



Municipality of Anchorage
Office of the Municipal Attorney
Memorandum

DATE: NOVEMBER 17, 2021

TO: BARBARA A. JONES, MUNICIPAL CLERK
ERIKA MCCONNELL, DEPUTY CLERK – ELECTIONS

THRU: PATRICK BERGT, MUNICIPAL ATTORNEY

FROM: RUTH BOTSTEIN, ASSISTANT MUNICIPAL ATTORNEY

SUBJECT: RECALL APPLICATION 2021-04
LAW MATTER NO. 21-0572

QUESTION PRESENTED

Does Recall Application 2021-04, seeking to recall Anchorage Assembly Member Jamie Allard, satisfy the statutory requirements for issuing a recall petition?

BRIEF ANSWER

Yes, Recall Application 2021-04 satisfies the statutory requirements. We recommend that the Clerk certify the application and prepare a recall petition for signature gathering.

THE RECALL APPLICATION

On November 9, 2021, the Clerk's Office received an application for recall of Assembly Member Jamie Allard based on misconduct in office and failure to perform prescribed duties (Recall Application 2021-04, attached). The Recall Application provided the following statement as grounds for recall (verbatim):

Assembly member Jamie Allard committed misconduct in office on August 11, 2020 by Violating EO-15, an emergency order intended to protect the health and safety of Anchorage citizens, issued by the Mayor of Anchorage pursuant to AMC 3.80.060(H) by: 1) knowingly participating in an indoor gathering of more than 15 people (a meeting of the Anchorage assembly) and 2) continuing to participate in an indoor gathering of more than 15 people at a meeting of the

Anchorage Assembly after being specifically informed of the violation. Assembly member Jamie Allard failed to perform prescribed duties as an assembly member. Of all citizens in Anchorage Assembly members should have been scrupulous in obeying the gathering limitations established by paragraph 4 of EO-15. Allard's willful, intentional failure to do so needlessly endangered the lives of Anchorage citizens, encouraged the spread of COVID-19 throughout the community, and merits recall from office.

APPLICABLE LAW

The Clerk's Office is tasked with reviewing recall applications to determine whether the requirements of AS 29.26.260 are satisfied. The statute does not specify a timeframe in which the application review process must take place. The Clerk's Office has asked the Municipal Attorney's Office to provide an opinion on the sufficiency of the petition.¹

Alaska law places both procedural and substantive limitations on the right to recall. Alaska Statute 29.26.260(a) requires each application to include: "(1) the signatures and residence addresses of at least 10 municipal voters who will sponsor the petition; (2) the name and address of the contact person and an alternate to whom all correspondence relating to the petition may be sent; and (3) a statement in 200 words or less of the grounds for recall stated with particularity." Recall is permitted only for cause, and there are three substantive statutory grounds for recall of an elected municipal official: "misconduct in office, incompetence, or failure to perform prescribed duties."²

The seminal case on recall in Alaska is *Meiners v. Bering Strait School District*,³ where a recall petition was filed against all eleven members of the Bering Strait School Board. The *Meiners* court held that statutes relating to recall "should be liberally construed so that the people [are] permitted to vote and express their

¹ AMC 2.50.030.A applies to initiative and referendum petitions and requires the municipal clerk's office to "immediately remit a copy of the [petition] application to the municipal attorney for review"; it also provides that in making a sufficiency determination, "the municipal clerk may rely upon the legal counsel of the municipal attorney."

² AS 29.26.250.

³ 687 P.2d 287 (Alaska 1984).

will.”⁴ The court did not want to create “artificial technical hurdles” blocking exercise of the recall power, noting that “the recall process is fundamentally a part of the political process.”⁵

At issue in *Meiners* was whether the asserted grounds for recall were sufficient to meet the statutory requirements. The court emphasized that it was up to the voters and not the court or certifying officer to assess the validity of the petition’s allegations.⁶ Instead, the sufficiency reviewer must determine whether the allegations, if true, are sufficient to meet one of the three grounds for recall under AS 29.26.250.⁷

Meiners additionally held that inaccurate legal statements or lack of statutory citation would not invalidate the application.⁸ The court wanted to avoid “wrapping the recall process in such a tight legal straitjacket that a legally sufficient recall petition could be prepared only by an attorney who is a specialist in election law matters.”⁹ If an assertion in the application were untrue, the court reasoned that the targeted school board member could address the charge in their rebuttal, which would be placed on the ballot.¹⁰

The Alaska Supreme Court recently issued another major recall case, *State v. Recall Dunleavy*.¹¹ There, the court approved a recall application for Governor Dunleavy in an opinion again emphasizing the importance of reading recall applications liberally and allowing voters to be the ultimate decisionmakers. Under the liberal standards for recall, the court explained, an allegation that “lacks any logical connection to one of the statutory grounds for recall” is legally insufficient, but “[i]f a logical connection can be made, we leave it to the voters to decide whether to make it.”¹²

⁴ *Id.* at 296 (quoting *Boucher v. Engstrom*, 528 P.2d 456, 462 (Alaska 1974) (alteration in original).

