



1           6.       I supervise a staff of 27 people, who include Specialists in Candidate Filing,  
2 Auditing, Voter Education, Election Certification, Training, as well as Management Analysts  
3 for the statewide voter registration and election management system.

4           7.       I understand that Plaintiffs in this litigation seek revised legislative district maps  
5 based on their contention that Legislative District 15, as drawn by the Redistricting Commission  
6 in 2021, violates Section 2 of the Voting Rights Act.

7           8.       Based on my knowledge and experience, any revised district maps would need to  
8 be final by March 28, to allow my office and county elections officials to perform necessary  
9 tasks before the primary election on August 2, 2022.

10          9.       Any change to the district maps after this date would put us in serious jeopardy  
11 of failing to meet our constitutional obligations.

12          10.       When the Redistricting Commission approves the district plan, my office  
13 transmits that information—not just the maps showing district lines, but the files containing the  
14 geographic data underlying those maps, known as shapefiles—from the Commission to county  
15 auditors’ offices.

16          11.       County auditors use that information to redraw precinct lines within the new  
17 districts.

18          12.       My understanding from my work with county auditors is that they have already  
19 drawn precincts based on the 2021 redistricting maps.

20          13.       A court order for revised district maps would require counties to repeat that task  
21 of precinct boundary revision on a crunched timeline, costing office time and money.

22          14.       My office is not directly responsible for drawing precinct boundaries.

23          15.       We do provide technical assistance to counties as needed in the precinct revision  
24 process. My staff serve as subject matter experts and provide assistance with understanding of  
25 the Geographic Information System (GIS) software, assistance with collaboration with county  
26 GIS experts, integration with the voter registration and election management system, and

1 precinct requirements under state law. This is particularly true for smaller counties that lack  
2 technical resources.

3 16. Once revised, precinct boundaries require approval from a county commission or  
4 county council, which would take one to two weeks. Many counties require a public comment  
5 period before approving precincts.

6 17. After counties finish revising precinct boundaries—which is already completed  
7 but must, by law, be complete no later than two weeks before candidate filing opens—counties  
8 submit their precinct lines and the associated shapefiles to us. We consolidate files from all the  
9 counties into our Geographic Information System (GIS) software.

10 18. We then validate the precinct boundaries counties have drawn to make sure they  
11 comply with state law and do not contain errors. For example, our staff must confirm that  
12 precinct boundaries do not cross congressional or legislative district boundaries, cross county  
13 lines, or have gaps or overlap. Depending on the size of the county, this may take anywhere from  
14 anywhere from several hours to a few days per county.

15 19. We then import those shapefiles into a consolidated data file and import it into  
16 our statewide system, which connects the precinct information to voter information.

17 20. We then inform counties which voters are affected by the revisions and have  
18 changed precincts in the statewide voter registration and election management system.

19 21. The counties review groups of voters subject to split precincts and approve  
20 changes in the statewide voter registration and election management system.

21 22. Voters' precinct assignments are updated by an authorized county user in the  
22 statewide voter registration and election management system.

23 23. Precinct assignments (and for some types of offices, even more precise  
24 information) determine what districts a voter will vote in, but also in what districts they are  
25 eligible to run for office. When candidates file online, our VoteWA system determines their  
26 eligibility based upon what precinct, or portion of a precinct, they are registered to vote in.

1 24. For that reason, the precinct revision process must be complete before candidate  
2 filing opens, which in 2022 will be May 16.

3 25. The candidate filing dates are set by state law.

4 26. Any change to the candidate filing date would create significant impacts for my  
5 office and for counties.

6 27. Pushing back the candidate filing deadline costs time that we don't have. It would  
7 force us to delay all other dates and deadlines related to the election, including the election date.

8 28. In 2022, the candidate withdrawal deadline is May 23, one week after the filing  
9 period opens.

10 29. The deadline for candidates to submit photographs and candidate statements for  
11 the voter pamphlet is May 27.

12 30. As soon as we have that information from candidates, our staff has to prepare  
13 material for voter pamphlets for the primary election. We compile, review, approve, and translate  
14 the material content for all candidates that file with the state. This includes candidates for federal  
15 office, statewide executive office, legislative office, supreme court justices, court of appeals  
16 judges, and superior court judges. We translate that content into Spanish statewide and Chinese  
17 and Vietnamese for King County.

18 31. Counties are then responsible for printing the voter pamphlets for the Primary.  
19 Materials for state and federal candidates need to be completed before each county's print  
20 deadline for printing of their voter pamphlet.

21 32. Each county prepares the ballots to be sent to voters in their county. Substantial  
22 time is required for ballot formatting after its content is certain, because every county must  
23 prepare multiple ballot styles based on every combination of issues and offices that will appear  
24 in various parts of the county. This can amount to many different ballot styles within a single  
25 county. Each of the resulting ballot styles must be carefully reviewed and proofread for accuracy.

26 New in 2022 is the requirement that counties allow for voters who will be 18 by the time of the

1 General Election participate in the Primary, “Primary Only Voters”. These “Primary Only  
2 Voters” are prohibited from participating in any special or general election. This results in  
3 effectively doubling the number of necessary ballot styles to accommodate this new category of  
4 voters to ensure they are only able to participate their eligible contests. Counties must also test  
5 each ballot type in their vote tallying system to ensure the ballots are formatted properly and can  
6 be tabulated correctly.

7 33. Many counties use private vendors to print, assemble, and mail ballot packets to  
8 voters. Once the ballots are final, counties then provide the electronic file to their contracted  
9 vendor to print the ballots. After printers receive the ballot orders, they prepare proofs of each  
10 ballot style, and provide them to the county auditors for final review and correction of any errors,  
11 and for testing of the proofs in the tabulation equipment. After counties approve these proofs  
12 (with or without changes), the ballots are printed.

13 34. After ballots are printed, county auditors (or their vendors) must collate each  
14 ballot style with the correct personalized outgoing envelope, correct personalized return  
15 envelope, a security envelope, and instruction sheet. In some counties, the ballot printing vendor  
16 and mailing vendor are the same.

17 35. Each county also must compile and print a voter pamphlet before each Primary  
18 and as soon as practical mail the voter pamphlet to each residence or registered voter. The Office  
19 of Secretary of State strives to have the approved voter pamphlet content available electronically  
20 online before the mailing of ballots to military and overseas voters.


21 36. Under Washington law, counties must mail ballots to military and overseas voters  
22 45 days before an election. Federal law also requires that ballots for elections for federal offices  
23 be available for mailing to military and overseas voters at the same time. For the 2022 primary,  
24 that deadline is June 18.

25 37. Between candidate filing and mailing the first ballots, there is less than one  
26 month. There is no wasted time in that month. Any compression of that schedule would be

1 extremely cost-intensive and cumbersome for my staff and for the counties we work with and  
2 support.

3  
4 I declare under penalty of perjury under the laws of the State of Washington and the  
5 United States that the foregoing is true and correct.

6 SIGNED this 18 day of March 2022, at Olympia, Washington.

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10 STUART HOLMES  
11 Acting Director of Elections  
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**DECLARATION OF SERVICE**

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court’s CM/ECF System which will serve a copy of this document upon all counsel of record.

DATED this 21st day of March 2022, at Olympia, Washington.

*s/ Leena Vanderwood*  
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