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

In the Matter of the	)	
	)	Case No. 3AN-21-08869CI
2021 Redistricting Plan.	)	3PA-21-02397CI
	)	3VA-21-00080CI

AFFIDAVIT OF VICKI ANN OTTE

Affiant, Vicki Ann Otte, being first duly sworn upon her oath, deposes and states as follows:

1. I was born in Fairbanks, Alaska in 1954 and was raised in McGrath, Alaska until I moved to Fairbanks in 1970. Since leaving, I have been back to McGrath many times for work and service on the village Native Corporation Board for the McGrath area.

2. My grandmother was Pauline Chappel and she resided in the distinct community of Kokrine near Ruby, Alaska. She was full-blooded Athabascan Indian.

3. My mother was Anna Egrass. She was born in Kokrine and lived in the Ruby, Alaska area until she was sent to the Catholic Mission in Holy Cross, Alaska. She was also full-blooded Athabascan Indian.

4. Around 1953, my mother moved to McGrath, Alaska where she met my father, Peter Egrass. They were married during that year. My father was non-Native. My parents had 5 children. I was the oldest.

DEFENDANT'S
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5. In 1971, I became an original Doyon, Limited (Doyon) Shareholder, as well as an original MTNT, Limited (MTNT) Shareholder. Doyon is one of 13 regional corporations formed through the Alaska Native Claims Settlement Act of 1971. MTNT stands for 4 villages formed into a village Corporation in the MTNT region (McGrath, Takotna, Nikolai and Telida).

6. MTNT is comprised of 4 of the villages within the Doyon/Dena' Nena' Henash, better known as the Tanana Chiefs Conference (TCC), region of Interior Alaska. The Doyon/TCC villages are predominantly Athabascan and share common family, cultural, and traditional ties.

7. I am an enrolled member of the McGrath Native Village Council, one of the federally recognized Indian Tribes located in the Doyon/TCC region.

8. I have a long history of participation in public service in Alaska.

9. In 1977, I went to work in the office of Governor Jay Hammond in Juneau, and served in several capacities until 1981, including as the Governor's Receptionist, Administrative Assistant to the Chief of Staff; Secretary to the Governor; and Special Assistant to the Governor.

10. In 1983, I graduated from the first Alaska Native Leadership Program, which was a year-long leadership training program about the Alaska Native Claims Settlement Act (ANCSA) and the formation of Native Corporations, along with training to be a successful Native leader.

11. Also in 1983, I ran for the Board of Directors for my village corporation, MTNT, and was elected. I served on the Board until 2014 (31 years). I served many of those years as the Chair of the Board of Directors.

12. In 1991, I moved back to McGrath and served as general manager of MTNT.

13. The ANCSA Regional Association was formalized in 1998, and I was hired as its first executive director in 1999 and served until 2011. This association is comprised of the Presidents and CEOs of the 12 existing regional Native Corporations organized under ANSCA.

14. In 2011, I left the ANSCSA Regional Association and accepted a position as CEO of MTNT, Limited, where I served until 2014.

15. In 2015, I began working for the Cook Inlet Region, Inc., the ANCSA Regional Corporation for the Cook Inlet Area, also known as CIRI. One of my duties was to maintain the art inventory and data base. Through this duty and through my service as a board member of Koahnic Broadcast Corporation, where I also served as an art ambassador for Koahnic's annual Alaska Native art auction, I became familiar with differences and similarities in Alaska Native art traditions across the State of Alaska.

16. I have also served in a number of other professional and civic capacities, including:

a. Co-founder, board member and chair of Anchor Arms Inc./DBA Safe Harbor Inn;

b. Director of United Way;

c. Trustee of the Doyon Foundation;

d. Council member of the Alaska Judicial Council;

e. Board member of McGrath Native Village Council; and

f. Village Representative to the Alaska Federation of Natives (AFN).

17. These experiences with State-wide and regional Alaska Native and civic organizations have exposed me to a broad range of Alaska Native art, language, and cultural traditions.

18. During the 2000 redistricting cycle, I served as the Chair of the Alaska Redistricting Board.

19. I am very familiar with the requirements of the Alaska Constitution for the Redistricting Board to draw House districts that are compact, contiguous, relatively socio-

economically integrated, and with populations as near as practicable to the population of the State (according to the census) divided by forty.

20. I am also very familiar with the difficulties of that task, and the need for the Redistricting Board to make difficult decisions that will inevitably leave some areas of the State less satisfied with the outcome of the redistricting process – it simply is not mathematically or geographically possible to draw a map that places every Alaska community or voter in their preferred district.

21. I have reviewed the 2021 Proclamation Redistricting Map, and am pleased to note that the Redistricting Board respected the socio-economic integration of communities across the State, including the Interior Region of Alaska, and did not push Interior communities into predominantly coastal districts.

22. For example, the 2021 Proclamation Map keeps the villages of Grayling, Anvik, Shageluk, and Holy Cross (also known as the GASH villages) within the socio-economically integrated Interior district (District 36).

23. The GASH villages are deeply connected to the other villages within the Doyon/TCC Region, and are all part of the Iditarod Area School District, along with McGrath, Nikolai, and Takotna.

24. These villages, along with all the other Athabaskan communities within the Doyon/TCC region participate in shared gatherings and events, such as the Denakkanaaga (Elders annual gathering/conference), Tanana Chiefs Conference, Doyon Annual Meeting, Athabascan Fiddler gatherings and other Athabascan gatherings that occur throughout the year.

