

Division of Elections  
Attn: Carol Beecher, Director  
PO Box 110017  
Juneau, AK 99811

December 1, 2024

**AMENDED APPLICATION FOR RECOUNT – BALLOT MEASURE 2**

Pursuant to AS 15.22.440, Carmela Warfield, Alaska Republican Party (“ARP”) Chairman and a qualified Alaska voter; Jason Warfield, ARP Finance Committee member and a qualified Alaska voter; Zackary Gottshall, ARP Vice Chair and a qualified Alaska voter; Cynthia Henry, ARP National Committeewoman and a qualified Alaska voter; Trevor Shaw, ARP Secretary and a qualified Alaska voter; Cheryl Markwood, ARP Assistant Secretary and a qualified Alaska voter; Ryan McKee, ARP Finance Chair and a qualified Alaska voter, Sandra Graham, ARP Regional Representative and a qualified Alaska voter, Brian Hove, ARP National Committeeman and a qualified Alaska voter; Barb Tyndall, ARP Regional Representative and a qualified Alaska voter; CJ Koan, ARP Regional Representative and a qualified Alaska voter; Donald Handeland, ARP Regional Representative and a qualified Alaska voter; Michele Hartline, ARP Regional Representative and a qualified Alaska voter do hereby collectively apply for a recount of the votes cast in the November 5, 2024 General Election for Ballot Measure 2.

**QUALIFIED VOTERS**

Carmela Warfield, Jason Warfield, Zackary Gottshall, Cynthia Henry, Trevor Shaw, Cheryl Markwood, Ryan McKee, Sandra Graham, Brian Hove, Barb Tyndall, CJ Koan, Donald Handeland, and Michele Hartline (hereinafter collectively referred to as “Requestors”) are all qualified Alaska voters. Accordingly, the thirteen qualified Alaska voters collectively meet the threshold to request this recount of the votes cast in the 2024 General Election for Ballot Measure 2 per AS 15.20.440(a).

Collectively, we designated Carmela Warfield as Chair pursuant to AS 15.20.440.

### **SCOPE OF RECOUNT**

Requestors respectfully request an election recount of the results of the November 5, 2024 General Election for Ballot Measure 2.

### **NECESSITY FOR RECOUNT**

According to the election results certified on November 30, 2024, Ballot Measure 2 was defeated by 737 votes – .22 percent. The certified results show that a total of 320,985 Alaska voters voted for or against Ballot Measure 2. However, prior to certification, the unofficial results showed that Ballot Measure 2 lost by only 664 votes – .2 percent. Moreover, the unofficial results showed that 320,574 Alaska voters voted for or against Ballot Measure 2, which is 411 less than the certified results. The Division added these 411 votes to the total with no explanation of why they had not been counted previously. Given the same, it is likely that a mistake(s) was made in the tabulation of the results, necessitating a recount to ensure the accuracy of the results.

Moreover, Requestors are aware of many ballot challenges that were rendered and overruled during the review of questioned ballots and during the regional counts of absentee and questioned ballots. Specifically, Requestors are aware that many absentee ballots required transcription and that errors were challenged and overruled. Given the same, it is likely that a mistake was made in the tabulation of the results, necessitating a recount to ensure the accuracy of the results.

Finally, and in addition to that above, given the extremely close margin of defeat, it is likely that a mistake was made in the final tabulation of results. This also necessitates a recount of the election results to ensure their accuracy.

### **COST OF RECOUNT**

According to the election results certified on November 30, 2024, the total votes in favor of Ballot Measure 2 was 160,124, the total number of votes cast in opposition to Ballot Measure 2 was 160,861, and the opposition's margin of victory was .22 percent. Because the difference in the number of votes cast in favor of Ballot Measure 2 was less than .5 percent of the total votes in opposition to Ballot Measure 2, this application does not require a deposit and the State of Alaska shall bear the cost of this recount. *See* AS 15.20.450.

### **DESIGNATED REPRESENTATIVES**

- Stacey C. Stone  
(Alternates: Richard R. Moses & Anna E. Cometa)  
c/o Holmes Weddle & Barcott, PC  
701 W. 8<sup>th</sup> Ave., Ste. 700  
Anchorage, AK 99501
- Mark P. Meuser  
(Alternates: Harmeet Dhillon & Mike Columbo)  
c/o Dhillon Law Group  
177 Post St., Ste. 700  
San Francisco, CA 94108

### **CONCLUSION**

We have retained the law firms of Holmes Weddle & Barcott, PC and Dhillon Law Group Inc. We respectfully request that any communication concerning this recount be made to Richard R. Moses of Holmes Weddle & Barcott, PC. Mr. Moses can be reached by phone at (907) 274.0666 or by email at [rmoses@hwb-law.com](mailto:rmoses@hwb-law.com).

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