



**Maryland Association of Election Officials**  
Representing the Local Election Boards of the State of Maryland

February 24, 2022

Linda H. Lamone, Esq., State Administrator  
PO Box 6486  
151 West Street Suite 200  
Annapolis, MD 21401

**RE: Redistricting Timeline**

Dear Administrator Lamone:

I am writing on behalf of the Maryland Association of Election Officials (MAEO) and the Election Directors tasked with adjusting Congressional, Legislative, and County Council lines in a timely manner with 100% accuracy for the 2022 Gubernatorial Primary Election. Due to forces beyond the control of the Local Boards of Elections (LBEs), including pending litigation and the ongoing appeal process, the LBEs request the date of the Primary Election be changed to a later date in 2022 and that the state adopt vote centers on Election Day. Below is a list of facts and risks impacting the upcoming 2022 Gubernatorial Primary Election and the ongoing redistricting project that necessitate more time to complete redistricting as well as adjusting the date of the 2022 Primary Election:

- **Litigation Interrupting the Election Calendar:** The timing of judicial challenges to the Congressional, Legislative, and County Council lines is directly affecting the ability of the LBEs to implement the boundary line changes. As MAEO noted more than a year ago, and on numerous subsequent occasions during testimony regarding the redistricting project, the timeline to complete redistricting for the June 28, 2022 Primary Election is unrealistic under the best circumstances. Due to the far-reaching impact of recent judicial decisions and changes to the election calendar, there is a very real risk LBEs will not be able to meet fast approaching election deadlines, including:
  - March 22, 2022 Candidate Filing Deadline - NOTE: Already moved from February 22, 2022.
  - March 29, 2022 Polling Place Change Deadline - NOTE: In light of recent judicial decisions in Baltimore County and appeals in Prince George's County, this deadline must be extended.
  - April 25, 2022 Certification of Ballot Content and Arrangement
  - April 27, 2022 Judicial Review of Content and Arrangement
  - April 28, 2022 Deadline to begin printing Ballots
  - May 14, 2022 Transmitting Mail-in Ballot Deadline
  - June 14, 2022 Voting System Logic and Accuracy Deadline
  - June 16, 2022 Primary Election Early Voting Begins
  - June 28, 2022 Primary Election Day

Recent judicial decisions changing approved County Council lines in Baltimore County and the timeline for the appeal process in Prince George's County have made it almost impossible for two LBEs representing 1.1 million registered voters (28% of all registered voters in Maryland) to finish redistricting in time to conduct the 2022 Primary Election as scheduled. All LBEs currently need at least 30 to 60 additional days in order to complete the changes due to redistricting, notify the voters, secure polling places, and prepare ballots and voting equipment for the Elections. Without relief, many LBEs will struggle to finish the redistricting process in time to hold the Gubernatorial Primary Election on June 28, 2022 as scheduled.

If boundary changes are made through litigation that is not resolved until mid-April, there is not enough time to implement the line changes, update the tens of thousands of precinct descriptions for precinct boundaries across the entire State, engage in a rigorous quality control process, schedule a special meeting for each Local Board to approve the new precinct boundaries, and notify the voters in a timely manner, while simultaneously ensuring the regular tasks required to prepare for an election are completed. Under the current system of assigned polling places, many tasks such as polling place assignments, Election Judge hiring, and voter education cannot begin until after Redistricting is completed.

- **Calendar Issues and the loss of quality control:** It takes six months of preparation and meticulous, conscientious work to ensure Congressional, Legislative, County Council, Board of Education, or precinct boundary lines are correctly updated and that each of Maryland's 5 million voters has convenient and accessible access to a polling place. Compressing the redistricting calendar in the period of a few weeks between mid-April and June 28, 2022 dangerously sacrifices time for quality control and will contribute to voter confusion as changes are made quickly and the LBEs have limited time to notify voters of their correct district information and polling place location.
- **Polling Place Locations:** Without finalized precinct lines, it is impossible to accurately reserve enough polling places for election day. If this deadline is changed, there is less time to reserve a polling place and for voter education. A speedy resolution of the judicial challenges is needed to ensure that there is adequate time to find polling places and educate the voters. If a speedy resolution is not possible, then the Court may have no option but to mandate the adoption of Vote Centers as a voting solution that removes the requirement a voter must cast their ballot at an assigned polling place in-person on Election Day.

- **Election Judge Assignments and Recruiting Issues:** Recruiting, hiring, and assigning election judges is one of the most difficult responsibilities faced by each LBE prior to the election. It is unfair to the LBEs and the election judges, who want to participate in the election process, to ask them to commit to serve when such basic issues like polling place locations and election dates are still in question.
- **Equipment and Supplies:** The LBEs cannot assign voting equipment and supplies to polling places because the LBEs do not know how many polling places will be required in 2022, nor do the LBEs know how many voters will be assigned to a polling place until the redistricting project has been completed. The size of the polling place facility and the number of registered voters are the two most important variables when assigning equipment and supplies.

### **Vote Centers**

MAEO recommends adopting Vote Centers for in-person voting on Election Day in Maryland. A vote center is an in-person voting location at a facility chosen to maximize voter parking, proximity to public transportation, room size and facility layout to optimize the voting experience. Any voter from any precinct in a jurisdiction could cast a ballot on their ballot style at the vote center of their choice on Election Day. Implementing vote centers would eliminate many of the risks related to polling place assignment deadlines since many LBEs could implement vote centers quickly, as was the case in 2020. Since vote centers allow anyone from any precinct in the county to vote at whatever vote center is most convenient, implementing this solution would allow the LBEs to prepare for the election now by establishing the vote centers and then implement the lines as decided by the courts when the litigation is settled.

By freeing the voter from voting at a required location on Election Day, the voter will be able to select the vote center of their choice and cast their ballot at the most convenient location. The LBEs, with SBE guidelines and SBE approval, would establish a required number of vote centers in each jurisdiction, and Election preparations could continue uninterrupted in time for the 2022 Gubernatorial Primary Election.

Given the risks and uncertainty for the 2022 Gubernatorial Elections related to redistricting and ongoing litigation, SBE should consider moving the date of the Primary Election to a later date in 2022 and adopting vote centers in time for the primary election. This will eliminate voter confusion by allowing voters to cast their ballot at any vote center operating in the jurisdiction and will reduce the likelihood of voters using provisional ballots to vote. Many LBEs will utilize their largest facilities to increase the number of ballot scanners, check-in stations, ballot marking devices, and privacy booths available on election day while also ensuring minimal lines and impact to the voting experience.

Mrs. Lamone  
February 24, 2022  
Page 4

Thank you for considering our concerns. We look forward to working with you to resolve these issues. We appreciate your assistance in bringing a speedy resolution to the issues regarding the timeline for Redistricting and the date of the 2022 Gubernatorial Primary Election.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized loop followed by a long horizontal stroke that tapers to the right.

David Garreis, President

cc: Maryland State Board of Elections Board Members  
Maryland Association of Election Officials Board of Directors  
Local Board of Elections Directors and Deputy Directors