
IN THE
SUPREME COURT OF MARYLAND

September Term, 2026

No. 21, 22

MARYLAND STATE BOARD OF ELECTIONS, *et al.*,

Appellants,

v.

MICHAEL L. HOWELL, *et al.*,

Appellees.

On Appeal from the Circuit Court for Anne Arundel County
(Robert J. Thompson, Judge)

On Appeal from the Circuit Court for Dorchester County
(James S. Sarbanes, Judge)

SUPPLEMENTAL RECORD EXTRACT

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September 1, 2026

Attorneys for Appellants

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Case Detail

Case Information

Court System:	Circuit Court For Dorchester County - Civil
Location:	Dorchester Circuit Court
Case Number:	C-09-CV-26-000285
Case Title:	Lindsay Wheatley, et al. vs. Maryland State Board of Elections, et al.
Case Type:	Election Law
Filing Date:	08/10/2026
Case Status:	Appealed

Other Reference Numbers

Case Appealed:	SCM-REG-0022-2026
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Involved Parties Information

Defendant

Name: **Shalleck, Jim**
Address: **151 West Street**
Address Line 2: **Suite 200**
City: **Annapolis** State: **MD** ZIP Code: **21401**

Attorney(s) for the Defendant

Name: **KOBRIN, DANIEL MICHAEL**
Appearance Date: **08/11/2026**
Address Line 1: **Office of the Attorney General**
Address Line 2: **200 Saint Paul Place**
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City: **BALTIMORE** State: **MD** ZIP Code: **21202**
Name: **Bilbrough, Natalie R**
Appearance Date: **08/13/2026**
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City: **ANNAPOLIS** State: **MD** ZIP Code: **21401**

Defendant

Name: **Worcester County Board of Elections**
Address: **1 West Market Street**
City: **Snow Hill** State: **MD** ZIP Code: **21863**

Attorney(s) for the Defendant

Name: **Bilbrough, Natalie R**
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Defendant

Name: **Talbot County Board of Elections**
Address: **215 Bay Street**
Address Line 2: **Suite 7**
City: **Easton** State: **MD** ZIP Code: **21601**

Attorney(s) for the Defendant

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Defendant

Name: **Wicomico County Board of Elections**
Address: **345 Snow Hill Road**
City: **Salisbury** State: **MD** ZIP Code: **21804**

Attorney(s) for the Defendant

Name: **KOBRIN, DANIEL MICHAEL**
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City: **ANNAPOLIS** State: **MD** ZIP Code: **21401**

Defendant

Name: **Jackson-Stanley, Victoria**
Address: **151 West Street**
Address Line 2: **Suite 200**
City: **Annapolis** State: **MD** ZIP Code: **21401**

Attorney(s) for the Defendant

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Defendant

Name: **Lee, Susan C.**
Address: **16 Francis Street**
City: **Annapolis** State: **MD** ZIP Code: **21401**

Attorney(s) for the Defendant

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Defendant

Name: **Dorchester County Board of Elections**
Address: **1000 Goodwill Avenue**
City: **Cambridge** State: **MD** ZIP Code: **21613**

Attorney(s) for the Defendant

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Defendant

Name: **Bryant, Eric**
Address: **151 West Street**
Address Line 2: **Suite 200**
City: **Annapolis** State: **MD** ZIP Code: **21401**

Attorney(s) for the Defendant

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Defendant

Name: **Maryland State Board of Elections**
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Attorney(s) for the Defendant

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Defendant

Name: **Demarinis, Jared**
Address: **151 West Street**
Address Line 2: **Suite 200**
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Attorney(s) for the Defendant

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Defendant

Name: **Butler, Diane**
Address: **151 West Steet**
Address Line 2: **Suite 200**
City: **Annapolis** State: **MD** ZIP Code: **21401**

Attorney(s) for the Defendant

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Defendant

Name: **Baltimore County Board of Elections**
Address: **5 Crossing Way**
City: **Owings Mills** State: **MD** ZIP Code: **21117**

Attorney(s) for the Defendant

Name: **KOBRIN, DANIEL MICHAEL**
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Plaintiff

Name: **Wheatley, Lindsay Mydra**
Address: **3113 Edgar Road**
City: **Church Creek** State: **MD** ZIP Code: **21622**

Attorney(s) for the Plaintiff

Name: **DICKSON, STRIDER LEE**
Appearance Date: **08/10/2026**
Address Line 1: **McAllister, DeTar, Showalter & Walker LLC**
Address Line 2: **706 Giddings Avenue**
Address Line 3: **Suite 305**
City: **ANNAPOLIS** State: **MD** ZIP Code: **21401**
Name: **Brohawn, Victoria**
Appearance Date: **08/14/2026**
Address Line 1: **McAllister, DeTar, Showalter & Walker LLC**
Address Line 2: **100 N. West Street**

City: **EASTON** State: **MD** ZIP Code: **21601**
Name: **Dickerson, Allen J.**
Appearance Date: **08/28/2026**
Address Line 1: **Baker & Hostetler LLP**
Address Line 2: **1050 Connecticut Ave, NW**
Address Line 3: **Suite 1100**
City: **WASHINGTON** State: **DC** ZIP Code: **20036**
Name: **Lewis, Patrick T.**
Appearance Date: **08/28/2026**
Address Line 1: **Baker & Hostetler LLP**
Address Line 2: **127 Public Square**
Address Line 3: **Suite 2000**
City: **CLEVELAND** State: **OH** ZIP Code: **44114**
Name: **Prouty, Erika Dackin**
Appearance Date: **08/28/2026**
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Address Line 3: **Suite 1200**
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Name: **Croyts, Anna E.**
Appearance Date: **08/28/2026**
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City: **COLUMBUS** State: **OH** ZIP Code: **43215**

Plaintiff

Name: **Carozza, Mary Beth**
Address: **2205 N. Philadelphia Ave.**
Unit 203D
City: **Ocean City** State: **MD** ZIP Code: **21842**

Attorney(s) for the Plaintiff

Name: **DICKSON, STRIDER LEE**
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Plaintiff

Name: **Adams, Christopher Troy**
Address: **7614 E. Longfield Drive**
City: **Hebron** State: **MD** ZIP Code: **21830**

Attorney(s) for the Plaintiff

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City: **CLEVELAND** State: **OH** ZIP Code: **44114**

Name: **Dickerson, Allen J.**
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Name: **Brohawn, Victoria**
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Name: **DICKSON, STRIDER LEE**
Appearance Date: **08/10/2026**
Address Line 1: **McAllister, DeTar, Showalter & Walker LLC**
Address Line 2: **706 Giddings Avenue**
Address Line 3: **Suite 305**
City: **ANNAPOLIS** State: **MD** ZIP Code: **21401**

Plaintiff

Name: **Mautz, John Frederick 4th**
Address: **23942 N. Porters Creek Lane**
City: **St. Michaels** State: **MD** ZIP Code: **21663**

Attorney(s) for the Plaintiff

Name: **DICKSON, STRIDER LEE**
Appearance Date: **08/10/2026**
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Name: **Dickerson, Allen J.**
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Address Line 3: **Suite 120**
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Plaintiff

Name: **West, Christopher Read**
Address: **7808 Overbrook Road**
City: **Towson** State: **MD** ZIP Code: **21204**

Attorney(s) for the Plaintiff

Name: **Croyts, Anna E.**
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Court Scheduling Information

Event Type	Event Date	Event Time	Judge	Court
Hearing	08/27/2026	09:30 AM	Sarbanes, Spyros James	CC09

Docket Entries

File Date: **08/10/2026**

Docket Entry Name: **Complaint / Petition**

Comment: **Petition for Review Under Md. Code Ann., Election Law 12-202 and Complaint for Declaratory and Injunctive Relief**

File Date: **08/10/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit A - Executive Order 01.01.2026.14**

File Date: **08/10/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit B - HB2100 (Introduced)**

File Date: **08/10/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit C - HB2100 (Amended)**

File Date: **08/10/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit D - HB2100 (Enacted)**

File Date: **08/10/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit E - Proposed Constitutional Amendments**

File Date: **08/10/2026**

Docket Entry Name: **Line**

Comment: **Line - Request for Summons**

File Date: **08/10/2026**

Docket Entry Name: **Case Information Report Filed**

Comment: **Civil Case Information Report**

File Date: **08/10/2026**

Docket Entry Name: **Summons Issued (Service Event) - New Case**

Comment: **w/ Summons Disclaimer to Attorney for service.**

File Date: **08/10/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Summons Disclaimer**

File Date: **08/10/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Writs of Summons**

File Date: **08/11/2026**

Docket Entry Name: **Attorney Appearance - No Fee**

Comment: **Entry of Appearance**

File Date: **08/12/2026**

Docket Entry Name: **Motion**

Comment: **Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction Against Defendants**

File Date: **08/12/2026**

Docket Entry Name: **Memorandum**

Comment: **Plaintiffs' Memorandum of Grounds and Authorities in Support of Motion for Temporary Restraining Order and Preliminary Injunction**

File Date: **08/12/2026**

Docket Entry Name: **Affidavit**

Comment: **Affidavit of Sen. Christopher West**

File Date: **08/12/2026**

Docket Entry Name: **Affidavit**

Comment: **Affidavit of Sen. Mary Beth Carozza**

File Date: **08/12/2026**

Docket Entry Name: **Affidavit**

Comment: **Affidavit of Sen. John Mautz IV**

File Date: **08/12/2026**

Docket Entry Name: **Affidavit**

Comment: **Affidavit of Del. Christopher Adams**

File Date: **08/12/2026**

Docket Entry Name: **Affidavit**

Comment: **Affidavit of Lindsay Mydra Wheatley**

File Date: **08/12/2026**

Docket Entry Name: **Certificate of Service**

Comment: **Plaintiffs' Rule 15-504(b) Certification**

File Date: **08/12/2026**

Docket Entry Name: **Motion / Request - To Transfer**

Comment: **Joint Motion to Transfer Venue**

File Date: **08/12/2026**

Docket Entry Name: **Memorandum**

Comment: **Memorandum in Support of Motion to Transfer Venue**

File Date: **08/12/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit A**

File Date: **08/12/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit B**

File Date: **08/12/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit C**

File Date: **08/12/2026**

Docket Entry Name: **Motion - Shorten Time**

Comment: **Emergency Motion to Shorten Time**

File Date: **08/13/2026**

Docket Entry Name: **Order - Motion/Request/Petition Granted**

Comment: **Order Granting Motion to Shorten Time for Response to Motion to Transfer**

File Date: **08/13/2026**

Docket Entry Name: **Copies Mailed**

Comment: **Order to Shorten Time**

File Date: **08/13/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Order to Shorten Time**

File Date: **08/13/2026**

Docket Entry Name: **Motion / Request - For Special Admission of Attorney**

Comment: **Motion for Special Admission of Out-of-State Attorney - Allen Dickerson**

File Date: **08/13/2026**

Docket Entry Name: **Motion / Request - For Special Admission of Attorney**

Comment: **Motion for Special Admission of Out-of-State Attorney - Patrick Lewis**

File Date: **08/13/2026**

Docket Entry Name: **Motion / Request - For Special Admission of Attorney**

Comment: **Motion for Special Admission of Out-of-State Attorney - Erika Prouty**

File Date: **08/13/2026**

Docket Entry Name: **Motion / Request - For Special Admission of Attorney**

Comment: **Motion for Special Admission of Out-of-State Attorney - Anna Croyts**

File Date: **08/14/2026**

Docket Entry Name: **Attorney Appearance - \$10 Fee**

Comment: **Entry of Appearance**

File Date: **08/14/2026**

Docket Entry Name: **Opposition**

Comment: **Plaintiffs' Opposition to Motion to Transfer Venue**

File Date: **08/18/2026**

Docket Entry Name: **Motion - Shorten Time**

Comment: **Emergency Motion to Shorten Time to Respond**

File Date: **08/19/2026**

Docket Entry Name: **Order - Motion/Request/Petition Denied**

Comment: **Motion to Transfer is DENIED**

File Date: **08/19/2026**

Docket Entry Name: **Copies Mailed**

Comment: **Order Denying Transfer of Venue**

File Date: **08/19/2026**

Docket Entry Name: **Order**

Comment: **See other order.**

File Date: **08/19/2026**

Docket Entry Name: **Copies Mailed**

Comment: **Order - See other order**

File Date: **08/19/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Order - See other order**

File Date: **08/19/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Order Denying Transfer of Venue**

File Date: **08/21/2026**

Docket Entry Name: **Opposition**

Comment: **Opposition to Plaintiffs' Request for Injunctive Relief**

File Date: **08/21/2026**

Docket Entry Name: **Memorandum**

Comment: **Memorandum in Support of Opposition**

File Date: **08/21/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit A**

File Date: **08/21/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit B**

File Date: **08/21/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit C**

File Date: **08/21/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit D**

File Date: **08/21/2026**

Docket Entry Name: **Motion**

Comment: **Defendants' Motion for Summary Judgment**

File Date: **08/21/2026**

Docket Entry Name: **Memorandum**

Comment: **Memorandum in Support**

File Date: **08/21/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit A**

File Date: **08/21/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit B**

File Date: **08/21/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit C**

File Date: **08/21/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit D**

File Date: **08/26/2026**

Docket Entry Name: **Motion for Summary Judgment**

Comment: **Motion for Summary Judgment**

File Date: **08/26/2026**

Docket Entry Name: **Order - Motion/Request/Petition Granted**

Comment: **Mt. for Special Admission of Out-of-State Attorney - Allen Dickerson**

File Date: **08/26/2026**

Docket Entry Name: **Order - Motion/Request/Petition Granted**

Comment: **Mt. for Special Admission of Out-of-State Attorney - Erika Prouty**

File Date: **08/26/2026**

Docket Entry Name: **Order - Motion/Request/Petition Granted**

Comment: **Mt. for Special Admission of Out-of-State Attorney - Anna Croyts**

File Date: **08/26/2026**

Docket Entry Name: **Order - Motion/Request/Petition Granted**

Comment: **Mt. for Special Admission of Out-of-State Attorney - Patrick Lewis**

NOTICE: For existing Odyssey Portal users, before your first login here, please watch the video titled - "Training Video for New Maryland Judiciary Case Search & Record Portal" at E-filing - Attorneys | Maryland Courts.

Docket Entry Name: **Copies Mailed**

Comment: **Order Granting Mt. for Special Admission of Out-of-State Attorney - Anna Croyts**

File Date: **08/26/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Order Granting Mt. for Special Admission of Out-of-State Attorney - Allen Dickerson**

File Date: **08/26/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Order Granting Mt. for Special Admission of Out-of-State Attorney - Erika Prouty**

File Date: **08/26/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Order Granting Mt. for Special Admission of Out-of-State Attorney - Anna Croyts**

File Date: **08/26/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Order Granting Mt. for Special Admission of Out-of-State Attorney - Patrick Lewis**

File Date: **08/26/2026**

Docket Entry Name: **Copies Mailed**

Comment: **Order Granting Mt. for Special Admission of Out-of-State Attorney - Allen Dickerson**

File Date: **08/26/2026**

Docket Entry Name: **Copies Mailed**

Comment: **Order Granting Mt. for Special Admission of Out-of-State Attorney -
Patrick Lewis**

File Date: **08/26/2026**

Docket Entry Name: **Copies Mailed**

Comment: **Order Granting Mt. for Special Admission of Out-of-State Attorney -
Erika Prouty**

File Date: **08/26/2026**

Docket Entry Name: **Opposition**

Comment: **Plaintiffs' Combined Reply Memorandum in Support of their Motion
for TRO and Preliminary Injunction and Opposition to Defendants'
MSJ**

File Date: **08/26/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit 1 - Order**

File Date: **08/26/2026**

Docket Entry Name: **Supporting Exhibit**

Comment: **Exhibit 2 - Memorandum**

File Date: **08/27/2026**

Docket Entry Name: **Hearing Sheet**

File Date: **08/28/2026**

Docket Entry Name: **Opinion and Order of the Court**

Comment: **Plaintiff's Mt. for Summary Judgment is Granted; Defendant's Mt. for Summary Judgment is Denied; The State Board of Elections is Enjoined from including statewide ballot Question 3 on the November 3, 2026, ballot; The execution of his injunction is Stayed pending an appeal of this ruling to the Supreme Court of Maryland.**

File Date: **08/28/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Opinion and Order**

File Date: **08/28/2026**

Docket Entry Name: **Copies Mailed**

Comment: **Opinion and Order of the Court**

File Date: **08/28/2026**

Docket Entry Name: **Notice Filed**

Comment: **Notice of Appeal to Supreme Court of Maryland**

File Date: **08/28/2026**

Docket Entry Name: **Order**

Comment: **from SCM to transmit the record**

File Date: **08/28/2026**

Docket Entry Name: **Certification**

Comment: **Original Case File**

File Date: **08/28/2026**

Docket Entry Name: **Original Record Sent**

Comment: **to SCM**

File Date: **08/28/2026**

Docket Entry Name: **Cover Sheet**

Comment: **Cover Page - Record on Appeal**

File Date: **08/28/2026**

Docket Entry Name: **Copies Mailed**

Comment: **Case Summary, Appeal Index and Cover Page**

File Date: **08/28/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Case Summary**

File Date: **08/28/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Appeal Index**

File Date: **08/28/2026**

Docket Entry Name: **Writ/Summons/Pleading - Electronic Service**

Comment: **Cover Page**

Service Information

Service Type	Issue Date
Summons Issued	08/10/2026

This is an electronic case record. Full case information cannot be made available either because of legal restrictions on access to case records found in Maryland Rules, or because of the practical difficulties inherent in reducing a case record into an electronic format.

LINDSAY MYDRA WHEATLEY
3113 Edgar Road
Church Creek, MD 21622

-and-

MARY BETH CAROZZA
2205 N. Philadelphia Avenue, Unit 203D
Ocean City, MD 21842

-and-

CHRISTOPHER TROY ADAMS
7614 E. Longfield Drive
Hebron, MD 21830

-and-

JOHN FREDERICK MAUTZ IV
23942 N. Porters Creek Lane
St. Michaels, MD 21663

-and-

CHRISTOPHER READ WEST
7808 Overbrook Road
Towson, MD 21204

Plaintiffs,

v.

MARYLAND STATE BOARD OF ELECTIONS
151 West Street, Suite 200
Annapolis, MD 21401

-and-

JARED DEMARINIS, in his official capacity as
Administrator of the Maryland State Board of
Elections
151 West Street, Suite 200
Annapolis, MD 21401

-and-

SUSAN C. LEE, in her official capacity as
Secretary of State of the State of Maryland
16 Francis Street
Annapolis, MD 21401

IN THE CIRCUIT COURT

FOR

DORCHESTER COUNTY, MARYLAND

Case No. C-09-CV-26-000285

-and-

JIM SHALLECK, in his official capacity as
Member of the Maryland State Board of Elections
151 West Street, Suite 200
Annapolis, MD 21401

-and-

VICTORIA JACKSON-STANLEY, in her
official capacity as Member of the Maryland State
Board of Elections
151 West Street, Suite 200
Annapolis, MD 21401

-and-

DIANE BUTLER, in her official capacity as
Member of the Maryland State Board of Elections
151 West Street, Suite 200
Annapolis, MD 21401

-and-

ERIC BRYANT, in his official capacity as
Member of the Maryland State Board of Elections
151 West Street, Suite 200
Annapolis, MD 21401

-and-

DORCHESTER COUNTY BOARD OF
ELECTIONS
1000 Goodwill Avenue
Cambridge, MD 21613

-and-

WORCESTER COUNTY BOARD OF
ELECTIONS
1 West Market Street
Snow Hill, MD 21863

-and-

WICOMICO COUNTY BOARD OF
ELECTIONS
345 Snow Hill Road
Salisbury, MD 21804

-and-

TALBOT COUNTY BOARD OF ELECTIONS
215 Bay Street, Suite 7
Easton, MD 21601

-and-

BALTIMORE COUNTY BOARD OF
ELECTIONS
5 Crossing Way
Owings Mills, MD 21117

Defendants.

**PETITION FOR REVIEW UNDER MD. CODE ANN., ELECTION LAW § 12-202 AND
COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

Plaintiffs Lindsay Mydra Wheatley, Mary Beth Carozza, Christopher Troy Adams, John Frederick Mautz IV, and Christopher Read West, through counsel, submit this Petition for Review under Md. Code Ann., Election Law (“EL”) § 12-202 and Complaint against Defendants for declaratory and injunctive relief and allege as follows:

PRELIMINARY STATEMENT

1. This action challenges the placement of a proposed amendment to Maryland’s Constitution on the November 3, 2026, general election ballot. The proposed amendment, HB 2100, was signed by the Governor on August 5, 2026, *see* 2026 Md. Laws, ch. 881 (“HB2100”), after a hasty special session. If approved, the amendment will eliminate constitutional protections against the gerrymandering of the People’s congressional districts. It will also strip voters of their inalienable rights to free elections, equal protection, and free speech guaranteed by Articles 7, 24,

and 40 of the Declaration of Rights at least insofar as congressional redistricting “criteria” is concerned. In addition, the ballot language that will present this amendment to the voters is seriously misleading and fails to disclose any of these consequences. Because trying to deceive voters into surrendering their fundamental constitutional rights in this fashion violates Article XIV, § 1 and Article I, § 7 of the Maryland Constitution, and Articles 7 and 24 of the Maryland Declaration of Rights, among others, it cannot stand.

