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

LA QUEN NAAY 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, DR. ARTHUR MATTHIAS, PHILLIP IZON, AND JAMIE R. DONLEY, Intervenors.	)	Case No. 3AN-24-05615 CI

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INTERVENORS/SPONSORS' REPLY TO OPPOSITIONS TO THEIR RENEWED MOTION FOR SUMMARY JUDGMENT

INTODUCTION

In *North West Cruiseships Ass'n, Inc. v. State*, the trial court (Judge William Morse) did not require a trial be held to determine factual issues related to the one petition booklet that had allegedly been left unattended at a ski resort where it allegedly was signed by eight ski instructors outside the "actual presence" of the booklet's circulator (who arguably signed a false affidavit on the back of the booklet), because **the signatures in that booklet,**

even if eliminated, would not have reduced the initiative below the required signature totals.[1] The Alaska Supreme Court affirmed Judge Morse's decision. Here, just as in *North West*, because the proof that Plaintiffs' have put forward in this case, proof as their own expert described shows only that "**a handful of circulators at least … some of the time** were not in fact circulating their booklets the entire time that they purported to be,"[2] does not implicate sufficient petition booklets or innocent voters' signatures contained therein, that if eliminated, would reduce 22AKHE's signature count below the requisite numbers,[3] there is no material issue of fact to hold a trial over.

The most telling part of Plaintiffs' Opposition to the Sponsors' renewed motion is the last page wherein they tacitly admit that they have shown but a tiny bit of evidence—the ice bobbing above the surface of the ocean (the "handful of circulators at least … some of the time"[4])—and from that are expecting the court to hold a full-blown six-day trial to see if perhaps maybe there is more evidence—the unseen iceberg below the surface of the water—that they have not been able to find or bring forward.[5] The problem with the Plaintiffs' proposition is that under Alaska R. Civ. P. 56 they have the burden to bring the evidence forward now in order to demonstrate that there is a reason to have a trial—*i.e.*,

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1 *North West Cruiseship Ass'n. Inc. v. State*, 145 P.3d 573, 588, 590 (Alaska 2006).
2 Costa Dep. pp. 102-103 ("either because they left them unattended or because, frankly, someone else entirely besides them was carrying it for at least part of the time that they purported to be carrying it.").
3 *See* AS 15.45.140.
4 Costa Dep. pp. 102-103.
5 Plaintiffs' Opposition (June 17, 2024), p. 22.

that they can prove (not merely surmise) that more petition booklets were improperly handled and that the signatures in those booklets will amount to enough to reduce 22AKHE's signature count below the AS 15.45.140 thresholds. Absent that proof there is no genuine issue of material fact to hold a trial over in this case—if at the end of trial, the Plaintiffs have identified no more than the twenty-six petition booklets containing 1,404 signatures for rejection that their proof has identified thus far,[6] then they lose.

The Sponsors' renewed motion does not address the "credibility" of Plaintiffs' expert witness,[7] nor does it ask the court to "conduct trial-like evidence weighing."[8] The Sponsors' renewed motion highlights for the court that (1) the Plaintiffs' expert brought no new evidence of circulating impropriety or fraud to the table; (2) that many of the observations he made about circulating or circulator certifications (from a mere review of the 641 petition booklets) were observances of perfectly legal things; and lastly that (3)

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[6] And for purposes of summary judgment the Sponsors simply asked the court to assume that the twenty-six petition booklets the Plaintiffs have identified should be eliminated. *See* Opposition and Cross-Motion, pp. 24-25 (identifying twenty-two booklets that are mentioned or shown in Plaintiffs' Initial Disclosures, Interrogatory Answers, and affidavits, videos and photographs; *also* Exs B and C to Sponsors' Opposition and Cross-Motion (which analyze the twenty-two booklets and the 903 signature contained therein); *also* Sponsors' Notice of Amended Exs. B and C (May 25, 2024) (adding one more booklet—booklet No. 435, that was circulated by Sylvia Stewart and thus bringing the total to twenty-three booklets and yet still not making a dent in the 22AKHE signature count); and *also* Notice Re Second Supplement to Exs. B and C and Second Supplements to Exs. B and C (dated June 17, 2024) (identifying three more booklets—booklets Nos. 392, 636, and 637 that were innocently but improperly shared by a husband and wife, Mr. and Mrs. Wessels that if also eliminated would bring the total eliminated signatures to 1,404, and once again barely dent the statewide total for 22AKHE and eliminate but one house district below the threshold of AS 15..45.140 bringing the total house districts to thirty-three—three more than the required thirty).

