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

PLANNED PARENTHOOD GREAT)
NORTHWEST, HAWAII, ALASKA,)
INDIANA, AND KENTUCKY,)

Plaintiffs,)

v.)

STATE OF ALASKA; CORI MILLS,)
in her official capacity as Acting)
Attorney General of the State of)
Alaska; ALASKA DEPARTMENT OF)
HEALTH; STATE MEDICAL)
BOARD; and ALASKA BOARD OF)
NURSING,)

Defendants.)

Case No. 3AN-26-07345CI

ANSWER

Defendants State of Alaska; Cori Mills, in her official capacity as Acting Attorney General; Alaska Department of Health; State Medical Board; and Alaska Board of Nursing (collectively, “Defendants”), through undersigned counsel, answer Plaintiff’s Complaint as follows:

GENERAL RESPONSES AND RESERVATIONS

1. Defendants deny each allegation not expressly admitted. A response that a statute, regulation, case, document, website, publication, or other writing “speaks for itself” admits only that the cited material contains its own text. Defendants deny Plaintiff’s characterization of that material to the extent inconsistent with its complete contents, context, legal effect, or applicable law.

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2. Headings, captions, footnotes, quotations, defined terms, and the prayer for relief do not require a response. To the extent a response is deemed required, Defendants deny any allegation or characterization not expressly admitted. Defendants' use of Plaintiff's defined terms is solely for convenience and does not constitute adoption of Plaintiff's characterizations, including the term "Telehealth Ban."

3. No response is required to legal conclusions. To the extent a response is required, Defendants deny them. Assertions concerning Plaintiff's organization, operations, providers, patients, clinical practices, protocols, studies, medical literature, or third parties are outside Defendants' knowledge unless expressly admitted.

4. Defendants reserve the right to amend this Answer as permitted by the Alaska Rules of Civil Procedure and any scheduling order.

RESPONSES TO NUMBERED ALLEGATIONS

I. PRELIMINARY STATEMENT

1. This paragraph contains Plaintiff's characterization of AS 18.16.010(a)(2), factual assertions concerning patients and access to care, and legal conclusions. The statute and referenced authorities speak for themselves. Defendants deny Plaintiff's characterization of the statute as a "Telehealth Ban," deny that the challenged law violates the Alaska Constitution, and otherwise lack knowledge or information sufficient to form a belief as to the truth of the allegations concerning Plaintiff's patients and those of third parties and therefore, pursuant to Civil Rule 8, must deny those allegations.

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2. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations concerning clinical practice, medical literature, and the positions of medical organizations and therefore, pursuant to Civil Rule 8, must deny them. Any referenced studies, literature, or organizational statements speak for themselves. Defendants deny the remaining allegations and legal conclusions.

3. Defendants admit that Alaska law generally authorizes telehealth subject to applicable statutes and regulations, which speak for themselves. Defendants admit that DTP telehealth is an important method of providing health care in Alaska. Defendants admit that Alaska authorizes the types of health care referenced in the averments. Defendants otherwise lack knowledge or information sufficient to form a belief as to the allegations concerning particular patients, medical practices, or clinical equivalence and therefore, pursuant to Civil Rule 8, must deny them. Defendants deny Plaintiff's characterization of AS 18.16.010(a)(2) and deny the remaining allegations and legal conclusions.

4. Alaska Statute 18.16.010, including its provisions concerning penalties, speaks for itself. Defendants deny any characterization inconsistent with the statute. No further response is required.

5. Defendants deny the first sentence. Defendants lack knowledge or information sufficient to form a belief as to the allegations concerning the locations or practices of abortion providers, the medical needs or circumstances of particular patients, travel burdens, delays, or health outcomes and therefore, pursuant to Civil

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Rule 8, must deny them. Defendants deny Plaintiff's characterization of AS 18.16.010(a)(2), and deny any remaining allegations and legal conclusions.

6. Defendants lack knowledge or information sufficient to form a belief as to the allegations concerning the circumstances, characteristics, experiences, or health outcomes of Plaintiff's patients or other third parties and therefore, pursuant to Civil Rule 8, must deny them. Defendants deny the remaining allegations and legal conclusions.

7. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's intended practices, its patients, or its providers and therefore, pursuant to Civil Rule 8, must deny those allegations. Whether Plaintiff may assert claims on behalf of others is a legal conclusion to which no response is required; to the extent a response is required, denied. Defendants deny that AS 18.16.010(a)(2) violates the Alaska Constitution.

8. This paragraph states a request for relief, not a factual allegation requiring a response. Defendants deny that Plaintiff is entitled to preliminary or permanent injunctive relief.