2. Further, HB2100 violates multiple provisions of the Election Law Article, including Sections 7-103 and 7-105, which set forth clear timelines and requirements for placing proposed constitutional amendments on the ballot in Maryland. These provisions of the Election Law Article are intended to *implement* the Maryland Constitution’s protection of due-process and free elections, and to ensure that voters are given reasonable notice and sufficient information to make a knowing choice. The violation of these statutes is another basis to enjoin HB2100, and the General Assembly’s effort to exempt HB2100 from those Election Law Article provisions is itself unconstitutional as it acts to retroactively strip Maryland citizens of their vested rights.

3. Finally, HB2100 also violates the single-subject requirement applicable to constitutional amendments. The purportedly single constitutional amendment in fact addresses three distinct subjects. But Article XIV, § 1 of Maryland’s Constitution prohibits such logrolling and limits an amendment to a single subject to ensure voter choice is preserved. HB2100 should have been three separate amendments and combining them violates the single-subject provision of Article XIV, § 1, providing an independent reason to enjoin it.

PARTIES

4. Plaintiff Lindsay Mydra Wheatley is a resident of the State of Maryland and registered to vote in the State of Maryland. Plaintiff Wheatley resides in Dorchester County.

5. Plaintiff Mary Beth Carozza is a resident of the State of Maryland and registered to vote in the State of Maryland. Plaintiff Carozza currently serves as a member of the Maryland Senate representing District 38. Plaintiff Carozza resides in Worcester County.

6. Plaintiff Christopher Troy Adams is a resident of the State of Maryland and registered to vote in the State of Maryland. Plaintiff Adams currently serves as a member of the Maryland House of Delegates representing District 37B. Plaintiff Adams resides in Wicomico County.

7. Plaintiff John Frederick Mautz IV is a resident of the State of Maryland and registered to vote in the State of Maryland. Plaintiff Mautz IV currently serves as a member of the Maryland Senate representing District 37. Plaintiff Mautz IV resides in Talbot County.

8. Plaintiff Christopher Read West is a resident of the State of Maryland and registered to vote in the State of Maryland. Plaintiff West currently serves as a member of the Maryland Senate representing District 42. Plaintiff West resides in Baltimore County.

9. Defendant Susan C. Lee is the Secretary of State for the State of Maryland and is sued in her official capacity. The Secretary of State is responsible for preparing and certifying the text of the proposed amendment to Defendant Maryland State Board of Elections under EL § 7-103(c)(1).

10. Defendant Maryland State Board of Elections is the state agency responsible for administering elections in Maryland, including the certification, printing, and canvassing of statewide ballot questions, and is charged with compliance with EL §§ 7-103, 7-105.

11. Defendant Jared DeMarinis is the Administrator of the Maryland State Board of Elections and is sued in his official capacity.

12. Defendants Victoria Jackson-Stanley, Jim Shalleck, Diane Butler, and Eric Bryant are members of the Maryland State Board of Elections. They are sued in their official capacities.

13. Defendants Dorchester County Board of Elections, Worcester County Board of Elections, Wicomico County Board of Elections, Talbot County Board of Elections, and Baltimore County Board of Elections are responsible for “oversee[ing] the conduct of all elections held in its county and ensur[ing] that the elections process is conducted in an open, convenient, and impartial manner,” for “serv[ing] as the local board of canvassers and certify[ing] the results of each election conducted by the local board,” and for “provid[ing] to the general public timely information and notice, by publication or mail, concerning voter registration and elections.” EL § 2-202(b)(1), (6), & (8). In particular, Defendants Dorchester County Board of Elections, Worcester County Board of Elections, Wicomico County Board of Elections, Talbot County Board of Elections, and Baltimore County Board of Elections must post proposed constitutional amendments “in a manner widely accessible to the public for at least 90 days before the general election,” EL § 7-105(e), must post or make available for public inspection the “complete text of” the ballot question for proposed constitutional amendments for 65 days prior to the general election, EL § 7-105(d)(1), and must “provide notice of each question to be submitted statewide” by mailing a “specimen ballot” or “publi[shing] or disseminat[ing] by mass communication” in the weeks prior to the election. EL § 7-105(a).

JURISDICTION AND VENUE

14. This Court has jurisdiction over Plaintiffs’ claims and the subject matter of this complaint under Md. Code Ann., Courts and Judicial Proceedings (“CJ”) § 1-501 and EL § 12-202, which applies “to an issue arising in an election conducted under this article” and authorizes a registered voter to “seek judicial relief from any act or omission relating to an election, whether

or not the election has been held, on the grounds that the act or omission: (1) is inconsistent with this article or other law applicable to the elections process; and (2) may change or has changed the outcome of the election.” EL § 12-202(a).

15. This Court additionally has jurisdiction and power to grant declaratory and injunctive relief under CJ § 3-403 and § 1-501, and Md. Rule 15-501, *et seq.*

16. Venue is proper in the Circuit Court for Dorchester County because at least one defendant resides and/or “carries on a regular business” in Dorchester County. CJ § 6-201(a). EL § 12-202(b) sets venue in the “appropriate circuit court,” and CJ § 6-201(b) provides that when “there is more than one defendant, and there is no single venue applicable to all defendants” under CJ § 6-201(a), then all defendants “may be sued in a county in which any one of them could be sued.” Because there is no single venue applicable to all Defendants here, venue is proper in this Court in Dorchester County, where Defendant Dorchester County carries on its regular business and where Defendant Jackson-Stanley resides in Dorchester County. Upon information and belief, meetings of the State Board are conducted remotely via videoconference and Defendant Jackson-Stanley regularly conducts the business of the State Board remotely in Dorchester County.¹

LEGAL AND FACTUAL BACKGROUND

Constitutional Amendment Process and Statutory Requirements

17. The Maryland Constitution and Maryland Election Law Article establish the procedural and substantive requirements for constitutional amendments proposed by the General Assembly and for the ballot question language to present voters with those proposed amendments.

¹ See *Draft Minutes of June 25, 2026 Meeting*, MD. STATE BD. OF ELECTIONS, at 1, <https://mdsbe.app.box.com/s/ly67mqf875239kr4otek9phuueqzxw3r/file/2358936781404> (last visited Aug. 8, 2026) (indicating meeting conducted “via conference call”); *Video of June 25, 2026 Meeting*, MD. STATE BD. OF ELECTIONS, https://elections.maryland.gov/about/board_archive.html (last visited Aug. 8, 2026) (showing meeting conducted via Zoom).

18. Article XIV, § 1 of the Maryland Constitution provides that “[t]he General Assembly may propose Amendments to this Constitution; provided that each Amendment shall be embraced in a separate bill, embodying the Article or Section, as the same will stand when amended and passed by three-fifths of all the members elected to each of the two Houses, by yeas and nays, to be entered on the Journals with the proposed Amendment.”

19. That provision further states that “[t]he requirement in this section that an amendment proposed by the General Assembly shall be embraced in a separate bill shall not be construed or applied to prevent the General Assembly from . . . (1) proposing in one bill a series of amendments to the Constitution of Maryland for the general purpose of removing or correcting constitutional provisions which are obsolete, inaccurate, invalid, unconstitutional, or duplicative; or (2) embodying in a single Constitutional amendment one or more Articles of the Constitution so long as that Constitutional amendment embraces only a single subject.” CONST. art. XIV, § 1.

20. The bill proposing the amendments must be publicized “either by publishing, by order of the Governor, in at least two newspapers, in each County, where so many may be published, and where not more than one may be published, then in that newspaper, and in three newspapers published in the City of Baltimore, once a week for four weeks, or as otherwise ordered by the Governor in a manner provided by law, immediately preceding the next ensuing general election, at which the proposed amendment or amendments shall be submitted, in a form to be prescribed by the General Assembly, to the qualified voters of the State for adoption or rejection.” CONST. art. XIV, § 1.

21. EL § 7-103(b) requires questions appearing on the ballot for proposed constitutional amendments to include: “(1) a question number or letter as determined under subsection (d) of this section; (2) a brief designation of the type or source of the question; (3) a brief title in boldface

type that describes the topic, goal, or outcome of the ballot question; (4) a condensed statement describing the change in policy to be adopted in plain and clear language that: (i) a voter can easily understand; (ii) does not explain the legal mechanism providing for the policy change; and (iii) does not contain legal jargon or use double negatives or the passive voice; (5) the voting choices that the voter has; and (6) a brief statement explaining what the practical outcome of each voting choice would be.”

22. The Secretary of State must prepare and certify the information required by § 7-103(b) to the State Board “[o]n or before July 1 immediately preceding a general election.” EL § 7-103(c)(1).

23. EL § 7-105 sets forth the statutory notice requirements for ballot questions for proposed constitutional amendments.

24. Local boards must “provide notice of each question to be submitted statewide” by either “(1) specimen ballot mailed at least 1 week before any early voting period before the general election” or “(2) publication or dissemination by mass communication during the 3 weeks immediately preceding the general election at which a question will appear on the ballot.” EL § 7-105(a).

25. For proposed constitutional amendments submitted under Article XIV, that notice must “contain the information specified in § 7-103(b) of this title and a brief statement, prepared in clear and concise language, devoid of technical and legal terms to the extent practicable, summarizing the question.” EL § 7-105(b)(1).

26. The statement required by EL § 7-105(b)(1) must be “prepared by the Department of Legislative Services” and “approved by the Attorney General,” and then submitted to the State Board of Elections by the first Monday in August. EL § 7-105(b)(2)(i)–(iii). This statement is

sufficient, however, if it is “contained in an enactment by the General Assembly, and the enactment clearly specifies that the statement is to be used on the ballot.” EL § 7-105(b)(3)(i).

27. The State Board and local boards must post “in a manner widely accessible to the public” the “complete text of” the proposed constitutional amendment “for at least 90 days before the general election.” EL § 7-105(e).

28. The complete text of the ballot question must also “be posted or available for public inspection” in the offices of the State Board and local boards for 65 days prior to the general election. EL § 7-105(d)(1).

29. The State Board must certify the “content and arrangement of each ballot” at least 64 days before the general election. EL § 9-207(a)(2).

Maryland Redistricting Requirements and the Decision in *Szeliga v. Lamone*

30. The U.S. Constitution provides that “[t]he House of Representatives shall be composed of Members chosen every second Year by the People of the several States,” U.S. CONST. art. I, § 2, cl. 1, and that “[t]he Times, Places and Manner of holding Elections for . . . Representatives, shall be prescribed in each State by the Legislature thereof,” *id.* § 4, cl. 1. The United States Constitution thus leaves to state legislatures primary responsibility for the apportionment of their federal congressional districts.

31. As the Supreme Court has confirmed, “[p]rovisions in state statutes and state constitutions can provide standards and guidance for state courts to apply” when redistricting. *Rucho v. Common Cause*, 588 U.S. 684, 719 (2019).

32. Maryland’s Constitution does just that. Article III, § 4 of the Maryland Constitution requires that for both congressional and General Assembly plans, “[e]ach legislative district shall

consist of adjoining territory, be compact in form, and of substantially equal population” and that “[d]ue regard shall be given to natural boundaries and the boundaries of political subdivisions.”

33. These requirements are common traditional redistricting criteria. *See Louisiana v. Callais*, 146 S. Ct. 1131, 1156 (2026). They were added to the Maryland Constitution in 1972. *See Szeliga v. Lamone*, No. C-02-CV-21-001816, 2022 WL 2132194, *9 (Anne Arundel Cir. Ct. Mar. 25, 2022). The compactness requirement was “intended to prevent political gerrymandering,” *Matter of Legis. Districting of State*, 299 Md. 658, 687 (1984), and so was the contiguity requirement (i.e., that districts consist of “adjoining territory”), *Szeliga*, 2022 WL 2132194, at **42–43.

34. In *Szeliga*, the Circuit Court of Anne Arundel County considered several constitutional challenges to the congressional districting plan enacted in 2021. 2022 WL 2132194, at *1. The court confirmed that the requirements of Article III, § 4 apply to congressional districts, and not only General Assembly districts. *Id.* at *11.

35. The court concluded that the 2021 congressional plan violated the compactness and “due regard” to “political subdivisions” requirements of Article III, § 4. *Id.* at *45–46.

36. The court also held that the 2021 congressional plan violated several provisions of the Maryland Declaration of Rights, including its Equal Protection requirements in Article 24, Free Elections clause in Article 7, and the Free Speech clause in Article 40 of the Declaration of Rights. *Id.* at 46. The court further held that the 2021 plan was unconstitutional “with respect to the evaluation of the 2021 Plan through the lens of the Constitution and Declaration of Rights,” and was “an outlier and a product of extreme partisan gerrymandering.” *Id.* at *45–46.

The General Assembly's Efforts to Amend the Constitution

37. On July 7, 2026, Democratic lawmakers and Governor Wes Moore announced that the General Assembly would convene in special session on August 3, 2026 to consider legislation placing a redistricting-related constitutional amendment before voters at the November 3, 2026 general election.

38. On July 17, 2026, Governor Moore issued a proclamation convening the General Assembly in an Extraordinary Session commencing on August 3, 2026. *See* Exhibit A, Executive Order 01.01.2026.14. According to the proclamation, the purpose of the Extraordinary Session was to “pass[] legislation to amend the State constitution to clarify and reaffirm that the provisions which govern the requirements of our State legislative districts do not apply to Maryland’s congressional districts.” *Id.* (capitalization omitted).

39. The General Assembly convened in a special session on August 3, 2026.

40. House Bill 2100 (“HB2100”) was first considered by the House on August 3, 2026. A copy of HB2100 as introduced is attached as Exhibit B.² HB2100 was amended by the House and then passed on August 4, 2026. A copy of HB2100 as amended is attached as Exhibit C.³

41. The Senate passed HB2100 on August 4, 2026. On August 5, 2026, Governor Moore signed HB2100. The proposed amendment was assigned Chapter 881. A copy of the enactment as approved by the Governor is attached as Exhibit D.⁴

42. HB2100 proposes the following amendments to the Maryland Constitution, with the new text appearing in bold small-capitalization:

² HB2100, 448th Gen. Assemb., Spec. Sess., <https://mgaleg.maryland.gov/2026RS/bills/hb/hb2100f.pdf> (as introduced by the House).

³ HB2100, 448th Gen. Assemb., Spec. Sess., <https://mgaleg.maryland.gov/2026RS/bills/hb/hb2100t.pdf> (as amended by the House on Aug. 3, 2026).

⁴ HB2100, 448th Gen. Assemb., Spec. Sess., https://mgaleg.maryland.gov/2026RS/chapters_noln/Ch_881_hb2100T.pdf (as enacted by Governor Moore).

Article III – Legislative Department

4.

Each legislative district **FOR THE ELECTION OF A MEMBER OF THE SENATE AND MEMBERS OF THE HOUSE OF DELEGATES** shall consist of adjoining territory, be compact in form, and of substantially equal population. Due regard shall be given to natural boundaries and the boundaries of political subdivisions.

62.

(A) THE GENERAL ASSEMBLY SHALL HAVE THE POWER TO GRANT ORIGINAL JURISDICTION TO THE SUPREME COURT OF MARYLAND TO REVIEW THE CONGRESSIONAL DISTRICTING PLAN OF THE STATE.

(B) NOTHING IN THIS ARTICLE OR ELSEWHERE IN THIS CONSTITUTION, INCLUDING THE DECLARATION OF RIGHTS, PROVIDES APPLICABLE CRITERIA FOR THE BOUNDARIES OF A CONGRESSIONAL DISTRICTING PLAN.

SECTION 2. AND BE IT FURTHER ENACTED, That the General Assembly determines that the amendment to the Maryland Constitution proposed by Section 1 of this Act affects multiple jurisdictions and that the provisions of Article XIV, § 1 of the Maryland Constitution concerning local approval of constitutional amendments do not apply.

43. The proposed amendment therefore alters the text of Article III, § 4 by specifying that only General Assembly districts are subject to the requirements that districts must be contiguous, compact, and of “substantially equal population” and that “due regard” must be given to political subdivision and natural boundaries. Ex. C, Section 1.

44. The proposed amendment also adds a new section (Section 62) to the Maryland Constitution containing two new provisions.

45. First, the proposed amendment adds a provision that permits the General Assembly to grant to the Maryland Supreme Court original jurisdiction to review the State’s congressional plan. Ex. C, Section 1.

46. Second, the proposed amendment adds a provision purporting to make the requirements of the Maryland Constitution, “including the Declaration of Rights,” inapplicable to the State’s congressional plan. Ex. C, Section 1.

47. HB2100 provides that the proposed amendment to Section 1 “shall be submitted to the qualified voters of the State at the next general election to be held in November 2026 for adoption or rejection in accordance with Article XIV of the Maryland Constitution.” Ex. C, Section 3(a).

48. HB2100 further provides that “[a]t that general election, the vote on the proposed amendment to the Constitution shall be by ballot, and on each ballot there shall be printed the words ‘For the Constitutional Amendment’ and ‘Against the Constitutional Amendment’, as now provided by law.” Ex. C, Section 3(b)(1).

49. HB2100 then provides:

(2) ~~At that general election, a question substantially similar to the following~~ Notwithstanding any other provision of law, at that general election, the following question shall be submitted to the qualified voters of the State:

“Question ____ – Constitutional Amendment

The proposed Constitutional Amendment clarifies that certain standards in the Maryland Constitution apply only to districts used to elect members of the General Assembly; authorizes the General Assembly to grant original jurisdiction to the Supreme Court of Maryland to review the congressional districting plan of the State; and requires the criteria for boundaries of congressional districts to be determined by applicable federal laws.”.

HB2100, Section 3(b)(2).

50. As the text of Section 3(b)(2) shows, HB2100 originally included language that “[a]t that general election, a question substantially similar to the following shall be submitted to the qualified voters of the State.” *See* Ex. B. However, that text was stricken by an amendment to HB2100 in the House.

51. The underlined language replaced the stricken language, stating “[n]otwithstanding any other provision of law, at that general election, the following question shall be submitted to the qualified voters of the State.” *See* Ex. C, Section 3(b)(2).

52. This “[n]otwithstanding” language is a blatant attempt to exempt HB2100 and its proposed constitutional amendment from the requirements of EL §§ 7-103 and 7-105. Delegate Kris Fair admitted that the purpose of the “[n]otwithstanding” language is to “bypass the normal process.” *Video of House Floor Actions (8/3/2026)*, MD. GEN. ASSEMBLY, at 42:05–42:30, <https://mgaleg.maryland.gov/mgaweb/FloorActions/Media/house-71-A?year=2026RS> (last visited Aug. 8, 2026). He acknowledged that it was too late for the process required by the Election Law Article to be followed, and that the “[n]otwithstanding” language was aimed at having the amendment “simply go straight to the ballot.” *Id.* at 42:40–42:44.

53. The reason for this attempt is clear: the proposed amendment is plainly untimely, and procedurally and substantively insufficient under the Maryland Constitution, the Declaration of Rights, and the Election Law Article.

54. EL § 7-103(c)(1) requires the Secretary of State to “prepare and certify to the State Board the information required under” EL § 7-103(b) “for all statewide ballot questions” to appear on the November 3, 2026 general election ballot on or before July 1, 2026. That deadline passed over a month before the enactment of HB2100 on August 5, 2026. *See Video of House Floor Actions (8/3/2026)*, MD. GEN. ASSEMBLY, at 46:18–46:42, <https://mgaleg.maryland.gov/mgaweb/FloorActions/Media/house-71-A?year=2026RS> (last visited Aug. 8, 2026). There are no other provisions in the Election Law Article for the Secretary of State to prepare and certify the information required by EL § 7-103(b); nor did HB2100 explicitly provide for such late certification for the November 3, 2026 general election.

55. Nevertheless, on August 7, 2026, the State Board posted the proposed amendment in HB2100 to its website as “Question 3” for the November 2026 general election. A copy of the

State Board’s website for proposed constitutional amendments is attached as Exhibit E.⁵ This information was not, upon information and belief, prepared and certified by the Secretary of State, and it was posted over one month after the July 1, 2026 deadline.

56. EL § 7-105(b) also required a “brief statement, prepared in clear and concise language, devoid of technical and legal terms to the extent practicable, summarizing the question” to be submitted to the State Board by August 3, 2026. No such statement was submitted to the State Board by that deadline.

57. Additionally, EL § 7-105(e) required the State Board and local boards to post the “complete text of” the proposed amendment no later than August 5, 2026. The State Board did not post the complete text of the proposed amendment in HB2100 on or before August 5, 2026.

