STATE OF ALASKA DIVISION OF ELECTIONS OFFICE OF THE DIRECTOR

P.O. BOX 110017, JUNEAU, AK 99811-0017

APPLICATION FOR RECOUNT – DISTRICT 27 (AS 15.20)

ATTN: Gail Fenumiai, Director Alaska Division of Elections

Carolyn "Care" Clift, Robert Edward Clift, Donald Crafts, Susan M. Kent-Crafts, Lynne

Vaughn, James Mark Vaughn, Margaret Nelson, Brad Campbell, Shannon Carte, Jeff Garness and

Lisa Garness hereby apply for a recount of the State House race in the November 2020 general

election for House District 27 pursuant to AS 15.20.430-440. Pursuant to AS 15.20.430(a), we as

at least 10 qualified voters in House District 27 believe that mistakes have been made by an

election official that could change the outcome of the election. We are therefore eligible to file

this application.

The basis of this application is the following:

1. Failure to count votes cast for Lance Pruitt where the voter intent was clear.

2. Inclusion in the final vote count of multiple questioned ballots.

3. Failure to ensure that absentee voter ballot certificates were properly completed.

4. Failure to properly confirm the results following an electronic count given publicly

reported issues with the Dominion voting system recently acquired by the State of Alaska.

5. Last minute and unnoticed change in a precinct location resulting in voter confusion and

errors in the ways ballots or questioned ballots were cast and counted.

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Jeff Garness shall serve as the Chair for the qualified voters. The full name and mailing address of the two persons who shall represent us and be present and assist during the recount are:

PERSON 1 Stacey C. Stone

ADDRESS 701 W. 8th Ave., Ste. 700, Anchorage, Alaska 99501

PERSON 2 Joseph W. Geldhof

ADDRESS 2 Marine Way, Ste. 207, Juneau, Alaska 99801

As the official results certified by the Division indicate a 13-vote margin (equal to 00.14%) between the two competitors, no deposit is required and the State shall bear the cost of the recount pursuant to AS 15.20.450.

In connection with the recount, we are represented by the law firm of Holmes Weddle & Barcott, P.C. and request that any communications concerning this recount be made to Stacey C. Stone of that firm. Her email address is sstone@hwb-law.com, and she can be reached at (907) 274-0666.

Given the current global COVID-19 pandemic, this document may be signed in counterparts, each of which shall be deemed to be an original, but all of which together shall constitute one and the same instrument.

Date: Noc 1, 2020

Carolyn Care" Clift 6402 Hampton Dr.

Anchorage, AK 99504

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Robert Edward Clift

6402 Hampton Dr. Anchorage, AK 99504

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Donald Crafts

9611 Burning Bush Dr. Anchorage, AK 99507

Susan M. Kent-Crafts 9611 Burning Bush Dr.

Anchorage, AK 99507

Date: 1 Dec 2020

Lynne Vaughn 7400 Tikchik Cir. Anchorage, AK 99504

Date: DEC 202

James Mark Vaugun 7400 Tikchik Cir. Anchorage, AK 99504 Date: 12/1/2020

Margaret Nelson 10121 Middlerock Rd. Anchorage, AK 99507

Date: 12 1 2020

Brad Campbell 10121 Middlerock Rd. Anchorage, AK 99507 Date: 12-1-2020

Shannon Carte 4017 James Dr.

Anchorage, AK 99504

Date:

Jeff Garness 7320/E. Chester Heights Cir. Anchorage, AK 99504

Lisa Garness

7320 E. Chester Heights Cir.

Anchorage, AK 99504

CERTIFICATE OF SERVICE

The undersigned certifies that on this 2 day of December, 2020, a true and correct copy of the foregoing document was served via email to:

Gail Fenumiai, Director gail.fenumiai@alaska.gov

By: Legal Assistant

Holmes Weddle & Barcott, P.C.

The undersigned certifies that on this _______ day of December, 2020, a true and correct copy of the foregoing document was served via U.S. Mail to:

Gail Fenumiai, Director P.O. Box 110017 Juneau, Alaska 99811-0017

Office of the Attorney General P.O. Box 110300 Juneau, Alaska 99801-0300

Legal Assistant

Holmes Weddle & Barcott, P.C.