

Case No.

*In re. Investigation of election irregularities affecting
counties within the 9th Congressional District*

Exhibit

7.1.4.1

Description: Submission(s) of Russell Priest, candidate for Bladen County Board of Commissioners.



NORTH CAROLINA

STATE BOARD OF ELECTIONS

STATE OF NORTH CAROLINA

NORTH CAROLINA STATE BOARD OF
ELECTIONS & ETHICS ENFORCEMENT

COUNTY OF WAKE

IN THE MATTER OF:)	
)	
Investigation of election)	Evidentiary Submission
irregularities affecting counties)	of Candidate Russell Priest
within the 9 th Congressional)	
District)	

This submission is made pursuant to Paragraph 7 of the Order of Proceedings issued in this matter by the North Carolina State Board of Elections and Ethics Enforcement (“State Board”) on December 17, 2018. Candidate Russell Priest won the elections for Bladen County Commissioner for District 3, by 234 votes.

1. A purported basis for including Bladen County in the State Board’s investigation is the high rate of non-return of absentee ballots sent by the Bladen County Board of Elections to those who requested them. Seven hundred thirty-six (736) absentee ballots that were requested in Bladen County were not returned. (Exhibit 1).
2. Failure of a voter to return a requested absentee ballot is not an irregularity.
3. Examination of the voting data suggests that the only reasonable conclusion concerning the non-returned absentee ballots is that, had they been returned, Mr. Edge would have received a greater number of votes.
4. Mr. Priest is a Democrat, as reflected on his voter registration. His opponent, Mr. Wayne Edge, is a Republican.
5. All available evidence indicates that McCrae Dowless and his operatives worked for Republican Mark Harris’s campaign. Since Candidate Wayne Edge was running as a Republican, the only plausible conclusion is that his efforts would have helped the Republican Candidate, Mr. Edge and not the Democratic Candidate, Mr. Priest.
6. Mr. Priest’s campaign did not hire anyone to engage in collecting absentee ballots on his behalf. (Exhibit 2).
7. Mr. Priest is unaware of any allegation that he engaged in any misconduct in the election.

8. Mr. Priest should not be punished because of potential wrongdoing by McCrae Dowless and his associates who were hired by the campaign of Republican, Mark Harris.

9. Even if all of the 153 absentee votes cast for Russell Priest were disallowed, the outcome of the election would not change since he won by 234 votes. (Exhibit 3).

Electronically Submitted
/s/ Russell Priest

BLADEN COUNTY BOARD OF ELECTIONS

ABSENTEE VOTING SUMMARY BY VTD

ELECTION DATE = "11/06/2018"

ABSENTEE TYPE = "CIV"

VOTING TABULATION DISTRICT	TOTAL REQUESTED	TOTAL ISSUED	TOTAL RETURNED	TOTAL ISSUED BUT NOT RETURNED
ELECTION DATE: 11/06/2018				
	10	10	2	8
P10	47	46	23	23
P15	209	193	104	89
P201	174	160	94	66
P202	358	337	178	159
P25	61	55	26	29
P30	59	59	39	20
P35	65	58	27	31
P40	93	90	45	45
P45	12	12	9	3
P501	271	267	151	116
P502	108	101	56	45
P55	28	28	13	15
P60	95	86	54	32
P65	11	11	9	2
P70	12	12	8	4
P75	70	69	51	18
P80	68	66	35	31
ELECTION TOTAL:	1,751	1,660	924	736
GRAND TOTAL:	1,751	1,660	924	736

EXHIBIT 2

STATE OF NORTH CAROLINA

NORTH CAROLINA STATE BOARD OF ELECTIONS & ETHICS ENFORCEMENT

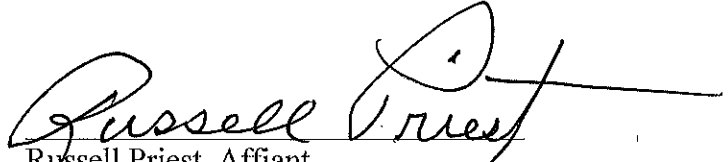
COUNTY OF WAKE)
)
IN THE MATTER OF)
)
Investigation of election)
irregularities affecting counties)
within the 9th Congressional)
District)

Affidavit of Candidate Russell Priest

I, Russell Priest, being first duly sworn, depose and say:

