

EXHIBIT C

SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

ARCTIC VILLAGE COUNCIL,
LEAGUE OF WOMEN VOTERS OF
ALASKA, ELIZABETH L. JONES, and
BARBARA CLARK,

Case No. 3AN-20- 078584

Plaintiffs,

v.

KEVIN MEYER, in his official capacity
as the Lieutenant Governor of the
State of Alaska; GAIL FENUMIAI, in
her official capacity as the Director of
the Alaska Division of Elections; and
ALASKA DIVISION OF ELECTIONS,

Defendants.

DECLARATION OF ELIZABETH L. JONES

My name is Elizabeth L. Jones. I am 71 years old and competent to make this declaration. The facts in this declaration are based on my personal knowledge. If called upon as a witness, I would testify to these facts:

1. I am a U.S. citizen and have lived in Alaska since 2002. I currently live 14 miles from the town center of Fairbanks, Alaska in the 99709 zip code. I am a registered voter at my current address.

2. I retired in 2012 after 40 years of teaching. I have two degrees in special education and I have taught many non-traditional learners and incarcerated youth. I have also been an assistant director of special education and a school principal. From 2012-2016, I worked a seasonal job at a resort gift shop in Fairbanks. I fully retired at age 67.

3. I understand that the general election is on November 3, 2020, and I wish to vote in that election. Voting and political participation are core parts of my values. The mantra in my family was always, "If you don't vote, you can't gripe." We are lucky in this country to have rights and with rights come responsibilities. I believe that voting is a responsibility and that my vote counts, and that everybody's vote counts.

4. That is why I have been voting for 50 years, since I could validly vote at 21 years of age (the voting age in 1970 was 21). You can count on one hand the number of elections I have missed and they are all primaries. I have voted in this district since 2010.

5. I voted in this year's primary election by absentee ballot on August 3. That was the first time I voted absentee. I did so due out of fear of contracting COVID-19 if I attempted to vote in-person. I am worried that even if poll workers wear masks and take additional

precautions, that other voters will not. There is currently no mask mandate in Fairbanks.

6. I live alone in a log cabin. I have been following public health recommendations around COVID-19 and self-isolating at home since the end of February. I have left my home only when necessary.

7. The in-person encounters I currently have with other people are limited to the following: (a) I buy my groceries online and then pick up curbside while wearing a mask. The curbside delivery person also wears a mask; (b) I have a dog and my veterinarian has curbside service. When I take my dog to the vet, I wear a mask and so do the veterinarian's support staff, and they come out to my car and get my dog. I do not enter the veterinarian's office; (c) I am on several prescriptions, but I only need to pick them up every three months. I pick these up via drive-up, curbside service. I wear a mask and the person who hands me my prescriptions is behind plexiglass and wears a mask and gloves; (d) I take my trash to the transfer station but many times no one else is present. When other people are present, I wait until they are finished and then unload my trash; (e) To get my mail, I go down to the bank of mailboxes located on the route where I live and wait until the area is clear of other people before collecting my mail.

8. I have eliminated contact with other people, including those in my quilting social group, to every reasonable extent possible. I now keep in touch with other people via phone and internet only, including my daughter who lives in Oklahoma and my son who lives in Arizona.

9. I am practicing social distancing and otherwise self-isolating because I am truly concerned about contracting COVID-19. While I understand that anyone can contract COVID-19, experience health issues from it, and potentially die from it, I believe I am at particular risk for serious complications from COVID-19 because of my age and three underlying medical conditions.

10. I have high blood pressure and am obese. And because I grew up around smokers, I was diagnosed in 2006 as having the initial stages of chronic obstructive pulmonary disease or COPD.

11. I understand that my age and my underlying health conditions put me at an increased risk for severe illness from COVID-19.

12. I do not anticipate feeling safe leaving my home unnecessarily until a vaccine against COVID-19 is developed or a cure becomes available. I am also fearful that leaving my home will become more dangerous to me if social distancing regulations are relaxed or

lifted before a vaccine or cure are available, because keeping distant from other members of the community while outside the home will only become harder.

13. I want to vote in the general election on November 3 but I am afraid to go to the polls because it would make it more likely that I could contract COVID-19. That is why I intend to vote by absentee ballot.

14. But, because I live alone, I do not have someone who could easily be a witness for an absentee ballot. Even if I could find someone like that, I do not wish to risk coming into contact with such a person because of the continuing transmission of COVID-19 and the serious health risks I will face if I develop the disease.

15. I reached out to the Division of Elections about voting absentee and my concerns about finding a witness and allowing them into my home. They told me I could have my mail person be my witness and that is what I did for the primary election.

16. On August 3, 2020, I drove down the mountain from my log cabin and waited three hours in the rain for the mail person to arrive. I had a mask on but she did not because she was not expecting anyone.

We did our best to maintain six feet of distance while she witnessed me completing my ballot. The mail person then took my ballot.

17. I understand that asking my mail person to witness my ballot for the general election is no longer a possibility due to a new directive from the USPS. Without this option available, I may have to undertake an even more significant health risk in order to vote. That is why I hope the witness requirement will be removed. If it is not, I will be forced to make a devastating choice between my right to vote and my health.

18. My daughter developed COVID-19, had severe symptoms, and eventually recovered. I am afraid that I will develop the disease but may not be so lucky given my age and underlying health conditions. I may not survive.

I certify under penalty of perjury that the foregoing is true, and that a notary public or other official empowered to administer oaths is unavailable.

Executed on September 8, 2020

s/ Elizabeth L. Jones
Elizabeth L. Jones

**Original signature and Form TF-835 forthcoming*