58. Upon information and belief, the complete text of the proposed amendment was not posted until August 7, 2026, after the statutory deadline. *See* Ex. E.

59. The State’s clear violation of these requirements with HB2100 are even more apparent when viewed in conjunction with the process that the State followed for the other proposed constitutional amendments that are being prepared for the November 2026 general election. *See* Ex. E. For example, upon information and belief, the Secretary of State certified the information required by EL § 7-103(b) for these other proposed amendments by the July 1, 2026 deadline. The Department of Legislative Services prepared the required summaries of the other proposed constitutional amendments, approved by the Attorney General, to the State Board on July 29, 2026, as required by EL § 7-105(b).⁶ The State Board made the text of the other ballot questions available for public comment from July 8 through July 30, 2026. *See* EL § 7-103(c)(5); Ex. E;

⁵ *Ballot Questions for the November 3, 2026 Election*, MD. STATE BD. OF ELECTIONS, https://elections.maryland.gov/elections/2026/ballot_questions.html (last visited Aug. 7, 2026).

⁶ Letter from Jodie L. Chilson, Senior Manager of Dept. of Legis. Services to Jared DeMarinis, Esq., State Admin’r of Elections (July 29, 2026), https://elections.maryland.gov/elections/2026/2026_Ballot_Question_SBE_Letter.pdf.

Elections, MD. STATE BD. OF ELECTIONS, <https://elections.maryland.gov/> (last visited Aug. 8, 2026) (“Proposed 2026 statewide and local ballot question language available for public comment . . . Jul 08–Jul 30”). The text of the other proposed amendments were posted by the State Board on its website by August 5, 2026. *See* EL § 7-105(e).

60. The State followed none of these procedures nor met any of these deadlines for HB2100.

61. The State Board must certify the ballot for the November 2026 general election by August 31, 2026. EL § 9-207(a)(2).⁷ Upon information and belief, the State Board will certify ballots containing the proposed amendment in HB2100 for the November 2026 general election, absent an injunction.

62. Plaintiffs will be irreparably harmed if the proposed constitutional amendment is placed on the November 3, 2026 ballot by being required to vote on a ballot question that is unlawful under the Maryland Constitution, Declaration of Rights, and Election Law Article.

63. Enacting HB2100 and placing the proposed constitutional amendment on the November 3, 2026 general election ballot is an act inconsistent with Article XIV, § 1 and Article 1, § 7 of the Maryland Constitution; Articles 7 and 24 of the Declaration of Rights; and EL §§ 7-103 and 7-105. *See* EL § 12-202(a)(1). “There can be no doubt that the inclusion of a” proposed constitutional amendment “on the ballot ‘may change’ the outcome of an election,” because the inclusion “creates the possibility that” the amendment may pass and be adopted, and the amendment’s “absence from the ballot assures that [it] will not.” *Cabrera v. Penate*, 439 Md. 99, 112 (2014); EL § 12-202(a)(2).

⁷ This certification of the ballot layout “may not be construed to be a certification of the ballot language required to be certified under § 7-103 of this article.” EL § 9-207(f).

64. The harm of requiring Plaintiffs to vote on a ballot question that is unlawful is irreparable because it “could not be redressed by any monetary sum, as it would undermine the integrity of the . . . election processes.” *See Ademiluyi v. Egbuonu*, 466 Md. 80, 134–35 (2019) (irreparable harm to voters from unqualified judicial candidate’s name being certified to ballot, due to risk of “a judge being elected . . . that lacked the proper qualifications”); *League of Women Voters v. Utah State Legis.*, 559 P.3d 11, 43 (Utah 2024) (injunction warranted because “Utah voters need to know now whether Amendment D . . . is valid”).

**COUNT I – VIOLATION OF MARYLAND’S CONSTITUTION AND DECLARATION
OF RIGHTS**

Declaration of Rights Art. 7 and Art. 24 & MD. CONST. Art. I, § 7 and Art. XIV, § 1

65. Plaintiffs re-allege and incorporate by reference all previous allegations.

66. Article I, § 7 of the Maryland Constitution requires that the Maryland General Assembly enact laws “necessary for the preservation of the purity of Elections.”

67. Article 7 of Maryland’s Declaration of Rights provides “[t]hat the right of the People to participate in the Legislature is the best security of liberty and the foundation of all free Government; for this purpose, elections ought to be free and frequent; and every citizen having the qualifications prescribed by the Constitution, ought to have the right of suffrage.”

68. This provision is “even more protective of rights of political participation than the provisions of the federal Constitution.” *Md. Green Party v. Md. Bd. of Elections*, 377 Md. 127, 150 (2003). The right of suffrage embodied in Article 7 is “one of, if not, the most important and ‘fundamental rights granted to Maryland citizens as members of a free society.’” *Nader for President 2004 v. Md. State Bd. of Elections*, 399 Md. 681, 686 (2007) (quotation omitted); *see also Kemp v. Owens*, 76 Md. 235, 241 (1892) (noting that “[t]he elective franchise is the highest right of the citizen, and the spirit of our institutions requires that every opportunity should be

afforded for its fair and free exercise”). Moreover, the “Free Elections Clause” in this provision “has been broadly interpreted to apply to legislation that infringes upon the right of political participation by citizens of the State.” *Szeliga*, 2022 WL 2132194, at *14.

69. Article 24 of Maryland’s Declaration of Rights guarantees that no person may be “deprived of his life, liberty or property, but by the judgment of his peers, or by the Law of the land.” The “concept of equal treatment is embodied in the due process requirement of Article 24 of the Declaration of Rights.” *Attorney General v. Waldron*, 289 Md. 683, 704–05 & n.7 (1981).

70. “[T]he Constitutional provision[] providing for voter input by amendment” in Article XIV, § 1 “as implemented by the Election Law, require[s] ‘a clear, unambiguous and understandable statement of the full and complete nature of the issues undertaken to be included in the proposition,’” and the proposed amendments “‘contents and purpose’” must be “set forth, in understandable language, ‘with the clarity and objectivity required to permit an average voter, in a meaningful manner, to exercise an intelligent choice.’” *Stop Slots MD 2008 v. State Bd. of Elections*, 424 Md. 163, 189–90 (2012) (quoting *Anne Arundel Cty. v. McDonough*, 277 Md. 271, 300 (1976)).

71. When, as here, “the ballot question is a summary of the purpose of the proposed amendment prepared” by the General Assembly, *see* § 7-105(b)(3), it must also “accurately and in a non-misleading manner, apprise[] the voters of the nature of the legislation upon which they are voting.” *Id.* at 191–92 (citation omitted); *see also Kelly v. Vote Know Coal., Inc.*, 331 Md. 164, 172 (1993).

72. Furthermore, “[w]hen the General Assembly submits an amendment to voters for approval, Due Process requires that adequate notice of the referendum be provided to the electorate prior to the election.” *Stop Slots MD 2008*, 424 Md. at 192 (citing *McDonough*, 277 Md. at 282).

“Thus, in determining the sufficiency of a ballot question summarizing a proposed amendment,” the court “must inquire not only whether the question itself sufficiently apprised voters of the amendment’s purpose, but, also, ‘whether or not its publication, by advertisements, prior to the election, permitted, in a meaningful manner, an intelligent decision, by an average voter.’” *Id.* at 193 (quoting *McDonough*, 277 Md. at 291–92).

73. The substance of the ballot question and the notice provided to date for the proposed amendment are insufficient under the Maryland Constitution and Declaration of Rights.

74. The summary of the proposed constitutional amendment that will appear as the ballot question states:

The proposed Constitutional Amendment clarifies that certain standards in the Maryland Constitution apply only to districts used to elect members of the General Assembly; authorizes the General Assembly to grant original jurisdiction to the Supreme Court of Maryland to review the congressional districting plan of the State; and requires the criteria for boundaries of congressional districts to be determined by applicable federal laws.

See Ex. D.

75. This summary is inaccurate, misleading, and otherwise insufficient in several ways.

76. First, the claim that the proposed amendment “clarifies that certain standards in the Maryland Constitution apply only to” General Assembly districts misstates both the operation and the scope of the proposed amendment. “Clarifies” signals continuity with existing law, but the amendments seek to repeal the application of Article III, § 4’s criteria to congressional maps and to exempt the General Assembly from the need to comply with any Constitutional or Declaration of Rights protections when enacting congressional district plans. In particular, Article III, § 4, as well as the Free Elections guarantee of Article 7 of the Maryland Declaration of Rights, the due process and equal protection guarantees of Article 24 of the Maryland Declaration of Rights, and the Free Speech guarantees of Article 40 of the Maryland Declaration of Rights have all been held

to apply to congressional districting plans in Maryland. *See Szeliga*, 2022 WL 2132194, at **11–12 (concluding that the term ““legislative districts”” in Article III § 4 “includes Congressional districts” and that the Free Elections Clause and Equal Protection Clause of the Maryland Declaration of Rights “implicate the use of standards contained in the Constitution in order to determine a violation of each,” such that “implementation of their provisions can be determined in reference to Article III, Section 4”); *see also id.* at *14 (holding Article 7’s free elections clause’s “pivotal goal” was “to protect the right of political participation in Congressional elections”); *id.* at **15–18, 46 (applying strict scrutiny under Article 24 to congressional redistricting, finding viable claim stated by allegations that the plan “intentionally discriminates against Plaintiffs by diluting the weight of their votes based on party affiliation and depriving them of the opportunity for full and effective participation in the election of their Congressional representatives”); *id.* at **19, 46 (applying strict scrutiny under Article 40’s free speech clause because congressional districting that dilutes voters’ influence “based upon their prior political expression . . . imposes a burden on a right or benefit, here a fundamental right”). Taken together, these provisions *require* the General Assembly to comply with Article III, § 4’s anti-gerrymandering standards and apply strict scrutiny to any congressional plans that infringe the due process, equal protection, and free speech rights of voters. And voters have further rights under the “fundamental principles of the Maryland Constitution and Declaration of Rights of popular sovereignty and avoiding extravagant and undue exercise of power by the Legislature.” *Id.* at *21.

77. Thus, the assertion that the proposed amendment only affects “certain standards in the Maryland Constitution” for congressional districts is false. *See* Ex. D, Section 3 (ballot question language). Indeed, the proposed amendment goes to extraordinary lengths to ensure that **no** criteria in the Maryland Constitution, including the Declaration of Rights, apply to congressional districts.

See id. Section 1 (“(B) NOTHING IN THIS ARTICLE OR ELSEWHERE IN THIS CONSTITUTION, INCLUDING THE DECLARATION OF RIGHTS, PROVIDES APPLICABLE CRITERIA FOR THE BOUNDARIES OF A CONGRESSIONAL DISTRICTING PLAN.”).

78. Second, the summary claims that the proposed amendment “requires” criteria for congressional districts to be “determined by applicable federal laws,” but the proposed amendment does not state what laws apply or what criteria derive from such laws. *See* Ex. D, Section 1. This is the improper substitution of confusing legal jargon for plain text prohibited by EL § 7-103(b). The amendment text, in fact, makes no reference to federal law and fails to identify any criteria, either.

79. This choice was likely deliberate. The proposed amendment seeks to repeal the requirements in Article III, § 4 that congressional districts must be compact, contiguous, and give due regard to natural boundaries and the boundaries of political subdivisions. There are no compactness, contiguity, or political subdivision requirements imposed by federal law for congressional districts,⁸ nor does federal law prohibit partisan gerrymandering. *See generally Rucho v. Common Cause*, 588 U.S. 684 (2019). The true effect of the proposed amendment to Article III, § 4 is that there will be no requirement that congressional districts be compact, contiguous, or give due regard to political subdivisions.

80. Proposed new Article III, § 62(B) is even worse. By exempting congressional districts from the requirements of the Maryland Constitution and the Declaration of Rights, the proposed amendment severely limits the criteria required for congressional redistricting plans to

⁸ Federal courts have acknowledged these requirements are permissible redistricting criteria, but not mandatory. *Callais*, 146 S. Ct. at 1156; *League of Women Voters of Chicago v. City of Chicago*, 757 F.3d 722, 726 (7th Cir. 2014); *Gaffney v. Cummings*, 412 U.S. 735, 752 n.18 (1973) (explaining that “compactness or attractiveness [of districts] has never been held to constitute an independent federal constitutional requirement”).

only the few mandated by the U.S. Constitution (the equal population requirements in Article I, § 2 and prohibitions on racial discrimination under the Fourteenth and Fifteenth Amendments). And it gives the General Assembly a breathtakingly broad exemption from any obligation to comply with the provisions of the Maryland Constitution or Declaration of Rights when configuring congressional plans—not the right to free elections (Article I, § 7 of the Maryland Constitution and Article 7 of the Maryland Declaration of Rights), not the due process and equal protection guarantees of Article 24 of the Maryland Declaration of Rights, not the free speech guarantee of Article 40 of the Maryland Declaration of Rights, and not the overall right under the Constitution and Declaration of Rights to popular sovereignty and the avoidance of extravagant and undue power by the General Assembly. But a voter would not know *a single word* of all the constitutional rights and protections they are being asked to forfeit from the text of the ballot question.

81. In reality, the General Assembly seeks to nullify the Maryland Constitution’s provisions that prevent it from engaging in partisan gerrymandering, giving itself a free pass to do exactly that. In 2022, the Anne Arundel County Circuit Court relied on the very criteria that the proposed amendment targets here—compactness, regard for political subdivisions, and the Declaration of Rights—to strike down the 2021 congressional plan and find it was “an outlier and a product of extreme partisan gerrymandering.” *Szeliga*, 2022 WL 2132194, at *45. By repealing the application of those provisions to congressional districts, the General Assembly is attempting to insulate a future congressional plan from allegations of partisan gerrymandering. It is clear that, in response to plans drawn by Republicans across the country, the State’s intent is to pass a new congressional plan that “overhauls” the State’s “lone Republican district,”⁹ and is “designed to

⁹ Bryan P. Spears, *Moore’s redistricting commission recommends ‘congressional map concept’*, MD. MATTERS (Jan. 21, 2026), <https://marylandmatters.org/2026/01/21/moores-redistricting-commission-recommends-congressional-map-concept/>.

allow the party to control all eight of Maryland’s congressional districts.”¹⁰ *See Governor Moore Statement on Maryland’s Passage of Redistricting Amendment Ensuring Elections Remain in the Hands of Marylanders*, OFFICE OF GOVERNOR WES MOORE (Aug. 4, 2026), <https://governor.maryland.gov/news/press-releases/governor-moore-statement-marylands-passage-redistricting-amendment-ensuring-elections-remain>.

82. The ballot question is inaccurate and misleading and does not “apprise[] the voters of the true nature of the legislation upon which they are voting.” *Stop Slots MD 2008*, 424 Md. at 192.

83. The ballot question for the proposed amendment therefore violates Article XIV, § 1. *See id.* at 189 (explaining that “the Constitutional provision[] providing for voter input by amendment . . . require[s] ‘a clear, unambiguous and understandable statement of the full and complete nature of the issues undertaken to be included in the proposition’”). Because the proposed amendment does not satisfy the requirements of Article XIV, § 1, it has not qualified for the ballot. *See* EL § 7-102(a)(3) (providing that “[a]n amendment to the Constitution qualifies upon its passage by the General Assembly pursuant to Article XIV, § 1 of the Maryland Constitution.”).

84. These deficiencies in the substance of the ballot question are compounded by the deficiencies in the notice given to the public. “When the General Assembly submits an amendment to voters for approval, Due Process requires that adequate notice of the [amendment] be provided to the electorate prior to the election.” *Stop Slots MD 2008*, 424 Md. at 192.

¹⁰ Jane C. Timm, *Maryland House passes new congressional map, setting up a showdown with the state Senate*, NBC NEWS (Feb. 2, 2026), <https://www.nbcnews.com/politics/2026-election/maryland-house-passes-new-congressional-map-state-senate-rcna257030>.

85. Underlying the notice inquiry here is the “notice prescribed by the statutory scheme and the well-settled principles of Due Process of Law.” *Id.* (citing *Ulman v. Baltimore*, 72 Md. 587, 593 (1890)).

86. HB2100 was rushed through the legislative process, well after the statutory deadlines for certification and publication of ballot questions for the November 2026 general election. The General Assembly passed the bill in just two days and suspended applicable rules governing hearings and readings to accelerate its passage. *See* HB 2100, *Election Districts - General Assembly and Representatives in Congress*, MD. GEN. ASSEMBLY, <https://mgaleg.maryland.gov/mgaweb/Legislation/Details/HB2100?ys=2026RS> (last visited Aug. 8, 2026) (“History . . . 8/03/2026 Motion Rules Suspend Two Readings Same Day” and “8/04/2026 Motion Rules Suspend Two Readings Same Day”). By virtue of the timing of HB2100’s passage, it does not comply with the statutory notice requirements and deadlines for certification of the ballot question language, EL § 7-103(c)(1), for the brief statement of the case, EL § 7-105(b)(2)(iii), nor for the posting of the constitutional text, EL § 7-105(e).

87. The State Board has also failed to make the ballot question information available to the public for a 15-day comment period, thus depriving the public of the opportunity to provide important feedback on the ballot question and making it impossible for the Secretary of State to “make any necessary changes to the question” based on those comments and submit the certified text to the State Board. EL § 7-103(c)(5). By virtue of this language, the ballot question was fixed on the date of enactment, making any subsequent notice-and-comment process, even if one was undertaken (which it was not), pointless as the Secretary would be unable to make changes in response to any public comments received.

88. Because it was too late to meet these statutorily-mandated deadlines, the General Assembly has attempted to exempt HB2100 from their requirements. *See* Ex. C, Section 3(b)(2) (“Notwithstanding any other provision of law, at that general election, the following question shall be submitted to the qualified voters of the State”); *Video of House Floor Actions (8/3/2026)*, MD. GEN. ASSEMBLY, at 42:05–53:27, <https://mgaleg.maryland.gov/mgaweb/site/FloorActions/Media/house-71-A?year=2026RS> (last visited Aug. 8, 2026).

89. The requirements in EL §§ 7-103 and 7-105 exist for good reason. They “implement[]” the “Constitutional provisions providing for voter input by amendment,” *Stop Slots MD 2008*, 424 Md. at 189, and set the notice that is required for due process. *Id.* at 189–90, 192. Those statutory deadlines have lapsed and the necessary notice cannot be reconstructed before the November 2026 general election.

90. Plaintiffs’ due process rights are therefore violated by both the deficiencies in the substance of the ballot and in the lack of adequate notice provided to the public prior to the election, as they do not “permit[], in a meaningful manner, an intelligent decision, by an average voter, when he exercise[s] his choice, in voting either ‘FOR’ or ‘AGAINST’” the ballot question. *McDonough*, 277 Md. at 291–92.

91. These procedural and substantive deficiencies also violate Plaintiffs’ right to vote and the Free Elections Clause in Article 7 of the Declaration of Rights. *See id.* at 307 (holding that “the failure of the ballot question to present a clear, unambiguous and understandable statement of the full and complete nature of the issues included” in the ballot question “coupled with” deficient advertisements of the question “constituted a ‘deviation from the prescribed forms of the law (and) had so vital an influence as probably to have prevented a free and full expression of the popular will.’”) (citations omitted).

92. Plaintiffs' rights are also violated by the General Assembly's attempt to exempt HB2100 from the statutory requirements of the Election Law.

93. Retrospective statutes are those "acts which operate on transactions which have occurred or rights and obligations which existed before passage of the act." *Langston v. Riffe*, 359 Md. 396, 406 (2000). Legislation that retroactively abrogates vested rights violates Article 24 of the Declaration of Rights. *Muskin v. State Dep't of Assessments & Taxation*, 422 Md. 544, 557 (2011).

94. HB2100's Section 3(b)(2) is clearly retrospective under Maryland's definition of that term. HB2100 missed the July 1, 2026 deadline for the Secretary of State to prepare and certify the ballot question information and the August 3, 2026 deadline for the brief statement summarizing the ballot question. The proposed amendment also was not posted within the deadline. Instead of complying with the deadlines as proscribed, based on the General Assembly's alleged "prerogative" to do so, HB2100 purports to eviscerate them by retroactively making them inapplicable.

95. Moreover, the Election Law Article "implements" the requirements of Maryland Constitution and establishes the notice that must be provided to the public. *Stop Slots MD 2008*, 424 Md. at 189. HB2100 retroactively abrogates the vested rights of Plaintiffs to adequate notice of proposed constitutional amendments by exempting HB2100 from those requirements.

96. The Maryland Constitution and Declaration of Rights guarantee free and fair elections for voters and protect voters' due process rights. The Constitution also requires the General Assembly to "pass Laws necessary for the preservation of the purity of Elections." CONST. art. I, § 7. These provisions are violated when elected officials selectively apply statutory election

requirements and attempt to make them applicable only when convenient or politically advantageous.