[7] *See* Plaintiffs' Opposition (June 17, 2024), p. 3.

[8] *Id.* pp. 3-4.

even assuming that the booklets and signatures the Plaintiffs have managed to show proof of (the twenty-six booklets containing 1,404 signatures—the "handful of circulators at least … some of the time"[9]) should be eliminated, the signature count for 22AKHE still leaves the initiative qualified for the November 2024 ballot under AS 15.45.140. This case presents precisely the scenario that led Judge Morse in *North West* to grant summary judgment and not hold a trial, [10] and that led the Alaska Supreme Court to affirm his decision.[11]

What is at stake in this case is most definitely not open jungle primaries and ranked choice voting.[12] This court is not being asked to render a decision on whether those current parts of Alaska's electoral system will continue. What is at stake in this case is the people of Alaska's right to self-legislate under Alaska Const., Art. 11—self-legislation that can (1) bring open jungle primaries and ranked choice voting (as Ballot Measure 2 did in 2020 on a vote margin of only 3,781), or (2) eliminate them and return Alaska to its long-time historical election system (as Ballot Measure 2 proposes in 2024). This court's obligation is to "liberally construe the requirements pertaining to the people's right to use the initiative process so that 'the people [are] permitted to vote and express their will on the proposed

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9 Costa Dep. pp. 102-103.

10 *See North West*, 145 P.3d at 588, 590.

11 *See Id*. at 575-576 ("we issued an order on May 11, 2006, affirming the superior court's decision granting summary judgment to the State…. This opinion sets out our reasons for affirming the superior court.").

12 What Plaintiffs call "an innovative system of electoral democracy."

legislation.'"[13] This court is to resolve "doubts as to technical deficiencies or failure to comply with the exact procedural requirements" "in favor of the accomplishment of that purpose."[14]

ARGUMENT

I. PLAINTIFFS HAVE NOT BROUGHT FORWARD PROOF OF BOOKLET OR SIGNATURE DISQUALIFICATION SUFICIENT TO REMOVE 22AKHE FROM THE BALLOT

It is "Plaintiffs' burden to prove that actual irregularities or fraud did in fact occur"[15] and to do so on a booklet-by-booklet and/or signature-by-signature basis—"Plaintiffs bear the burden of proving by a preponderance of the evidence that particular booklets or signatures are invalid."[16] The court should note that neither the Plaintiffs' long-awaited expert witness[17] nor their most recent Opposition[18] have identified even one additional booklet to add to the twenty-six already identified and discounted in the Sponsors' cross-motion for summary judgment.[19] Plaintiffs keep promising to present proof of fraud or

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13 *North West*, 145 P.3d at 577 (quoting *Boucher v. Engstrom*, 528 P.2d 456, 462 (Alaska 1974) (quoting *Cope v. Toronto*, 332 P.2d 977, 979 (Utah 1958)).

14 *North West*, 145 P.3d at 577 (citing *Boucher*, 528 P.2d at 462; *Municipality of Anchorage v. Frohne*, 568 P.2d 3, 8 (Alaska 1977)).

15 Plaintiffs' Opposition (June 17, 2024), p. 7.

16 Opposition/Reply, p. 31.

17 *See* Costa Dep. pp. 1-137 (submitted with the Sponsors' Supplement Re Renewed Motion for Summary Judgment (June 14, 2024).

18 *See* Plaintiffs' Opposition (June 17, 2024), pp. 1-23.

