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DISTRICT COURT, JEFFERSON COUNTY, COLORADO 100 Jefferson County Parkway , Golden, CO 80401	2021 MAY 27 AM 8:13 DATE FILED: May 27, 2021 CASE NUMBER: 1983CV155 FILED JEFFERSON COUNTY JEFFERSON COUNTY, CO <input type="checkbox"/> COURT USE ONLY <input type="checkbox"/>
Brenda Bronson, et al Plaintiff v. Party Name Not on File Defendant	Case No. 1983 CV 155 Division 7
Alex Plotkin 1231 S. Ward Ct., Lakewood, CO 80228 Alex.Plotkin@greenmountainwater.org <hr/> <hr/> <hr/> <hr/> <hr/> Jeff Baker 941 S Van Gordon Ct, Lakewood, CO 80228 Email: Jeffrey.Baker@greenmoutainwater.org Pro Se	<p style="text-align: center;">MOTION TO MODIFY COURT ORDER APPOINTING ADRIENNE HANAGAN DESIGNATED ELECTION OFFICIAL</p>

Comes now, Alex Plotkin, *Karen Morgan* and Jeff Baker "Board Directors", the subjects of the pending recall petition and respectfully moves this court for an order modifying the Court's Order of May 10, 2021 appointing Adrienne Hanagan as the designated election official for the pending recall petition.

In support, the Board Directors offer the following for the court's consideration:

1. Alex Plotkin, Karen Morgan and Jeff Baker are duly elected members of the five member Board of Directors for the Green Mountain Water and Sanitation District ("District").
2. Adrienne Hanagan is also a duly elected member of the five member Board of Directors for the Green Mountain Water and Sanitation District.

3. The Designated Election Official (DEO) for the past two elections of the Green Mountain Water and Sanitation District has been Sue Blair, the CEO of Community Resource Services who has over 30 years of experience managing special districts such as the District and has experience as the DEO for recall petitions.
4. Adrienne Hanagan is engaged in a campaign to unseat a majority of the board members through a group of supporters who have attended every meeting since October, 2020 and who have actively harassed and demanded the resignations of the Board Directors.
5. Adrienne Hanagan has obstructed the Board Directors in their efforts to review expenses by counsel, who is actively engaged in representing Director Hanagan's positions against the majority.
6. Adrienne Hanagan recently referred to the two male directors as "wicked misogynistic men" and the one female director as "a hateful woman" in an email to supporters.
7. Adrienne Hanagan has on several occasions openly defied the direction of a majority of the board members with respect to meeting with the plaintiffs to discuss settlement in recent litigation.
8. Adrienne Hanagan has openly encouraged her supporters to file CORA requests against the Board Directors.
9. Adrienne Hanagan has openly and falsely accused two of the Board Directors of actions which significantly compromised the District's position in the pending litigation.
10. In short, Adrienne Hanagan has a conflict of interest in the recall with the Board Directors.
11. The purpose of the court appointing a designated election official is to have a neutral professional manage the important work of the recall. That includes reviewing the petition for compliance with the statutory requirements, receiving and maintaining the petitions, reviewing the petitions for the sufficiency of the signatures by comparing the names and signatures with the voter lists to certify that they are qualified electors, and deciding any disputes regarding the process and sufficiency of the petitions.
12. Adrienne Hanagan indicated during a public meeting on May 25, 2021, that she was not capable of performing these duties. She also indicated that she would need the help of Sue Blair, the designated election official retained to manage the prior two elections.
13. Notwithstanding Director Hanagan's admission that she had never done anything like this before and was not capable of performing the task, she vehemently opposed a motion by the Board Directors to appoint Sue Blair as the district's designated election official and vehemently opposed a motion by the Board Directors to make this motion as a board to modify the Court's order to appoint Sue Blair as the election official.

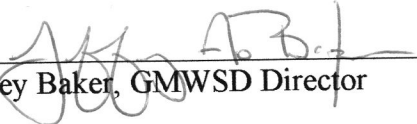
14. Adrienne Hanagan and Counsel, in support, would not allow the matter to come to a vote. Instead, Counsel instructed the Board Directors that they were on their own and that filing this motion would be "contempt of court". Furthermore, during the Board meeting on May 25th, the Counsel had, in effect, told the Directors who are the subjects of the recall, that they have no legal representation as elected officials and that the Counsel would not file a motion on the Board's behalf.