97. Plaintiffs are entitled to a declaration that the ballot question information and lack of notice provided for HB2100's proposed amendment violate Article I, § 7 and Article XIV, § 1 of the Maryland Constitution and Articles 7 and 24 of the Declaration of Rights.

98. Plaintiffs are likewise entitled to injunctive relief prohibiting Defendants from certifying, printing, or distributing the proposed amendment in HB2100 on the ballot for the November 2026 general election, from conducting the November 2026 general election with the proposed amendment in HB2100 on the ballot, and from canvassing or certifying the results of the November 2026 general election with the proposed amendment in HB2100 on the ballot.

99. Plaintiffs have no adequate remedy at law other than the declaratory and injunctive relief requested herein.

**COUNT II – VIOLATION OF ELECTION LAW ARTICLE
EL § 7-103 and § 7-105**

100. Plaintiffs re-allege and incorporate by reference all previous allegations.

101. HB2100 also violates EL § 7-103 and EL § 7-105 in numerous ways.

102. EL § 7-103(c)(1) required the Secretary of State to “prepare and certify to the State Board the information required under” EL § 7-103(b) “for all statewide ballot questions” on or before July 1, 2026. HB2100 and its proposed amendment were not passed by the General Assembly and signed by the Governor until August 5, 2026. Therefore, the Secretary of State could not and did not prepare and certify the required information for HB2100's ballot question by July 1, 2026. This failure violates EL § 7-103(c)(1).

103. The information that the State Board has posted on its website relating to HB2100's ballot question as of the date of this filing does not meet the requirements of EL § 7-103(b).

Specifically, the ballot question language does not include “a brief statement explaining what the practical outcome of each voting choice would be.” EL § 7-103(b)(6). This omission violates EL § 7-103(b). And the omission is intentional, as a truthful statement of the “practical outcome” of voting FOR the proposed amendment in HB2100 would be to strip voters of numerous constitutional protections in connection with congressional redistricting.

104. The “brief statement, prepared in clear and concise language, devoid of technical and legal terms to the extent practicable, summarizing the question” required by EL § 7-105(b)(1) was not submitted to the State Board by the August 3, 2026 deadline. EL § 7-105(b)(2)(iii). This failure violates EL § 7-105(b).

105. The condensed statement that was untimely provided also violates EL § 7-103(b)(4) in multiple ways, including without limitation that the ballot question statement:

- a. is festooned with legal jargon and vague, passive-voice language about the effect, which is not reasonably understandable by a voter, in violation of EL § 7-103(b)(4)(i) & (iii);
- b. claims the amendment proposed by HB2100 “clarifies” that Article III, § 4’s standards apply only to General Assembly districts and not congressional districts, and thereby obscures that it is *changing* the text of the constitution to remove congressional boundaries from its scope and not merely “clarifying” language that already exists, and further fails to identify specifically what standards are being changed (instead claiming “certain standards” without specificity), violating §§ 7-103(b)(4)(i) & (iii);
- c. claims the amendment “requires the criteria” for congressional district boundaries to “be determined by applicable federal laws,” which is both false

and is stated in the passive voice and with legal jargon that is not understandable to voters, violating §§ 7-103(b)(4)(i) & (iii); and

- d. improperly uses legal jargon or legal mechanisms in the summary to describe the grant of original jurisdiction to the Maryland Supreme Court to “review the congressional districting plan of the state,” in violation of §§ 7-103(b)(4)(i)–(iii).

106. The State Board and county boards also failed to post the complete text of the proposed amendment in HB2100 on or before August 5, 2026. EL § 7-105(e). This failure violates EL § 7-105(e).

107. Nor did the State Board “make the information submitted in accordance with” EL § 7-103(c) for HB2100’s proposed amendment “available to the public for a 15-day comment period.” EL § 7-103(c)(5)(i). Instead of the standard 15-day comment period, the proposed amendment was made available for public comment via a six-hour legislative hearing held open to a mere fifty members of the public on the same day the final amendment language was proposed. *See Video of House Floor Actions (8/3/2026)*, MD. GEN. ASSEMBLY, at 43:10–28, 55:30–57:05, <https://mgaleg.maryland.gov/mgaweb/FloorActions/Media/house-71-A?year=2026RS> (last visited Aug. 8, 2026) (acknowledging the General Assembly was bypassing “15-days of public comment” and instead holding a public hearing “for the last six hours” that was limited to 50 people). This failure violates EL § 7-103(c).

108. Plaintiffs are entitled to a declaration that the ballot question information and notice provided for HB2100’s proposed amendment violate EL § 7-103 and EL § 7-105.

109. Plaintiffs are likewise entitled to injunctive relief prohibiting Defendants from certifying, printing, or distributing the proposed amendment in HB2100 on the ballot for the

November 2026 general election, from conducting the November 2026 general election with the proposed amendment in HB2100 on the ballot, and from canvassing or certifying the results of the November 2026 general election with the proposed amendment in HB2100 on the ballot.

110. Plaintiffs have no adequate remedy at law other than the declaratory and injunctive relief requested herein.

**COUNT III – VIOLATION OF MARYLAND’S SINGLE-SUBJECT REQUIREMENT
Md. CONST. Art. XIV, § 1**

111. Plaintiffs re-allege and incorporate by reference all previous allegations.

112. Article XIV, § 1 of the Maryland Constitution states that “[t]he General Assembly may propose Amendments to this Constitution; provided that each Amendment shall be embraced in a separate bill, embodying the Article or Section, as the same will stand when amended and passed by three-fifths of all the members elected to each of the two Houses, by yeas and nays, to be entered on the Journals with the proposed Amendment.”

113. Article XIV, § 1 further provides that the requirement that a proposed amendment be “embraced in a separate bill” does not prevent the General Assembly from “embodying in a single Constitutional amendment one or more Articles of the Constitution so long as that Constitutional amendment embraces only a single subject.”

114. This single-subject requirement “is intended to require a single amendment to deal with a single subject which may be ratified or rejected by a single vote.” *Andrews v. Governor of Maryland*, 294 Md. 285, 296–97 (1982). “If the proposed changes deal with different or dissimilar subjects and seek to reach different objectives which require amendment, then the legislature must submit these proposals to the electorate so as to allow the electors to vote upon each separately.” *Id.* at 297.

115. Single-subject requirements are intended to “prevent[] the pernicious practice of ‘logrolling’ in the submission of a constitutional amendment.” *Id.* at 292 (collecting cases). “Logrolling occurs when two or more propositions essentially dissimilar in subject matter are submitted to the electorate in one amendment so that the voter may cast one expression of his vote answer on the measure as a whole.” *Id.* A legislature is guilty of logrolling when it proposes an amendment with propositions “related to more than one subject and ha[ving] at least two distinct and separate purposes not dependent upon or connected with each other,” *id.*, so as to “make it impossible for the voters to express their will as to each,” *id.* at 296 (citing *Baum v. Newbry*, 267 P.2d 220, 223 (Or. 1954)).

116. Single-subject requirements are also intended to prohibit proposed amendments that are misleading to the public. *See Andrews*, 294 Md. at 295 (citing *In re Initiative Petition No. 314*, 625 P.2d 595, 603 (Ok. 1982)); *see also Fugina v. Donovan*, 104 N.W.2d 911, 914 (Minn. 1960) (in addition to preventing logrolling, goal of single-subject requirement is “to prevent imposition upon or deceit of the public by the presentation of a proposal which is misleading or the effect of which is concealed or not readily understandable”).

117. Thus, a proposed amendment cannot stand when it is both misleading to the public and “logrolls” unrelated proposals into one. *Andrews*, 294 Md. at 295; *In re Initiative Petition No. 314*, 625 P.2d at 603; *Fugina*, 104 N.W.2d at 914.

118. HB2100’s proposed amendment violates Article XIV, § 1’s single-subject requirement because it is both misleading and combines multiple propositions relating to different subjects that could stand on their own into one amendment.

119. HB2100 contains three amendments. First, the existing text of Article III, § 4 is altered to state that only General Assembly districts are subject to the requirements that districts

must be contiguous, compact, and of “substantially equal population” and that “due regard” must be given to political subdivision and natural boundaries. Ex. D, Section 1.

120. Second, in a new section titled § 62, the proposed amendment adds a provision that allows the General Assembly to grant to the Maryland Supreme Court original jurisdiction to review the state’s congressional plan. *Id.*

121. Third, another provision is added to § 62 to make the requirements of the Maryland Constitution, “including the Declaration of Rights” inapplicable to the state’s congressional plan. *Id.*

122. These are “three distinct propositions contained therein, no two of which are necessarily required for a proper operation of the third.” *Kerby v. Luhrs*, 36 P.2d 549, 554 (Ariz. 1934). The amendment limiting the criteria for General Assembly districts could be separately proposed from the amendment stating that the criteria do not apply to congressional districts, and neither amendment is necessary to the amendment providing original jurisdiction over congressional districts to the Maryland Supreme Court. All three provisions are independent of each other and could stand alone.

123. Furthermore, a Maryland voter could support limiting the constitutional requirements of Article III, § 4 to only state legislative districts but still want the Declaration of Rights and constitutional requirements to apply to congressional districts. Or a voter could support Supreme Court original jurisdiction for congressional redistricting but disapprove of limiting the constitutional requirements to only state legislative districts. Accordingly, HB2100’s proposed amendment seems to be an attempt to “constrain[] [voters] to adopt measures of which in reality they disapprove, in order to secure the enactment of others they earnestly desire” in violation of

the single-subject requirement. *Andrews*, 294 Md. at 301 (citing *Mundell v. Swedlund*, 71 P.2d 434, 443–44 (Idaho 1937)).

124. At a minimum, the proposed amendment relates to the two separate subjects of “redistricting criteria” and “jurisdiction,” or to the subjects of “General Assembly redistricting” and “congressional redistricting.” Thus, they should be presented separately.

125. The combination of these amendments into one proposal was not done “to make obvious possible hidden side effects and to promote public awareness.” *Id.* at 297.

126. Quite the opposite, the proposed amendment is misleading to the public and hides its true effects.

127. Because the proposed amendment is both misleading to the public and “logrolls” unrelated proposals into one, they violate the single-subject requirement of Article XIV, § 1. *Id.* at 295; *In re Initiative Petition No. 314*, 625 P.2d at 603; *Fugina*, 104 N.W.2d at 914.

128. Plaintiffs are entitled to a declaration that the proposed amendment violates Article XIV, § 1.

129. Plaintiffs are likewise entitled to injunctive relief preventing Defendants from certifying, printing, or distributing the proposed amendment in HB2100 on the ballot for the November 2026 general election, from conducting the November 2026 general election with the proposed amendment in HB2100 on the ballot, and from canvassing or certifying the results of the November 2026 general election with the proposed amendment in HB2100 on the ballot.

130. Plaintiffs have no adequate remedy at law other than the declaratory and injunctive relief requested herein.

REQUEST FOR EXPEDITED CONSIDERATION

131. Because this action concerns the composition of the November 3, 2026 general election ballot, Plaintiffs respectfully request that the Court hear and decide this matter as expeditiously as the circumstances require, consistent with EL § 12-203(a)(1).

REQUEST FOR RELIEF

WHEREFORE, for the foregoing reasons, Plaintiffs request relief as follows:

- a. A declaration that the ballot question and notice provided for the proposed constitutional amendment in HB2100 violates the rights of Plaintiffs under Articles 7 and 24 of Maryland's Declaration of Rights, and violates Article XIV, § 1 and Article I, § 7 of the Maryland Constitution;
- b. A declaration that the proposed amendment violates Article XIV, § 1 of the Maryland Constitution;
- c. A declaration that the ballot question information and notice provided for the proposed amendment in HB2100 violates EL § 7-103 and EL § 7-105;
- d. An injunction preliminarily prohibiting Defendants from certifying, printing, or distributing the proposed amendment in HB2100 on the ballot for the November 2026 general election, from conducting the November 2026 general election with the proposed amendment in HB2100 on the ballot, and from canvassing or certifying the results of the November 2026 general election with the proposed amendment in HB2100 on the ballot;
- e. An injunction permanently prohibiting Defendants from certifying, printing, or distributing the proposed amendment in HB2100 on the ballot for the November 2026 general election, from conducting the November 2026 general election with the

proposed amendment in HB2100 on the ballot, and from canvassing or certifying the results of the November 2026 general election with the proposed amendment in HB2100 on the ballot;

- f. In the event ballots have already been printed or votes have already been cast on the proposed amendment at the time of any hearing or ruling in this matter, order such further or alternative relief as may be necessary to prevent certification or canvassing of the results of the vote on the proposed amendment, including severance of the proposed amendment question from certification of the remainder of the November 3, 2026, general election;
- g. Costs; and
- h. Any other and further relief to which Plaintiffs are entitled at law or in equity.

Respectfully submitted,

Dated: August 10, 2026

/s/ Strider L. Dickson

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Facsimile: (410) 934-3933
sdickson@mdswlaw.com

Attorney for Plaintiffs

EXHIBIT A



The State of Maryland

Executive Department

EXECUTIVE ORDER
01.01.2026.14

Proclamation Convening the General Assembly of Maryland in
Extraordinary Session at Annapolis, Maryland Commencing August 3, 2026

WHEREAS, The Moore-Miller Administration is committed to preserving Marylanders' voting rights and fair representation, which form the foundation of our democracy, as these bedrock principles come under attack across the country;

WHEREAS, We are seeing coordinated efforts to weaken voting rights, dilute Black representation, and bend the rules of democracy for partisan gain, through the dismantling of the Voting Rights Act;

WHEREAS, Until this country adopts national redistricting reform, Maryland will fight to ensure that our State has the tools necessary to protect voters and defend fair representation, and

WHEREAS, My Administration is committed to working with the General Assembly to clarify the constitutional standards that govern the establishment of the State of Maryland's federal congressional districts.

NOW, THEREFORE, I, WES MOORE, GOVERNOR OF THE STATE OF MARYLAND, BY VIRTUE OF THE AUTHORITY VESTED IN ME BY ARTICLE II, SECTION 16, OF THE MARYLAND CONSTITUTION AND THE LAWS OF MARYLAND, HEREBY PROCLAIM AND CONVENE A SPECIAL AND EXTRAORDINARY SESSION OF THE GENERAL ASSEMBLY OF MARYLAND TO COMMENCE ON AUGUST 3, 2026, IN THE STATE CAPITAL IN THE CITY OF ANNAPOLIS FOR THE PURPOSE OF PASSING LEGISLATION TO AMEND THE STATE CONSTITUTION TO CLARIFY AND REAFFIRM THAT THE PROVISIONS WHICH GOVERN THE REQUIREMENTS OF OUR STATE LEGISLATIVE DISTRICTS DO NOT APPLY TO MARYLAND'S CONGRESSIONAL DISTRICTS.

GIVEN Under My Hand and the Great Seal of the State of Maryland, in the City of Annapolis, effective this 17th Day of July 2026.



Wes Moore
Governor



ATTEST:



Susan C. Lee
Secretary of State

EXHIBIT B

HOUSE BILL 2100

G1, P5

CONSTITUTIONAL AMENDMENT

6lr3740
CF SB 2100

By: **The Speaker**

Introduced and read first time: August 3, 2026

Assigned to: Government, Labor, and Elections

A BILL ENTITLED

1 AN ACT concerning

2 **Election Districts – General Assembly and Representatives in Congress**

3 FOR the purpose of clarifying that certain requirements apply only to districts for the
4 election of members of the Senate of Maryland and the House of Delegates;
5 authorizing the General Assembly to grant original jurisdiction to the Supreme
6 Court of Maryland to review the congressional districting plan of the State; and
7 providing that nothing in the Maryland Constitution provides applicable criteria for
8 the boundaries of a congressional districting plan.

9 BY proposing an amendment to the Maryland Constitution
10 Article III – Legislative Department
11 Section 4

12 BY proposing an addition to the Maryland Constitution
13 Article III – Legislative Department
14 Section 62

15 Preamble

16 WHEREAS, Congressional districting in Maryland remains subject to the U.S.
17 Constitution, federal law, and any Maryland statute expressly governing congressional
18 districts; and

19 WHEREAS, In *Szeliga v. Lamone* and *Parrott v. Lamone*, the Circuit Court for Anne
20 Arundel County held that Article III, § 4 districting standards apply to congressional
21 districts, relying on Articles 7, 24, and 40 of the Declaration of Rights, though no Maryland
22 constitutional provision expressly addresses congressional districting; and

23 WHEREAS, This amendment clarifies the long-standing understanding and case
24 law that Article III, § 4 of the Maryland Constitution governs only General Assembly
25 districting plans, not congressional districting plans; and

EXPLANATION: CAPITALS INDICATE MATTER ADDED TO EXISTING LAW.

[Brackets] indicate matter deleted from existing law.



WHEREAS, Preserving Maryland's cohesive communities of interest connected by shared civic, social, economic, political subdivisions, and other common interests without unnecessary fragmentation is a legitimate, neutral consideration in congressional districting; and

WHEREAS, Nothing in this amendment establishes a demographic target, requires proportional representation, guarantees any electoral outcome, or authorizes discrimination prohibited by federal law; and

WHEREAS, This amendment is not intended to provide new grounds to challenge the plan enacted by Chapter 16 of the Acts of 2022; now, therefore,

SECTION 1. BE IT ENACTED BY THE GENERAL ASSEMBLY OF MARYLAND, (Three-fifths of all the members elected to each of the two Houses concurring), That it be proposed that the Maryland Constitution read as follows:

Article III – Legislative Department

4.

Each legislative district **FOR THE ELECTION OF A MEMBER OF THE SENATE AND MEMBERS OF THE HOUSE OF DELEGATES** shall consist of adjoining territory, be compact in form, and of substantially equal population. Due regard shall be given to natural boundaries and the boundaries of political subdivisions.

62.

(A) THE GENERAL ASSEMBLY SHALL HAVE THE POWER TO GRANT ORIGINAL JURISDICTION TO THE SUPREME COURT OF MARYLAND TO REVIEW THE CONGRESSIONAL DISTRICTING PLAN OF THE STATE.

(B) NOTHING IN THIS ARTICLE OR ELSEWHERE IN THIS CONSTITUTION, INCLUDING THE DECLARATION OF RIGHTS, PROVIDES APPLICABLE CRITERIA FOR THE BOUNDARIES OF A CONGRESSIONAL DISTRICTING PLAN.

SECTION 2. AND BE IT FURTHER ENACTED, That the General Assembly determines that the amendment to the Maryland Constitution proposed by Section 1 of this Act affects multiple jurisdictions and that the provisions of Article XIV, § 1 of the Maryland Constitution concerning local approval of constitutional amendments do not apply.

SECTION 3. AND BE IT FURTHER ENACTED, That:

(a) The amendment to the Maryland Constitution proposed by Section 1 of this Act shall be submitted to the qualified voters of the State at the next general election to be

1 held in November 2026 for adoption or rejection in accordance with Article XIV of the
2 Maryland Constitution.

3 (b) (1) At that general election, the vote on the proposed amendment to the
4 Constitution shall be by ballot, and on each ballot there shall be printed the words “For the
5 Constitutional Amendment” and “Against the Constitutional Amendment”, as now
6 provided by law.

7 (2) At that general election, a question substantially similar to the
8 following shall be submitted to the qualified voters of the State:

9 “Question ____ – Constitutional Amendment

10 The proposed Constitutional Amendment clarifies that certain standards in the
11 Maryland Constitution apply only to districts used to elect members of the General
12 Assembly; authorizes the General Assembly to grant original jurisdiction to the Supreme
13 Court of Maryland to review the congressional districting plan of the State; and requires
14 the criteria for boundaries of congressional districts to be determined by applicable federal
15 laws.”.

16 (c) Immediately after the election, all returns shall be made to the Governor of
17 the vote for and against the proposed amendment, as directed by Article XIV of the
18 Maryland Constitution, and further proceedings held in accordance with Article XIV.

EXHIBIT C

HOUSE BILL 2100

G1, P5

CONSTITUTIONAL AMENDMENT

6lr3740
CF SB 2100

By: **The Speaker**

Introduced and read first time: August 3, 2026

Assigned to: Government, Labor, and Elections

Rules suspended

Committee Report: Favorable with amendments

House action: Adopted

Read second time: August 3, 2026

CHAPTER _____

1 AN ACT concerning

2 **Election Districts – General Assembly and Representatives in Congress**

3 FOR the purpose of clarifying that certain requirements apply only to districts for the
4 election of members of the Senate of Maryland and the House of Delegates;
5 authorizing the General Assembly to grant original jurisdiction to the Supreme
6 Court of Maryland to review the congressional districting plan of the State; and
7 providing that nothing in the Maryland Constitution provides applicable criteria for
8 the boundaries of a congressional districting plan.

9 BY proposing an amendment to the Maryland Constitution
10 Article III – Legislative Department
11 Section 4

12 BY proposing an addition to the Maryland Constitution
13 Article III – Legislative Department
14 Section 62

15 Preamble

16 WHEREAS, Congressional districting in Maryland remains subject to the U.S.
17 Constitution, federal law, and any Maryland statute expressly governing congressional
18 districts; and

EXPLANATION: CAPITALS INDICATE MATTER ADDED TO EXISTING LAW.

