IN THE SUPERIOR COURT FOR THE STATE OF ALASKA

THIRD JUDICIAL DISTRICT AT ANCHORAGE

In the Matter of the	)	
	)	
2021 Redistricting Plan.	)	
	)	
	)	Case No. 3AN-21-08869CI

RESPONSE TO GIRDWOOD PLAINTIFFS' NOTICE OF CORRECTION

Following oral argument on the merits of the Girdwood Plaintiffs' challenges to the Alaska Redistricting Board's ("Board") April 2022 Amended Redistricting Plan, the Girdwood Plaintiffs submitted a "Notice of Correction" along with a new opinion letter from Dr. Chase Hensel. The Board responds as following:

1. Dr. Hensel is still mistaken about the population of Joint Base Elmendorf-Richardson ("JBER"). The 2020 U.S. Census Data shows the following population numbers for residents within the boundaries of JBER's two voting precincts (JBER No. 1 and JBER No. 2):[1]

    - Total Population is 11,029.
    - The voting-age population ("VAP") is 8,234.

2. Dr. Hensel uses his "correction" to state the opinion that one "cannot tell how the JBER vote broke down in past elections." Official State of Alaska election results, which are publicly available from the Division of Elections, show that JBER reliably chooses candidates of the same type as those preferred by voters in District 24, and opposite to the preference of voters in downtown Anchorage.[2]

---

[1] *See* Second Supplemental Affidavit of Peter Torkelson, ¶ 3 and **Exhibit D** (May 13, 2022).

[2] *See* Second Supplemental Affidavit of Peter Torkelson, ¶ 4 and **Exhibit E**.

SCHWABE, WILLIAMSON & WYATT, P.C.
420 L Street, Suite 400
Anchorage, AK 99501
Telephone: (907) 339-7125

- In 2014, JBER voted in favor of Republican candidates for U.S. Senate and U.S. House of Representatives. Downtown Anchorage voted in favor of Democratic candidates in the same races.

- In 2016, JBER voted in favor of Republican candidates for U.S. President and U.S. House of Representatives. Downtown Anchorage voted in favor of the Democratic candidates in the same races.

- In 2018, JBER voted in favor of Republican candidates for U.S. House of Representatives and Alaska Governor. Downtown Anchorage voted in favor of the Democratic candidates in the same races.

DATED at Anchorage, Alaska, this 13th day of May, 2022.

SCHWABE, WILLIAMSON & WYATT, P.C.
Attorneys for Alaska Redistricting Board

By:_____

Matthew Singer, ABA No. 9911072
Email: msinger@schwabe.com
Lee C. Baxter, ABA No. 1510085
Email: lbaxter@schwabe.com
Kayla J. F. Tanner, ABA No. 2010092
Email: ktanner@schwabe.com

SCHWABE, WILLIAMSON & WYATT, P.C.
420 L Street, Suite 400
Anchorage, AK 99501
Telephone: (907) 339-7125

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of May, 2022, a true and correct copy of the RESPONSE TO GIRDWOOD PLAINTIFFS' NOTICE OF CORRECTION (4 pages) was served upon the following by:

☐ US Mail ☒ **Email** ☐ Fax ☐ Hand-Delivery

Stacey C. Stone
Gregory Stein
Holmes Weddle & Barcott, PC
Email: sstone@hwb-law.com
gstein@hwb-law.com

Holly Wells
Mara E. Michaletz
Zoe A. Danner
Birch Horton Bittner & Cherot
Email: hwells@BHB.com
mmichaletz@bhb.com
wfalsey@bhb.com
zdanner@bhb.com

Nathaniel Amdur-Clark
Whitney A. Leonard
Sonosky, Chambers, Sachse, Miller & Monkman, LLP
Email: nclark@sonosky.com
whitney@sonosky.net

Eva R. Gardner
Michael S. Schechter
Benjamin J. Farkash
Ashburn & Mason
Email: eva@anchorlaw.com
mike@anchorlaw.com
ben@anchorlaw.com

Robin O. Brena
Jake W. Staser
Laura S. Gould
Jon S. Wakeland
Brena, Bell & Walker
Email: rbrena@brenalaw.com
jstaser@brenalaw.com
lgould@brenalaw.com
jwakeland@brenalaw.com

Thomas S. Flynn
State of Alaska
Attorney General's Office
Email: thomas.flynn@alaska.gov

Susan C. Orlansky
ACLU Alaska
Email: sorlansky@acluak.org

Richard F. Curtner
Email: richcurtner13@gmail.com

Jeanine M. Huston
11:10am

Jeanine M. Huston
jhuston@schwabe.com

SCHWABE, WILLIAMSON & WYATT, P.C.
420 L Street, Suite 400
Anchorage, AK 99501
Telephone: (907) 339-7125