

1 2. Before I became Director of Elections, I was Deputy Director of Elections.

2 3. I have worked for the Office of the Secretary of State since 2014 and worked in
3 elections administration since 2005.

4 4. I am a nationally and state certified election administrator.

5 5. As director I oversee the statewide voter registration and election management
6 system; voter education and outreach; and election official certification and training.

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

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

13 8. Based on my knowledge and experience, any revised district maps would need to
14 be final by March 25, 2024, to allow my office and county elections officials to perform
15 necessary tasks before the primary election on August 6, 2024.

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

18 10. When the a new legislative district plan is adopted, my office transmits that
19 information—not just the maps showing district lines, but the files containing the geographic
20 data underlying those maps, known as shapefiles—from the Commission to county auditors’
21 offices.

22 11. County auditors use that information to redraw precinct lines within the new
23 districts.

24 12. My office is not directly responsible for drawing precinct boundaries.

25 13. We do provide technical assistance to counties as needed in the precinct revision
26 process. My staff serve as subject matter experts and provide assistance with understanding of

1 the Geographic Information System (GIS) software, assistance with collaboration with county
2 GIS experts, integration with the voter registration and election management system, and
3 precinct requirements under state law. This is particularly true for smaller counties that lack
4 technical resources.

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

8 15. After counties finish revising precinct boundaries—which must, by law, be
9 complete no later than one week before candidate filing opens—counties submit their precinct
10 lines and the associated shapefiles to us. We consolidate files from all the counties into our
11 Geographic Information System (GIS) software.

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

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

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

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

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

25 21. Precinct assignments (and for some types of offices, even more precise
26 information) determine what districts a voter will vote in, but also in what districts they are

1 eligible to run for office. When candidates file online, our VoteWA system determines their
2 eligibility based upon what precinct, or portion of a precinct, they are registered to vote in.

3 22. For that reason, the precinct revision process must be complete before candidate
4 filing opens, which, barring a veto of recent legislation, will be May 6, 2024.

5 23. The candidate filing dates are set by state law.

6 24. Any change to the candidate filing dates would create significant impacts for my
7 office and for counties.

8 25. Pushing back the candidate filing deadline will cost time that we don't have. It
9 would force us to delay all other dates and deadlines related to the election, including the election
10 date itself.

11 26. Barring a veto of recent legislation, in 2024, the candidate withdrawal deadline
12 will be May 18, eleven days after the filing period opens.

13 27. Barring a veto of recent legislation, the deadline for candidates to submit
14 photographs and candidate statements for the voter pamphlet will be May 20, 2024.

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

21 29. Counties are then responsible for printing the voter pamphlets for the Primary.
22 Materials for state and federal candidates need to be completed before each county's print
23 deadline for printing of their voter pamphlet.

24 30. Each county prepares the ballots to be sent to voters in their county. Substantial
25 time is required for ballot formatting after its content is certain, because every county must
26 prepare multiple ballot styles based on every combination of issues and offices that will appear

1 in various parts of the county. This can amount to many different ballot styles within a single
2 county. Each of the resulting ballot styles must be carefully reviewed and proofread for accuracy.
3 Counties must allow voters who will be 18 by the time of the General Election to participate in
4 the Primary. These “Primary Only Voters” are prohibited from participating in any special or
5 general election. This results in effectively doubling the number of necessary ballot styles to
6 accommodate this new category of voters to ensure they are only able to participate in their
7 eligible contests. In addition, some counties must translate ballots, a task that requires additional
8 time. Counties must also test each ballot style in their vote tallying system to ensure the ballots
9 are formatted properly and can be tabulated correctly.

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

16 32. After ballots are printed, county auditors (or their vendors) must collate each
17 ballot style with the correct personalized outgoing envelope, correct personalized return
18 envelope, a security envelope, and instruction sheet. In some counties, the ballot printing vendor
19 and mailing vendor are the same. In other counties, they are not.

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

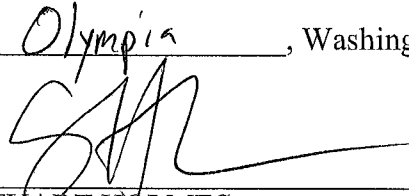
24 34. Under Washington law, counties must mail ballots to military and overseas voters
25 45 days before an election. Federal law also requires that ballots for elections for federal offices
26

1 be available for mailing to military and overseas voters at the same time. For the 2024 Primary,
2 that deadline is June 22.

3 35. Between candidate filing and mailing of the first ballots, there are just six weeks.
4 There is no wasted time in that time period. Any compression of that schedule would be
5 extremely cost-intensive and cumbersome for my staff and for the counties we work with and
6 support.

7
8 I declare under penalty of perjury under the laws of the State of Washington and the
9 United States that the foregoing is true and correct.

10 SIGNED this 9 day of May 2023, at Olympia, Washington.

11
12 

13 STUART HOLMES
14 Director of Elections

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 9th day of May 2023, at Olympia, Washington.

s/ Leena Vanderwood
Leena Vanderwood
Legal Assistant
1125 Washington Street SE
PO Box 40100
Olympia, WA 98504-0100
(360) 753-6200
Leena.Vanderwood@atg.wa.gov

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26