

IN THE SUPREME COURT OF THE STATE OF ALASKA

**Damen Aguila, Mario Lanza
Dyer, and Jamie
Scarborough,**

Appellants,

v.

Municipality of Anchorage,

Appellee.

Supreme Court Case No. S-_____

Superior Court Case No. 3AN-25-
04570 CI

STATEMENT OF POINTS ON APPEAL

Damen Aguila, Mario Lanza Dyer, and Jamie Scarborough intend to rely on the following points on appeal:

1. The superior court erred in holding that the Municipality of Anchorage's prohibited campsite statutory regime at AMC 15.20.020.B.15 does not violate their right to be free from unreasonable seizures under the Alaska Constitution.

2. The superior court erred in holding that the Municipality's prohibited campsite regime does not violate their procedural due process right to adequate notice under the Alaska Constitution.

3. The superior court erred in holding that the Municipality's prohibited campsite regime does not violate their procedural due process right to be heard under the Alaska Constitution.

4. The superior court erred in holding that the Municipality's prohibited campsite regime does not violate their substantive due process

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right to be free from an unconstitutionally vague law under the Alaska Constitution.

5. The superior court erred in holding that the Municipality's prohibited campsite regime does not violate their right to be free from cruel and unusual punishment under the Alaska Constitution.

6. The superior court erred in holding that Appellants failed to plead a ripe privacy claim under the Alaska Constitution and in holding, in the alternative, that the Municipality's prohibited campsite regime does not violate their right to privacy under the Alaska Constitution.

7. The superior court erred in holding that the Municipality's prohibited campsite regime does not violate Alaska's constitutional provisions on public health and welfare.

Dated: June 17, 2026.

American Civil Liberties Union of Alaska Foundation

/s/ Eric Glatt

Eric Glatt, Alaska Bar No. 1511098

Helen Malley, Alaska Bar No. 2411126

Pro Bono Counsel for Appellants

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This Notice of Appeal uses a 13-point Century Schoolbook typeface.

Certificate of Service

On June 17, 2026, a true and correct copy of this filing was served by email on: Joseph Busa, Nicholas Mendolia, Zachary Schwartz, and Jessica Whilloughby.

/s/ Helen Malley

Helen Malley