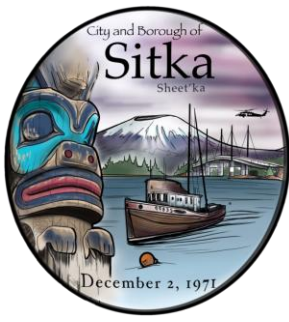


CBS Submittal



CITY AND BOROUGH OF SITKA

A COAST GUARD CITY

LEGAL DEPARTMENT

100 Lincoln Street | Sitka, Alaska 99835

www.cityofsitka.com

legal@cityofsitka.org

907-747-1810

MEMORANDUM

To: Mayor Eisenbeisz and Assembly Members

From: Rachel Jones, Municipal Attorney

Date: April 22, 2026

Subject: Second-Level Appeal of Austin W. Cranford
Public Records Request dated February 3, 2026 (received February 12, 2026)

Dear Mr. Mayor and Assembly Members,

I. INTRODUCTION AND SUMMARY

This memorandum responds to the second-level appeal filed by Austin W. Cranford on March 23, 2026, challenging the City and Borough of Sitka's response to his Public Records Request dated February 3, 2026 (the "Request"). Mr. Cranford appealed the initial response to the Municipal Administrator, John Leach, who on March 24, 2026, issued a first-level appellate determination upholding the production. Mr. Cranford now asks the Assembly to overturn that determination and order further production. The Assembly has jurisdiction under Sitka General Code § 1.20.080.

For the reasons set forth below, the Assembly should uphold the administrator's affirmation of the production and deny Mr. Cranford's request for further relief in its entirety.

1. Each of Items 1–4 of the Request required the Municipal Clerk, with assistance from the Legal Department, to perform content-based analysis and research of records, which is not contemplated by the APRA, but nevertheless constituted a good faith effort to assist the requestor, despite the inappropriate nature of the request.
2. The Municipality made a good faith effort to return responsive material from a search that produced over 450 pages of non-responsive material. There is no Alaska case law prohibiting segregation of responsive and non-responsive records. And the Municipality provided, in good faith, the responsive material that it found. Non-responsiveness is not a stated statutory exemption because it is a threshold matter – non-responsive material is material that is outside the scope of the request and therefore has not been requested.

3. Each redaction is additionally supported by a statutory exemption under AS 40.25.120(a)(4), which includes common law deliberative privilege under Alaska Supreme Court case law, or by Sitka General Code § 1.20.042, which declares municipal personnel records confidential except for narrow, enumerated information. The Municipality’s Legal Department reviewed each redaction for both responsiveness and exemption before production. The Administrator’s review only addressed the threshold issue of responsiveness, since non-responsive documents do not need to have exemptions applied to them, but exemption review did occur and still stands.
4. As to Item #4 specifically, the Clerk conducted a search reasonably calculated to locate responsive records and located none. The appellant’s assertion that emails show that an offer letter for a specific applicant “must” exist somewhere is misplaced, as that applicant was not hired by the municipality and the legal department has confirmed that no offer letter exists.

The Municipality therefore respectfully requests that, for the reasons stated herein, the Assembly uphold the production and deny the appeal in its entirety.

II. BACKGROUND

On February 12, 2026, the Municipal Clerk’s Office received the Request. It identified the records sought as follows:

1. Copies of employment contracts for all police officers hired with a sign on-bonus; 2. Records of all sign-on bonuses paid to Police Department Employees in 2025/2026; 3. Any emails or written transcripts approving a sign-on bonus for police department staff; 4. Any written records, emails, job ads, or exit interview [sic] notes regarding staff who delcined [sic] offers or resigned due to disputes.