19 *See* Opposition and Cross-Motion, pp. 24-25; Plaintiffs' Initial Disclosures, Interrogatory Answers, and affidavits filed with the Sponsors' cross-motion; *also* Exs B and C to Sponsors' Opposition and Cross-Motion (903 signatures analyzed); *also* Sponsors' Notice of Amended Exs. B and C (May 25, 2024) (adding one more booklet); and *also* Notice Re Second Supplement to Exs. B and C and Second Supplements to Exs. B and C (dated June 17, 2024) (identifying three more booklets bringing the total questioned signatures to 1,404).

circulating irregularities sufficient to disqualify 22AKHE from the ballot under AS 15.45.140,[20] but they have not demonstrated in response to the Sponsors' fully supported motion for summary judgment that they can. The Plaintiffs repeatedly ignore their burden on summary judgment to present evidence of a "genuine" issue for trial,[21] and instead keep pleading for that the court let them go to trial on nothing more than a wing and prayer and the hope that maybe they will get lucky and discover more booklets or signatures.

But according to *North West*, unless the Plaintiffs show this court in response to the Sponsors' motion, that they have proof of a sufficient number of booklets containing a sufficient number of qualified voters' signatures so as to make a difference in the 22AKHE signature count, they have no right to survive summary judgment or to go to trial.[22] The Alaska Supreme Court affirmed Judge Morse's decision to grant summary judgment to the state in that case because the plaintiffs did not present evidence of sufficient booklets or signatures to make a difference in the initiative's signature count—eliminating the eight ski instructors' signatures were not enough to reduce the initiative's signature count below the AS 15.45.140 thresholds. The Alaska Supreme Court did not reverse Judge Morse and

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20 *See* Opposition p. 7.

21 The burden to present evidence of consequence–that will show facts sufficient to disqualify sufficient specific petition booklets or signatures to reduce 22AKHE's signature count below the AS 15.45.140 thresholds. Only evidence of this nature would create a "genuine" issue for trial. *See e.g.*, *North West*, 145 P.3d at 575-576, 588, 590.

22 *Id.* at 575-576, 588, 590.

require a trial on the plaintiffs' mere hope that maybe they could find more booklets or signatures to eliminate.

II. THE SPNSORS' MOTION PRESUMED THAT THE PROTOCOLS OF AS 15.45.130 WERE APPLCIABLE AND COULD RESULT IN THE ELIIMINATION OF BOOKLETS AND/OR SIGNATURES

The Plaintiffs' discussion on pages 12-13 of their Opposition misses the point of the Sponsors' motion entirely. The Sponsors' motion in part presumed that the circulating protocols of AS 15.45.130 applied and that booklets circulated in violation of those protocols (and signatures contained therein) could be eliminated from the 22AKHE signature count.[23] The point of this part of the Sponsors' motion was that even with these presumptions, Plaintiffs' proof was inadequate because they had not (and still have not) identified sufficient booklets and signatures to make a difference as *North West* requires.[24]

III. THE PLAINTIFFS' DRACONIAN REMEDY PROPOSAL, ELIMINATING ENTIRE BOOKLETS ALONG WITH THE QUALIFIED VOTERS' SIGNATRES CONTAINED THEREIN, BASED UPON CIRCULATOR CONDUCT AND AFFIDAVITS, IS OVERLY BURDENSOME AND UNCONSTITUTIONAL

In their Opposition, Plaintiffs completely ignore the Alaska Supreme Court's decision in *Resource Dev. Council, Inc. v. Vote Yes for Alaska's Fair Share*,[25] in which the Court, not simply Judge Matthews, held that negating voters' signatures and thus disenfranchising voters based upon circulator conduct (including breaching circulating

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[23] The Sponsors also later made constitutional arguments regarding what the permissible remedies might be for breaches of circulating protocols.

[24] 145 P.3d at 575-576, 588, 590.