⁵ *Meiners*, 687 P.2d at 296.

⁶ *Id.* at 300 n.18.

⁷ *Id.*

⁸ *Id.* at 301.

⁹ *Id.*

¹⁰ *Id.*

¹¹ 491 P.3d 343 (Alaska 2021).

¹² *Id.* at 359.

From these cases, we conclude that a recall petition need not be perfectly asserted, but still must be legally sufficient. Petitions must also be factually sufficient: articulate enough that the grounds for recall are understandable and that the elected official may appropriately respond in 200 words.

SUFFICIENCY ANALYSIS

- (1) Signature and residence addresses.**
- (2) Contact and alternate.**

The Clerk’s Office reviews the application to determine whether these statutory requirements—names, identifying information, and signatures of two sponsors and ten additional qualified voters—have been satisfied.

- (3) Statement of grounds.**

The third statutory requirement for a recall petition is that it must contain “a statement in 200 words or less of the grounds for recall stated with particularity.”¹³

Applicants’ statement regarding Assembly Member Allard is 147 words and alleges both “misconduct in office” and “failure to perform prescribed duties.” As discussed above, this office does not weigh in on the factual accuracy of the petition’s allegations. Rather, assuming that the allegations are true, this office must determine whether the statement is factually and legally sufficient.

The application alleges that Assembly Member Allard committed misconduct in office and failure to perform prescribed duties by “1) knowingly participating in an indoor gathering of more than 15 people (a meeting of the Anchorage assembly) and 2) continuing to participate in an indoor gathering of more than 15 people at a meeting of the Anchorage Assembly after being specifically informed of the violation.” The allegations include a specific date of a meeting and how the alleged conduct violated local law.

By way of background, Emergency Order 15 was issued by then-Mayor Ethan Berkowitz on July 31, 2020, pursuant to AMC 3.80.060H. An emergency public health order aimed at curbing transmission of the COVID-19 virus, the order directed, in part, that “[a]ll indoor gatherings with more than 15 people are prohibited—this includes business, cultural, political and religious gatherings.” This emergency order was in effect from August 3, 2020, to August 30, 2020.

¹³ AS 29.26.260(a)(3).

Assembly meetings were closed to in-person participation by the public during the length of EO-15.¹⁴ Recordings of the proceedings are available online.¹⁵ At one point during the August 11 meeting, Assembly Member Allard commented to the chair of the meeting that 17 people were present in the Assembly Chambers.¹⁶ (This office is not tasked with determining whether there were, in fact, more than 15 people in chambers on August 11, because, pursuant to the Supreme Court's requirement in *Meiners*,¹⁷ we assume that the allegations are true.) According to the allegations of the application, Assembly Member Allard continued to participate in the meeting after becoming aware that the gathering was too large and therefore in violation of the emergency order.

A. Misconduct in office.

¹⁴ See Assembly Press Release: *Assembly Aligns Meeting Participation With Mayor's Latest Emergency Order, EO-14*, (July 22, 2020), available at <https://www.muni.org/departments/assembly/pressreleases/siteassets/pages/default/20200722%20assembly%20aligns%20meeting%20participation%20with%20mayor%27s%20latest%20emergency%20order,%20eo-14.pdf> (last visited Oct. 27, 2020); see also Assembly Press Release: *Anchorage Assembly Chambers Reopening Plan*, (July 31, 2020), available at <https://www.muni.org/departments/assembly/pressreleases/siteassets/pages/default/anchorage%20assembly%20chambers%20reopening%20plan%20-%20august%2031,%202020.pdf> (last visited Oct. 27, 2020).

¹⁵ Recordings of Anchorage Assembly meetings, available at <http://www.muni.org/Residents/Pages/MuniMeetings.aspx> (last visited Oct. 27, 2020).

¹⁶ August 11, 2020 Anchorage Assembly Meeting at 2:52:40, available at https://youtu.be/_znV4j8JKY?t=10350 (last accessed Oct. 20, 2020):

Assembly Member Jamie Allard (JA): Can I make a comment?

