



Municipality of Anchorage

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Office of the Municipal Clerk

MEDIA ADVISORY 12

DATE: MAY 3, 2012

Assembly Chair Ernie Hall has released the report of Independent Counsel Tim Petumenos on his review of the Election Commission Report of April 25, 2012 and the Municipal Attorney's Opinion dated April 20, 2012.

Assembly Memorandum, AM 280-2012 which includes the Petumenos opinion, is attached. The Assembly will consider this as part of the certification consideration at the Special Assembly Meeting tonight at 5 pm at the Assembly Chambers at the Loussac Library, 3600 Denali Street.

Community, Security, Prosperity



MUNICIPALITY OF ANCHORAGE
ASSEMBLY MEMORANDUM
NO. AM 280-2012

Meeting Date: May 3, 2012

1 **From: ASSEMBLY CHAIR HALL**

2 **Subject: Birch Horton Bittner & Cherot (Independent Counsel)**
3 **Review on Election Certification**
4

5 The Anchorage law firm Birch Horton Bittner & Cherot, retained as Independent Counsel to
6 review of the Election Commission Report of April 25, 2012 and the Municipal Attorney's
7 Opinion dated April 20, 2012, has completed this legal review.
8

9 The attached report has been prepared to assist the Assembly in its duty to understand and
10 apply the laws that govern certification of the April 3, 2012 election. I have requested Tim
11 Petumenos to present the independent legal review at the Special Meeting, prior to the
12 Election Commission's Report and action by the Assembly on certification.
13

14 The filing deadline for an election contest expired on Wednesday, May 2, 2012 at 5:00 p.m.
15 No election contest was filed.
16

17 The Municipal Clerk is in receipt of a Recount Application, filed the afternoon of May 2, 2012.
18 I have asked Mr. Petumenos to assist our understanding of the relevant distinctions between
19 an election contest and a recount application in the context of election certification.
20

21 The law firm's work is not intended as a third-party investigation of the April 3, 2012 election,
22 and the law firm was not asked to undertake a duty to conduct additional fact-finding. Mr.
23 Petumenos' task has been to focus on the legal role and duties of the Assembly vis-à-vis
24 election certification, and how these compare to the Assembly's more routine legislative
25 functions.
26

27 As Chair of the Assembly, I feel it imperative for the Assembly to follow legal process and to
28 recognize when the law calls upon the Assembly to serve in a non-legislative function.
29 Through clarity on the elected body, public clarity can follow.
30

31
32 Respectfully submitted:

33
34
35 Ernie Hall
36 Chair of the Assembly
37

HAL R. HORTON (1944 - 1998)

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May 3, 2012

Mr. Ernie Hall
Municipality of Anchorage Assembly Chair
Anchorage City Hall
632 W. Sixth Avenue
Anchorage, AK 99501

RE: April 3, 2012 Municipal Election

Dear Chairman Hall and Members of the Anchorage Assembly:

This letter shall constitute our report to the Assembly on the matters which are the subject of our retention. Because our client in this matter is an elected body, we understand our task to be to assist the Assembly in its duty to strictly apply the laws that govern certification of the April 3, 2012 election. Where appropriate, we will seek to shed light on the public policy considerations that underlie the operation of these laws and legal standards that govern the election certification decision. Our role as Special Counsel also requires that we give deference to this body as to decisions on the ultimate issue, being respectful of the authority that lies exclusively in the office that the Assembly members hold. Further, our present retention specifically does not include conducting an independent factual investigation and we have not undertaken to independently investigate any of the underlying facts.

Scope of This Report

As Independent Counsel, our study of the April 20, 2012 Municipal Attorney's Opinion (MA Opinion), the Report of the April 25, 2012 Municipal Election Commission (Commission Report), numerous submissions to the municipal government, including submissions to the Commission, and prior proceedings before the Assembly lead us to conclude there are two distinct and separate tasks the Assembly faces and appears to have an interest in taking on in the short term: 1) Reaching a decision on whether to certify the 2012 municipal election pursuant to AMC 28.80.060; and 2) Apart from the decision on certification, investigate the circumstances surrounding the election to determine in the broadest sense, what reforms, remedies and actions the Assembly

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should undertake to improve the municipal electoral process. This report addresses these tasks separately.