Each of the four items contemplates research hypothesis, “which applicants did and did not get sign on bonuses,” “who resigned because they didn’t get a bonus,” that exceeds the Clerks’ duties under the APRA or would require the creation of a new record to answer, which is also not required by ARPA. Specifically:

Item 1 did not ask for mere clerical retrieval of “all employment contracts issued by the Police Department in 2025/2026,” but instead asked for the subset of employment contracts that contained a sign-on-bonus clause, requiring the Clerk’s Office, in consultation with the legal department to analyze the contents of each document to determine if it answered the appellant’s research question.

Item 2 asked for records of sign-on bonus payments, which would require the Municipality to create a compilation of financial records that does not currently exist.

Item 3 did not identify any specific records at all. It instead named an enormous potential corpus (“any emails or written transcripts”) and asked the Clerk to research and analyze which items within that corpus amount to “approving a sign-on bonus for police department staff.” The question requires analysis of which documents “approve” versus merely contain the word “sign-on bonus”,

which constitutes research and analysis that is outside of the scope of the Clerk's duties under APRA.

Item 4 contained a similar research and analysis question, asking the clerk to not just retrieve resignation materials from a specific department and time period but to analyze those records to determine the individual's subjective reason for resignation and to determine whether that reason matches the appellant's research hypothesis that some individuals "resigned due to disputes."

Despite the appellant's requests amounting to an impermissible research project, the Clerk's Office nevertheless made a good faith effort to retrieve available records. That search, including a keyword-based search from the IT department, and individual outreach to specific departments as shown in the attached affidavits, returned nearly 500 pages of material, over 80% of which was non-responsive in that it was not conceivably related to Appellant's request. For example, the keyword search apparently included the word "bonus," thereby returning records related to a staff pumpkin carving event at which employees could get "bonus points" for bringing something "festive or frightful" to the potluck.

The Clerks office and Legal Department reviewed the material in good faith and removed – either by deletion or redaction – non-responsive material. The Municipality produced 82 pages to Appellant on March 23, 2026. Several pages contained discrete redactions. Those redactions removed records that were non-responsive to Mr. Cranford's requests, and/or were either deliberative communications or confidential personnel matters that were exempt from disclosure as explained below. The Municipality also advised Mr. Cranford that the Clerk's search had not located records responsive to Item #4.

Mr. Cranford appealed to the Municipal Administrator. On March 24, 2026, Mr. Leach issued the first-level appellate determination, upholding the production because the 80% of records that were removed by either deletion or redaction were non-responsive to the Request. There was no reason to reach the question of exemptions, because responsiveness is a threshold matter. The Administrator did not make a determination as to the appropriateness of the requests themselves, nor did he assess which exemptions applied to the redacted material, because the responsiveness question fully resolved the matter.

Mr. Cranford now appeals to the Assembly pursuant to SGC § 1.20.080. The Municipality requests that the Assembly deny the appeal in its entirety on all three bases stated above: that the requests were impermissible requests for research that exceeded the scope of the Clerk's duties under APRA, that the Municipality nevertheless made a good faith effort to segregate and return the 20% of responsive records from the 80% of nonresponsive records, and that all redactions were additionally supported by an exemption, as determined by the legal office prior to production.

III. STANDARD OF REVIEW

APRA creates a presumption of public access to "public records" held by a public agency.¹ A "public record" is a record that exists and the statute reaches records "developed or received" by the entity and "preserved for their informational value or as evidence of the organization or

¹ AS 40.25.110(a).

operation of the public agency.”² Although not directly controlling on the municipality, 2 AAC 96.210, provide guidance to State agencies on how to interpret the scope, explaining that APRA does not require an agency to “create records, conduct research, or analyze records in response to a public records request.”³

APRA applies to the Municipality through its general terms. However, contrary to the appellant’s incorrect assertion, the State does not “occupy the field” of public records requests. The Sitka general code Chapter 1.20 (public records) and Chapter 1.21 (records management) are valid ordinances governing Sitka’s public record obligations and procedures in compliance with Alaska law.

