

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

Common Cause Florida, FairDistricts Now,
Dorothy Inman-Johnson, Brenda Holt,
Leo R. Stoney, Myrna Young, and Nancy
Ratzan,

Plaintiffs,

v.

Laurel M. Lee, in her official capacity as
Florida Secretary of State,

Defendant.

Case No.: 4:22-cv-109

DECLARATION OF SUPERVISOR LORI EDWARDS

STATE OF FLORIDA)
 : ss.:
COUNTY OF POLK)

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am a resident of Florida and am fully familiar with the facts set forth below.

2. I currently serve as Supervisor of Elections for Polk County, Florida (“Polk County Supervisor of Elections”). Polk County is located in central Florida. Out of 67 counties, Polk County is the ninth most populous county in Florida.

3. I was elected to my post in November 2000. As Polk County Supervisor of Elections, I hold an elected, non-partisan office. In this role, my duties include administering county, state, and federal elections; maintaining accurate voter rolls; and providing voter registration, campaign finance, and turnout information to the public. I also provide educational programs in schools and to community groups and offer mobile voter registration.

4. The Supervisors of Elections administer elections in each county in Florida, which includes assigning voters to districts, preparing ballots, recruiting and training elections officials, conducting in-person and absentee voting, and tabulating and canvassing results.

5. On August 23, 2022, Florida is scheduled to hold its 2022 statewide

primary election.

6. At this time, I understand that Florida's legislature and Governor have not reached agreement on a new congressional district plan following the delivery of the 2020 Census data to be used for the 2022 statewide primary elections.

7. In order for the primary election to proceed on August 23, 2022, numerous tasks must be completed, many of which cannot be started until initial tasks are finished, and a number of interim deadlines must first be met to prepare for the election. These preparations cannot be completed absent a final congressional district plan.

8. For example, Florida election officials must have adequate time to prepare and mail absentee ballots to members of the armed services, their dependents overseas, and other citizens residing overseas, and those voters must also have adequate time to return their completed ballots. Under the federal Uniformed and Overseas Citizens Absentee Voting Act ("UOCAVA"), absentee ballots that include elections for federal office must be transmitted no later than 45 days before a primary election. *See* 52 U.S.C. § 20302(a)(8)(A). The deadline to transmit absentee ballots pursuant to UOCAVA is therefore July 9, 2022.

9. Ballot information must be sent to the printer in advance of the July 9, 2022 UOCAVA deadline for transmittal of absentee ballots. In my experience, vendors used to print ballots typically require approximately two to three weeks to

create and ship ballots. The Supervisor of Elections must then proofread and conduct a quality control review before ballots are finalized for transmittal to voters. Three weeks before the July 9, 2022 UOCAVA deadline is June 18, 2022.

10. Ballots cannot be created before candidates for office are determined. By statute, the names of all duly qualified candidates for election must be certified to Supervisors of Elections within seven days after the closing date for qualifying. Fla. Stat. § 99.061(6). The qualifying period in Florida for candidates for Congress, State Senator, and State Representative, among other candidates, is set to begin on June 13, 2022 and to close on June 17, 2022. Fla. Stat. § 99.061(9). Thus, the list of qualified candidates must be certified by no later than June 24, 2022 (within seven days of June 17, 2022). By June 24, 2022 at the latest, absentee ballots should be sent to the printer in order to allow sufficient time to meet the July 9, 2022 UOCAVA deadline.

11. Redistricting requires elections staff to complete a process of assigning voters to new districts prior to creating and preparing ballots for the election and before sending ballots to be printed. My staff and I cannot begin this process unless we have received files containing census block data for each district for all maps to be used.

12. After receiving the census block information, my staff uses the files and mapping software to update the districts that are assigned to each voter

address.

13. Every voter must also be coded with a State House, State Senate, and congressional district (among others) in a voter registration system that is separate from the mapping software system. Information in the mapping software system must be transmitted to the information in the voter registration system. This alignment is not an entirely automated process. If the system detects exceptions, voter information must be reviewed manually on an individual voter-by-voter basis to resolve any issues. In the past, there have been several thousand exceptions requiring manual review in connection with a given election, which involves a time-intensive review process.

14. The amount of time required to complete this process corresponds with the number of district boundaries that are redrawn within the counties. In this case, counties will undergo changes to their districts following decennial redistricting—including state, legislative, congressional, and local jurisdiction districts—and a number of counties are likely to have newly drawn district boundaries within their counties' borders.

15. Once new congressional districts are set, the census block files must also be used to manually align precincts to the new districts. New precincts must be approved by the Board of County Commissioners. That body meets every two weeks.

16. After the close of the candidate filing period, elections officials must also create and print ballots, review the ballots for potential errors, and then prepare and test voting equipment.

17. Ballot preparation and proofing ballots cannot begin until after the proper geographic boundaries for voting districts are set, each voter record is assigned to the correct districts, the candidates are known, and the candidate-filing period closes. The process of generating and proofing ballots is complex and involves multiple technical systems and quality-control measures. This process includes confirming candidates for each race and proofing each ballot for content and accuracy.

18. Based on my experience, I estimate that it will take a minimum of six to eight weeks from the date that a new congressional district plan is enacted and census block files are delivered to counties in Florida to complete the numerous tasks described above.

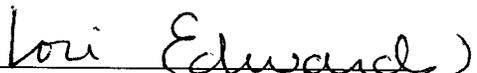
19. As such, a new congressional districting map is needed approximately six to eight weeks prior to the June 24, 2022 deadline for certification of all duly qualified candidates, at which time ballots would need to be submitted to be printed to meet the July 9, 2022 UOCAVA deadline. Accordingly, a new congressional map needs to be in place between April 29, 2022 (8 weeks before June 24, 2022) and May 13, 2022 (6 weeks before June 24) to allow adequate time

to prepare for the election and meet the relevant election deadlines in advance of the primary election.

20. I understand that the Florida Secretary of State has stated that the deadline for the State to have a new congressional map is June 13, 2022. It will be impossible to perform the tasks of creating new precincts and assigning districts to all voters in time to meet the necessary deadlines for printing ballots, complying with the July 9, 2022 UOCAVA deadline, and preparing for the August 23, 2022 primary if a new map is not finalized until June 13, 2022.

21. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 6th day of April, 2022


Lori Edwards