Assembly Chair Felix Rivera (FR): On the Amendment? Sure.

JA: Yeah. So we're supposed to have 15 people in here right now? Right? I meant that's part of what we're talking about with the amendment, what to limit. Of people in chambers?

FR: Go ahead, Ms. Allard, you can make your comment.

JA: We have 17.

FR: Thank you. Seeing no further discussion on the amendment, members may proceed to vote.

¹⁷ *Meiners*, 687 P.2d at 300 n. 18.

The statement of grounds regarding misconduct in office contained in Application No. 2021-04 is substantively identical to that recently reviewed by the Alaska Superior Court and Supreme Court in *Biggs v. Jones*.¹⁸ There, the courts considered the sufficiency of a recall application alleging misconduct in office against another member of the Anchorage Assembly, Meg Zaletel. The statement of grounds for the Zaletel recall alleged the exact same conduct as that alleged here: that, at the August 11, 2020 Assembly meeting, the Assembly Member violated Emergency Order 15 by remaining in the room after being alerted that the gathering was too large and therefore in violation of EO-15. In fact, other than the name of the Assembly member and some minor capitalization and formatting differences, the misconduct in office allegations of the two petitions are identical.¹⁹

In the Zaletel recall litigation, the superior court found that the misconduct in office allegation was a legally sufficient statement of grounds for recall, and ordered that the recall be placed on the ballot: “Participating in an assembly meeting, as an assembly member, in knowing violation of municipal law . . . is legally sufficient to support an allegation of misconduct in office for the purposes of a recall petition. The decision must be left up to the voters.”²⁰ After full briefing and argument, the Alaska Supreme Court affirmed this holding in a summary order.²¹

¹⁸ Decision on Appeal (May 20, 2021), *Biggs v. Jones*, No. 3AN-20-08262 CI, *aff’d sub nom, Municipality of Anchorage v. Biggs*, No. S-18012 (Order, Aug. 19, 2021).

¹⁹ The recall statement for Assembly Member Zaletel read: “Assembly member Meg Zaletel committed misconduct in office on August 11, 2020 by violating EO-15, an emergency order intended to protect the health and safety of Anchorage citizens, issued by the Mayor of Anchorage pursuant to AMC 3.80.060(H) by: 1) knowingly participating in an indoor gathering of more than 15 people (a meeting of the Anchorage Assembly) and 2) continuing to participate in an indoor gathering of more than 15 people at a meeting of the Anchorage Assembly after being specifically informed of the violation. Of all citizens in Anchorage, the Anchorage Assembly members should have been scrupulous in obeying the gathering limitations established by paragraph 4 of EO-15. Zaletel’s willful, intentional failure to do so needlessly endangered the lives of Anchorage citizens, encouraged the spread of COVID-19 throughout the community, and merits recall from office.”

²⁰ Decision on Appeal, *Biggs v. Jones*, *supra* n.18, at 14.

²¹ Order, *Municipality of Anchorage v. Biggs*, *supra* n.18, at 1. The Court has not yet issued its full substantive opinion in this case.

Because the Alaska Supreme Court has previously agreed that the same statement of grounds for “misconduct in office” at issue in this case is legally sufficient for recall under Alaska law, we can reach no other conclusion here. The Clerk’s Office should approve the recall statement regarding misconduct in office.

B. Failure to perform prescribed duties.

As well as the allegation that Assembly Member Allard committed misconduct in office, Recall Application No. 2021-04 also alleges that, based on the facts as there described, “Assembly member Jamie Allard failed to perform prescribed duties as an assembly member.” The allegations say that as an assembly member, Ms. Allard “should have been scrupulous in obeying [EO-15’s] gathering limitation.” The application does not explain why this conduct constitutes “failure to perform prescribed duties,” nor does it define or discuss an Assembly Member’s legal obligations, but a recall petition need not be perfectly asserted.²²

The recall application for Assembly Member Zaletel discussed above did not include a “failure to perform prescribe duties” allegation, so the Alaska Supreme Court has not addressed the sufficiency of that statutory ground in connection with the current factual context. However, both *Meiners* and *Recall Dunleavy* are instructive on this issue. In *Recall Dunleavy*, the court characterized “failure to perform prescribed duties” as being “analogous” to “neglect of duties,” a state recall ground under AS 15.45.510.²³ The court agreed that “neglect of duties” is properly defined as “the nonperformance of a duty of office established by applicable law.”²⁴

Both *Meiners* and *Recall Dunleavy* endorse a broad view of job duties under this definition. In *Meiners*, one question before the court was whether a regional school board failed to perform its prescribed duties when it allegedly failed to “control” the school superintendent’s behavior.²⁵ State statute set forth a list of duties of the school board; because the statute required the board to “employ” the superintendent, but did not mention ongoing control or supervision, the school district argued that those tasks did not fall within its prescribed duties.²⁶ The

²² *Meiners*, 687 P.2d at 301.