[25] 494 P.3d 541, 545 (Alaska 2021).

protocols and signing false affidavits), was overly burdensome and unconstitutional under the First Amendment and Alaska Const. Art, 11.[26] The Sponsors have thoroughly briefed the constitutional issues regarding proper remedies.[27]

The state defendants' suggestion that in *North West* the Alaska Supreme Court permitted the rejection of voters' signatures (and the disenfranchisement of voters) simply because of circulating conduct (there the failure to place a "paid by" disclaimer on certain pages of certain booklets) is incorrect because it reads too much into *North West.* The Court, consistent with its past decisions, permitted the rejection of signatures on those limited booklet pages out of a concern that the voters might have been misled when they signed the petition booklet.

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The Court in *North West* explained:

> We conclude that the Division construed its own regulations in a manner that struck a careful balance between the people's right to enact legislation by initiative and the regulations **requiring that potential petition subscribers be made aware that the circulators may have a motivation to induce them to sign the petition other than a personal belief in the value of the initiative**. **Those signatures from persons who were clearly unaware that the circulator was or was not being paid were correctly discarded, but those signatures from persons who had been made aware of the issue were properly retained.** The Division's construction of its own regulations is therefore in line with our directive in Fischer v. Stout to seek "a construction . . . which avoids the wholesale dis[en]franchisement of qualified electors." Again in light of the fact that we have adopted a rule of liberal construction with regard to statutory initiative procedures, we

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[26] *Resource Dev.*, 494 P.3d at 546-549, 552-554. This holding in *Resource Dev.* was made by the Alaska Supreme Court and is not simply a description of Superior Court Judge Thomas Matthews' decision. *Id*.

[27] *See* Renewed Motion for Summary Judgment, pp. 40-44.

> conclude that counting the signatures from the pages containing the proper "paid by" information reflects the balance sought by the legislature between the people's right to legislate by initiative and the goal of **ensuring that petition subscribers are well-informed upon signing**.[28]

As the Sponsors' argued previously, the only cases in which the Alaska Supreme Court has countenanced the wholesale disqualification of signatures and the disenfranchisement of voters via their petition signatures, are situations in which the voters have potentially been misled—situations wherein the voters might have reconsidered lending their support to the petition if they had been given more or more correct information.[29]

The state defendants' attempt to distinguish *Meyer v. Grant*[30] fails. Yes, circulating petitions and interactions between circulators and potential subscribers is core political speech that receives the highest degree of First Amendment protection.[31] But so does a voters' act in placing their signature on an initiative petition—this was the point of the Alaska Supreme Court's decision in *Resource Dev.*[32] As the court explained:

> The superior court rightly recognized that **the State has a compelling interest in "ensuring the integrity of the election process and preventing fraud." But** as the Court held in *Meyer*, **the means chosen to achieve the State's interests must be narrowly tailored**. Alaska Statute 15.45.110(c) is not narrowly tailored because, unlike the statutes that survived less exacting

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28 *North West*, 145 P.3d at 578 (emphasis added).

29 *See North West*, 145 P.3d at 578; *accord Faipeas v. Municipality of Anchorage*, 860 P.2d 1214, 1219-1221 (Alaska 1993) (finding the referendum itself and its summary to be **misleading**, the court threw the entire referendum, with all signatures in support, out). In *North West*, the court required a limited page-by-page rejection of signatures, not a wholesale rejection of entire booklets (thus discarding booklets containing appropriately collected signatures). 145 P.3d at 578.

30 *Meyer v. Grant*, 486 U.S. 414, 421 (1988).

31 *See* State Defendants' Opposition (June 17, 2024), p. 9.

32 *See Resource Dev.*, 494 U.S. at 548-549, 553-554; relying upon *Meyer*, 486 U.S. at 421-422.