15. For these reasons, the Board Directors respectfully move to modify the Court's Order of May 10, 2021 and appoint Sue Blair as the Designated Election Official in this matter.

Respectfully,



Alex Plotkin, GWMSD Director



Jeffrey Baker, GMWSD Director

Dated: May 27, 2021

Certificate of Service

I hereby certify that on May 26, 2021, I served the foregoing document to the petitioners via email.

Attachments

1) Sue Blair's Biography:

Sue Blair

CEO and Director of Elections



Background Summary

Sue Blair has an extensive background providing over 30 years of administrative, management and paralegal expertise to special districts and municipalities in Colorado.

Sue has a broad understanding of key aspects of governmental taxation issues, auditing, budgeting, contracting, elections, property ownership issues, sales and tax collection, utility billing, and statutory and constitutional requirements of special districts. Her insurance administration expertise includes the ability to review various insurance needs of each district, discuss these needs with insurance agents and underwriters, and secure the types of policies required to fill those needs. Sue has provided oversight and administration for numerous construction projects, and has implemented control systems for staff to follow on specific projects. She is well versed in drafting resolutions, municipal ordinances and legislation, as well as district rules and regulations.

Sue has been involved in numerous innovative inclusions and exclusions of property within special districts. Her expertise in organizing, overseeing, and supervising all aspects of district and municipal elections has brought her recognition throughout the State. She has worked with the Division of Local Government and the Special District Association to conduct statewide training of election judges. Her election duties have included appointment by the district court to act as an administrative hearing officer for election issues, as well as supervising the verification of thousands of petition signatures in a highly publicized recall election. Sue's experience in local government management and administrative matters translates to a solid understanding of both legal and policy issues that effect local governments.

Sue's Career Experience Highlights of over 30 years include:

Leading the incorporation and election of City of Lone Tree. She remains the City's designated election official.

Establishing policies and procedures for financial management of sales and use tax, public improvement fees, building department administration and liquor licensing.

An appointment by Adams County District Court to server as an Administrative Hearing Judge.

Managing countless ballot initiatives / elections, ranging from over 40,000 petitions to multiple district and municipal elections.

Serving on numerous Legislative Committees that have reviewed and improved the following statutory provisions: Election Code, Budget and Financial Compliance and District formulation.

An instructor for the Division of Local Government Budget Training Sessions and numerous County wide election judge training sessions exceeding over 100 participants on occasion.

Managed billing operations of over 90,000 customer accounts annually, and supervised all customer service representatives.

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2) Adrienne Hanagan's Biography:

https://www.greenmountainwater.org/RelId/657117/ISvars/default/Adrienne_Hanagan_President.htm

Adrienne Hanagan, President



Elected May, 2018.

Term expires May, 2022. Eligible for re-election.

I am a graduate of the Colorado School of Mines (B.S. Ch. E.). I also have an M.A. in Biology with an emphasis in Cell and Molecular Biology from San Francisco State University. Eight years of my career was devoted to Biotech, and I have been a part-time secondary science teacher since 2010.

I contribute my time to two math and science volunteer activities, including Math Pioneers Ignite!, an inner city summer STEM program for its duration (now closed) and I am a volunteer math and science tutor for the past 5 years for Foothills Young Marines to students whose families may not be able to afford tutoring.

I also attended Denver Water's Water Shed Training for Educators last summer to learn about water quality issues facing Colorado. I currently teach engineering fundamentals, physical science, and biology to high school students. I use these classes as an opportunity to educate my students about water quality chemistry and biology. In my personal life, I am married with two sons who are attending college. One is studying engineering at my alma mater and the other is studying liberal arts. Both boys attended Jeffco schools.

adrienne.hanagan@greenmountainwater.org

- 3) An email from Adrienne Hanagan disparaging the Board Members, who are the subject of the recall.

From: Adrienne Hanagan <alhanagan@gmail.com>

Date: May 6, 2021 at 3:22:41 PM MDT

To: undisclosed-recipients;

Subject: Jo Timmins Wins and Scott Gessler, GOP Wannabe Chair claims credit

Hello Friends,

Jo Timmins won for Green Mountain, the case against GMWSD is dismissed. WOW!! She won the cross motion for summary judgement and the board still wants to replace her as general counsel. It is because John Henderson, in my opinion, is still the master Puppeteer.

A tiny, brilliant and brave lady defeated an army of lawyers and won. She Is being disparaged by three wicked misogynistic men and one hateful woman, my thoughts.

Yours,

Adrienne