II. JURISDICTION & VENUE

9. Admit.

10. Alaska Statute 22.10.020 and Alaska Civil Rules 57 and 65 speak for themselves. Whether this action satisfies their requirements is a legal conclusion to which no response is required.

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11. Alaska Civil Rule 3(c) speaks for itself. Defendants deny any allegation or implication inconsistent with the Rule. Defendants note that Acting Attorney General Mills' primary office is in Juneau, Alaska and that she maintains an office in Anchorage, Alaska.

III. PARTIES

A. Plaintiff

12. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations concerning Plaintiff's organization and corporate status, and therefore, pursuant to Civil Rule 8, must deny them.

13. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations concerning Plaintiff's operations, and therefore, pursuant to Civil Rule 8, must deny them.

14. Defendants lack knowledge or information sufficient to form a belief as to the truth of the allegations concerning the services Plaintiff provides, and therefore, pursuant to Civil Rule 8, must deny them.

15. Defendants lack knowledge or information sufficient to form a belief as to whether Plaintiff's identified health centers are the only "publicly identified facilities" providing abortions in Alaska, and therefore, pursuant to Civil Rule 8, must deny them.

16. This paragraph states a legal conclusion concerning representative standing to which no response is required. To the extent a response is required, Defendants admit that Planned Parenthood purports to sue on behalf of its patients and abortion providers.

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B. Defendants

17. Defendants admit that the State of Alaska is named as a Defendant.

Alaska Statute 44.80.010 speaks for itself. Whether the State is a proper party is a legal conclusion to which no response is required.

18. Defendants admit that Cori Mills is sued in her official capacity as Acting Attorney General. Alaska Statute 44.23.020 speaks for itself. Defendants deny Plaintiff's characterization of the Acting Attorney General's authority to the extent it is inconsistent with applicable law and otherwise deny the remaining allegations and legal conclusions.

19. Defendants admit that the Alaska Department of Health is named as a Defendant. Alaska Statute 18.05.010 and AS 18.16.010 speak for themselves. Defendants deny Plaintiff's characterization of the Department's authority to the extent it is inconsistent with applicable law and otherwise deny the remaining allegations and legal conclusions.

20. Defendants admit that the State Medical Board is named as a Defendant, is a state agency, and that Alaska law assigns it licensing and disciplinary responsibilities. The cited statutes and regulation speak for themselves. Defendants deny Plaintiff's characterization of the Board's authority to the extent inconsistent with applicable law and otherwise deny the remaining allegations and legal conclusions.

21. Defendants admit that the Alaska Board of Nursing is a named Defendant, is a professional licensing board, and that Alaska law assigns it licensing and disciplinary responsibilities. The cited statutes speak for themselves. Defendants deny

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Plaintiff's characterization of the Board's authority to the extent inconsistent with applicable law and otherwise deny the remaining allegations and legal conclusions.

IV. FACTUAL STATEMENT

A. Planned Parenthood provides sexual & reproductive Care to Alaskans.

22. Admit.

23. Defendants admit that medication abortion generally refers to terminating a pregnancy using medication. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's protocols or gestational limits and therefore, pursuant to Civil Rule 8, must deny the remaining allegations.

24. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's methods, staffing, scheduling, or patients' experiences and therefore, pursuant to Civil Rule 8, must deny the allegations. Defendants deny Plaintiff's characterization of what Alaska law permits.

25. Defendants admit that procedural abortion generally involves a procedure to terminate a pregnancy. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's protocols, locations, or gestational limits and therefore, pursuant to Civil Rule 8, must deny those allegations. Defendants deny any remaining allegation or implication.

26. Defendants lack knowledge or information sufficient to form a belief as to the proportion of abortions Plaintiff provides by any method and therefore, pursuant to Civil Rule 8, must deny the allegation.

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27. Defendants lack knowledge or information sufficient to form a belief as to the services Plaintiff offers, the methods by which it offers them, or the conditions for which it provides care and therefore, pursuant to Civil Rule 8, must deny the allegations.

B. Abortion is a safe and common form of health care.

28. Defendants lack knowledge or information sufficient to form a belief as to the cited estimates and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited publications and underlying data speak for themselves.

29. Defendants lack knowledge or information sufficient to form a belief as to the reasons particular patients decide to end pregnancies and therefore, pursuant to Civil Rule 8, must deny the allegations.

30. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's characterization of the views of medical organizations or comparative medical risks and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited publications, organizational statements, and judicial decision speak for themselves.