> scrutiny in *Prete v. Bradbury* and *Initiative & Referendum Institute v. Jaeger*, it "does not leave alternative methods for payment available" to initiative sponsors. **And the State has other, less burdensome ways of countering fraud: the State may impose criminal sanctions, as evidenced by the existing statute, that "deal expressly with the potential danger that circulators might be tempted to pad their petitions with false signatures**."[33]

The constitutional rights of voters that the Court was concerned with protecting in *Resource Dev.* was (1) their First Amendment right to engage in core political expression; and (2) their right to engage in self-legislation under Alaska Const., Art. 11. These were the constitutional rights that triggered the Court's least restrictive means analysis in *Resource Dev*. The state defendants' assumption that the Court engaged in least restrictive means analysis *vis-à-vis* voters, in a situation where the voters had no constitutional rights at stake, is, with all due respect, absurd. And it is plainly obvious that the right to engage in core political speech regarding whether a voter will sign a circulating initiative would be rendered meaningless if the voters' signature on the initiative is likewise protected—if the voters' signature could simply be discarded without the slightest constitutional protection, then the First Amendment protection of the circulator/voter speech that led to the voters' act of signing in the first place, would be rendered meaningless.

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[33] *See Resource Dev.*, 494 P.3d at 553-554 (the plaintiffs challenged circulator affidavits because they untruthfully stated that the circulators had not entered into agreements to be paid in violation of AS 15.45.110(c)).

Under the rule of Resource Dev., whatever concern the state has regarding how a circulators' (1) failure to perfectly follow AS 15.45.130's circulating protocols,[34] and/or (2) providing a false affidavit,[35] might affect election integrity and implicate potential fraud, those concerns can and must be addressed in less burdensome ways *vis-à-vis* the voters who exercised their rights under the First Amendment and Alaska Const., Art. 11, by signing the initiative petition. Whatever action is appropriate for these issues, the state must direct it at the circulators and not force innocent voters to bear the brunt.[36]

IV. CIRCULATING MORE THAN 3 PETITION BOOKLETS IS PERFECTLY LEGAL AND DOES NOT, BY ITSELF, SUGGEST CIRULATING IMPROPRIETY OR FRAUD

Plaintiffs' expert Mr. Costa admitted that he and his company did no investigation for circulating improprieties or fraud related to 22AKHE beyond or behind the petition booklets.[37] Mr. Costa formed no opinions about whether the 3+ petition booklet circulation practices that he observed (from the face of the booklets—meaning a circulator having 3 or more booklets circulating at any given time), is evidence of impropriety or fraud. He

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34 In *Resource Dev.* it was the protocol of AS 15.45.130(6) which required that the circulator not receive payment in violation of AS 15.45.110(c). *See Resource Dev.*, 494 P.3d at 546-549, 553-554.

35 Here, the alleged failures to follow protocols involved things such as (a) a husband and wife sharing petition booklets as they circulated together; (b) a book that was circulated one day by one circulator at the Alaska State Fair and then later being inadvertently given to another circulator to collect signatures; and (c) booklets being left unattended at static locations (with no evidence that anyone actually signed the booklets while they were unattended). *See* Plaintiffs Initial Disclosures, First and Second Interrogatory Answers, and the Affidavits of Derek Aplin; Alexander Susky; Angela Chiapetta; Alec "Allison" Dill; Dawn Dunbar; Marcie Wilson; Brooke Reinsch; Valerie Kenny; and Gregory Lee.

36 *See Resource Dev.*, 494 P.3d at 546-549, 553-554.

37 Costa Dep. p. 40.

acknowledged there could be perfectly innocent explanations for the practice of circulating 3+ booklets at a time, a practice that is not prohibited by Alaska law.[38]

V. HANDWRITING IN THE INFORMATIONAL SECTIONS OF CIRCULATOR AFFIDAVITS OR SELF-CERTIFICATIONS IS NOT PROHIBITED BY ALASKA LAW AND, BY ITSELF, DOES NOT SUGGEST FOREGRY, IMPROPRIETY, OR FRAUD

Alaska law does not require every mark of printed word in the informational sections of a circulators' affidavit or self-certification be in the circulator's own hand.[39] The only thing required to be in the circulator's own hand on the affidavits and self-certifications is the circulator's signature. *Id.* Mr. Costa has no handwriting analysis expertise[40] nor do his opinions qualify as lay opinion.[41] And in any event, he is not expressing an opinion to the effect that any of the signatures of the circulators he identified (Coulter, Durham, or Berg Smith) were forged.[42]

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VI. LARGE SIGNATURE COLLECTION DAYS DO NOT, BY THEMSELVES, PROVE FORGERY, IMPROPROETY OR FRAUD

With respect to his observations that a few circulators had large signature gathering days, Mr. Costa testified that he is not claiming that the voters did not sign the booklets in

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38 Costa Dep. pp. 61-63.