Summary of Conclusions

The Assembly Makes Its Election Certification Decision As A Quasi-Judicial Administrative Body and Applies Legal Standards. When sitting as the tribunal designated by law to decide whether an election should be certified, the Assembly sits as a quasi-judicial administrative tribunal. When reviewing the Election Commission recommendation and any Election Contest, each Assembly Member acts individually in a manner analogous to an administrative judge or regulatory authority, bound by legal standards. The process set forth in the municipal election code defines the nature and quality of the information to be taken into account in making the certification decision so that the decision made is reliable. After careful and independent study, Independent Counsel agrees with the pertinent parts of the MA Opinion in its recitation of the legal standard applicable for deciding whether to certify elections. Our counsel on the certification process is one of emphasis to supplement the MA Opinion by focusing more attention on the process that is contemplated by the law and the reasons why following that process is critical to the integrity of the election certification.

The Commission Is By Law Designated as the Assembly's Principal and Initial Factfinder With Respect to the Certification Decision. The duty to report the facts to the Assembly in the first instance rests with the Commission. After the Commission issues its report, a case or controversy for the Assembly to resolve is initiated by the filing of a proper and timely election contest. When such a contest is filed, the Assembly must decide whether to adopt the recommendation of the Commission or uphold the election contest. Absent very extraordinary circumstances, the failure to adopt the Commission's recommendations on grounds other than those set forth in a valid election contest would be unprecedented, and under some circumstances, could form the basis for a valid challenge to the Assembly's action on constitutional grounds.

Commission Recommendations Are Typically Challenged Through the Filing of an Election Contest Which Creates the Controversy on Which the Assembly Rules. Once an election contest is filed, the Assembly has the discretion to defer the decision to certify and may order that additional evidence be received prior to ruling on election certification. The filing of an election contest is a critical event, since it creates the existence of a case or controversy. The resolution of specific claims set forth with particularity in a properly filed election contest narrows issues, provides focus, increases the quality of information upon which the certification decision is made, and is the necessary prerequisite for the citizenry or any aggrieved candidate to formally challenge the certification decision in court.

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There is a Strong Presumption in the Law Favoring the Finality of Elections Which Must Be Rebutted In Order to Justify the Failure to Certify. The failure to apply the correct legal standards, and the failure to certify an election when it should be certified, can also be challenged. As set forth in the MA Opinion, there is a strong presumption in favor of the finality of elections and certification, which cannot be withheld arbitrarily. When an election contest sets forth grounds under AMC 28.60.080 for invalidating an election, and there is adequate evidence to support the existence of facts meeting the legal standard for election invalidation, or any subpart of a municipal election, the Assembly must order a new election and may not certify an election.

The Legislative and Supervisory Function. The Assembly is also responsible, in a broader sense, for the enactment of election related laws and for the supervision of this and future elections. The Municipal Clerk's Office and the Commission, which have important roles to play in the conduct of elections, answer to the Assembly. When voters, constituents and others provide Municipal Government with information, problems and complaints about the election process that do not rise to the requisite level to invalidate an election, the Assembly may investigate and take other action unfettered by the constraints that govern certification. When the Assembly is acting pursuant to its supervisory or legislative authority, it performs its duty to propose and pass laws, make personnel decisions, modify staffing and allocate resources. In these roles, it operates with fewer restrictions than in its role to certify under Title 28.

The Certification Decision

One hallmark of the democratic process is the peaceful and smooth transition of power following an election. It has been the experience of governments across history that the time immediately following an election is sometimes a fragile time in all democracies. Accordingly, our election laws are written carefully to set forth, in advance of any outcome, both the procedure for election validation and the standard of proof that must be met before an election can be invalidated. The time frames for contesting an election are short but strictly enforced. State v. Jeffrey, 170 P.3d 226 (Alaska 2007). There is a presumption of validity that attaches to an election. The party contesting the election bears the burden of establishing corruption or reckless conduct. It must be proved that claimed malconduct actually affected the outcome of the election.

Inconvenience to voters is not sufficient. Errors in conducting the election which are not targeted to bring about a particular result are treated differently than those which appear to be aimed at affecting the outcome. Outright corrupt or criminal conduct which may have been aimed at affecting the outcome of an election is insufficient ground to invalidate an election unless the conduct reasonably had the potential for changing the outcome. This is true even when people may go to jail for their wrongful conduct. This is so because not only does democracy itself place a heavy premium on election finality,

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but those voters whose votes were properly cast and counted are entitled to be enfranchised, even when it can be shown that some voters were disenfranchised. Our system has been held up to the world as the model for democracy. See e.g., The Role of Elections in Peace Processes: When and How Do They Advance Stability or Exacerbate Conflict, UN System Staff College, October 28, 2011, at 19-20, which compares the concession speech of Vice President Al Gore, after the United States Supreme Court ruling in Bush v. Gore, to the violence that befell Angola following a contested election. The same principles that safeguard our democracy in national elections are also the fabric of our state and local elections.