25. The villages within the Doyon/TCC Region share in the social services provided by TCC, and have pooled federal funding provided through the Indian Self-Determination Act and

other federal funding sources. For example, Village Public Safety Officers in the Doyon/TCC Region are employed by TCC, and the Tribal Administrator of the McGrath Native Village Council is employed by TCC.

26. The traditional trade links all across the Doyon/TCC Region villages have existed since time immemorial. For example, human remains of 3 people found buried in McGrath on MTNT lands are thought to be of Athabascan origin from 500 to 1,000 years ago. Two shards of obsidian a volcanic glass used for prehistoric tools from ancient volcano near Hughes show that there was quite a trade network at that time.[1]

27. The historical and contemporary trade and traditional links between Interior Athabaskan communities include the Ahtna region. For example, the art, food and other cultural traditions of the Doyon/TCC region and Ahtna regions are very similar. They are very different, on the other hand, from those of the coastal regions of the State. For example, the Doyon/TCC and Ahtna communities subsist on similar diets of freshwater-caught fish, moose and caribou. Southwest and western Alaska subsists on a diet of seal, fish, sea otter and whale.

28. House District 36 as mapped in the 2021 Proclamation Map is comprised of a socio-economically integrated area.

29. Similarly the Board's proposed versions 1, 2, 3, and 4, along with the map proposed by the coalition of Doyon, TCC, Fairbanks Native Association, Ahtna, and Sealaska, all mapped Interior and Western Alaska in ways that respected the socio-economic integration of the Doyon/TCC villages.

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[1] https://fm.kuac.org/science/2012-11-09/rare-human-remains-may-hold-secret-to-alaskas-ancient-past; https://www.tananachiefs.org/tochak-mcgrath-discovery.

30. However, some of the proposals brought before the Redistricting Board entirely failed to respect the distinct socio-economic integration of the Interior region, and instead paired villages in the Western part of the Doyon/TCC region with coastal communities that do not share any socio-economic integration with them.

31. For example, I have reviewed the Map labeled Valdez Option 1.

32. As an initial matter, based on my experience as the former Chair of the Alaska Redistricting Board, I question the utility of proposed maps that do not show all forty house districts. In my experience, it is much easier to gloss over difficulties and "trouble spots" when it is not necessary to make the population math work for the whole state.

33. More specifically, the districts that are actually mapped out and proposed in Valdez Option 1 do not comport with the constitutional requirements for House districts.

34. Valdez proposed, for example, a district stretching from Mekoryuk Island in the Bering Sea all the way to the border of the North Slope Borough.

35. The only hub community in this proposed district is Bethel, and there is no socio-economic integration whatsoever between Bethel and the Doyon/TCC villages of Bettles, Allakaket, Huslia, Koyokuk, Nulato, Galena, Ruby, Kaltag, and the like – these Doyon/TCC villages share socio-economic integration with themselves and the rest of the Interior, not the coast and the Calista region.

36. I have reviewed the map proposed by Alaskans for Fair and Equitable Redistricting/Calista (AFFER). This map pairs Grayling, Anvik, Shageluk, Holy Cross, Takotna, McGrath, Nikolai, and Lake Minchumina with the proposed Nome district (District 39). These Doyon/TCC villages share socio-economic integration with themselves and the rest of the Interior,

not the coast and the Bering Straits Native Corporation region. AFFER's Proposed District 39 is not comprised of a relatively socio-economically integrated area.

37. I have reviewed the map proposed by Alaskans for Fair Redistricting (AFFR). This map pairs Grayling, Anvik, Shageluk, Holy Cross, Takotna, McGrath, Nikolai, Lake Minchumina, Kaltag, Nulato, Koyukuk, Galena, Ruby, Tanana, and Minto with the proposed Nome district (District 39). These Doyon/TCC villages share socio-economic integration with themselves and the rest of the Interior, not the coast and the Bering Straits Native Corporation region. AFFR's Proposed District 39 is not comprised of a relatively socio-economically integrated area.

38. I have reviewed the map proposed by the Alaska Senate Minority Caucus. This map pairs Grayling, Anvik, Shageluk, Holy Cross, Takotna, McGrath, Nikolai, Lake Minchumina, Kaltag, Nulato, and Koyukuk with the proposed Nome district (District 39). These Doyon/TCC villages share socio-economic integration with themselves and the rest of the Interior, not the coast and the Bering Straits Native Corporation region. In addition, the Alaska Senate Minority Caucus map proposed including the coastal Chugach community of Cordova in the rural Interior district (District 36). There is no socio-economic integration whatsoever between Cordova and Doyon/TCC communities of the Western Interior, such as Galena and Ruby. The Senate Minority Caucus' Proposed Districts 36 and 39 are not comprised of a relatively socio-economically integrated area.

39. My testimony with respect to proposed Districts 36 and 39 as mapped in the Valdez, AFFER, AFFR, and Senate Minority Caucus proposed maps does not suggest that I think that the other districts proposed by these third parties are constitutional.

40. On the other hand, based on my review of the 2021 Proclamation Map, I do think the House districts in that map comport with the requirements of the Alaska Constitution.

Further your affiant sayeth naught.

Vicki Ann Otte

Vicki Ann Otte

SUBSCRIBED AND SWORN to before me in Wasilla, Alaska, this 12th day of January, 2022.

Notary Public in and for Alaska
My commission expires: 11/16/2025

Certificate of Service

I certify that on January 12, 2022, a copy of the foregoing document was served via email on:

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/s/ Karin Gustafson
Karin Gustafson