The Municipality is obligated to make a good faith effort to locate and produce requested records that fall within the scope of the request and are not subject to statutory exemptions.⁴ Falling within the scope of the request, herein “responsiveness,” is a threshold matter, and the Municipality is not required to return records that are not within the scope of the request, whether or not an exemption applies.

More specifically, the Alaska Supreme Court has clarified that agencies have no obligation to generate documents that do not already exist. The requestor’s counsel in *Carter v. Alaska Public Employees Ass’n*, conceded that the University of Alaska was under no duty to create a list answering the requestor’s research question when responding to a public records request.⁵

When the Municipality does identify responsive documents that already exist, and determines that an exemption applies for withholding or redacting the document, the burden of proof is on the agency to justify the exemption.⁶ The *Gwich’in* case, cited by the applicant, shows firmly that responsive documents that contain pre-determinative deliberations are exempt from disclosure. And SGC 1.20.042(b) explicitly states that personnel records are confidential except for the following limited items:

1. The names and position titles of all municipal employees;
2. The position held by a municipal employee;
3. Prior positions held by a municipal employee;
4. Whether a municipal employee is in a partially exempt or exempt service;
5. The dates of appointment and separation of a municipal employee;
6. The compensation authorized for or received by a municipal employee; and
7. Time sheets submitted by a municipal employee.

² AS 40.25.220(3).

³ 2 AAC 96.210.

⁴ *Griswold v. Homer City Council*, 310 P.3d 938 (2013).

⁵ *Carter v. Alaska Public Employees Ass’n*, 663 P.2d 916 (1983) (“The University argues that AS 09.25.110–.120 cannot be used to compel an agency to create a record to fulfill a request for disclosure. The University contends that it does not presently maintain a listing of the “job location” of every classified employee and that the cost of generating such information would approach \$10,000. Thus, the University concludes, non-existing data regarding “job locations” should not be subject to disclosure under the public records statute. We find that it is not necessary to address this issue as counsel for appellee at oral argument conceded that the University of Alaska is under no duty to create a new record and that appellee would be satisfied to review existing relevant data in the University’s possession.”)

⁶ *Gwich’in*, 10 P.3d at 579–81

IV. ARGUMENT

A. The Request submitted research question to the Clerk that exceeded the scope of the Clerk's duties under ARPA, and any search the Clerk performed was an above-and-beyond effort at good faith compliance.

APRA's disclosure obligation runs to records that the agency has "developed or received" and that already exist.⁷ It does not extend to analysis the agency performs on those records in response to a requester's subject-matter goals. That limit is made explicit in the context of state agencies in 2 AAC 96.210, which provides that agencies are "not required to create records, conduct research, or analyze records in response to a public records request," and is confirmed by the Alaska Department of Law's APRA guidance, which reads the statute to the same effect. Federal FOIA doctrine, from which the Alaska Supreme Court draws when appropriate, explains that the statute reaches records the agency has in fact created or obtained.⁸ And more specifically that the agency is not required to "create" or compile information that does not exist in the form requested.⁹

Here, the requests were improper because they asked the clerk to complete research questions or produce new documents to answer a research question, instead of clerically retrieving documents. Item 1 asks the clerk not just to produce all police officer contracts for a specific period, which the requestor can then review to satisfy his curiosity about sign-on bonuses. But it instead asks the Clerk to act outside the scope of her duties to research which police officers, if any, received sign on bonuses before producing related records.

Item 2, to the extent that it contemplates financial records, and not just emails or policies authorizing bonuses, would require the clerk to research which officers got bonuses and compile that information into a new record, an "all sign-on bonus transactions list," that is not currently kept by the Municipality's financial department.

Item 3 does not identify particular emails or transcripts that the clerk can look for and return to the requestor. It instead proposes a research project in which the clerk is required to analyze which emails and transcripts, if any, in the city's possession, constitute "approval" of sign-on bonuses versus those which merely discuss, refer to, reference, deny, etc. sign-on bonuses or don't discuss sign-on bonuses at all.

