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Pro Se Movant / Proposed Amicus Curiae

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CLERK, U.S. DISTRICT COURT
ANCHORAGE, AK

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

STATE OF ALASKA; CAROL
BEECHER, in her official capacity as
Director of the Division of Elections of the
State of Alaska; the ELECTION BOARDS
OF THE STATE OF ALASKA; and the
STATE BALLOT COUNTING REVIEW
BOARD OF THE STATE OF ALASKA,

Defendants.

Case No. 3:26-cv-00376-SLG

**MOTION FOR LEAVE TO FILE
BRIEF OF AMICUS CURIAE
THOMAS A. LAMB IN
OPPOSITION TO PLAINTIFF'S
REQUESTED RELIEF**

Thomas A. Lamb respectfully moves for leave to file the attached brief as amicus curiae. The Federal Rules of Civil Procedure do not address amicus filings, and the Court has broad discretion to accept a brief that offers useful information or perspective the parties may not supply.

I. IDENTITY AND INTEREST OF PROPOSED AMICUS

Movant is a lifelong Alaskan, a registered voter, and a former candidate for the Alaska State Senate (District D, 2020). He participated as amicus curiae in *State of Alaska, Division of Elections v. Sullivan*, No. S-19935, the Alaska Supreme Court

appeal that resolved the ballot-access dispute underlying this case. The court's order states that it was entered on consideration of the amicus briefs and lists his among those filed on behalf of Mr. Sullivan. Order at 1 & n.1, No. S-19935 (Alaska June 29, 2026). Movant has already cast his ranked-choice ballot in the November 3, 2026 general election and has a direct interest in having that ballot counted and the election certified under Alaska law.

II. REASONS THE BRIEF WILL ASSIST THE COURT

The Alaska Supreme Court affirmed Daniel J. Sullivan, Jr.'s ballot access by summary order on June 29, 2026, and has not yet issued its full opinion. Movant can describe the issues presented in that appeal, which bear directly on the comity concerns raised by Plaintiff's request. The brief also addresses questions the named Defendants may not press, because the Division of Elections previously took the position Plaintiff now advances: whether the National Voter Registration Act's statement of purpose creates any certification duty; whether a post-election reallocation of votes is consistent with *U.S. Term Limits, Inc. v. Thornton* and *Cook v. Gralike*; and whether the claim is ripe.

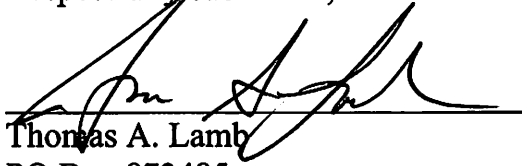
III. TIMELINESS AND NO PREJUDICE

This motion is filed promptly after the Complaint, at the outset of the case. The brief is concise and will not delay proceedings.

For these reasons, Movant respectfully requests leave to file the attached brief.

DATED: OCTOBER 22ND, 2026, at Wasilla, Alaska.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tom Lamb', is written over a horizontal line.

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