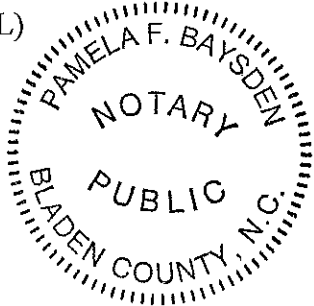
- 1 I am over the age of 18 and legally competent to give this affidavit.
2 I have personal knowledge of the facts set forth in this affidavit.
3 I am a resident of Bladen County.
4 I was the Democratic candidate for Bladen County Commissioner in District 3 of the 2018 general election.
5 I received 234 more votes than my opponent Mr. Wayne Edge, with the final tally being 2401 votes for Russell Priest and 2167 votes for Wayne Edge. Of this total, there were 153 absentee votes for Russell Priest and 83 absentee votes for Wayne Edge.
6 I did not pay anyone to assist with absentee ballots for my campaign.
7 My campaign finance report shows my campaign expenditures.
8 I am aware only through news articles Mr. McCrae Dowless is accused of harvesting absentee ballots in Bladen and Robeson Counties and that he was hired by Republican Mark Harris' congressional campaign, through the Red Dome Group.
9 I have never hired Mr. McCrae Dowless to assist with my campaign.
10 I learned of the existence of the Red Dome Group as a result of the State Board of Elections publicized election fraud investigation. I did not hire the Red Dome Group to assist with my campaign.


This the 3rd day of January 2019.


Russell Priest, Affiant

Sworn to and subscribed before me this the 3rd day of January 2019.

(SEAL)




Notary Public

My Commission expires:
11 / 09 / 2023

Bladen Co Board of Elections
General Election 11-6-18

	1025_NC HOUSE DIST 022 NC HOUSE DISTRICT 22		1201 DISTRICT ATTORNEY DIST 15 15TH PROSECUTORIAL		0002 BOARD OF COMMISSIONERS DIST 1 COMMISSION #1		0003 BOARD OF COMMISSIONERS DIST 2 COMMISSION #2			0004 BOARD OF COMMISSIONERS DIST 3 COMMISSION #3							
	WILLIAM BRISSON	(TONY) DENIG	OVERVOTES	UNDERVOTES	JOHNDAVID	UNDERVOTES	A.BLOCK	OVERVOTES	UNDERVOTES	RAYPETERSON	SINGLETOWN	OVERVOTES	UNDERVOTES	RUSSELLPRIEST	WAYNEEDGES	OVERVOTES	UNDERVOTES
P10 ABBOTTS	135	101	0	3	149	0	90	116	119	0	4	0	4	0	0	0	0
P15 BETHEL	550	179	0	17	630	0	156	553	218	0	15	0	15	0	0	0	0
P201 BLADENBORO 1	378	79	0	8	401	0	64	321	140	0	4	0	4	0	0	0	0
P202 BLADENBORO 2	365	201	0	6	427	0	145	312	253	1	6	0	6	0	0	0	0
P25 BROWN MARSH	199	149	1	3	255	0	97	229	0	123	0	0	123	0	0	0	0
P30 CARVERS CREEK	62	248	0	6	101	0	215	280	0	36	0	0	36	0	0	0	0
P35 CENTRAL	80	75	0	3	106	0	52	0	0	0	0	0	0	0	0	0	0
P40 COLLY	244	87	0	9	256	0	84	8	0	2	0	0	2	0	0	0	0
P45 CYPRESS CREEK	125	55	0	5	141	0	44	0	0	0	0	0	0	0	0	0	0
P501 ELIZABETHTOWN 1	190	207	0	14	238	0	173	139	12	24	0	0	12	0	0	0	0
P502 ELIZABETHTOWN 2	93	133	0	4	115	0	115	82	0	36	0	0	36	0	0	0	0
P55 FRENCHES CREEK	133	118	0	9	155	0	105	170	0	90	0	0	90	0	0	0	0
P60 HOLLOW	241	263	0	10	284	0	230	0	0	0	0	0	0	0	0	0	0
P65 LAKE CREEK	124	70	0	6	170	0	30	111	0	89	0	0	89	0	0	0	0
P70 TURNBULL	82	57	0	3	95	0	47	0	0	0	0	0	0	0	0	0	0
P75 WHITES CREEK	117	164	0	7	160	0	128	192	0	96	0	0	96	0	0	0	0
P80 WHITE OAK	203	99	0	5	235	0	72	0	0	0	0	0	0	0	0	0	0
ONE STOP LIBRARY	3290	2945	1	119	3784	0	2571	1516	0	561	0	645	28	1240	1156	0	36
ABSENTEE	441	385	1	20	442	0	405	157	0	53	0	103	5	153	83	1	5
PROVISIONAL	4	6	0	0	6	0	4	4	0	0	0	0	0	0	0	0	0
TOTALS	7096	5621	3	257	8150	0	4827	2888	0	1104	0	1499	64	2401	2167	2	69