²³ *Recall Dunleavy*, 491 P.3d at 361.

²⁴ *Id.*

²⁵ *Meiners*, 687 P.2d at 299-301.

²⁶ *Id.* at 300.

Supreme Court rejected that claim, instead finding that the specifically listed duty to “employ” necessarily encompassed a broader set of related, intertwined duties: “Implicit in the board’s duty to ‘employ’ a superintendent are duties such as the following: to determine what the duties of the position of superintendent shall be, to advise the superintendent on the manner in which it wishes him to perform his duties, to evaluate his performance, and to determine from time to time whether he should be retained or whether they should ‘employ’ someone else.”²⁷ The court also imputed to board members the general duty to comply with applicable laws, suggesting that an “exercise of power in an unlawful manner” would violate their prescribed duties:

The board members’ duties include the duty to comply with statutes of general application relating to education. When the board undertakes to exercise one of its powers specified in section 101, it must do so in accordance with the law, even though it had no obligation to exercise that particular power at all. Its exercise of the power in an unlawful manner could constitute a failure to perform a prescribed duty, one prescribed by the statute of general application.^[28]

Recall Dunleavy reaffirmed these principles, refusing to narrow the scope of implied and general duties included within its concept of “prescribed duties.”²⁹ The *Recall Dunleavy* court also reasoned that an allegation of “unlawful conduct that would in fact be unlawful . . . makes a prima facie showing of at least one statutorily prescribed ground for recall” and that because the Governor has a general constitutional duty to use state funds for lawful purposes, an allegation of misuse of funds could properly be read as failing to perform his legal duties.³⁰

This is a close call, but we think the Alaska Supreme Court would find the same here. As in *Meiners*, we are unable to identify any specifically enumerated “prescribed duties” of an Assembly Member that require her to take action in response to an identified violation of the law occurring during the meeting. The Anchorage Municipal Code places the responsibility for running Assembly meetings, responding to points of order, and maintaining order and decorum with the Assembly Chair.³¹ The Assembly Member now facing recall was not the

²⁷ *Id.*

²⁸ *Id.*

²⁹ *Recall Dunleavy*, 491 P.3d at 362.

³⁰ *Id.* at 364.

³¹ AMC 2.30.080C.

Chair; accordingly, she did not have a specifically enumerated duty or responsibility to adjourn or postpone the meeting or to eject persons from the Assembly Chambers to comply with EO-15's gathering limit. For these reasons, a narrow reading of "failure to perform prescribed duties" would place the allegations of the application outside of this category.

But the Alaska Supreme Court has repeatedly rejected that narrow reading in favor of a more expansive conception of an elected official's duties. Under its precedents, those duties must be read broadly and to include implicit duties to exercise power in a lawful manner and to follow generally applicable laws.³² Application 2021-04 alleges that the Assembly Member knowingly violated municipal law during an Assembly meeting. The application alleges "a prima facie violation of the law" that voters could construe as a violation of Assembly Member Allard's implicit duties to comply with local law at public meetings and to exercise her power in a lawful manner.³³ Because the recall right must be liberally construed to allow voters to be the ultimate decisionmakers, and because voters here could make "a logical connection" between Assembly Member Allard's alleged violation of the law and the failure to perform her prescribed duties, the allegation is legally sufficient for recall.³⁴

CONCLUSION

The allegations of this recall application are legally sufficient. The Clerk should certify Recall Application 2021-04 and prepare a petition.

³² *Recall Dunleavy*, 491 P.3d at 361-64; *Meiners*, 687 P.2d at 299-30.

³³ *Recall Dunleavy*, 491 P.3d at 364.

³⁴ *Id.* at 359.