Item 4 goes even farther into research that exceeds the Clerk's authority, asking the clerk to review a broad swath of potentially responsive records to analyze former staff members' subjective reasons for terminating employment.

⁷ AS 40.25.220(3).

⁸ *Kissinger v. Reporters Comm. for Freedom of the Press*, 445 U.S. 136, 152 (1980) ("Following FOIA's enactment in 1966, the Attorney General issued guidelines for the use of all federal departments and agencies in complying with the new statute. The guidelines state that FOIA 'refers, of course, only to records in being and in the possession or control of an agency. . . . [It] imposes no obligation to compile or *procure* a record in response to a request.'" *citing* Attorney General's Memorandum on the Public Information Section of the Administrative Procedure Act 23–24 (June 1967), Source Book I, pp. 222–223).

⁹ *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 161–62 (1975) ([FOIA] only requires disclosure of certain documents which the law requires the agency to prepare or which the agency has decided for its own reasons to create); *Zemansky v. EPA*, 767 F.2d 569, 573–74 (9th Cir. 1985).

A properly framed records request identifies a record that the agency can retrieve without analyzing every line within it to decide whether it satisfies the *purpose* for which the requestor is seeking documents. “All employment contracts issued by the Police Department between January 1, 2025 and February 3, 2026” is a proper records request because Clerk can request offer letters from the Human Resources director, check for compliant dates, and produce the records (subject to exemptions) without analyzing whether the documents is useful for the substantive question that the requestor is investigating. The Clerk is not a personal investigator for citizens. She is records custodian, and the Clerk’s obligations under APRA are custodial in nature.

Because all of the appellant’s requests amounted to improper requests for research and analysis, or creation of documents, the Clerk was under no obligation to produce any records at all. Her search through over 400 pages of irrelevant materials to find 80-or-so pages of responsive records went above and beyond the call of duty. The applicant’s assertion that the Clerk did not make a good faith effort to respond to his improper requests, is patently false.

B. Segregation of Non-Responsive Content from Mixed-Subject Documents Was Proper.

Because of the overly broad, research-oriented nature of the appellant’s request, the Clerk’s records search returned nearly 500 pages of material, of which only 20% were conceivably responsive to the applicant’s request. The keyword searches that IT performed swept in sign-on bonuses for linemen in the electric department, emails regarding resignations from other departments, “bonus” point in a potluck event, the “bonus” of a present at a conference already being registered, etc. that were clearly not within the scope of the request. The Municipality appropriately segregated non-responsive material from responsive material either by removal of the non-responsive records, or where removal of non-responsive records was impossible because they occurred on the same page as responsive material, by redaction.

The Municipality was not required to cite an exemption for the 400 or so pages of records removed as non-responsive, because non-responsive items are, by definition, not requested. Mr. Leach’s March 24, 2026, determination identified the responsiveness question, found that the excised content lay outside the scope of Items 1–4, and affirmed the production on that basis. Because the Administrator did not rest on an exemption, the requirement to identify an exemption was not triggered. The threshold segregation of non-responsive material was dispositive.

C. Each Redaction was Supported by a Statutory Exemption Under AS 40.25.120(a)(4) or SGC § 1.20.042.

Additionally, the redacted items in the production are supported by statutory exemptions, and the Legal Department reviewed each redacted passage for both responsiveness and exemption before production.

Pre-Decisional, Deliberative-Process Communications are exempt from disclosure. AS 40.25.120(a)(4) exempts records “required to be kept confidential by a federal law or regulation or by state law.” Because “State law” includes both statutory law and common law, the Alaska Supreme Court has consistently held that this provision to incorporate Alaska’s deliberative-process privilege, which protects pre-decisional, deliberative communications among agency

personnel.¹⁰ The doctrine protects pre-decisional recommendations, options, and internal analysis; it does not protect final agency action.¹¹

In the present matter, records showing final agency determinations including policies authorizing sign-on bonuses for police generally, and for specific potential hires, were provided. However, some of the records were policy discussions, floating ideas and making recommendations about difficult-to-fill positions within the police department, including dispatchers, and other deliberative matters prior to any final determination, which were both non-responsive and pre-decisional, deliberations. They reflect internal recommendations and assessments, not final municipal action. Such records, whether they appear independently or in mixed emails with other topics, are exempt under AS 40.25.120(a)(4).