31. Defendants lack knowledge or information sufficient to form a belief as to the medical options available to any particular patient or national statistics concerning abortion methods and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited sources speak for themselves.

32. Defendants lack knowledge or information sufficient to form a belief as to the asserted medical conclusions and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited research and practice guidance speaks for itself.

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33. Defendants lack knowledge or information sufficient to form a belief as to the asserted medication-abortion regimens, their prevalence, or the clinical matters alleged and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited authorities and materials speak for themselves.

34. Defendants lack knowledge or information sufficient to form a belief as to the safety, efficacy, complication rates, or other clinical matters alleged and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited authorities and materials speak for themselves.

35. Defendants lack knowledge or information sufficient to form a belief as to the medical, practical, or patient-specific assertions alleged and therefore, pursuant to Civil Rule 8, must deny them. The cited authorities and materials speak for themselves.

36. Defendants lack knowledge or information sufficient to form a belief as to the comparative medical risks, patient circumstances, or clinical assertions alleged and therefore, pursuant to Civil Rule 8, must deny them. The cited authorities and materials speak for themselves.

C. Telehealth is a safe, routine, and critical mode of delivering health care.

37. Defendants admit that telehealth is used in Alaska and elsewhere. Defendants lack knowledge or information sufficient to form a belief as to the remaining factual and medical assertions and therefore, pursuant to Civil Rule 8, must deny them. The cited statutes and regulation speak for themselves.

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38. Defendants lack knowledge or information sufficient to form a belief as to the effects of telehealth on particular patients or populations and therefore, pursuant to Civil Rule 8, must deny the allegations.

39. Defendants admit that use of telehealth changed during the COVID-19 pandemic. Defendants lack knowledge or information sufficient to form a belief as to the remaining allegations and therefore, pursuant to Civil Rule 8, must deny them.

40. Defendants lack knowledge or information sufficient to form a belief as to the role, use, safety, or effectiveness of telehealth in particular fields of medicine and therefore, pursuant to Civil Rule 8, must deny the allegations. Any cited materials speak for themselves.

41. Defendants lack knowledge or information sufficient to form a belief as to the circumstances or preferences of particular patients and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited sources speak for themselves.

42. Defendants admit the first sentence. Defendants lack knowledge or information sufficient to form a belief as to any third-party historical or statistical assertions and therefore, pursuant to Civil Rule 8, must deny them. The cited sources speak for themselves.

43. Defendants admit the first sentence. The cited federal and state statutes, regulations, policies, documents, websites, and other writings speak for themselves. Defendants deny Plaintiff's characterizations to the extent inconsistent with those materials and deny any remaining allegation or legal conclusion.

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44. Defendants admit that telehealth plays an important role in providing access to health care in Alaska. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's characterization of the studies and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited studies speak for themselves.

D. Providing medication abortions via direct-to-patient telehealth is safe, effective, and common.

45. Defendants lack knowledge or information sufficient to form a belief as to the safety, efficacy, prevalence, or clinical importance of providing medication abortion through direct-to-patient telehealth and therefore, pursuant to Civil Rule 8, must deny the allegations.

46. Defendants admit that direct-to-patient telehealth generally may involve a clinician evaluating or treating a patient at a location other than a clinical site. Defendants lack knowledge or information sufficient to form a belief as to the remaining medical or practice assertions and therefore, pursuant to Civil Rule 8, must deny them.

47. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's practices in other states and therefore, pursuant to Civil Rule 8, must deny the allegations.

48. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's protocols, screening, prescribing, dispensing, or mailing practices and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited clinical materials speak for themselves.

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49. Defendants lack knowledge or information sufficient to form a belief as to ultrasound use, clinical eligibility, risk assessment, diagnostic methods, or other medical assertions and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited clinical materials and studies speak for themselves.

50. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's counseling practices, instructions, or patient care and therefore, pursuant to Civil Rule 8, must deny the allegations.

51. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's practices, protocols, or patient experiences in other states and therefore, pursuant to Civil Rule 8, must deny the allegations.

52. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's triage, follow-up, emergency, or patient-care practices and therefore, pursuant to Civil Rule 8, must deny the allegations.

53. Defendants deny the last sentence. Defendants lack knowledge or information sufficient to form a belief as to the clinical needs, follow-up care, or experiences of particular patients and therefore, pursuant to Civil Rule 8, must deny the allegations.

54. Defendants lack knowledge or information sufficient to form a belief as to the asserted conclusions of peer-reviewed research or the safety, effectiveness, and outcomes alleged and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited research speaks for itself.

