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November 16, 2020

Via U.S. First Class Mail, Email, and Facsimile: (702-455-2793)
jpg@ClarkCountyNV.gov

Joseph P. Gloria
Registrar of Voters
Clark County Election Department
965 Trade Drive, Suite A
North Las Vegas, NV 89030-7801

Re: Canvassing of the Clark County Commission District C Election

Dear Mr. Gloria:

The law firm of Hutchison & Steffen serves as legal counsel to the Stavros Anthony for County Commission campaign (the "Anthony Campaign"). As you prepare to report to the Clark County Board of Commissioners on the canvassing of the 2020 General Election returns on Monday, November 16th, we ask respectfully, on behalf of the Anthony Campaign, that you seriously consider delaying the presentation for approval of the vote from Clark County Commission District C.

As the Anthony Campaign reviewed Election Department voter data, some possible voting irregularities may have occurred in District C, including:

1. Over two dozen residents of District C have provided written statements that they had a ballot returned from their address by people who do not live there. This information has been researched and gathered by the Anthony Campaign's field and phone teams. This research and outreach is continuing and very well may result in securing additional affidavits.
2. There are approximately 160 voters who were mailed ballots in the Primary Election that were returned by the post office as undeliverable. Those same voters were again mailed ballots in the General Election, to the same addresses that were previously shown as undeliverable, yet votes were cast in the General Election for those 160 voters.
3. There are 19 voters who cast two ballots.
4. There are approximately 150 addresses to which mail was delivered and from which votes were cast, but the addresses were inaccurate. This should have resulted in the ballot being returned to Clark County.

The Anthony Campaign respectfully requests that you investigate and give due consideration to these potential voting irregularities before presenting the election results to the County Commission for approval. With a 10-vote margin separating Mr. Anthony and Mr. Miller, the utmost consideration and careful review should be given to the voters of District C and the counting of their votes so that an accurate final vote tally can be confidently given.

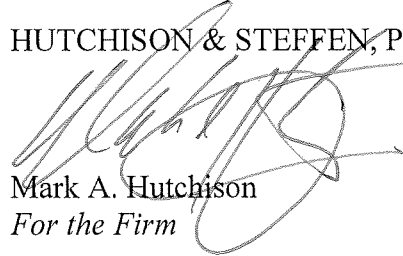
Additionally, as the Anthony Campaign proceeds in the days ahead and weighs its options, including a recount, the Anthony campaign respectfully requests that you seriously consider and make all necessary arrangements to include not just a recount of ballots, but a thorough review of all mail envelopes that contained the ballots and signatures to ensure they comply with Nevada law. With the extraordinary circumstances of the 2020 General Election, when the normal mail-ballot load received by the Election Department increased from 5% of the total vote to roughly 50% of the total vote, the envelopes take on critical importance. In addition, the corresponding workload placed on county staff was significantly higher than a normal General Election and must be considered in ensuring that the final vote count is accurate.

Because the legitimacy of *all* mail-in ballots are tied directly to the envelopes that they were mailed in, a complete review and careful evaluation of all envelopes should be undertaken. It is imperative that any envelope from which a ballot was received, extracted, accepted, and then counted meets all requirements for a legal submission. Ballots arriving in envelopes that failed to comply with county guidelines or Nevada law would have be considered for rejection.

On behalf of the Anthony Campaign and Stavros Anthony personally, thank you for taking the time to ensure that the final vote tally is correct and the voters of Clark County Commission District C can be confident that the canvassing of the election is accurate because it was completed in a careful and deliberative manner in light of the concerns expressed above.

Sincere regards,

HUTCHISON & STEFFEN, PLLC



Mark A. Hutchison
For the Firm

MAH/ttp

cc: All Clark County Commissioners