Personnel Records are Confidential Under Sitka General Code § 1.20.042 and are exempt from disclosure except for the items specifically listed as being available for public inspection. That local ordinance is an independent, Sitka-specific source of confidentiality and is not preempted by any state law.¹² To the extent personnel content was redacted, the Municipality acted under SGC § 1.20.042, which parallels the confidentiality afforded state employee personnel records under AS 39.25.080.

Exemption supported redactions:

Page 1, 17, 18, 19, 23, 30, 31, 38, 42, 46, 62, 63, 64, 68, 75, 76 – personnel information not on the list of what can be opened for inspection under SGC § 1.20.042.

Page 16, 61 –deliberations regarding hard to fill dispatcher positions redacted under AS 40.25.120(a)(4).

Page 28, 73 – deliberations regarding scheduling and compliance with PSEA contract obligations redacted under AS 40.25.120(a)(4).

Page 29, 74 – deliberations on compliance with PSEA contract obligations redacted under AS 40.25.120(a)(4).

D. The Appellant’s assertion that emails show that records are omitted is misplaced.

Mr. Cranford asserts that because there are emails discussing putting together an offer letter for a certain applicant, the lack of the offer letter in the provided records shows that the search was incomplete. The legal department has confirmed with human resources that there is no offer letter for that particular applicant, as the Municipality did not move forward with that individual’s hiring process.

The appellant’s assertions that that he has knowledge of records existing that the Municipality has failed to produce, show that his records request was not only an improper request for research, in which Mr. Cranford had a hypothesis that he wanted the clerks to go digging for support of, but

¹⁰ *Gwich’in*, 10 P.3d at 578–82; *Fuller v. City of Homer*, 75 P.3d 1059, 1065 (Alaska 2003) (privilege applies to municipalities).

¹¹ *Capital Info. Grp.*, 923 P.2d at 35–36.

¹² *City of Kenai*, 642 P.2d at 1325–26.

that his efforts were a deliberate attempt to cast a wide net for a fishing expedition that is well outside of the scope of the statutorily contemplated purposes of the public records process.

V. CONCLUSION AND REQUESTED RELIEF

The Appellant's public records request was an improper attempt to have the Clerk's office complete research on his behalf, outside of the scope of their duties under ARPA. The Clerk's office was not required to engage in research, analysis, or document creation in responding to this public records request.

That the Clerk's office nevertheless completed a search that returned over 500 pages of records and segregated out the 80% of records that were non-responsive, producing 82 pages of responsive records, shows a good faith effort to interpret Mr. Cranford's request as a public records request and to provide as much responsive material as was available. The segregated records, whether by deletion or redaction, were properly removed prior to release. And the redacted records within the production were additionally reviewed for and justified by statutory exemptions.

The Clerk's Office made a comprehensive, good faith effort, to make the materials sought by Mr. Cranford available for his review as governed by applicable laws.

For the reasons stated above, the Assembly should uphold the production, and the appeal should be denied in its entirety.

Respectfully submitted this 22nd day of April, 2026.

**BEFORE THE ASSEMBLY
OF THE CITY AND BOROUGH OF SITKA**

In the Matter of the City and Borough of Sitka)
Assembly sitting as the Appeal Board to hear the)
appeal of the decision denying or partially denying)
Public Records Request filed by Austin Cranford.)
AUSTIN CRANFORD,)
Appellant,)
CITY AND BOROUGH OF SITKA,)
Appellee.)

