

LEGAL SERVICES

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MEMORANDUM

April 18, 2026

SUBJECT: Single subject
(CSHB 211(JUD); Work Order No. 34-LS0848\N.3)

TO: Representative Dan Saddler
Attn: Dolores Neal

FROM: Megan A. Wallace
Chief Counsel 

Attached is the amendment you requested. Article II, sec. 13, of the Alaska Constitution¹ requires that all matters in an act must "fall under some one general idea, be so connected with or related to each other, either logically or in popular understanding, as to be parts of, or germane to, one general subject."²

Historically, the Alaska Supreme Court has interpreted Alaska's single subject rule to permit very broad subject matter in one bill without violating the single subject requirement. For example, the court has held that bills relating to such broad themes as "development of water resources,"³ "taxation,"⁴ "land,"⁵ "intoxicating liquor,"⁶ and "criminal law"⁷ are acceptable.⁸

¹ Art. II, sec. 13, Constitution of the State of Alaska provides, in relevant part, "Every bill shall be confined to one subject unless it is an appropriation bill or one codifying, revising, or rearranging existing laws."

² *Gellert v. State*, 522 P.2d 1120, 1123 (Alaska 1974) (internal citations omitted).

³ *Id.*

⁴ *North Slope Borough v. Sohio Petroleum Corp.*, 585 P.2d 534, 545 (Alaska 1978).

⁵ *State v. First Nat'l Bank of Anchorage*, 660 P.2d 406 (Alaska 1982).

⁶ *Van Brunt v. State*, 646 P.2d 872 (Alaska App. 1982).

⁷ *Galbraith v. State*, 693 P.2d 880 (Alaska App. 1985).

⁸ *Evans v. State*, 56 P.3d 1046, 1070 (Alaska 2002).

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HB 211 relates to prepaid legal plans. Your amendment adds the contents of HB 20, relating to fees for paper documents. It may be possible to categorize all these provisions as relating to "consumer protection." However, sec. 1 of HB 211 simply provides that prepaid legal plans are not insurance. There may be a question as to whether sec. 1 of HB 211 would fall under the single subject of "consumer protection"; therefore, your amendment does pose some single subject risk. As you are aware, failure to comply with the single subject requirement could jeopardize the entire underlying bill, if the bill is challenged.

If you proceed with offering this amendment, you may want to make a record as to what the new single subject of the legislation would be and how the provisions in HB 211 and HB 20 are related.

Please reach out with any questions you may have.

MAW:lei

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Attachment