[Brackets] indicate matter deleted from existing law.

Underlining indicates amendments to bill.

~~Strike out~~ indicates matter stricken from the bill by amendment or deleted from the law by amendment.



WHEREAS, In *Szeliga v. Lamone* and *Parrott v. Lamone*, the Circuit Court for Anne Arundel County held that Article III, § 4 districting standards apply to congressional districts, relying on Articles 7, 24, and 40 of the Declaration of Rights, though no Maryland constitutional provision expressly addresses congressional districting; and

WHEREAS, This amendment clarifies the long-standing understanding and case law that Article III, § 4 of the Maryland Constitution governs only General Assembly districting plans, not congressional districting plans; and

WHEREAS, Preserving Maryland's cohesive communities of interest connected by shared civic, social, economic, political subdivisions, and other common interests without unnecessary fragmentation is a legitimate, neutral consideration in congressional districting; and

WHEREAS, Nothing in this amendment establishes a demographic target, requires proportional representation, guarantees any electoral outcome, or authorizes discrimination prohibited by federal law; and

WHEREAS, This amendment is not intended to provide new grounds to challenge the plan enacted by Chapter 16 of the Acts of 2022; now, therefore,

SECTION 1. BE IT ENACTED BY THE GENERAL ASSEMBLY OF MARYLAND, (Three-fifths of all the members elected to each of the two Houses concurring), That it be proposed that the Maryland Constitution read as follows:

Article III – Legislative Department

4.

Each legislative district **FOR THE ELECTION OF A MEMBER OF THE SENATE AND MEMBERS OF THE HOUSE OF DELEGATES** shall consist of adjoining territory, be compact in form, and of substantially equal population. Due regard shall be given to natural boundaries and the boundaries of political subdivisions.

62.

(A) THE GENERAL ASSEMBLY SHALL HAVE THE POWER TO GRANT ORIGINAL JURISDICTION TO THE SUPREME COURT OF MARYLAND TO REVIEW THE CONGRESSIONAL DISTRICTING PLAN OF THE STATE.

(B) NOTHING IN THIS ARTICLE OR ELSEWHERE IN THIS CONSTITUTION, INCLUDING THE DECLARATION OF RIGHTS, PROVIDES APPLICABLE CRITERIA FOR THE BOUNDARIES OF A CONGRESSIONAL DISTRICTING PLAN.

SECTION 2. AND BE IT FURTHER ENACTED, That the General Assembly determines that the amendment to the Maryland Constitution proposed by Section 1 of this

1 Act affects multiple jurisdictions and that the provisions of Article XIV, § 1 of the Maryland
2 Constitution concerning local approval of constitutional amendments do not apply.

3 SECTION 3. AND BE IT FURTHER ENACTED, That:

4 (a) The amendment to the Maryland Constitution proposed by Section 1 of this
5 Act shall be submitted to the qualified voters of the State at the next general election to be
6 held in November 2026 for adoption or rejection in accordance with Article XIV of the
7 Maryland Constitution.

8 (b) (1) At that general election, the vote on the proposed amendment to the
9 Constitution shall be by ballot, and on each ballot there shall be printed the words “For the
10 Constitutional Amendment” and “Against the Constitutional Amendment”, as now
11 provided by law.

12 (2) ~~At that general election, a question substantially similar to the~~
13 ~~following~~ Notwithstanding any other provision of law, at that general election, the following
14 question shall be submitted to the qualified voters of the State:

15 “Question ____ – Constitutional Amendment

16 The proposed Constitutional Amendment clarifies that certain standards in the
17 Maryland Constitution apply only to districts used to elect members of the General
18 Assembly; authorizes the General Assembly to grant original jurisdiction to the Supreme
19 Court of Maryland to review the congressional districting plan of the State; and requires
20 the criteria for boundaries of congressional districts to be determined by applicable federal
21 laws.”.

22 (c) Immediately after the election, all returns shall be made to the Governor of
23 the vote for and against the proposed amendment, as directed by Article XIV of the
24 Maryland Constitution, and further proceedings held in accordance with Article XIV.

Approved:

Governor.

Speaker of the House of Delegates.

President of the Senate.

EXHIBIT D

Chapter 881

(House Bill 2100)

AN ACT concerning

Election Districts – General Assembly and Representatives in Congress

FOR the purpose of clarifying that certain requirements apply only to districts for the election of members of the Senate of Maryland and the House of Delegates; authorizing the General Assembly to grant original jurisdiction to the Supreme Court of Maryland to review the congressional districting plan of the State; and providing that nothing in the Maryland Constitution provides applicable criteria for the boundaries of a congressional districting plan.

BY proposing an amendment to the Maryland Constitution
Article III – Legislative Department
Section 4

BY proposing an addition to the Maryland Constitution
Article III – Legislative Department
Section 62

Preamble

WHEREAS, Congressional districting in Maryland remains subject to the U.S. Constitution, federal law, and any Maryland statute expressly governing congressional districts; and

WHEREAS, In *Szeliga v. Lamone* and *Parrott v. Lamone*, the Circuit Court for Anne Arundel County held that Article III, § 4 districting standards apply to congressional districts, relying on Articles 7, 24, and 40 of the Declaration of Rights, though no Maryland constitutional provision expressly addresses congressional districting; and

WHEREAS, This amendment clarifies the long-standing understanding and case law that Article III, § 4 of the Maryland Constitution governs only General Assembly districting plans, not congressional districting plans; and

WHEREAS, Preserving Maryland's cohesive communities of interest connected by shared civic, social, economic, political subdivisions, and other common interests without unnecessary fragmentation is a legitimate, neutral consideration in congressional districting; and

WHEREAS, Nothing in this amendment establishes a demographic target, requires proportional representation, guarantees any electoral outcome, or authorizes discrimination prohibited by federal law; and

WHEREAS, This amendment is not intended to provide new grounds to challenge the plan enacted by Chapter 16 of the Acts of 2022; now, therefore,

SECTION 1. BE IT ENACTED BY THE GENERAL ASSEMBLY OF MARYLAND, (Three-fifths of all the members elected to each of the two Houses concurring), That it be proposed that the Maryland Constitution read as follows:

Article III – Legislative Department

4.

Each legislative district **FOR THE ELECTION OF A MEMBER OF THE SENATE AND MEMBERS OF THE HOUSE OF DELEGATES** shall consist of adjoining territory, be compact in form, and of substantially equal population. Due regard shall be given to natural boundaries and the boundaries of political subdivisions.

62.

(A) THE GENERAL ASSEMBLY SHALL HAVE THE POWER TO GRANT ORIGINAL JURISDICTION TO THE SUPREME COURT OF MARYLAND TO REVIEW THE CONGRESSIONAL DISTRICTING PLAN OF THE STATE.

(B) NOTHING IN THIS ARTICLE OR ELSEWHERE IN THIS CONSTITUTION, INCLUDING THE DECLARATION OF RIGHTS, PROVIDES APPLICABLE CRITERIA FOR THE BOUNDARIES OF A CONGRESSIONAL DISTRICTING PLAN.

SECTION 2. AND BE IT FURTHER ENACTED, That the General Assembly determines that the amendment to the Maryland Constitution proposed by Section 1 of this Act affects multiple jurisdictions and that the provisions of Article XIV, § 1 of the Maryland Constitution concerning local approval of constitutional amendments do not apply.

SECTION 3. AND BE IT FURTHER ENACTED, That:

(a) The amendment to the Maryland Constitution proposed by Section 1 of this Act shall be submitted to the qualified voters of the State at the next general election to be held in November 2026 for adoption or rejection in accordance with Article XIV of the Maryland Constitution.

(b) (1) At that general election, the vote on the proposed amendment to the Constitution shall be by ballot, and on each ballot there shall be printed the words “For the Constitutional Amendment” and “Against the Constitutional Amendment”, as now provided by law.

(2) ~~At that general election, a question substantially similar to the following~~ Notwithstanding any other provision of law, at that general election, the following question shall be submitted to the qualified voters of the State:

“Question ____ – Constitutional Amendment

The proposed Constitutional Amendment clarifies that certain standards in the Maryland Constitution apply only to districts used to elect members of the General Assembly; authorizes the General Assembly to grant original jurisdiction to the Supreme Court of Maryland to review the congressional districting plan of the State; and requires the criteria for boundaries of congressional districts to be determined by applicable federal laws.”.

(c) Immediately after the election, all returns shall be made to the Governor of the vote for and against the proposed amendment, as directed by Article XIV of the Maryland Constitution, and further proceedings held in accordance with Article XIV.

Approved by the Governor, assigned a chapter number, enactment subject to constitutional referendum, August 5, 2026.

EXHIBIT E

Ballot Questions for the November 3, 2026 Election

Under Election Law Article, § 7-103(c)(5)(i), the State Board has made available for public comment the text of ballot questions for the 2026 general election.

The comment period closed on July 30, 2026, except for the following counties:

- For **PG County** the date has been extended to August 11.
- For **Cecil County** the date has been extended to August 19.
- For **Baltimore City** the date has been extended to August 21.

Members of the public may submit comments to info.sbe@maryland.gov ([mailto:info.sbe@maryland.gov?subject=Ballot question comments](mailto:info.sbe@maryland.gov?subject=Ballot%20question%20comments)).

Under Election Law Article, § 7-103(e), questions that propose amendments to the State Constitution or a County Charter are posted with links to authorizing legislation, and the text of proposed amendments.

Note: The certification of petition-based questions may depend upon successful submission and verification of voters' signatures that has not yet been completed. This means certain questions presented here for comment may not qualify for the ballot.

▾ SBE

- [Department of Legislative Services - State Ballot Question Summaries \(PDF\)](#)
([2026 Ballot Question SBE Letter.pdf](#))
- [Amendment Text \(PDF\)](#) ([SBE Proposed Constitutional Amendment Text.pdf](#))

Note: Updated August 4. The questions below were posted for public comment. The Secretary of State provided the following updated questions, based on comments received. Spanish translations are of the original questions posted for public comment. Updated spanish language is forthcoming.

Question 1

Constitutional Amendment ([Ch. 155 of the 2026 Legislative Session](#))

Arbitration Reform for State Employees Act of 2026

Providing that each budget submitted by the Governor shall include proposed expenditures necessary to implement wages, hours, fringe benefits, health benefits, and other terms and conditions of employment in each collective bargaining memorandum of understanding with State employees, whether the State and State employees reached those terms and conditions by mutual agreement or through a neutral decider's order.

(Amending Article III of the Maryland Constitution)

- For the Constitutional Amendment -A vote FOR this amendment means that the Governor has to include money in the proposed State budget to pay for agreements between the State and its employees. Agreements might include changes to wages, hours, fringe benefits, health benefits, and other terms and conditions of employment. The Governor must put enough money in the

State budget to cover the agreed upon pay and benefits for employees, whether those terms were negotiated or decided by a neutral decision-maker.

- Against the Constitutional Amendment - A vote AGAINST the amendment means that the law about funding agreements between the State and State employees stays the same.

Pregunta 1

Enmienda Constitucional ([Cap. 155 de la Sesión Legislativa de 2026](#))

Ley de Reforma de Arbitraje para Empleados Estatales de 2026

Estipula que cada presupuesto presentado por el Gobernador deba incluir los gastos propuestos necesarios para implementar los salarios, horarios, beneficios complementarios, beneficios de salud y otras condiciones de empleo en cada memoranda de acuerdo de negociación colectiva con los empleados estatales, ya sea que el Estado y los empleados estatales hayan alcanzado dichas condiciones por mutuo acuerdo o mediante la orden de un árbitro neutral.

(Enmendando el Artículo III de la Constitución de Maryland)

- A Favor de la Enmienda Constitucional - Un voto A FAVOR de esta enmienda significa que el Gobernador deba incluir fondos en el presupuesto estatal propuesto para pagar los acuerdos sobre las condiciones laborales entre el Estado y sus empleados. Los acuerdos pueden incluir cambios en los salarios, horarios, beneficios complementarios, beneficios de salud y otras condiciones de empleo. El Gobernador debe destinar suficiente dinero en el presupuesto estatal para cubrir los salarios y beneficios acordados de los empleados, ya sea que dichas condiciones hayan sido negociadas o decididas por un árbitro externo neutral.
- En Contra de la Enmienda Constitucional - Un voto EN CONTRA de la enmienda significa que la ley sobre el financiamiento de los acuerdos entre el Estado y los empleados estatales permanece igual.

Question 2

Constitutional Amendment ([Ch. 878 of the 2026 Legislative Session](#))

Temporary Appointments on the Commission on Judicial Disabilities

Authorizing temporary substitute appointments to the Commission on Judicial Disabilities when a member is recused or disqualified, or when a member's term expires. In these situations, the Commission Chair may recall a former member of the Commission, or the Governor, at the request of the Commission Chair, may appoint a temporary substitute member or extend the term of a current member until a permanent replacement is appointed. Only individuals who meet the constitutional eligibility requirements may be recalled or appointed to the Commission.

(Amending Article IV of the Maryland Constitution)

- For the Constitutional Amendment - A vote FOR this amendment means that temporary appointments to the Commission are allowed if a member is recused, disqualified, or if a member's term ends without a replacement. The Commission Chair can temporarily fill an opening on the Commission with a former member. The Governor can, at the request of the Commission Chair pick a temporary substitute to fill an opening on the Commission or extend the term of a

current member until a replacement is appointed. Only individuals who meet the constitutional eligibility requirements may be recalled or appointed to the Commission.

- Against the Constitutional Amendment - A vote AGAINST the amendment means that current membership rules for the Commission stay the same. Temporary appointments are not allowed if a member is recused, disqualified, or if a member's term ends.

Pregunta 2

Enmienda Constitucional ([Cap. 878 de la Sesión Legislativa de 2026](#))

Nombramientos Temporales en la Comisión sobre Discapacidades Judiciales

Autoriza nombramientos sustitutos temporales en la Comisión sobre Discapacidades Judiciales cuando un miembro este recusado o descalificado, o cuando el mandato de un miembro expire. En estas situaciones, el Presidente de la Comisión podrá convocar a un exmiembro de la Comisión, o el Gobernador, a solicitud del Presidente de la Comisión, podrá nombrar a un miembro sustituto temporal o extender el mandato de un miembro actual hasta que se nombre un reemplazo permanente.

(Enmendando el Artículo IV de la Constitución de Maryland)

- A Favor de la .Enmienda Constitucional - Un voto A FAVOR de esta enmienda significa que se permiten nombramientos temporales en la Comisión si un miembro esta recusado, descalificado, o si el mandato de un miembro termina sin un reemplazo. El Presidente de la Comisión puede llenar temporalmente una vacante en la Comisión con un exmiembro. El Gobernador puede, a solicitud del Presidente de la Comisión, elegir a un sustituto temporal para llenar una vacante en la Comisión o extender el mandato de un miembro actual hasta que se nombre un reemplazo.
- En Contra de la Enmienda Constitucional - Un voto EN CONTRA de la enmienda significa que las reglas actuales de membresía de la Comisión permanecen igual. No se permiten nombramientos temporales si un miembro esta recusado, descalificado, o si el mandato de un miembro termina.

Question 3

Constitutional Amendment ([Ch. 878 of the 2026 Legislative Session \(PDF\)](#))

Election Districts

The proposed Constitutional Amendment clarifies that certain standards in the Maryland Constitution apply only to districts used to elect members of the General Assembly; authorizes the General Assembly to grant original jurisdiction to the Supreme Court of Maryland to review the congressional districting plan of the State; and requires the criteria for boundaries of congressional districts to be determined by applicable federal laws.

(Amending Article III of the Maryland Constitution)

- For the Constitutional Amendment
- Against the Constitutional Amendment

▼ Anne Arundel

[Amendment Text \(PDF\)](#), [\(Anne Arundel Proposed Charter Amendment Text.pdf\)](#)

QUESTION A

CHARTER AMENDMENT

(Resolution No. 30-25)

Executive Branch – Merit System - Binding Arbitration

To amend the Anne Arundel County Charter to permit all authorized employee representatives to enter into binding arbitration to resolve labor disputes relating to the terms and conditions of employment.

Currently, only authorized employee representatives of uniformed firefighters and uniformed officers of the County Police Department, Sheriff's Department, and Office of Detention Facilities may enter into binding arbitration with the County to resolve labor disputes relating to the terms and conditions of employment. There are several other labor organizations in the County that cannot enter into binding arbitration with the County.

A vote FOR the charter amendment would permit all authorized employee representatives to enter into binding arbitration to resolve labor disputes relating to the terms and conditions of employment.

A vote AGAINST the charter amendment would retain the current binding arbitration provisions in the County Charter, meaning only authorized employee representatives of uniformed firefighters and uniformed officers of the County Police Department, Sheriff's Department, and Office of Detention Facilities may enter into binding arbitration to resolve labor disputes relating to the terms and conditions of employment.

- FOR Charter Amendment
- AGAINST Charter Amendment

QUESTION B

CHARTER AMENDMENT

(Resolution No. 15-26)

Legislative Branch – Officers – Specific Position Titles

To amend the Anne Arundel County Charter to remove specific position titles from the officers appointed by the Council.

Currently, the Charter provides that the County Council shall have an Administrative Officer appointed by the Council and other officers as provided in the County Council's Rules of Procedure.

A vote FOR the charter amendment would remove from the County Charter the specific position titles of the officers the County Council may appoint.

A vote AGAINST the charter amendment would retain the current Charter provision that the County Council shall appoint an officer with the specific position title of Administrative Officer.

- FOR Charter Amendment
- AGAINST Charter Amendment

QUESTION C

CHARTER AMENDMENT

(Resolution No. 18-26)

Executive Branch – Planning Advisory Board – Staggered Terms – Council Confirmation

To amend the Anne Arundel County Charter to establish staggered terms for the appointees to the Planning Advisory Board and to require County Council confirmation of County Executive appointments to the Planning Advisory Board.

Currently, the members of the Planning Advisory Board are appointed by the County Executive and serve terms coterminous with the County Executive or until their successors are appointed.

A vote FOR the charter amendment would require, starting December 2026, staggered initial terms for appointees to the seven-member County Planning Advisory Board and County Council confirmation of the County Executive's appointees, meaning the County Executive, with the confirmation of the County Council, would appoint one member for a one-year term, two members for two-year terms, two members for three-year terms, and two members for four-year terms, with four-year terms for all members thereafter.

A vote AGAINST the charter amendment would retain the current terms of members of the Planning Advisory Board, meaning a term coterminous with the County Executive's term or until their successor shall qualify, and retain the authority of the County Executive to appoint members of the Planning Advisory Board without confirmation of the County Council.

- FOR Charter Amendment
- AGAINST Charter Amendment

▼ Baltimore County

[Amendment Text \(PDF\)](#) ([Baltimore County Proposed Charter Amendment Text.pdf](#))

QUESTION A

CHARTER AMENDMENT (BILL 19-25)

BALTIMORE COUNTY FARMLAND PRESERVATION ACT (URDL)

Currently, the Planning Board changes the Urban-Rural Demarcation Line (URDL), which separates urban areas from rural areas in Baltimore County, largely in response to zoning changes or water/sewer designation changes enacted by the County Council. The Baltimore County Charter requires a simple majority of the County Council to approve changes by the Planning Board to the Urban-Rural Demarcation Line (URDL). This amendment to the Baltimore County Charter would require a vote of six (6) of the nine (9) members of the County Council rather than a simple majority of five (5) votes to approve changes to the Urban-Rural Demarcation Line (URDL) recommended by the Planning Board. All other planning and zoning matters would continue to be approved by a simple majority vote of the County Council.

This would amend Section 522.1 of the Baltimore County Charter and add Section 1015 to the Baltimore County Charter.

A vote FOR the amendment requires six (6) of the nine (9) members of the County Council to approve changes to the Urban-Rural Demarcation Line (URDL).

A vote AGAINST the amendment keeps the current simple majority vote of 5 members of the County Council on changes to the Urban-Rural Demarcation Line (URDL) .

- FOR Charter Amendment
- AGAINST Charter Amendment

QUESTION B

CHARTER AMENDMENT (BILL 49-25)

DEPARTMENT OF AGRICULTURE – ESTABLISHMENT OF DEPARTMENT

This Charter Amendment establishes a Department of Agriculture to promote and support farming and agriculture in Baltimore County as a viable component of the county's economic section, including encouraging local food production and distribution to improve access to food for County residents.

This would amend Section 504 of the Baltimore County Charter and add Sections 542.9 and 542.10 to the Baltimore County Charter.

Various agriculture issues will continue to be handled by other County agencies depending on the subject matter. As an example, agriculture land preservation is currently handled by the Department of Planning; local food initiatives are currently handled by the Department of Health; and agricultural tourism is handled by the Department of Economic and Workforce Development.