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55. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's characterization of medical organizations' positions and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited statements and publications speak for themselves.

E. The State broadly authorizes DTP telehealth for other forms of care.

56. Defendants admit the first sentence. Alaska's statutes and regulations governing telehealth and health care speak for themselves. Defendants deny Plaintiff's characterizations to the extent inconsistent with those authorities and deny any remaining allegation or legal conclusion.

57. Defendants admit the first sentence. The cited statutes and governmental materials speak for themselves. As to any factual assertion concerning the State's purposes or policy choices, Defendants deny any inconsistent characterization.

58. Alaska law governing insurance and the Medicaid program in the context of telehealth speaks for itself. Defendants deny Plaintiff's characterizations to the extent inconsistent with applicable law and deny any remaining allegation or legal conclusion.

59. Alaska law governing prescribing, dispensing, and telehealth speaks for itself. Defendants deny Plaintiff's characterizations to the extent inconsistent with applicable law and deny any remaining allegation or legal conclusion.

F. The State prohibits providing medication abortions via DTP telehealth.

60. Defendants deny the second sentence. The referenced statutes and regulations speak for themselves. Defendants deny any characterization inconsistent with applicable law, and deny any remaining allegations and legal conclusions.

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61. Defendants admit that the quoted language appears in AS 18.16.010(a)(2), which speaks for itself. Defendants deny any characterization or implication inconsistent with the statute.

62. The referenced 2023 press release and cited statutes speak for themselves. Defendants deny Plaintiff's characterizations to the extent inconsistent with the materials or applicable law.

63. Alaska Statute 18.16.010, including its penalty provisions, speaks for itself. Defendants deny any characterization inconsistent with the statute. No further response is required.

64. This paragraph characterizes and draws legal conclusions from Alaska statutes and regulations. Those authorities speak for themselves. No further response is required.

65. The statutes and regulations referenced in this paragraph speak for themselves. Defendants deny Plaintiff's characterization of those authorities and any legal conclusion or implication inconsistent with applicable law.

G. The telehealth ban burdens Alaskans' abortion access.

66. Defendants deny that AS 18.16.010(a)(2) violates or unlawfully burdens Alaskans' constitutional rights. Defendants lack knowledge or information sufficient to form a belief as to the alleged effects on particular patients and therefore, pursuant to Civil Rule 8, must deny those allegations.

67. Defendants lack knowledge or information sufficient to form a belief as to the circumstances, barriers, demographics, finances, employment, schooling, childcare,

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travel, health, or experiences of Plaintiff's patients or other third parties and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited studies, reports, and other writings speak for themselves. With respect to the last sentence, Defendants lack knowledge or information sufficient to form a belief as to the effect of AS 18.16.010(a)(2) on the patients of Plaintiff or other third parties, and therefore, pursuant to Civil Rule 8, must deny the same.

68. Defendants lack knowledge or information sufficient to form a belief as to intimate-partner violence experienced by Plaintiff's patients or other third parties, or the asserted effects on access to care, and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited studies and reports speak for themselves.

69. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's characterizations of the number, identity, availability, location, or practices of abortion providers, or the asserted consequences for patients, and therefore deny the allegations. All cited sources speak for themselves.

70. Defendants admit that it is not possible to travel by car from some Alaska communities to Anchorage or Fairbanks, and that some other form of travel, including by airplane, is necessary. Defendants admit the first clause of the last sentence. Defendants deny the second clause of the last sentence. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's patients, their travel distances, travel methods, costs, delays, or experiences and therefore, pursuant to Civil Rule 8, must deny the allegations.

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71. Defendants lack knowledge or information sufficient to form a belief as to whether barriers to travel are insurmountable for particular Alaskans or whether any barriers have forced Alaskans to remain pregnant against their will, and therefore, pursuant to Civil Rule 8, must deny the allegations.

72. Defendants lack knowledge or information sufficient to form a belief as to the time, expense, logistics, timing or other burdens experienced by particular patients seeking abortions and therefore, pursuant to Civil Rule 8, must deny the allegations.

73. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's gestational limits, appointment availability, patient timing, patient preferences, or whether any patient receives a different method of abortion and therefore, pursuant to Civil Rule 8, must deny the allegations.

74. Defendants lack knowledge or information sufficient to form a belief as to the medical conditions, clinical indications, eligibility, or treatment options of particular patients and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited reports and clinical materials speak for themselves.

75. Defendants lack knowledge or information sufficient to form a belief as to the preferences, circumstances, or experiences of particular patients and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited study speaks for itself.