There are safeguards built into the system for hearing election disputes. Prior to the election, the Commission which is responsible for overseeing the vote count and investigating election irregularities is selected. In Anchorage this is the Commission. Qualification for service on the Commission requires nomination by the Mayor and confirmation by the Assembly. Commissioners must have served previously on a precinct board. They may not hold elected or appointed office or office in a political party; must not have made a political endorsement or engaged in any political or campaign activity on behalf of any candidate for public office; and cannot be an employee of the Municipality, any school district or any subdivision thereof. AMC 28.120.130.

The law's clear purpose is to appoint unbiased, non-political, non-aligned members of the electorate to serve as the initial investigators to advise the Assembly. Like our jury and grand jury systems, the law provides for commissioners drawn from the citizenry. Other than precinct experience and neutral political affiliation, no other educational or expert background is required. As with other governmental functions common to our experience, the decision has been made to opt for citizen participation on the Commission. Trust has been placed by the law in our officials to choose ordinary citizens and not a cadre of professional experts. Finality of fact finding by citizen bodies such as the Commission have precedent in many of our democratic institutions.

After an election, particularly a controversial one, there is often a blizzard of information that becomes part of the public discourse, some of which is reliable and some not so. One of the critical purposes for passing laws governing election contests is to have a mechanism for insuring that the information is of such quality and credibility that it supports the Assembly action to validate or invalidate the sanctity of an election result. The lawfully constituted Commission counts the votes, examines the facts in the first instance and reports to the decision maker, the Assembly. The law requires the Commission's report be disseminated to all interested parties and the public. Those who read and study the report, mindful of the standards for certification that are to be applied, must come forward formally, place their names on an election contest, allege

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sufficient facts, and prove them, to establish grounds for contesting the election. The very process of requiring the filing of an election contest culls out defects which occur in any imperfect election, but which do not rise to the level of affecting an election outcome. Facts which may at first have been thought to exist may be found upon investigation by the Commission or would be Election Contestants to be seen in a different light or found not to exist at all.

When a group of ten voters, or an aggrieved candidate, decide that they have adequate grounds to contest the election, the issues to be addressed are set forth with particularity in writing by the contestant. The Assembly then focuses on the matter which is the subject of the actual controversy. The resolution of specific election contest claims controls the quality of the evidence that will be relied upon to determine whether the legal standard for election certification or invalidation is met. AMC 28.100.010, 28.80.060. When a contest is filed, the Assembly makes its decision on the strength of the Commission Report and the Elections Contest or the Assembly may receive further evidence. Like a judicial panel or administrative tribunal, the Assembly evaluates and hears such evidence together, as a body.

The ultimate standard of proof, which is set forth adequately in the MOA Opinion at 1, and set forth in the holdings of binding cases from the Alaska Supreme Court and in AMC 28.60.080B, requires that the Assembly find that there was malconduct, fraud, or corruption which affected the outcome of the election. Malconduct can include a significant deviation from the prescribed norms caused by reckless disregard of those norms. Where, however, the conduct is not directed to a particular result and the results appear to have been randomly experienced, the Assembly is bound to employ remedies, if it can, short of invalidating the election. It is only when such remedies, as proration or adding or subtracting votes or computing the likely extent of voter disenfranchisement, cannot be effectively employed that denying certification is appropriate. Technical violations of law, for example using a ballot that is not an official ballot under AMC 28.40.010E, which are motivated by election workers efforts to enfranchise voters, are not malconduct as a matter of law.

We note that there has only been one instance in the history of Alaska when an election was invalidated. That election was 42 years ago. A ballot proposition was found to have been written in a misleading way such that a percentage of voters, based upon expert testimony received by the court, were misled in a proportion higher than the margin by which the proposition was decided. Boucher v. Bomhoff, 495 P.2d 77 (Alaska 1972). The case is instructive as the only example we have of proof of malconduct that was held to have affected the outcome of a particular election. The language of the proposition could not be undone and there was direct statistical evidence of the probability of a change in the outcome of the election on the measure.

