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

8 DONNA PATRICK, JAMES K.  
BARNETT, and JOHN P. LAMBERT,

9 Appellant,

10 vs.

Case No. 3AN-18-\_\_\_\_\_ CI

11 INTERIOR VOTERS FOR JOHN  
12 COGHILL, WORKING FAMILIES OF  
ALASKA, and THE ALASKA PUBLIC  
13 OFFICES COMMISSION,

14 Appellees.  
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16 **STATEMENT OF POINT ON APPEAL**

17 Alaska Statute 15.13.070 places limits on the amount of money individuals or  
18 groups may contribute to independent expenditure groups during any election cycle.  
19 Complainants Donna Patrick, James K. Barnett, and John P. Lambert filed complaints  
20 with the Alaska Public Offices Commission because they identified two independent  
21 expenditure groups that had accepted contributions that greatly exceeded the statutory  
contribution limits for the last election cycle. The Commission rejected the complaints

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because it concluded that, as a matter of federal constitutional law, statutory limits on contributions to independent expenditure groups are unconstitutional and may not be enforced. The single Point on Appeal is:

1. Must Alaska’s statutory limits on contributions to independent expenditure groups be enforced because, contrary to the Commission’s conclusion in this case, the limits are consistent with the anti-corruption principles of the First Amendment to the U.S. Constitution?

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DATED this 30<sup>th</sup> day of March, 2018.

DAVIS WRIGHT TREMAINE LLP  
Attorneys for Plaintiffs

By   
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Certificate of Service

On the 30<sup>th</sup> day of March, 2018, a true and correct copy of the foregoing document was sent by U.S. Mail, to the following parties:

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