A vote FOR the amendment would create a Department of Agriculture to support farming and agriculture in Baltimore County and encourage local food production and distribution to improve access to food for County residents.

A vote AGAINST the amendment does not create a Department of Agriculture, and the current County Charter would remain unchanged.

- FOR Charter Amendment
- AGAINST Charter Amendment

QUESTION C

CHARTER AMENDMENT (BILL 50-25)

INSPECTOR GENERAL APPOINTMENT BOARD

The Inspector General provides oversight of County government by investigating fraud, waste, and abuse. This Charter Amendment establishes an Inspector General Appointment Board; provides for the appointment of members to the Appointment Board; provides authority for the Inspector General Appointment Board to appoint or reappoint the Inspector General and, if necessary, remove the Inspector General for cause. It replaces the current process under which the County Executive appoints or reappoints the Inspector General, and the County Council confirms the appointment. It provides for a residency requirement for the Inspector General.

The Inspector General Appointment Board will consist of seven (7) members, with the County Council and County Executive each selecting one member, and the Chair of the Ethics Commission electing the other five (5) members, each of whom must be from specific judicial, accounting, fraud examination or academic professions. There are also several requirements for members relating to

potential ethical conflicts between their service on the Inspector General Appointment Board and their employment or business involvement with the County; candidacy for elected office or involvement in campaign finances; registration as a lobbyist; or criminal convictions.

This would amend Section 1014 of the Baltimore County Charter and add Section 1014.1 to the Baltimore County Charter.

A vote FOR the amendment transfers the authority to appoint or reappoint and remove the Inspector General from the County Executive to an Inspector General Appointment Board to be established.

A vote AGAINST the amendment keeps the current process, in which the County Executive appoints or reappoints, the Inspector General and the County Council confirms the appointment.

- FOR Charter Amendment
- AGAINST Charter Amendment

QUESTION D

CHARTER AMENDMENT (BILL 52-26)

CHARTER REVIEW COMMISSION – MEMBERSHIP

This Charter Amendment increases the number of Charter Review Commission members appointed by the County Council from seven to nine for purposes of matching the expansion of the County Council.

This would amend Section 1203(a) of the Baltimore County Charter.

A vote FOR the amendment increases the number of Charter Review Commission appointments made by County Council members from seven (7) to nine (9).

A vote AGAINST the amendment keeps the current Charter provisions, under which County Council members make seven (7) appointments to the Charter Review Commission.

- FOR Charter Amendment
- AGAINST Charter Amendment

QUESTION E

CHARTER AMENDMENT (BILL 61-26)

BOARD OF RECREATION AND PARKS – MEMBERSHIP AND DUTIES

This Charter Amendment changes the membership of the Board of Recreation and Parks by increasing the number of at-large members from three (3) to four (4) and provides that district-level members are appointed based on recommendations from County Council members. The amendment also amends and modernizes the Board duties to reflect both current board practices and its role to serve in an advisory capacity to the Department of Recreation and Parks.

This would amend Section 533 of the Baltimore County Charter.

A vote FOR the amendment changes the membership of the Board of Recreation and Parks and clarifies that the Board is an advisory body to the Department of Recreation and Parks.

A vote AGAINST the amendment keeps the current membership and duties of the Board of Recreation and Parks.

- FOR Charter Amendment

- AGAINST Charter Amendment

QUESTION F

BOND ISSUE: COUNTY ORDINANCE (BILL 42-26)

REFUSE DISPOSAL BORROWING

AN ORDINANCE to authorize and empower Baltimore County, Maryland to borrow \$5,000,000 for refuse disposal projects, to be undertaken pursuant to Sections 705(a) and 718 of the Baltimore County Charter.

A vote FOR the bond issue authorizes Baltimore County to borrow \$5,000,000 for refuse disposal projects.

A vote AGAINST the bond issue precludes Baltimore County from borrowing \$5,000,000 for refuse disposal projects.

- FOR Bond Issue
- AGAINST Bond Issue

QUESTION G

BOND ISSUE: COUNTY ORDINANCE (BILL 43-26)

COMMUNITY COLLEGE BORROWING

AN ORDINANCE to authorize and empower Baltimore County, Maryland to borrow \$18,620,000 for community college projects, including but not limited to: acquisition, construction, reconstruction, extension, improvement, enlargement, alteration, maintenance, repair, modernization, and development of buildings and other improvements for community colleges; the architectural, engineering, and other services incident thereto; and the acquisition of land, furnishings, and equipment, to be undertaken pursuant to Sections 705(a) and 718 of the Baltimore County Charter.

A vote FOR the bond issue authorizes Baltimore County to borrow \$18,620,000 for community college projects.

A vote AGAINST the bond issue precludes Baltimore County from borrowing \$18,620,000 for community college projects.

- FOR Bond Issue
- AGAINST Bond Issue

QUESTION H

BOND ISSUE: COUNTY ORDINANCE (BILL 44-26)

PUBLIC WORKS BORROWING

AN ORDINANCE to authorize and empower Baltimore County, Maryland to borrow \$54,380,000 for public works projects, including but not limited to: streets and highways, bridges, storm drain systems, sewer systems, refuse disposal systems, viaducts, environmental projects, grade crossings and parking lots and structures, to be undertaken pursuant to Sections 705(a) and 718 of the Baltimore County Charter.

A vote FOR the bond issue authorizes Baltimore County to borrow \$54,380,000 for public works projects.

A vote AGAINST the bond issue precludes Baltimore County from borrowing \$54,380,000 for public works projects.

- FOR Bond Issue
- AGAINST Bond Issue

QUESTION I

BOND ISSUE: COUNTY ORDINANCE (BILL 45-26)

PARKS, PRESERVATION AND GREENWAYS BORROWING

AN ORDINANCE to authorize and empower Baltimore County, Maryland to borrow \$2,000,000 for the purpose of parks, preservation and greenways projects, including but not limited to: acquisition, construction, maintenance, and equipping of playgrounds, parks, community centers, and recreational facilities; related engineering, architectural, and other services; and the acquisition and maintenance of equipment, to be undertaken pursuant to Sections 705(a) and 718 of the Baltimore County Charter.

#6 A vote FOR the bond issue authorizes Baltimore County to borrow \$2,000,000 for parks, preservation and greenways projects.

A vote AGAINST the bond issue precludes Baltimore County from borrowing \$2,000,000 for parks, preservation and greenways projects.

- FOR Bond Issue
- AGAINST Bond Issue

QUESTION J

BOND ISSUE: COUNTY ORDINANCE (BILL 46-26)

SCHOOL BORROWING

AN ORDINANCE to authorize and empower Baltimore County, Maryland to borrow \$200,000,000 for school buildings and site projects, including but not limited to: the acquisition, construction, reconstruction, improvement, extension, alteration, maintenance, conversion and modernization of buildings and sites for school purposes; architectural and engineering services; and recreation and pedagogical equipment for such buildings and sites, to be undertaken pursuant to Sections 705(a) and 718 of the Baltimore County Charter.

A vote FOR the bond issue authorizes Baltimore County to borrow \$200,000,000 for school buildings and site projects.

A vote AGAINST the bond issue precludes Baltimore County from borrowing \$200,000,000 for school buildings and site projects.

- FOR Bond Issue
- AGAINST Bond Issue

QUESTION K

BOND ISSUE: COUNTY ORDINANCE (BILL 47-26)

AGRICULTURAL AND RURAL LAND PRESERVATION BORROWING

AN ORDINANCE to authorize and empower Baltimore County, Maryland to borrow \$6,000,000 for agricultural and rural land preservation projects, including but not limited to the purchase of land, development rights, conservation easements and other real property approved by the County Council pursuant to the Maryland Agricultural Land Preservation Program and the Rural Legacy Program or other similar federal or state programs, to be undertaken pursuant to Sections 705(a) and 718 of the Baltimore County Charter.

A vote FOR the bond issue authorizes Baltimore County to borrow \$6,000,000 for agricultural and rural land preservation projects.

A vote AGAINST the bond issue precludes Baltimore County from borrowing \$6,000,000 for agricultural and rural land preservation projects.

- FOR Bond Issue
- AGAINST Bond Issue

QUESTION L

BOND ISSUE: COUNTY ORDINANCE (BILL 48-26)

COMMUNITY IMPROVEMENT PROJECT BORROWING

AN ORDINANCE to authorize and empower Baltimore County, Maryland to borrow \$4,000,000 for community improvement projects, including but not limited to construction, renovation, extension, alteration, repair or modernization of: street curbs; gutters; water; sewer and other utilities; sidewalk improvements; interior and rear access improvements; landscaping and lighting improvements; building and other structural improvements; and sidewalk and pedestrian system improvements, to be undertaken pursuant to Sections 705(a) and 718 of the Baltimore County Charter.

A vote FOR the bond issue authorizes Baltimore County to borrow \$4,000,000 for community improvement projects.

A vote AGAINST the bond issue precludes Baltimore County from borrowing \$4,000,000 for community improvement projects.

- FOR Bond Issue
- AGAINST Bond Issue

QUESTION M

BOND ISSUE: COUNTY ORDINANCE (BILL 49-26)

WATERWAY IMPROVEMENT PROGRAM BORROWING

AN ORDINANCE to authorize and empower Baltimore County, Maryland to borrow \$20,000,000 for the acquisition, construction, reconstruction, extension, alteration, repair and modernization of waterway improvement and stormwater-related projects, including but not limited to: shoreline stabilization; shore erosion control; wetland restoration; streambank and riverbank restoration; stabilization and reconstruction; control and monitoring of nonpoint pollutants; landscaping;

dredging; planting of trees and similar waterway improvement projects in residential, rural and commercial areas; and engineering and other services incident thereto, to be undertaken pursuant to Sections 705(a) and 718 of the Baltimore County Charter.

A vote FOR the bond issue authorizes Baltimore County to borrow \$20,000,000 for acquisition, construction, reconstruction, extension, alteration, repair and modernization of waterway improvement and stormwater-related projects.

A vote AGAINST the bond issue precludes Baltimore County from borrowing 20,000,000 for acquisition, construction, reconstruction, extension, alteration, repair and modernization of waterway improvement and stormwater-related projects.

- FOR Bond Issue
- AGAINST Bond Issue

QUESTION N

BOND ISSUE: COUNTY ORDINANCE (BILL 50-26)

OPERATIONAL BUILDINGS BORROWING

AN ORDINANCE to authorize and empower Baltimore County, Maryland to borrow \$81,750,000 for public operational buildings, including but not limited to: general, health, police, fire, recreation, library, senior center, and jail buildings or facilities, and necessary or desirable equipment, to be undertaken pursuant to Sections 705(a) and 718 of the Baltimore County Charter.

A vote FOR the bond issue authorizes Baltimore County to borrow \$81,750,000 for public operational buildings.

A vote AGAINST the bond issue precludes Baltimore County from borrowing \$81,750,000 for public operational buildings.

- FOR Bond Issue
- AGAINST Bond Issue

▼ Baltimore City

Question A

BOND ISSUE

AFFORDABLE HOUSING LOAN

Question A authorizes the City to borrow up to \$22,000,000 to be used for the City's Affordable Housing Program. The money may be used to acquire, redevelop, and dispose of property in the City for this purpose, along with related costs.

The money may be used to rehabilitate, construct, and operate rental and homeownership developments, including relocation assistance, rental payments, home purchase assistance, housing counseling, project financing, buyer education assistance, activities to support the development of economically diverse housing in the City, and the Affordable Housing Trust Fund.

The money may also be used to eliminate unhealthy and unsafe conditions, including blight, and may be used to improve land, buildings, streets, highways, alleys, utilities, and other structures,

including all related costs.

Voting for this amendment allows the City to borrow this money.

Voting against the amendment means the City is not allowed to borrow this money.

- FOR Bond Issue
- AGAINST Bond Issue

Question B

BOND ISSUE

SCHOOL LOAN

Question B authorizes the City to borrow up to \$60,000,000 to be used for school purposes. The money may be used to acquire property in the City for these purposes and to build new or improve existing school buildings, athletic facilities, and community health and recreation facilities, along with all related costs. The money may also be used to acquire equipment for such facilities.

Voting for this amendment allows the City to borrow this money.

Voting against the amendment means the City is not allowed to borrow this money.

- FOR Bond Issue
- AGAINST Bond Issue

Question C

BOND ISSUE

COMMUNITY AND ECONOMIC DEVELOPMENT LOAN

Question C authorizes the City to borrow up to \$50,000,000 to be used for the City's economic development program. The money may be used to acquire, develop, and dispose of property in the City for this purpose, along with related costs.

The money may be used to eliminate unhealthy and unsafe conditions, including blight, and to create healthy, sanitary, safe, and green conditions in the City. It may be used to stabilize and improve middle neighborhoods and neighborhood retail corridors, as well as to improve land, buildings, streets, highways, alleys, sidewalks, utilities, parks, recreational land or facilities, and other structures, including all related costs.

The money may also be used as loans or grants to develop, improve, or construct buildings in the City for residential or commercial purposes, and as loans or grants for growing businesses, attracting and retaining jobs, encouraging homeownership, providing home repair assistance, promoting economic inclusion, achieving whole-block outcomes, improving the City's cultural life, and promoting City tourism.

Voting for this amendment allows the City to borrow this money.

Voting against the amendment means the City is not allowed to borrow this money.

- FOR Bond Issue
- AGAINST Bond Issue

Question D

BOND ISSUE

PUBLIC INFRASTRUCTURE LOAN

Question D authorizes the City to borrow up to \$148,000,000 to be used for the development of public infrastructure owned or controlled by the City. The money may be used to develop buildings owned by the City, the Enoch Pratt Free Library, and public parks and recreational land. It may be used to acquire property in the City and to construct new or improve existing buildings, structures, and auxiliary facilities for use by the City and the Enoch Pratt Free Library.

The money may also be used to improve, construct, relocate, or repair buildings, streets, highways, alleys, utilities, and other structures, including information technology infrastructure, as well as to acquire and install trees, equipment, and fixtures, along with all related costs.

Voting for this amendment allows the City to borrow this money.

Voting against the amendment means the City is not allowed to borrow this money.

- FOR Bond Issue
- AGAINST Bond Issue

Question E

CHARTER AMENDMENT

CONTRACT BIDDING AND AWARDS

Question E amends the City Charter to remove the requirement of awarding a contract to the lowest bidder, removes the process for resolving tie bids, and removes provisions governing the bid bonds and performance bonds required by some contractors.

Voting for this Amendment removes these provisions from the Charter, which will become effective November 7, 2028, unless an ordinance or regulation governing the topic is adopted sooner.

Voting against the amendment leaves the current Charter language governing contract bidding and awards in place.

- FOR Charter Amendment
- AGAINST Charter Amendment

Question F

CHARTER AMENDMENT

LEGISLATION, BUDGET, AND BOARD OF ESTIMATES

Question F amends the City Charter's legislative process, the annual budget process, and the role of the Board of Estimates. It shortens the amount of time in which the Mayor can veto legislation passed by the City Council and the amount of time the City Council has to override the Mayor's veto. The Amendment also eliminates the preliminary budget hearing process and transfers from the Board of Estimates to the Mayor the responsibility to prepare and submit the proposed budget before April 30 each year. The City Council must then adopt the budget at least eight days before the beginning of the fiscal year on July 1, and any veto and veto override process must be completed by then.

The Amendment removes the current \$1 million dollar cap on the amount that may be used as a contingent fund for emergencies or other unexpected needs. It allows the Finance Director and the Planning Commission to make new recommendations about the proposed budget after it is submitted to the City Council and allows the City Council to add amounts based on those recommendations before final passage. The Amendment also transfers from the Board of Estimates to the Finance Director or the Planning Commission the authority to make supplemental appropriation recommendations outside of the annual budget process.

The Amendment transfers from the Board of Estimates to the Finance Department the responsibility to estimate revenues and formulate the annual rates for all property taxes, and transfers from the Board of Estimates to the Finance Director the responsibility to estimate any surpluses. It also transfers from the Board of Estimates to the Mayor the authority to increase or decrease the salaries of municipal officers in preparing the budget.

The Amendment removes from the Charter a number of other duties assigned to the Board of Estimates, including formulating and executing the fiscal policy of the City, advertising for contracts, establishing the process for professional services contracts and for bidder prequalification, approving emergency contracts, fixing salary and wage scales of employees, approving collective bargaining agreements, determining bonds of City officials, establishing procedures for paying or releasing claims against or claims held by the City, fixing the salary of officials in the State's Attorney's Office, and approving expenditures for new improvements. These roles could be given to other agencies or departments by City ordinance.

Voting for this amendment brings about the changes described above, with the following effective dates: November 7, 2028, for Charter sections that are removed, unless an ordinance or regulation governing that topic is adopted sooner; December 5, 2028, for changes to approving and vetoing legislation; and December 3, 2026, for all other changes.

Voting against the amendment leaves the current Charter language governing legislation, budget, and the Board of Estimates in place.

- FOR Charter Amendment
- AGAINST Charter Amendment

Question G

CHARTER AMENDMENT

LEGISLATION, BUDGET, AND BOARD OF ESTIMATES

Question G amends the City Charter language governing how the City allows third parties to use certain City property. It adds the City's stormwater system to the list of City property that cannot be sold or rented out as a franchise. It clarifies that space in the City's conduit system can be rented out as a franchise, but the conduit system itself still cannot be sold. The Amendment also simplifies the general provisions governing franchise agreements and other such grants.

The Amendment updates the language for granting minor privileges to use a portion of City property by clarifying the definition of minor privilege, including temporary and permanent varieties, and permitting minor privileges to be further identified and defined by ordinance. It also removes the Board of Estimates' authority to grant minor privileges, along with related processes, and instead

allows minor privileges to be granted by an executive agency under a new process to be established by City ordinance.

The Amendment also eliminates certain obsolete provisions in the Charter pertaining to street railways and trackless trolleys.

Voting for this amendment brings about the changes described above with the following effective dates: November 7, 2028, for Charter sections that are removed, unless an ordinance or regulation governing that topic is adopted sooner; and December 3, 2026, for all other changes.

Voting against the amendment leaves the current Charter language governing franchises and minor privileges in place.

- FOR Charter Amendment
- AGAINST Charter Amendment

Question H

CHARTER AMENDMENT

DEPARTMENT OF WATER AND WASTEWATER

Question H establishes in the City Charter a new Department of Water and Wastewater, which will be supervised and directed by a Director. It transfers from the Department of Public Works to this new Department the responsibility to oversee the City's water supply system and its wastewater system, along with related duties.

The Amendment also removes from the Charter the requirement that bureaus within the Department of Public Works must be established or abolished by City ordinance.

Voting for this amendment brings about the changes described above, which will become effective January 1, 2029.

Voting against the amendment leaves the current Charter language governing water and wastewater systems in place.

- FOR Charter Amendment
- AGAINST Charter Amendment

Question I

CHARTER AMENDMENT

BALTIMORE BABY FUND

Question I is a charter amendment to create the "Baltimore Baby Fund" as a new, separate fund in City government. The City could use money in the Baby Fund only to enhance the economic stability of families with newborns in Baltimore City. The City could not use money from the Baby Fund to replace funding for newborn children that already exists in this year's City budget.

The amendment would require each year's City budget to include a contribution to the Baby Fund.

The City's required annual contribution to the Baby Fund will be \$0.03 for every \$100 in taxable property value in the City. The Baby Fund will also be able to accept grants and donations. Money in the Baby Fund will stay in the Baby Fund until the City spends it for the benefit of families with newborns. The City could not transfer money in the Baby Fund to any other purpose.

Voting for this amendment would create the Baltimore Baby Fund and require the City to fund it as described above.

Voting against this amendment would mean that the Baltimore Baby Fund would not be created.

- FOR the Charter Amendment
- AGAINST the Charter Amendment

▼ Cecil

[Amendment Text \(PDF\) \(Cecil County Proposed Charter Amendment Text.pdf\)](#)

Question A

Charter Amendment

Date for Submission of the Budget

Currently the charter requires the executive to prepare and submit the proposed budget to the county council not later than April 1 of each year. The referred charter amendment will allow submission of the proposed budget after Maryland's General Assembly but no later than on or before the second Monday in April in each year.

A vote in favor of the question will require the executive to submit the proposed budget to the county council on or before the second Monday of April each year. This later date is after the conclusion of Maryland's General Assembly. This later date will allow the executive to have knowledge of the full financial effect upon the county from legislation passed during Maryland's General Assembly session.

A vote against the question will keep the current date of April 1 of each year for submission of the budget to county council and prior to knowing the full financial effects upon the county from Maryland's General Assembly.

- FOR the Charter Amendment
- AGAINST the Charter Amendment

▼ Dorchester

[Amendment Text \(PDF\) \(Dorchester County Proposed Charter Amendment Text.pdf\)](#)

Question A

Charter Amendment

Administrative Structure Review

Currently, the County Charter requires the County Council to conduct an evaluation of the organizations, functions, powers, and duties of each department, agency, and office in the executive branch of the County government at least every four years. A vote in favor of the question amends the County Charter to specify that such evaluation of the County administrative structure shall be conducted within the first fiscal year of each County Council term. A vote against the question keeps

the requirement that the County Council conduct the evaluation of the County administrative structure at least every four years.