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We have found no occasion where certification was withheld, when there was no election contest, and a body like the Commission recommended certification. While it is possible to conceive of hypothetical instances where a Commission report is either so completely devoid of merit or corrupt on its face that the Assembly would be justified in rejecting a Commission recommendation in the absence of an election contest, such a circumstance would have to present extraordinary facts. In this regard, it must be emphasized that a decision by the Assembly not to certify is also subject to judicial review.

Independent Counsel wishes to emphasize that just as there are rules and procedures for conducting elections, so are there rules and that deal with contesting elections. It is just as critical to the jurisprudence of elections that the procedures that govern the contesting of elections be followed as it is for the conduct of the election itself. One of the few federal constitutional claims that can be brought to challenge a local election is based on this concept. A local election cannot begin with a set of rules for conducting an election which change during the course of the election. The rules relating to election certification also cannot change materially once the election results are in. State tribunals and even state courts that violate this principle are subject to federal court intervention:

Yet at the same time that courts have resisted constitutionalizing most aspects of disputed elections, some federal courts have recognized at least one kind of relevant federal interest: an interest in providing security against state courts or state actors developing 'new law' in the context of resolving election disputes. Changes in state law or practice, whether through judicial or administrative action, can reach the point of what these federal courts have called 'patent and fundamental unfairness,' enough so that federal constitutional violations arise. Those federal courts that have identified such an interest, before Bush v. Gore, have done so even when the election at issue was for state or local office. Thus these cases have identified a general constitutional interest, not confined to presidential elections, in avoidance of 'new law.' But these courts have also cautioned that for a constitutional violation of this sort to arise, the 'situation must go well beyond the ordinary dispute over the counting and marking of ballots.' (Footnotes omitted.)

Richard Pildes, Judging New Law In Election Disputes 29 Fla. St. U. L Rev. 691, 701 (2001 Symposium on Bush v. Gore); See also, Roe v. Alabama, 43 F.3d 574 (11th Cir. 1995). This line of authority teaches that the failure to follow the election certification procedures that were passed and in place prior to the election can result in federal constitutional violations.

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Legislative/Supervisory Inquiry

The foregoing does not mean that the Assembly should or must ignore or be insensitive to the reports of constituents and others who bring problems to the attention of the body. The power and duty of the body to investigate matters relating to its legislative and supervisory function is well recognized in the law. Voter disenfranchisement is a serious issue regardless of how it comes about. In a given election, it can be fortuitous that malconduct does not rise to the level of causing an election to fail based upon the particular vote counts in that election. The same circumstances in a close election can have a different result than one that is not. Moreover, the service to the public, good and efficient government, election credibility and participation, and the cost attendant to election controversy are more than adequate grounds to support review of the election and further inquiry by the Assembly outside the certification process. As one of our nation's foremost scholars on election law has written:

[T]here is reason to be concerned about error rates in elections even when those error rates are not large enough to affect the determination of which candidate won. In particular, the disenfranchisement of an eligible citizen who attempts to vote violates that citizen's right to participate in democratic government. It is worth identifying the extent to which this harm occurs, even if the affront of disenfranchisement does not cause the wrong candidate to take office. Likewise, the inclusion of invalid ballots taints the integrity of the voting process even when those ballots do not affect the outcome, and we have an interest in knowing the prevalence of the taint. In fact, it may be reassuring if it turns out that the frequency of invalid votes being counted is so low as to rarely risk the consequence of the wrong candidate being elected.

Edward Foley, The Analysis and Mitigation of Electoral Errors: Theory, Practice, Policy, 18 Stanford Law and Policy Rev 350, 356 (2007).

This is particularly true of Municipality of Anchorage elections where the Assembly bears direct responsibility for the supervision of elections. The subdivisions of municipal government in this instance are directly employed and supervised by the Assembly. So in addition to whatever fact finding may support changes to municipal code or practice, the Assembly has a direct role in running the departments in question and having input into future decisions about funding, staffing and the efficient use of electoral and administrative resources.

While the credibility of the democratic process can be seriously harmed by the invalidation of elections that do not meet the requisite standard set forth in the

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certification section above, so can the credibility of the electoral process suffer when deficiencies, which are short of being outcome determinative, nevertheless cause the electorate to lose confidence in the administration of our elections. Nothing in the restrictive standards related to election certification is meant to curtail or foreclose investigative inquiry for the purposes in furtherance of reform, both legislative and administrative. The law ascribes to the Assembly multiple roles when it comes to election administration, and the quasi-judicial role that attends the certification decision, is not the Assembly's exclusive mandate.