AFFIDAVIT OF HOLLEY BAYNE

STATE OF ALASKA)
FIRST JUDICIAL DISTRICT) ss:

I, HOLLEY BAYNE, being first duly sworn, upon oath, state as follows:

1. I am the Deputy Municipal Clerk for the Appellee.
2. This affidavit is submitted in support of Appellee’s position to uphold the partial denial of Appellant’s Public Records Request (“PRR”) dated February 3, 2026.
3. On February 3, 2026, I received a PRR from Mr. Cranford. I reviewed the request and met with Sara to discuss how to route the request and found it was too broad to route.
4. I called Mr. Cranford and left a voicemail asking him to call me to discuss the PRR. Mr. Cranford did not call me back. At the February 10, 2026, Assembly meeting he noted at public comment that he submitted a PRR with “no response” from the clerk’s office about his request, although I had already left him a voicemail asking him to call me back to help with his PRR.
5. On February 12, 2026, I called Mr. Cranford and left another voicemail. He called back shortly afterwards, saying he was in a meeting. I spent about 10 minutes on the phone walking him through suggestions on how to revise the wording on his request so we could narrow it down to documents that we could search for. He emailed me the revised request after the phone call at 12:38 PM. I sent the PRR to Grant Turner, Josh Branthoover, John Leach, Chief Goeden, with a cc to Lt. Achee. The due date on the request was determined to be March 2.
6. On February 13, 2026, Mr. Leach responded with an email noting what documents he had, and suggesting I check with Finance for financial records, and letting me know what other departments might have records in response to the request.

7. On February 17, 2026, I sent a reminder for records to Grant Turner, Josh Branthoover, Chad Goeden, and Amanda Diehl.

8. On February 19, 2026, I sent another reminder to Grant Turner, Josh Branthoover, Chad Goeden, and Amanda Diehl. Chief Goeden responded and didn't think anything was pending from PD. After talking with Mr. Branthoover, it was agreed the last records pending were from Grant Turner. Mr. Turner said he would be running search results overnight and would have these to me tomorrow.

9. On February 20, 2026, I received the final records from Grant Turner and sent all records to Mindy Lowrance, Legal Assistant, for review. Josh Branthoover noted that some of the records were not releasable due to being in personnel files.

10. On March 4, 2026, I sent a reminder to Ms. Lowrance that the due date for responding to the PRR was March 2, 2026.

11. On March 5, 2026, Mr. Cranford emailed me asking for an update. I responded that same day that I had checked with Ms. Lowrance and was told the review would be done by the following Monday.

12. On March 9, 2026, I talked to Ms. Lowrance and was told the PRR was still under review, that final review was needed from Rachel Jones, Municipal Attorney, who was out of office until March 20. I emailed Mr. Cranford with the update. Mr. Cranford emailed back with frustration about the delay.

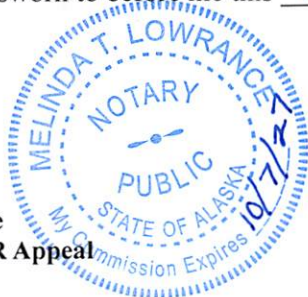
13. On March 23, 2026, I received the records from Ms. Lowrance. I then combined the documents, added a notarized certification page (signed by Sara Peterson, Municipal Clerk and notarized by me), added bates stamp, entered in tracking excel sheet, and saved on shared drive. The documents, consisting of 41 pages, were then emailed to Mr. Cranford.

14. After sending the documents to Mr. Cranford on March 23, 2026, Mr. Cranford emailed me with cc to Assembly, Administrator and Clerk about appealing. I did not respond as there were no questions for me in his email.

DATED this 17 day of April, 2026.

Holley Bayne
Holley Bayne

Subscribed and sworn to before me this 17th day of April 2026.



