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Original Received  
**MAR 17 2023**  
Clerk of the Trial Courts

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

ANCHORAGE MUNICIPAL )  
ASSEMBLY, )  
 )  
*Appellant,* )

vs. )

MUNICIPALITY OF ANCHORAGE, )  
DAVID BRONSON, in his official )  
capacity as Mayor, Municipality of )  
Anchorage, )

*Appellee.* )

Appeal Case No. \_\_\_\_\_ CI

**APPELLANT’S STATEMENT OF POINTS ON APPEAL**  
**(Questions Presented on Appeal to Superior Court)**

Pursuant to Appellate Rule 602(c)(1)(A) and Alaska Statute (AS) 40.25.124 appellants state their points on appeal from the final administrative order of David Bronson, Mayor of the Municipality of Anchorage, dated February 15, 2023, denying of the Assembly’s records request submitted under the authority of AS 40.25.110, as follows:

- (1) The final administrative order incorrectly asserts that the requested records are personnel files that cannot be disclosed under Anchorage Municipal Code (AMC) 3.30.016D.
- (2) The final administrative order incorrectly asserts that the requested records are exempt from disclosure under AMC 3.90.040B.
- (3) The final administrative order incorrectly suggests that the constitutional right to privacy in Article I, section 22 of the Alaska Constitution prevents the requested records from being released, absent authorization from Mr. Joe Gerace.
- (4) The final administrative order asserts no lawful basis to prevent disclosure of the requested records to the Assembly, or the subsequent public release of the requested documents.

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Appellants reserve the right to request leave to supplement these points on appeal as allowed by Appellate Rule 602(c)(1)(A).

Pursuant to AS 09.68.040(a), municipalities, and officers thereof, are exempt providing a bond, therefore no cost bond is filed with this appeal.

Respectfully submitted this 17th day of March 2023.



Matthew Hurt  
Legislative Counsel  
Alaska Bar No. 2302010

Certificate of Service

I certify that on March 17, 2023 I personally delivered a true and correct copy of the foregoing to:

Office of the Municipal Clerk  
632 W. 6<sup>th</sup> Street, Suite #250  
Anchorage, AK 99501



Brandi Heasley, Legal Assistant  
Assembly Counsel's Office

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