Therefore, the actions of the Assembly in seeking independent investigation and recommendations, input and review of facts beyond those that would relate to certification and which may require a more lengthy and studied examination than the actions called for under the short deadlines set forth for the purposes of election certification are entirely legal and well within the power of the Assembly to commission.

The May 2, 2012 Election Recount Application

On May 2, 2012, 4:31 p.m, the Municipal Clerk received a filing entitled "Recount Application" (attached). The application requests a recount under AMC 28.90.010. A request for recount under AMC 28.90.010 is not an election contest. The recount process does not include, nor would the applicants be entitled to, the same remedies afforded to an election contestant under AMC 28.100.020. An application for recount is not subject to the same standard of proof required to invalidate an election. AMC 28.100.010. Instead, municipal election code contemplates an election will be certified subject to the outcome of a recount. AMC 28.80.060A. The results of a recount affect only the proper ballot count in an otherwise valid election. In circumstances where the outcome of the recount changes the numerical count to the point of changing the result with respect to a particular candidate or other electoral issue, the recount does not invalidate the election. A new election does not result. The filing of a recount petition under AMC 28.90.010 does not affect the duty of the Assembly to certify the election as described in this report.

Waiver of Attorney Client Privilege

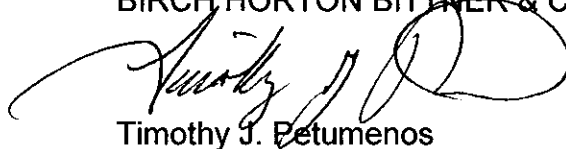
The law firm of Birch Horton Bittner and Cherot is pleased to have been chosen to serve as Independent Counsel to the Anchorage Assembly in connection with the serious matters before the Assembly in connection with the April 3, 2012 election. This concludes our initial report to the Assembly, which we have been asked to provide to the Assembly publically. We understand that notwithstanding the Assembly's right to receive our advice and legal counsel in confidential session and subject to the attorney client privilege, it is the desire of the Assembly that our input be available to the public in the first instance, and understand that in any meetings that we should attend in

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furtherance of our retention, that the meetings will likely be in public session. Should that instruction change at any point during our retention, please advise us, otherwise we will assume that the confidentiality that could attend our advice to you in writing and in person as Special Counsel to the Assembly has been waived.

Very truly yours,

BIRCH HORTON BITTNER & CHEROT



Timothy J. Petumenos

TJP:klh

Attachments

cc: Members of the Anchorage Assembly
Assembly Counsel
(w/ attachments)

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AMC 28.60.080

AMC 28.80.060

AMC 28.90.010

AMC 28.100.010

AMC 28.100.020

AMC 28.120.13

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3 McQuillin Mun. Corp. § 12.25 (3rd Ed.)

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Services/Construction/Supplies Contract, Bid/RFQ No. 2012B009 (March 2012)

RECOUNT APPLICATION***

We, the undersigned qualified voters of the Municipality of Anchorage, hereby request, pursuant to AMC 28.90.10, an audit and physical hand recount of the paper ballots from the April 3, 2012 municipal election. This would entail NO USE of optical-scan voting machines, as the integrity of their vote count cannot be verified due to the following reasons:

--Recorded public testimony at Assembly meetings following the election and a published interview with the Municipal Deputy Clerk in charge of running Municipal Elections (Jacqueline Duke) revealed that Ms. Duke instructed poll workers to ignore and/or replace security seals protecting the memory cards that were "broken in transport." This contradicted procedures laid out in page seven of the Official 2012 Municipal Election Manual,

--In testimony at Assembly Meetings following the election, a poll worker testified that she observed at least one security seal that appeared to be "cut."

--Former Deputy Clerk in charge of Municipal Elections, Ms. Guadalupe Marroquin stated in a published interview that the Data Processing Review Board was eliminated in 2010. This board was integral to election integrity as it was made up of independent computer professionals who tested the machines before and after the election and sealed the cards into place to prevent tampering.

