

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

LA QUEN NAA Y ELIZABETH)
MEDICINE CROW, AMBER LEE,)
KEVIN MCGEE,)

Plaintiffs,)

v.)

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

Defendants.)

FILED in the Trial Courts
State of Alaska Third District

APR 08 2024

Clerk of the Trial Courts
By _____ Deputy

Case No. 3AN-24-05615 CI

ANSWER OF THE INTERVENORS TO PLAINTIFFS' COMPLAINT

Intervenors, Dr. Arthur Matthias, Phillip Izon, and Jamie R. Donley (hereafter "the Sponsors"), answer the Plaintiff's complaint as follows:

1. The Sponsors admit the jurisdiction and venue allegations of the complaint set forth in ¶¶ 1-2.

2. With respect to the allegations stated in ¶¶ 4-14 and 36-131, the Sponsors deny any and all of the plaintiffs' allegations to the effect that (a) they or anyone associated with 22AKHE instructed circulators to violate Alaska law in the course of collecting signatures on the petition booklets for 22AKHE that were submitted to the State of Alaska, Division of Elections (hereafter "the Division"); and (b) Alaska law was violated

in the course of collecting signatures on the petition booklets for 22AKHE that were submitted to the Division.

3. With respect to the allegations stated in ¶¶ 15-29 and 132-166, the Sponsors deny that the state defendants violated any Alaska law with respect to the review and approval of signatures and petition booklets for 22AKHE.

4. With respect to the allegations stated in ¶¶ 167-168, the Sponsors take the position that the plaintiffs should only be given unredacted petition booklets subject to an appropriate protective order so as to protect the privacy of the Alaskans who the signed petition booklets and to protect them from harassment.

5. With respect to the allegations stated in ¶¶ 167-181, the Sponsors deny that the plaintiffs are entitled to the injunctive and declaratory relief they request.

WHEREFORE, the Sponsors pray that plaintiffs' take no relief as a result of their claims, that their complaint be dismissed with prejudice, that the Sponsors be awarded their costs and attorney's fees to the extent permitted by law, and that the court grant such other and further relief as the court deems just and equitable.

Dated this 8th day of April 2024.

Law Offices of Kevin G. Clarkson

Kevin Clarkson

By

Kevin G. Clarkson
ABA No. 8511149

I certify that on April 8, 2024,
a copy of this Answer in Intervention
was emailed to:

Thomas S. Flynn
Lael Harrison
Assistant Attorneys General
Department of Law
Office of the Attorney General, Anchorage Branch
1031 W. Fourth Avenue, Suite 200
Anchorage, AK 99501
thomas.flynn@alaska.gov
lael.harrison@alaska.gov

Scott Kendall, ABA No. 0405019.
Samuel Gottstein, ABA No. 1511099
Cashion, Gilmore & Lindemuth
510 L Street, Ste. 601
Anchorage, AK 99501
scott@cashiongilmore.com
sam@cashiongilmore.com

Kevin Clarkson
Kevin G. Clarkson