINSCH, being first duly sworn, depose and state as follows:

1. I work for a company that manages signature gathering campaigns throughout the United States. I know that each State has its own rules for how signature gathering campaigns must be run.

2. On July 25, 2023, I went to Duane's Antique Market located at 1233 E 76th Avenue in Anchorage, Alaska. I observed a 22AKHE petition booklet, booklet 0835, at

AFFIDAVIT OF BROOKE REINSCH
Medicine Crow, et al., vs. Beecher, et al., 3AN-24-_____

Duane's Antique Market on that date. I had gone to Duane's Antique Market because I had seen postings online about how a 22AKHE petition booklet would be available for signing at that location.

3. Attached as Exhibits 1 and 2 are true and correct copies of photographs that I took of 22AKHE petition booklet 0835 on July 25, 2023. The booklet was sitting on a glass counter next to the checkout, and nobody was monitoring it.

4. On April 2, 2024, I reviewed a redacted version of 22AKHE petition booklet 0835. Attached as Exhibit 3 is a true and correct copy of the redacted version of 22AKHE petition booklet 0835 that I reviewed. Page 25 of Exhibit 3, or signature page 3, confirms that I observed 22AKHE petition booklet 0835 at Duane's Antique Market on July 25, 2023, because some of the signatures on that page match signatures that are visible in Exhibits 1 and 2.

5. When I went to Duane's Antique Market on July 25, 2023, I encountered three individuals. One was a woman appeared to be in her late 20s or early 30s with dark hair. Another was a younger man who appeared to be in his late teens or early 20s. Finally, I also observed an older, taller woman who appeared to be in her late 60s or early 70s.

6. I was told by those individuals that "Duane" of Duane's Antique Market was not in the store, and that he was currently out of state.

7. When I was in Duane's Antique Market, I observed that no one was paying attention to the petition booklet, and that it was left unattended. For example, when I first

arrived, nobody was next to or near the petition booklet. Additionally, no one was personally circulating the booklet or asking customers for signatures, and no one was asking if the signers are registered to vote in Alaska. Instead, it appeared that anyone was free to manipulate the booklet in any manner whatsoever without oversight by a circulator. Nobody told me to sign, but I could have picked up a pen to sign, even though I was not registered to vote in Alaska.

8. The person who remained closest to the petition booklet while I was there was the young woman, who is unlikely to be "Brad L. Campbell" that Exhibit 3 shows signed 22AKHE petition booklet 0835 as the circulator.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Brooke Reinsch

SUBSCRIBED AND SWORN to before me on this ____ day of _____, 2024, at Jefferson City, Missouri.

Notary Public in and for the State of
Missouri
My Commission Expires: _____