- FOR Charter Amendment
- AGAINST Charter Amendment

Question B

Charter Amendment

County Budget Preparation and Adoption Dates

Currently, the County Charter requires the County Council to prepare a proposed Budget for the ensuing fiscal year no later than May 1 and to adopt the Annual Budget no later than May 31, each year. A vote in favor of the question changes the proposed Budget deadline to May 15 each year and changes the Annual Budget adoption deadline to June 15, each year, to better align with revenue estimates. A vote against the question keeps the current deadlines in the County Charter for Budget preparation and Annual Budget adoption by the County Council.

- FOR Charter Amendment
- AGAINST Charter Amendment

Question C

Charter Amendment

County Manager Responsibilities

Currently, the duties and responsibilities of the County Manager are specified in Section 405 of the County Charter. A vote in favor of the question amends the duties and responsibilities of the County Manager, as follows: clarifying when certain vacancies may be filled by the County Manager and when certain studies and investigations are performed by the County Manager; requiring the County Manager to attend all County Council meetings; providing for the appointment and function of an Assistant County Manager; clarifying that the County Manager is responsible for the day-to-day operation of the County government; and establishing a process for the County Council when the County Manager position becomes vacant. A vote against the question will keep the duties and responsibilities of the County Manager as currently specified in the County Charter.

- FOR Charter Amendment
- AGAINST Charter Amendment

Question D

Charter Amendment

Governmental Transparency and Public Access

Currently, there are no provisions in the County Charter specific to transparency in County government functions or public access to County government records. A vote in favor of the question amends the County Charter to add a new section titled Governmental Transparency and Public Access with provisions to ensure transparency of governmental functions, public access to meetings

(in person and remotely) and access to public records. A vote against the question keeps a new Governmental Transparency and Public Access section from being added to the County Charter.

- FOR Charter Amendment
- AGAINST Charter Amendment

▼ Frederick

[Amendment Text \(PDF\) \(Frederick County Proposed Charter Amendment Text.pdf\)](#)

Question A

Charter Amendment

Term limits for the County Council and County Executive

This Charter Amendment would prohibit a County Council member from serving more than three terms in their lifetime and prohibit the County Executive from serving more than two terms in their lifetime.

A vote for the charter amendment would limit a County Council member from serving more than three terms and a County Executive from serving more than two terms.

A vote against the Charter Amendment would continue to permit a County Council member to serve no more than three consecutive terms, and a County Executive from serving more than two consecutive terms.

- FOR the Charter Amendment
- AGAINST the Charter Amendment

▼ Howard

[Amendment Text \(PDF\) \(Howard County Proposed Charter Amendment Text.pdf\)](#)

Question A

Charter Amendment

Gender Neutrality

The County Charter uses gender-specific words like "he" and "she". The Charter Amendment would replace these types of words with gender-neutral words like "they" and "them".

A vote for the Amendment would make gender-neutral changes to the Charter. A vote against the Amendment would leave gender-specific words unchanged in the Charter.

- FOR the Charter Amendment
- AGAINST the Charter Amendment

Question B

Charter Amendment

Affordable For-Sale Housing Projects

The County Charter only allows the County to use its capital budget to finance an affordable housing project in its Housing Opportunities Trust Fund if the County owns the project. The Charter Amendment would change this requirement by allowing the County to use its capital budget to finance some or all of an affordable housing project if the project meets certain criteria. The County is not required to own or construct the project, but the Howard County Housing Commission or another entity controlled by the Housing Commission must own the project. The project must only have housing units for sale. The County would repay the bonds for the project over a defined time period, typically 20-30 years, and the affordable for-sale housing units must remain affordable for that period.

A vote for the Charter Amendment would allow the County to use its capital budget to finance these affordable for-sale housing projects. A vote against the Charter Amendment would require these affordable for-sale housing projects to be financed in ways other than the County's capital budget.

- FOR the Charter Amendment
- AGAINST the Charter Amendment

▼ Montgomery

Question A

 **Note:** This question was posted for public comment and was modified on August 4 based on comments received.

Charter Amendment by Petition

Unanimous County Council Approval to Increase Operating Budget Above Rate of Inflation

Currently Section 305 of the Montgomery County Charter requires a supermajority vote (at least seven of eleven County Councilmembers) to increase the annual operating budget above the annual rate of inflation.

The proposed amendment to Montgomery County Charter Section 305 would require the unanimous vote of the County Council to increase the annual operating budget above the annual rate of inflation.

For / Against

- A vote for Question A: Would amend Section 305 of the Montgomery County Charter to require the unanimous vote of the County Council to increase the annual operating budget above the annual rate of inflation.
- A vote against Question A: Would keep the current requirement in Section 305 of the Montgomery County Charter of a supermajority vote (at least seven of eleven County Councilmembers) in order to increase the annual operating budget above the annual rate of inflation.

Pregunta A

Enmienda a la Carta Constitucional mediante petición

Aprobación unánime del Concejo del Condado para aumentar el presupuesto operativo por encima de la tasa de inflación

Actualmente, la Sección 305 de la Carta Constitucional del Condado de Montgomery exige un voto de supermayoría (al menos siete de los once miembros del Concejo del Condado) para aumentar el presupuesto operativo anual por encima de la tasa de inflación anual.

La enmienda propuesta a la Sección 305 de la Carta Constitucional del Condado de Montgomery exigiría el voto unánime del Concejo del Condado para aumentar el presupuesto operativo anual por encima de la tasa de inflación anual.

A favor / En contra

- Un voto a favor de la Pregunta A: Modificaría la Sección 305 de la Carta Constitucional del Condado de Montgomery para exigir el voto unánime del Concejo del Condado para aumentar el presupuesto operativo anual por encima de la tasa anual de inflación.
- Un voto en contra de la Pregunta A: Mantendría el requisito actual de la Sección 305 de la Carta Constitucional del Condado de Montgomery, que exige un voto de supermayoría (al menos siete de los once miembros del Concejo del Condado) para aumentar el presupuesto operativo anual por encima de la tasa anual de inflación.

▼ Prince George's

[Amendment Text \(PDF\)](#), [\(PG County Proposed Charter Amendment Text.pdf\)](#)

Question A

CHARTER AMENDMENT

HARMFUL BUSINESSES TAXES AND FEES

To allow the County to impose taxes and fees on the operators of businesses deemed to have an adverse impact on community health, safety, and welfare, or County economic development, including, but not limited to, tobacco stores, liquor stores, and self-storage, by removing the requirement that the public vote on such taxes and fees.

A vote for this measure will allow the County to impose taxes and fees, to the extent authorized by law, on operators of businesses that negatively impact the quality-of-life of County residents or economic development. A vote against this measure will prevent the County from imposing taxes and fees on businesses that negatively impact the quality-of-life of County residents or economic development.

- For the Charter Amendment
- Against the Charter Amendment

PREGUNTA A

MODIFICACIÓN A LA CARTA ORGÁNICA

EMPRESAS NOCIVAS: IMPUESTOS Y TARIFAS

Para que el condado pueda imponer impuestos y tarifas a los titulares de empresas que se considere que tienen repercusiones negativas en la salud, la seguridad y el bienestar de la comunidad, o en el desarrollo económico del condado, incluidos, entre otros, las tabaquerías, las licorerías y los

almacenes de alquiler, mediante la eliminación del requisito de que la ciudadanía vote sobre dichos impuestos y tarifas.

Un voto a favor de esta medida permitirá al condado recaudar impuestos y tarifas, en la medida en que esté autorizado a hacerlo por ley, a los titulares de empresas que afecten negativamente la calidad de vida de los residentes del condado o el desarrollo económico. Un voto en contra de esta medida impedirá que el condado imponga impuestos y tarifas que se imponen a las empresas y que afectan negativamente la calidad de vida de los residentes del condado o el desarrollo económico.

- A favor de la modificación de la Carta Orgánica
- En contra de la modificación a la Carta Orgánica

Question B

CHARTER AMENDMENT

ELIMINATE AT-LARGE COUNCIL MEMBERS

Effective December 2030, and for each subsequent election cycle, this measure will reduce the County Council membership from 11 members to 9 members by eliminating the two at-large council seats which do not represent a specific council district. This measure will provide for more efficient and cost-effective elections and will restore the voting strength of communities and neighborhoods in each district.

A vote for the measure will reduce the County Council membership from 11 members to 9 members and eliminate spending of taxpayer dollars for general and special elections for at-large members and for the compensation of the offices for at-large members. A vote against the measure will keep the County Council membership at 11 members and will not eliminate spending of taxpayer dollars for general and special elections for at-large members and for the compensation of the offices for at-large members.

- For the Charter Amendment
- Against the Charter Amendment

PREGUNTA B

MODIFICACIÓN A LA CARTA ORGÁNICA

ELIMINAR A LOS CONCEJALES ELECTOS POR VOTO GENERAL

A partir de diciembre de 2030, y en cada ciclo electoral posterior, esta medida reducirá el número de miembros del Concejo del Condado de 11 a 9, mediante la eliminación de los dos escaños generales del concejo que no representan a un distrito específico. Esta medida permitirá que las elecciones sean más eficientes y rentables, y restablecerá el peso electoral de las comunidades y los vecindarios en cada distrito.

Si se aprueba esta medida, el número de miembros del Concejo del Condado se reducirá de 11 a 9 y se eliminará el gasto de dinero de los contribuyentes destinado a las elecciones generales y especiales de los miembros de representación general, así como a la remuneración de los cargos de dichos miembros. Un voto en contra de la medida mantendrá el número de miembros del Concejo del Condado en 11 y no eliminará el gasto de los fondos de los contribuyentes destinados a las

elecciones generales y especiales para los miembros de representación general, ni a la remuneración de los cargos de dichos miembros.

- A favor de la modificación de la Carta Orgánica
- En contra de la modificación a la Carta Orgánica

Question C

CHARTER AMENDMENT

BILL TO CHANGE REDISTRICTING PLAN

This measure provides that if the County Council passes a law to change the redistricting plan proposed by the Redistricting Commission it shall do so by bill and not by resolution after notice and public hearing.

A vote for this measure will correct Section 305 of the Charter to require the County Council to adopt a bill and not a resolution when it changes the redistricting plan proposed by the Redistricting Commission. A vote against this measure will not correct Section 305 of the Charter and may result in the County Council adopting a resolution instead of a bill when it changes the redistricting plan proposed by the Redistricting Commission.

- For the Charter Amendment
- Against the Charter Amendment

PREGUNTA C

MODIFICACIÓN A LA CARTA ORGÁNICA

PROYECTO DE LEY PARA MODIFICAR EL PLAN DE REDISTRIBUCIÓN

Esta medida establece que, si el Concejo del Condado aprueba una ley para modificar el plan de redistribución de distritos propuesto por la Comisión de Redistribución de Distritos, deberá hacerlo mediante un proyecto de ley y no mediante una resolución, previa notificación y audiencia pública.

Un voto a favor de esta medida modificará la sección 305 de la Carta Orgánica para exigir al Concejo del Condado que adopte un proyecto de ley y no una resolución cuando se modifique el plan de redistribución de circunscripciones propuesto por la Comisión de Redistribución de Distritos. Un voto en contra de esta medida no modificará la sección 305 de la Carta Orgánica y podría dar lugar a que el Concejo del Condado apruebe una resolución en lugar de un proyecto de ley cuando modifique el plan de redistribución de distritos propuesto por la Comisión de Redistribución de Distritos.

- A favor de la modificación de la Carta Orgánica
- En contra de la modificación a la Carta Orgánica

Question D

CHARTER AMENDMENT

COUNTY PURCHASING

This measure will allow the County Purchasing Agent to sign all purchasing documents to promote flexibility in conducting government operations. It will also allow the County to partner with other public entities to buy goods and services.

A vote for this measure will expand the signature authority of the County Purchasing Agent. It will also allow the County to partner with other public entities to buy goods and services. A vote against this measure will maintain the current, more limited, signature authority of the County Purchasing Agent and will limit opportunities for the County to partner with other public entities to buy goods and services.

- For the Charter Amendment
- Against the Charter Amendment

PREGUNTA D

MODIFICACIÓN A LA CARTA ORGÁNICA COMPRAS DEL CONDADO

Esta medida permitirá al responsable de compras del condado firmar todos los documentos de compra con el fin de promover la flexibilidad en la gestión de las actividades gubernamentales. Además, permitirá al condado colaborar con otras entidades públicas para la adquisición de bienes y servicios.

Un voto a favor de esta medida ampliará la facultad de firma del responsable de compras del condado. Además, permitirá al condado asociarse con otras entidades públicas para adquirir bienes y servicios. Un voto en contra de esta medida mantendrá la autoridad actual (más limitada) del agente de compras del condado y restringirá las oportunidades del condado de asociarse con otras entidades públicas para adquirir bienes y servicios.

- A favor de la modificación de la Carta Orgánica
- En contra de la modificación a la Carta Orgánica

Question E

CHARTER AMENDMENT COUNTY UNION INDEPENDENT ARBITRATION SERVICE

This policy will allow unionized County employees to submit disputed labor issues to an independent arbitration service for arbitration.

A vote for this measure will allow unionized County employees to use an additional independent arbitration service to resolve disputed labor issues. A vote against this measure will maintain current labor dispute options for unionized County employees to resolve disputed labor issues.

- For the Charter Amendment
- Against the Charter Amendment

PREGUNTA E

MODIFICACIÓN A LA CARTA ORGÁNICA SERVICIO DE ARBITRAJE INDEPENDIENTE DE LA UNIÓN DEL CONDADO

Esta política permitirá a los empleados sindicalizados del condado someter a arbitraje los conflictos laborales ante un servicio de arbitraje independiente.

Un voto a favor de esta medida permitirá a los empleados sindicalizados del condado recurrir a un servicio de arbitraje independiente adicional para resolver controversias laborales. Un voto en contra

de esta medida mantendrá las opciones actuales de resolución de conflictos laborales para que los empleados sindicalizados del condado puedan resolver los asuntos laborales en disputa.

- A favor de la modificación de la Carta Orgánica
- En contra de la modificación a la Carta Orgánica

Question F

BOND ISSUE

COMMUNITY COLLEGE FACILITIES BONDS

This measure will allow the County to borrow money by issuing bonds of up to \$67,306,000 to pay for the design, construction, acquisition, improvement, or repair of Community College Facilities.

A vote "for" this measure will allow the County to borrow money by issuing bonds to pay for Community College Facilities. A vote "against" this measure will prevent the County from borrowing money by issuing bonds to pay for Community College Facilities.

- For the Referred Law
- Against the Referred Law

PREGUNTA F

EMISIÓN DE BONOS

BONOS PARA INFRAESTRUCTURAS DE COLEGIOS COMUNITARIOS

Esta medida permitirá al condado obtener fondos mediante la emisión de bonos por un monto de hasta \$67,306,000 para financiar el diseño, la construcción, la adquisición, la mejora o la reparación de las instalaciones de las universidades comunitarias.

Un voto "a favor" de esta medida permitirá al condado obtener financiación mediante la emisión de bonos para sufragar universidades comunitarias. Un voto "en contra" de esta medida impedirá que el condado obtenga financiación mediante la emisión de bonos para sufragar las instalaciones de las universidades comunitarias.

- A favor de la ley mencionada
- En contra de la ley mencionada

Question G

BOND ISSUE

PUBLIC WORKS AND TRANSPORTATION BONDS

This measure will authorize the County to borrow money by issuing bonds of up to \$140,089,000 to pay for roads, bridges, parking lots, and maintenance facilities.

A vote "for" this measure will allow the County borrow money by issuing bonds to pay for roads, bridges, parking lots, and maintenance facilities. A vote "against" this measure will prevent the County from borrowing money by issuing bonds to pay for roads, bridges, parking lots, and maintenance facilities.

- For the Referred Law
- Against the Referred Law

PREGUNTA G

EMISIÓN DE BONOS

BONOS DE OBRAS PÚBLICAS Y TRANSPORTE

Esta medida autorizará al condado a obtener financiación mediante la emisión de bonos por un importe máximo de \$140,089,000 para financiar carreteras, puentes, aparcamientos e instalaciones de mantenimiento.

Un voto "a favor" de esta medida permitirá al condado obtener financiación mediante la emisión de bonos para financiar las carreteras, puentes, aparcamientos e instalaciones de mantenimiento.

Un voto "en contra" de esta medida impedirá que el condado obtenga financiación mediante la emisión de bonos para sufragar los gastos de carreteras, puentes, estacionamientos e instalaciones de mantenimiento.

- A favor de la ley mencionada
- En contra de la ley mencionada

Question H

BOND ISSUE

COUNTY BUILDINGS BONDS

This measure will enable the County to borrow money by issuing bonds of up to \$117,848,000 to pay for the design, construction, acquisition, improvement, or repair of County Buildings.

A vote "for" this measure will allow the County to borrow money by issuing bonds to pay for County buildings. A vote "against" this measure will prevent the County from borrowing money by issuing bonds to pay for County buildings.

- For the Referred Law
- Against the Referred Law

PREGUNTA H

EMISIÓN DE BONOS

BONOS PARA EDIFICIOS DEL CONDADO

Esta medida permitirá al condado obtener financiación mediante la emisión de bonos por un monto máximo de \$117,848,000 para financiar el diseño, la construcción, la adquisición, la mejora o la reparación de los edificios del condado.

Un voto "a favor" de esta medida permitirá al condado obtener financiación mediante la emisión de bonos para sufragar edificios del condado. Un voto "en contra" de esta medida impedirá que el condado obtenga financiación mediante la emisión de bonos para sufragar los edificios del condado.

- A favor de la ley mencionada
- En contra de la ley mencionada

Question I

BOND ISSUE

LIBRARY FACILITIES BONDS

This measure will allow the County to borrow money and issue bonds of up to \$33,656,000 to build, expand, repair, or improve County library buildings and facilities. This includes acquiring and developing library sites, hiring architects and engineers, and purchasing equipment needed to operate those facilities.

A vote for this measure will allow the County to borrow money and issue bonds to build, expand and repair County library facilities. A vote against this measure will prevent the County from borrowing money and issuing bonds to build, expand and repair County library facilities.

- For the Referred Law
- Against the Referred Law

PREGUNTA I

EMISIÓN DE BONOS

BONOS PARA LAS INSTALACIONES DE LA BIBLIOTECA

Esta medida permitirá al condado obtener préstamos y emitir bonos por un monto máximo de \$33,656,000 para construir, ampliar, reparar o mejorar los edificios y las instalaciones de las bibliotecas del condado. Esto incluye la adquisición y construcción de las sedes de las bibliotecas, la contratación de arquitectos e ingenieros y la adquisición del equipamiento necesario para gestionar dichas instalaciones.

Un voto a favor de esta medida permitirá al condado solicitar préstamos y emitir bonos para construir, ampliar y reparar las instalaciones de las bibliotecas del condado. Un voto en contra de esta medida impedirá que el condado solicite préstamos y emita bonos para construir, ampliar y reparar las instalaciones de las bibliotecas del condado.

- A favor de la ley mencionada
- En contra de la ley mencionada

Question J

BOND ISSUE

PUBLIC SAFETY FACILITIES BONDS

This measure will allow the County to borrow money by issuing bonds in an amount of up to \$53,503,000 to finance the design, construction, acquisition, improvement, or repair of Public Safety Facilities including Fire Department Facilities.

A vote "for" this measure will allow the County to borrow money by issuing bonds to pay for Public Safety Facilities. A vote "against" this measure will prevent the County from borrowing money by issuing bonds to pay for Public Safety Facilities.

- For the Referred Law
- Against the Referred Law

PREGUNTA J

EMISIÓN DE BONOS

BONOS PARA INSTALACIONES DE SEGURIDAD PÚBLICA

Esta medida permitirá al condado obtener financiación mediante la emisión de bonos por un monto de hasta \$53,503,000 para financiar el diseño, la construcción, la adquisición, la mejora o la reparación de instalaciones de seguridad pública, incluidas las del cuerpo de bomberos.

Un voto "a favor" de esta medida permitirá al condado obtener financiación mediante la emisión de bonos para sufragar instalaciones de seguridad pública. Un voto "en contra" de esta medida impedirá que el condado solicite un préstamo mediante la emisión de bonos para financiar las instalaciones de seguridad pública.

- A favor de la ley mencionada
- En contra de la ley mencionada

▼ Wicomico

[Amendment Text \(PDF\)](#), [\(Wicomico County Proposed Charter Amendment Text.pdf\)](#)

Question A

Charter Resolution

Charter Revision

#110-2026

A revision of the Charter of Wicomico County to permit the Council Administrator to keep minutes of meetings by written minutes, digital recordings, or a combination thereof.