76. Defendants lack knowledge or information sufficient to form a belief as to Plaintiff's charges, the costs of particular procedures, insurance coverage, or patients' expenses and therefore, pursuant to Civil Rule 8, must deny the allegations. The cited report speaks for itself.

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77. Defendants lack knowledge or information sufficient to form a belief as to whether the alleged burdens fall disproportionately on any identified group or as to the health outcomes alleged and therefore, pursuant to Civil Rule 8, must deny the allegations. The referenced data and studies speak for themselves.

78. Defendants deny the allegations and deny that AS 18.16.010(a)(2) unlawfully burdens access to abortion or violates the Alaska Constitution.

V. CLAIMS FOR RELIEF

COUNT I — Right to Privacy

79. Defendants incorporate their responses to paragraphs 1 through 78 as though fully set forth here. Defendants deny any allegation in paragraph 79 inconsistent with those responses.

80. Article I, section 22 of the Alaska Constitution and the cited decision speak for themselves. This paragraph otherwise states legal conclusions to which no response is required.

81. Denied. Defendants deny that AS 18.16.010(a)(2) violates any right protected by the Alaska Constitution or that Plaintiff is entitled to relief under Count I.

COUNT II — Equal Protection

82. Defendants incorporate their responses to paragraphs 1 through 78 as though fully set forth here. Defendants deny any allegation in paragraph 82 inconsistent with those responses.

83. Admit.

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84. Denied. Defendants deny that AS 18.16.010(a)(2) denies equal protection to Plaintiff's patients or that Plaintiff is entitled to relief on that basis.

85. Denied. Defendants deny that AS 18.16.010(a)(2) denies equal protection to Plaintiff's providers or that Plaintiff is entitled to relief under Count II.

RESPONSE TO CLAIMS FOR RELIEF

Count I — Right to Privacy

Defendants deny that AS 18.16.010(a)(2) violates Article I, section 22 of the Alaska Constitution, deny that Plaintiff has established any basis for declaratory or injunctive relief, and request judgment in Defendants' favor on Count I.

Count II — Equal Protection

Defendants deny that AS 18.16.010(a)(2) violates Article I, section 1 of the Alaska Constitution, deny that Plaintiff has established any basis for declaratory or injunctive relief, and request judgment in Defendants' favor on Count II.

RESPONSE TO PRAYER FOR RELIEF

Defendants deny that Plaintiff is entitled to any relief requested in the Prayer for Relief, including declaratory relief, preliminary or permanent injunctive relief, costs, attorney's fees, or other relief. Defendants request that the Court deny the requested relief, enter judgment in Defendants' favor, dismiss the Complaint with prejudice to the extent permitted by law, award Defendants their allowable costs and fees, and grant such other relief as the Court deems just and proper.

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AFFIRMATIVE DEFENSES AND OTHER DEFENSES

1. Failure to State a Claim. The Complaint, in whole or in part, fails to state a claim upon which relief can be granted.
2. Standing and Justiciability. To the extent Plaintiff cannot establish standing, third-party standing, ripeness, an actual controversy, or another requirement of justiciability as to a claim, party, remedy, or enforcement theory, that claim or request for relief is barred or must be limited.
3. Constitutionality and Valid Exercise of State Authority. Alaska Statute 18.16.010(a)(2) is presumed constitutional and is a valid exercise of the State's authority. Plaintiff bears the applicable burden of proof and cannot establish a constitutional violation.
4. Equitable Relief Unavailable. Plaintiff cannot satisfy the requirements for preliminary or permanent injunctive relief, including the requirements concerning likelihood of success, irreparable harm, balance of hardships, and the public interest, to the extent each applies.
5. Relief Must Be Properly Tailored. Any declaratory or injunctive relief must be limited to a live controversy, the parties properly before the Court, conduct shown by admissible evidence, and the minimum relief authorized by law; overbroad or advisory relief is unavailable.
6. Severability. If any application or portion of a challenged law is held invalid, the remaining valid provisions and applications are severable to the fullest extent allowed by law.

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REQUEST FOR JUDGMENT

WHEREFORE, Defendants respectfully request that the Court deny Plaintiff's requested relief, enter judgment in favor of Defendants on all claims, dismiss the Complaint with prejudice to the extent permitted by law, award Defendants allowable costs and attorney's fees, and grant such other relief as the Court deems just and proper.

DATED August 28, 2026.

CORI MILLS
ACTING ATTORNEY GENERAL

By: /s/Jeffrey G. Pickett
Jeffrey G. Pickett
Assistant Attorney General
Alaska Bar No. 9906022