Melinda Lowrance
Notary Public for the State of Alaska
My commission expires: 10-7-27

**BEFORE THE ASSEMBLY
OF THE CITY AND BOROUGH OF SITKA**

In the Matter of the City and Borough of Sitka)
 Assembly sitting as the Appeal Board to hear the)
 appeal of the decision denying or partially denying)
 Public Records Request filed by Austin Cranford.)
)
 AUSTIN CRANFORD,)
)
 Appellant,)
)
 CITY AND BOROUGH OF SITKA,)
)
 Appellee.)

AFFIDAVIT OF JOSH BRANTHOOVER

STATE OF ALASKA)
) ss:
 FIRST JUDICIAL DISTRICT)

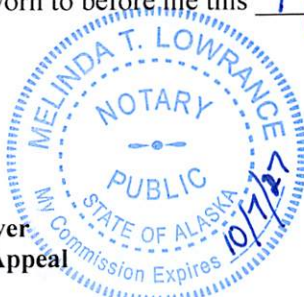
I, JOSH BRANTHOOVER, being first duly sworn, upon oath, state as follows:

1. I am the Assistant Municipal Administrator for the Appellee.
2. This affidavit is submitted in support of Appellee’s position to uphold the partial denial of Appellant’s Public Records Request (“PRR”) dated February 3, 2026.
3. I received the PRR notification regarding this matter on February 12, 2026. I began working to ascertain what public records I was aware of and could produce that were relevant to the PRR.
4. I identified policy documents/memos/etc. that were related to the PRR and to identify what is releasable or confidential from an employee personnel file based on State law and CBS code.
5. I provided all documents that I was aware of relevant to the PRR to the Deputy Municipal Clerk.

DATED this 17th day of April, 2026.

 Josh Branthoover

Subscribed and sworn to before me this 17th day of April 2026.



Melinda Lowrance
 Notary Public for the State of Alaska
 My commission expires: 10-7-27

**BEFORE THE ASSEMBLY
OF THE CITY AND BOROUGH OF SITKA**

In the Matter of the City and Borough of Sitka)
Assembly sitting as the Appeal Board to hear the)
appeal of the decision denying or partially denying)
Public Records Request filed by Austin Cranford.)
AUSTIN CRANFORD,)
Appellant,)
CITY AND BOROUGH OF SITKA,)
Appellee.)

AFFIDAVIT OF JEAN ACHEÉ

STATE OF ALASKA)
FIRST JUDICIAL DISTRICT) ss:

I, JEAN ACHEÉ, being first duly sworn, upon oath, state as follows:

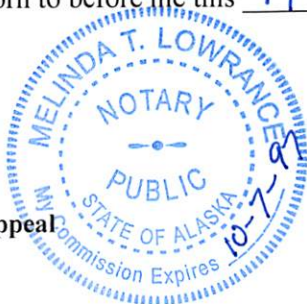
1. I am a Lieutenant with the Sitka Police Department.
2. This affidavit is submitted in support of Appellee's position to uphold the partial denial of Appellant's Public Records Request ("PRR") dated February 3, 2026.
3. I received the request from the Deputy Municipal Clerk, Holley Bayne.
4. After reviewing the PRR, I determined the police department did not have any records relevant to the request, and that if we had received anything, those records would have been turned over to the Human Resources Department. Copies would not have been retained in any Sitka Police Department files. I conferred with my supervisor at that time, Chief Chad Goeden, who concurred.
5. Chief Goeden emailed Deputy Municipal Clerk Holley Bayne informing her that the Sitka Police Department had no documentation that was relevant to this PRR.


DATED this 17TH day of APRIL, 2026.



Jean Acheé

Subscribed and sworn to before me this 17th day of April 2026.






Notary Public for the State of Alaska
My commission expires: 10-7-27

DATED this 20 day of April, 2026.


John Leach

Subscribed and sworn to before me this 20th day of April 2026.


Notary Public for the State of Alaska
My commission expires: 10-7-2027