--There were reports of at least one Diebold Accu-Vote machine malfunctioning,

--A Dittman poll predicted 50% for and 41% against Proposition 5 a week before the April 3 Anchorage Municipal election. The actual outcome was 58% no and 42% for - a 17% switch in the 'no' votes,

--Transparent, fair, honest elections, free from any hint of tampering, is a cornerstone of American Democracy and should be the highest priority for the Municipality of Anchorage,

We request this audit (requested information listed below) and hand recount of paper ballots from the following precincts:

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215, 220, 235, 340, 445, 550, 610, 625, 660, 670, 675, 830, 840 925

*****IF THE CONDITIONS LAID OUT ABOVE ARE NOT MET, WE RECIND THIS APPLICATION AND REQUEST THAT ALL MONIES ARE RETURNED.**

*****ALSO, PURSUANT TO AMC 39.90.060, WE ASK THAT THE AUDIT REQUEST BELOW ALSO BE CONSIDERED A PUBLIC RECORDS REQUEST NO MATTER THE STATUS OF THE RECOUNT APPLICATION AND BE SUBJECT TO THE TIME CONSTRAINTS SET FORTH WITHIN THAT POLICY**

As part of the audit, we request a review of all relevant materials, including but not limited to:

- The certified statement of the votes cast in the April 3rd election, broken down by precinct and absentee ballot group showing the total number of ballots cast for each candidate, and the number of over and under votes recorded in each precinct and absentee ballot group;
- A specific count of all unused ballots, separated by type, and their physical location;
- All precinct rosters and voter index lists;
- A list of all absentee ballots requested. Also, a signed explanation for why, for the first time, absentee ballots were sent out to the requestor's physical address this year rather than the mailing address provided;
- All absentee ballots returned as undeliverable because they were sent to the requestor's physical address rather than the mailing address;
- All rejected absentee, questioned and special needs ballots and envelopes and the reasons therefore;
- All accepted absentee, questioned and special needs ballots envelopes and the corresponding application forms;
- All logs, e-mails, notes or other documentation of any complaints or requests for assistance;
- All documentation of the policies or policy of your office with respect to the recruitment and engagement of poll workers, as well as all applications or other materials retained by your office in connection with poll workers for this election;
- All manuals, directives, guidelines or other documentation prepared by your office or the State of Alaska, Division of Elections, the manufacturer of the optical scan voting system or any other organization or governmental agency setting forth the standards and procedures for the use of the voting systems you employ.

We designate Hal Gazaway as the chairperson of the group. We also designate Linda S. Kellen and Melissa Green, whose full names and mailing addresses appear below, as the two persons who will represent the applicant group at the recount.

MEMPHIS OFFICE
2012 MAY -2 PM 4:31
M.O.A

Signature: H. P. Gazaway
Full Name: HAR P. GAZAWAY
Date: 5/1/12
District 19

Mailing Address: 8620 BOUNDARY
ANCHORAGE, AK.
99504

Signature: B. A. Gazaway
Full Name: Barbara A. Gazaway
Date: 5/1/12

Mailing Address: 8620 EDWARDS AVE
ANCHORAGE, AK 99504
District 19

Signature: Joseph McKinnon
Full Name: JOSEPH MCKINNON
Date: 5/2/12

Mailing Address: 1434 KINNICKINNICK ST
ANCHORAGE, AK 99508

Signature: Zebra K Kennedy
Full Name: Zebra K Kennedy
Date: 5/2/12

Mailing Address: 5533 College Drive
ANCHORAGE, AK 99504

Signature: Dana Klein
Full Name: Dana Klein
Date: 2 May 2012

Mailing Address: 6428 G 10th Ave
ANCHORAGE, AK

Signature: Wendy J. Isbell
Full Name: Wendy J. Isbell
Date: 2 May 2012

Mailing Address: 1319 H ST
ANCHORAGE, AK 99501

Signature: Steven R. McCoy
Full Name: STEVEN R MCGOY
Date: 2 May 2012

Mailing Address: 7749 OLD HARBOR
ANCH. AK. 99504

Signature: [Handwritten Signature]
Full Name: Melissa S. Green
Date: May 2, 2012

Mailing Address: 2303 D St # A5
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Signature: [Handwritten Signature]
Full Name: Kelly S. Walters
Date: May 2, 2012

Mailing Address: 3743 Terrace DR
Anchorage AK 99502

Signature: [Handwritten Signature]
Full Name: Linda S. Kelten
Date: May 2, 2012

Mailing Address: 7599 Brayton #418
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99507
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aka: Linda Kelten Biegel