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632 West Sixth Avenue Anchorage, Alaska 99501 Suite 250
Mailing Address: P.O. Box 196650 Anchorage, AK 99519-6650

Phone: 343-4311 Fax: 343-4313

Municipal Clerk: Barbara A. Jones

Recall Application



Anchorage Charter: Section 3.03 ~ Anchorage Municipal Code: Chapter 2.50 ~ Alaska State Statute 29.26.240-29.26.360

Alaska State Statute: 29.26.260 Application for a recall petition

- (a) An application for a recall petition shall be filed with the municipal clerk and must contain
 - (1) the signatures and residence addresses of at least 10 municipal voters who will sponsor the petition;
 - (2) the name and address of the contact person and an alternate to whom all correspondence relating to the petition may be sent; and
 - (3) a statement in 200 words or less of the grounds for recall stated with particularity.
- (b) An additional sponsor may be added at any time before the petition is filed by submitting the name of the sponsor to the clerk.

Recall Petition Sponsor

Print Name: Chelsea Foster

Phone Number: 907-229-8197 Email Address: Chelsea@CannaCommunity.net

Residence Address: 6250 Michigan Blvd, Anchorage, AK, 99516

Mailing Address: Same

Identifier: [REDACTED]
(Voter #, Social Security #)

Signature: [REDACTED] Date: 11/5/21

Alternate Petition Sponsor

Print Name: Kerry Brown

Phone Number: 342-2460 Email Address: KerryBrownAlaska@gmail.com

Residence Address: 1220 E 16th, Unit 4 Anchorage, AK 99501

Mailing Address: SAME

Identifier: [REDACTED]
(Voter #, Social Security #)

Signature: [REDACTED] Date: 11/5/21

Unsworn falsification in the second degree is a class A misdemeanor. (a) Unsworn falsification in the second degree if, with the intent to mislead a public servant in the performance of his or her duties, the person submits a false written or recorded statement that the person does not believe to be true... (2) on a form bearing notice, authorized by law, that false statements made in it are punishable. (b) Unsworn falsification in the second degree is a class A misdemeanor." AS 11.56.210



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Recall Statement

~~Assembly Member Jamie Allard committed misconduct in office on August 11, 2020 by Violating EO-15, an emergency order intended to protect the health and safety of Anchorage citizens, issued by the Mayor of Anchorage pursuant to AMC 3.80.060(H) by: 1) knowingly participating in an indoor gathering of more than 15 people (a meeting of the Anchorage assembly) and 2) continuing to participate in an indoor gathering of more than 15 people at a meeting of the Anchorage Assembly after being specifically informed of the violation. Assembly member Jamie Allard failed to perform prescribed duties as an assembly member. Of all citizens in Anchorage Assembly Members should have been scrupulous in obeying the gathering limitations established by paragraph 4 of E0-15. Allard's willful, intentional failure to do so needlessly endangered the lives of Anchorage citizens, encouraged the spread of COVID-19 throughout the community, and merits recall from office.~~



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	Printed Name	Residence Address	Mailing Address	Identifier: Voter #, Social, or DOB	Signature	Date
1.	Margaret Cichoracki	11601 S Yellowstone Dr. Eagle River, AK 99577	SAME			11/04/21
2.	Ken Ni'ug	7640 Bufwood Dr. Anchorage AK 99507	SAME			11/04/21
3.	AMUNDROVITZ	970 W. 80th Ave Anchorage, AK 99518	SAME			11/4/21
4.	JARED BEAUDOUIN	2298 N. THUNDERBOLT Palmer, AK 99645	SAME			11/4/21
5.	Michael V. Witham	1303 Valarian St. Anchorage AK 99508	Same			11/4/2021
6.	SEAN NORTHOVER	627 E 16th AVE Anchorage, AK 99501	SAME			11/7/2021
7.	Ivan Hodas	3810 W. 79th Ave #5 Anchorage, AK 99542				11/7/21
8.	Jennifer Curtman	8181 Stewart Mtn. Dr. Eagle River AK 99577	Same			11/8/21
9.	Becky Davonport	18319 Karta Cir. Eagle River, AK 99577	Same			11/8/21
10.	Kathleen Morales	17936 Lacey Dr Eagle River	Same			11/8/21
11.	Kyle Curtman	8189 Stewart Mtn Dr Eagle River AK 99577	Same			11/8/21



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1.	Roger Branson	16820 Coronado Rd #210 Eagle River AK	same			11-8-21
2.	Jonathon Marsh	10311 Betula Drive Anchorage, AK 99507	same			11-8-21
3.	Terje Marsh	10311 Betula Dr Anchorage, AK 99507	same			11-8-21
4.	KASSANDRA Smiley	11335 Mausel Eagle River AK 99577	same			11-8-21
5.	Eric Johnson	11335 Mausel 1st Eagle River 99577	same			11-8-21
6.						
7.						
8.						
9.						
10.						