39 *See* Sponsors' Renewed Motion (June 10, 2024), pp. 30-35.

40 Costa Dep. pp. 15, 18, 26, 27-28.

41 Mr. Costa has no familiarity with any of the handwriting or signatures of any of the people he has highlighted and thus cannot claim to compare what he has seen to their actual handwriting and signatures (like a spouse identifies the husband's handwriting because she has seen it numbers of times).

42 Costa Dep. p. 88. The most he would say about Liinda Berg Smith was that he thinks her signatures look different to him. Costa Dep. p. 89. The court should know that Ms. Berg Smith testified at deposition that all her signatures were in fact hers. Berg Smith Dep. pp. 40-41.

which their names appear or that signatures were forged.[43] And he freely admits that other than what he has seen in the Plaintiffs' already considered affidavits and depositions (booklets that comprise the twenty-six already discounted in the Sponsors' cross-motion) he has nothing else to add. The Plaintiffs likewise have offered no such proof—they have simply submitted proof (or more correctly the Sponsors' have submitted for them) proof as to the twenty-six petition booklets already discounted in the Sponsors' cross-motion.

VII. THE PLAINTIFFS HAVE FAILED ONCE AGAIN TO OPPOSE OR RESPOND TO THE SPONSORS' MOTION REGARDING THE NOTARIZATIONS BY MR. RANSUM

The Plaintiffs did not previously respond to or oppose the Sponsors' cross-motion for summary judgment with respect to the Plaintiffs' claims challenging certifications that were notarized by Mr. Theodorus Ransum. They have failed to do so once again in their most recent June 17, 2024, Opposition.[44] Plaintiffs tacitly concede these claims are invalid.

VII. THE PLAINTIFS HAVE NOW STIPULATED THAT THEY HAVE NO VALID CLAIMS RELATED TO BOOK 546 (PLACE OF NOTARY) AND THE 71 SIGNATURES CONTAINED THEREIN, OR MORE INDIVIDUAL SIGNATURES

The stipulation filed today by the parties reflects that the Plaintiffs have abandoned their claim that booklet 546 should be rejected because the notarization of the circulator's

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[43] Costa Dep. p. 78. It is hard to imagine what else could have been the point of Mr. Costa's observation than to claim that voters' signatures were forged or collected improperly. Yet he offers no proof beyond the Plaintiffs' already considered and discounted affidavits and deposition transcripts (the twenty-six petition booklets and 1,404 signatures).

[44] *Snyder v. American Legion Spenard Post 28*, 119 P.3d 996, 999 (Alaska 2005) ("motions for summary judgment need to be opposed").

affidavit lacks a city where the notarization occurred. A conclusion mandated by the Alaska Supreme Court's decision in *North West*.[45]

CONCLUSION

For reasons above, and for the reasons argued by the Sponsors previously, the court should grant the Sponsors' cross-motion for summary judgment as to Counts I, II, V, VI and VII. The Plaintiffs pleadings and supporting materials, particularly, but not exclusively, the Report of Expert Witness John Costa, fail to establish genuine issues of material fact. Plaintiffs' having failed to demonstrate a legitimate way in which they can sufficiently alter the signature count on 22AKHE to prevent it from qualifying for the November 2024 ballot. The twenty-six petition booklets identified by Plaintiffs' efforts thus far, do not make a difference. There is no justification for the court and parties wasting substantial time and resources on a trial in this case.

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Dated this 19th day of June 2024.

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By *Kevin Clarkson*

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[45] *North West*, 145 P.3d at 577-578.

I certify that on June 19, 2024,
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