A vote in favor of the question permits the Council Administrator to keep minutes of the meetings by written minutes, digital recordings, or a combination thereof.

A vote against the question requires the Council Administrator to continue to manually type minutes of the meetings.

- FOR the Charter Amendment
- AGAINST the Charter Amendment

Question B

Charter Resolution

Charter Revision

#110-2026

A revision of the Charter of Wicomico County to require formal communications from the Council to the Executive Branch be addressed to the County Executive, unless for the purpose of inquiry or information, which will allow members of the County Council and Council staff to communicate directly with officers or employees of the Executive Branch.

A vote in favor of the question clarifies that the County Council and Council staff may directly communicate with officers and employees of the Executive branch for the sole purpose of inquiry or information.

A vote against the question maintains the requirement that all formal communications from the Council to the Executive Branch shall be addressed to the County Executive.

- FOR the Charter Amendment
- AGAINST the Charter Amendment

Question C

Charter Resolution

Charter Revision

#110-2026

A revision of the Charter of Wicomico County providing that an Acting Director of Administration, Acting Department Head or Acting Deputy Director shall be a current employee of Wicomico County at the time of appointment. Further providing that a newly elected County Executive may appoint a person who is not a current County employee to serve as Acting Director of Administration for a period not to exceed Six (6) months or until a Director of Administration is appointed, whichever occurs first.

A vote in favor of the question requires that an Acting Director of Administration, Acting Department Head or Acting Deputy Director shall be a current employee of Wicomico County at the time of appointment. A vote in favor of the question also permits a newly elected County Executive to appoint a person who is not a current County employee to serve as Acting Director of Administration for a period not to exceed Six (6) months from the date the County Executive assumes office or until a Director of Administration is appointed, whichever occurs first.

A vote against the question permits the County Executive to appoint an Acting Director of Administration or Acting Head of a Department or Agency without the requirement that the appointment be a current employee of Wicomico County. A vote against the question also does not limit the duration of the appointment for an Acting Director of Administration by a newly elected County Executive.

- FOR the Charter Amendment
- AGAINST the Charter Amendment

Question D

Charter Resolution

Charter Revision

#110-2026

A revision of the Charter of Wicomico County to add a definition of "Work Rules," which shall mean policies, procedures, directive standards or requirements governing employee conduct, performance, attendance, workplace behavior, use of County property or resources or other conditions of employment. Work rules include provisions that may result in disciplinary action, suspension, loss of privileges, revocation of authorizations, termination of employment, or other employment-related consequences for failure to comply.

A vote in favor of the question adds a definition of "Work Rules" to the County Charter. "Work Rules" establish policies, procedures and standards for workplace conduct, and may result in disciplinary action.

A vote against the question means a definition of "Work Rules" will not be inserted in the Charter.

- FOR the Charter Amendment
- AGAINST the Charter Amendment

LINDSAY MYDRA WHEATLEY, *et al.*,
Plaintiffs,
v.
MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,
Defendants.

IN THE CIRCUIT COURT
FOR
DORCHESTER COUNTY, MARYLAND
Case No. C-09-CV-26-000285

AFFIDAVIT OF PERSONAL KNOWLEDGE OF LINDSAY MYDRA WHEATLEY

I, Lindsay Mydra Wheatley, being over the age of 21 and competent to testify, state:

1. My name is Lindsay Mydra Wheatley.
2. I am a Plaintiff in the above-entitled action and submit this affidavit in support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction Against Defendants ("**Motion**"). Unless otherwise specified, I have personal knowledge of the facts set forth in the affidavit, and, if called upon as a witness, I could and would testify to such facts under oath. I am familiar with the matters set forth in this affidavit based on my personal knowledge.
3. I reside in Dorchester County.
4. I am a registered voter in the State of Maryland.
5. My current voting precinct is in Dorchester County.
6. I have voted in Maryland elections over the past several years.
7. I am eligible to vote in the upcoming Maryland general election in November 2026 and I plan to vote in that election.
8. I am familiar House Bill 2100 ("**HB2100**") and the changes to the Maryland Constitution it asks voters to adopt.
9. I am aware that the Maryland General Assembly passed HB2100 in early August 2026 and that Governor Moore signed HB2100 into law on August 5, 2026.
10. I believe that the Maryland General Assembly failed to comply with the Maryland Constitution and Maryland Declaration of Rights in passing HB2100. The constitutional violations are described in the Complaint and include, for example, violating voters' rights to due process and free elections in connection with amendments to the Constitution guaranteed by Article XIV, § 1 and Article I, § 7 of the Maryland Constitution and Articles 7 and 24 of Maryland's Declaration of Rights; failing to adhere to Sections 7-103 and 7-105 of the Election Law Article; infringing the

Constitutional prohibition against retroactive legislation by virtue of HB2100's attempt to exempt the amendment from the requirements of Sections 7-103 and 7-105 of the Election Law Article for the November 3, 2026, election; and violating the single-subject requirement of Article XIV, § 1, of the Maryland Constitution by logrolling changes to the Maryland Constitution on three subjects into one amendment.

11. In addition to those violations, the misleading, vague, and legal jargon-infused nature of the ballot statement for HB2100—deficiencies discussed more fully in the Complaint—was confusing to me and makes me believe the statement is likely to lead to voter confusion and to voters unknowingly voting to reduce or eliminate all Marylanders' inalienable constitutional rights as it relates to congressional redistricting without the information to make a knowing and informed choice. This, too, infringes my rights.

12. Further, as a Maryland voter, I face the reality that the inclusion of HB2100 on the November 3, 2026 general election ballot may change the outcome of that election because the mere presence of HB2100's proposed amendment on that ballot creates the possibility that Maryland's Constitution could be unconstitutionally amended whereas its absence from that ballot removes that possibility. And the effect of an election being held under these circumstances would undermine confidence in the integrity of our state's electoral processes—another injury that cannot be remedied.

13. Further, passage of the amendment could result in the constitutional rights of myself and other Marylanders to be eliminated as to the subject of, at the very least, the criteria the General Assembly uses to configure congressional districting plans. And it would eliminate essential anti-gerrymandering protections in Article III, § 4 of the Maryland Constitution as to congressional plans. The loss, or threatened loss, of fundamental rights guaranteed by the Maryland Constitution and Declaration of Rights is also an injury that is irreparable.

14. Absent an injunction, substantial injustice will result—I am being improperly asked to vote on whether to amend the Declaration of Rights and Maryland Constitution, the State's founding documents.

15. The State's failure to comply with the Maryland Constitution, Declaration of Rights, and Election Code in passing HB2100 and putting it on the November 3, 2026, ballot will change the outcome of the November 3, 2026, general election by, among other things, permitting a vote on the ballot question in the first place.

16. The Circuit Court enjoining HB2100 prevents me from having to face these terrible possibilities and their associated harm.

17. The harm posed by these constitutional violations is immeasurable and incalculable. However, given the singular importance of the Maryland Constitution and the fundamental rights of myself and other Marylanders at stake, the case presents one of extraordinary hardship and the bond should be waived.

FURTHER YOUR AFFIANT SAYETH NOT.

Pursuant to Maryland Rule 1-304, I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of this document are true.

Executed this 12 day of August 2026 at Dorchester County, MD.

ra Wheatley (Aug 12, 2026 08:36:57 EDT)

Lindsay Mydra Wheatley

LINDSAY MYDRA WHEATLEY, *et al.*,
Plaintiffs,
v.
MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,
Defendants.

IN THE CIRCUIT COURT
FOR
DORCHESTER COUNTY, MARYLAND
Case No. C-09-CV-26-000285

AFFIDAVIT OF PERSONAL KNOWLEDGE OF CHRISTOPHER TROY ADAMS

I, Christopher Troy Adams, being over the age of 21 and competent to testify, state:

1. My name is Christopher Troy Adams.
2. I submit this affidavit in support of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction Against Defendants ("**Motion**"). Unless otherwise specified, I have personal knowledge of the facts set forth in the affidavit, and, if called upon as a witness, I could and would testify to such facts under oath. I am familiar with the matters set forth in this affidavit based on my personal knowledge.
3. I reside in Wicomico County.
4. I am a registered voter in the State of Maryland.
5. My current voting precinct is in Wicomico County.
6. I have voted in Maryland elections over the past several years.
7. I am eligible to vote in the upcoming Maryland general election in November 2026 and I plan to vote in that election.
8. I am a Maryland State Delegate serving the citizens of Maryland District 37B, which covers parts of Caroline, Dorchester, Talbot, and Wicomico counties.
9. I am familiar with House Bill 2100 ("**HB2100**") and the changes to the Maryland Constitution it asks voters to adopt.
10. On August 3, 2026, I bore witness to Maryland's House of Delegates passing HB2100. I voted against HB2100's passage.
11. I am aware that the Maryland General Assembly passed HB2100 in early August 2026 and that Governor Moore signed HB2100 into law on August 5, 2026.

12. I believe that the Maryland General Assembly failed to comply with the Maryland Constitution and Maryland Declaration of Rights in passing HB2100. The constitutional violations are described in the Complaint and include, for example, violating voters' rights to due process and free elections in connection with amendments to the Constitution guaranteed by Article XIV, § 1 and Article I, § 7 of the Maryland Constitution and Articles 7 and 24 of Maryland's Declaration of Rights; failing to adhere to Sections 7-103 and 7-105 of the Election Law Article; infringing the Constitutional prohibition against retroactive legislation by virtue of HB2100's attempt to exempt the amendment from the requirements of Sections 7-103 and 7-105 of the Election Law Article for the November 3, 2026, election; and violating the single-subject requirement of Article XIV, § 1, of the Maryland Constitution by logrolling changes to the Maryland Constitution on three subjects into one amendment.

13. In addition to those violations, the misleading, vague, and legal jargon-infused nature of the ballot statement for HB2100—deficiencies discussed more fully in the Complaint—was confusing to me and makes me believe the statement is likely to lead to voter confusion and to voters unknowingly voting to reduce or eliminate all Marylanders' inalienable constitutional rights as it relates to congressional redistricting without the information to make a knowing and informed choice. This, too, infringes my rights.

14. Further, as a Maryland voter, I face the reality that the inclusion of HB2100 on the November 3, 2026, general election ballot may change the outcome of that election because the mere presence of HB2100's proposed amendment on that ballot creates the possibility that Maryland's Constitution could be unconstitutionally amended whereas its absence from that ballot removes that possibility. And the effect of an election being held under these circumstances would undermine confidence in the integrity of our state's electoral processes—another injury that cannot be remedied.

15. Further, passage of the amendment could result in the constitutional rights of myself and other Marylanders to be eliminated as to the subject of, at the very least, the criteria the General Assembly uses to configure congressional districting plans. And it would eliminate essential anti-gerrymandering protections in Article III, § 4 of the Maryland Constitution as to congressional plans. The loss, or threatened loss, of fundamental rights guaranteed by the Maryland Constitution and Declaration of Rights is also an injury that is irreparable.

16. Absent an injunction, substantial injustice will result—I and my constituents are being improperly asked to vote on whether to amend the Maryland Constitution and the Declaration of Rights, the State's founding documents.

17. The State's failure to comply with the Maryland Constitution, Declaration of Rights, and Election Code in passing HB2100 and putting it on the November 3, 2026 ballot will change the outcome of the November 3, 2026, general election by, among other things, permitting a vote on the ballot question in the first place, as well as by threatening the potential adoption of a constitutional amendment proposed and promulgated in violation of numerous existing constitutional guarantees.

18. The Circuit Court enjoining HB2100 prevents me and my constituents from having to face these terrible possibilities and their associated harm to us.

19. The harm posed by these constitutional violations is immeasurable and incalculable. However, given the singular importance of the Maryland Constitution and the fundamental rights of myself and other Marylanders at stake, the case presents one of extraordinary hardship and the bond should be waived.

FURTHER YOUR AFFIANT SAYETH NOT.

Pursuant to Maryland Rule 1-304, I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of this document are true.

Executed this 11 day of August 2026 at 7614 E Longfield Dr., Hebron MD 21830.

 Troy Adams (Aug 11, 2026 23:36:09 EDT)

Christopher Troy Adams

LINDSAY MYDRA WHEATLEY, *et al.*,
Plaintiffs,
v.
MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,
Defendants.

IN THE CIRCUIT COURT
FOR
DORCHESTER COUNTY, MARYLAND
Case No. C-09-CV-26-000285

AFFIDAVIT OF PERSONAL KNOWLEDGE OF JOHN FREDERICK MAUTZ IV

I, John Frederick Mautz IV, being over the age of 21 and competent to testify, state:

1. My name is John Frederick Mautz IV.
2. I submit this affidavit in support of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction Against Defendants ("**Motion**"). Unless otherwise specified, I have personal knowledge of the facts set forth in the affidavit, and, if called upon as a witness, I could and would testify to such facts under oath. I am familiar with the matters set forth in this affidavit based on my personal knowledge.
3. I reside in Talbot County.
4. I am a registered voter in the State of Maryland.
5. My current voting precinct is in Talbot County.
6. I have voted in Maryland elections over the past several years.
7. I am eligible to vote in the upcoming Maryland general election in November 2026 and I plan to vote in that election.
8. I am a Maryland State Senator serving the citizens of Maryland District 37, which covers all of Talbot and Dorchester counties and parts of Caroline and Wicomico counties.
9. I am familiar with House Bill 2100 ("**HB2100**") and the changes to the Maryland Constitution it asks voters to adopt.
10. HB2100 is part of a larger scheme, clearly articulated in various press reports, designed to target Maryland's 1st Congressional District, where I reside, including the entire Eastern Shore and, more specifically, Dorchester County.

11. On August 4, 2026, I bore witness to Maryland's Senate passing HB2100. I voted against HB2100's passage.

12. I am aware that the Maryland General Assembly passed HB2100 in early August 2026 and that Governor Moore signed HB2100 into law on August 5, 2026.

13. I believe that the Maryland General Assembly failed to comply with the Maryland Constitution and Maryland Declaration of Rights in passing HB2100. The constitutional violations are described in the Complaint and include, for example, violating voters' rights to due process and free elections in connection with amendments to the Constitution guaranteed by Article XIV, § 1 and Article I, § 7 of the Maryland Constitution and Articles 7 and 24 of Maryland's Declaration of Rights; failing to adhere to Sections 7-103 and 7-105 of the Election Law Article; infringing the Constitutional prohibition against retroactive legislation by virtue of HB2100's attempt to exempt the amendment from the requirements of Sections 7-103 and 7-105 of the Election Law Article for the November 3, 2026, election; and violating the single-subject requirement of Article XIV, § 1, of the Maryland Constitution by logrolling changes to the Maryland Constitution on three subjects into one amendment.

14. In addition to those violations, the misleading, vague, and legal jargon-infused nature of the ballot statement for HB2100—deficiencies discussed more fully in the Complaint—was confusing to me and makes me believe the statement is likely to lead to voter confusion and to voters unknowingly voting to reduce or eliminate all Marylanders' inalienable constitutional rights as it relates to congressional redistricting without the information to make a knowing and informed choice. This, too, infringes my rights.

15. Further, as a Maryland voter, I face the reality that the inclusion of HB2100 on the November 3, 2026, general election ballot may change the outcome of that election because the mere presence of HB2100's proposed amendment on that ballot creates the possibility that Maryland's Constitution could be unconstitutionally amended whereas its absence from that ballot removes that possibility. And the effect of an election being held under these circumstances would undermine confidence in the integrity of our state's electoral processes—another injury that cannot be remedied.

16. Further, passage of the amendment could result in the constitutional rights of myself and other Marylanders to be eliminated as to the subject of, at the very least, the criteria the General Assembly uses to configure congressional districting plans. And it would eliminate essential anti-gerrymandering protections in Article III, § 4 of the Maryland Constitution as to congressional plans. The loss, or threatened loss, of fundamental rights guaranteed by the Maryland Constitution and Declaration of Rights is also an injury that is irreparable.

17. Absent an injunction, substantial injustice will result—I and my constituents are being improperly asked to vote on whether to amend the Declaration of Rights and Maryland Constitution, the State's founding documents.

18. The State's failure to comply with the Maryland Constitution, Declaration of Rights, and Election Code in passing HB2100 and putting it on the November 3, 2026 ballot will

change the outcome of the November 3, 2026, general election by, among other things, permitting a vote on the ballot question in the first place.

19. The Circuit Court enjoining HB2100 prevents me and my constituents from having to face these terrible possibilities and their associated harm to us.

20. The harm posed by these constitutional violations is immeasurable and incalculable. However, given the singular importance of the Maryland Constitution and the fundamental rights of myself and other Marylanders at stake, the case presents one of extraordinary hardship and the bond should be waived.

FURTHER YOUR AFFIANT SAYETH NOT.

Pursuant to Maryland Rule 1-304, I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of this document are true.

Executed this 12th day of August 2026 at Ocean City, MD.


John Mautz (Aug 12, 2026 10:03:33 EDT)

John Frederick Mautz IV

LINDSAY MYDRA WHEATLEY, *et al.*,
Plaintiffs,
v.
MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,
Defendants.

IN THE CIRCUIT COURT
FOR
DORCHESTER COUNTY, MARYLAND
Case No. C-09-CV-26-000285

AFFIDAVIT OF PERSONAL KNOWLEDGE OF MARY BETH CAROZZA

I, Mary Beth Carozza, being over the age of 21 and competent to testify, state:

1. My name is Mary Beth Carozza.
2. I submit this affidavit in support of Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction Against Defendants ("**Motion**"). Unless otherwise specified, I have personal knowledge of the facts set forth in the affidavit, and, if called upon as a witness, I could and would testify to such facts under oath. I am familiar with the matters set forth in this affidavit based on my personal knowledge.
3. I reside in Worcester County.
4. I am a registered voter in the State of Maryland.
5. My current voting precinct is in Worcester County.
6. I have voted in Maryland elections over the past several years.
7. I am eligible to vote in the upcoming Maryland general election in November 2026, and I plan to vote in that election.
8. I am a Maryland State Senator serving the citizens of Maryland District 38, which includes the counties of Somerset, Worcester, and Wicomico.
9. I am familiar with House Bill 2100 ("**HB2100**") and the changes to the Maryland Constitution it asks voters to adopt.
10. On August 4, 2026, I bore witness to Maryland's Senate passing HB2100. I voted against HB2100's passage.
11. I am aware that the Maryland General Assembly passed HB2100 in early August 2026 and that Governor Moore signed HB2100 into law on August 5, 2026.

12. I believe that the Maryland General Assembly failed to comply with the Maryland Constitution and Maryland Declaration of Rights in passing HB2100. The constitutional violations are described in the Complaint and include, for example, violating voters' rights to due process and free elections in connection with amendments to the Constitution guaranteed by Article XIV, § 1 and Article I, § 7 of the Maryland Constitution and Articles 7 and 24 of Maryland's Declaration of Rights; failing to adhere to Sections 7-103 and 7-105 of the Election Law Article; infringing the Constitutional prohibition against retroactive legislation by virtue of HB2100's attempt to exempt the amendment from the requirements of Sections 7-103 and 7-105 of the Election Law Article for the November 3, 2026, election; and violating the single-subject requirement of Article XIV, § 1, of the Maryland Constitution by logrolling changes to the Maryland Constitution on three subjects into one amendment.

13. In addition to those violations, the misleading, vague, and legal jargon-infused nature of the ballot statement for HB2100—deficiencies discussed more fully in the Complaint—was confusing to my constituents and to me. I believe the statement is likely to lead to voter confusion and to voters unknowingly voting to reduce or eliminate all Marylanders' inalienable constitutional rights as it relates to congressional redistricting without the information to make a knowing and informed choice. This, too, infringes my rights.

14. Further, as a Maryland voter, I face the reality that the inclusion of HB2100 on the November 3, 2026, general election ballot may change the outcome of that election because the mere presence of HB2100's proposed amendment on that ballot creates the possibility that Maryland's Constitution could be unconstitutionally amended whereas its absence from that ballot removes that possibility. And the effect of an election being held under these circumstances would undermine confidence in the integrity of our state's electoral processes—another injury that cannot be remedied.

15. Further, passage of the amendment could result in the elimination of my and other Marylanders' constitutional rights as to the subject of, at the very least, the criteria the General Assembly uses to configure congressional districting plans. And it would eliminate essential anti-gerrymandering protections in Article III, § 4 of the Maryland Constitution as to congressional plans. The loss, or threatened loss, of fundamental rights guaranteed by the Maryland Constitution and Declaration of Rights is also an injury that is irreparable.

16. Absent an injunction, substantial injustice will result—my constituents and I are being improperly asked to vote on whether to amend the Declaration of Rights and the Maryland Constitution, the State's founding documents.

17. The State's failure to comply with the Maryland Constitution, Declaration of Rights, and Election Code in passing HB2100 and putting it on the November 3, 2026 ballot will change the outcome of the November 3, 2026, general election by, among other things, permitting a vote on the ballot question in the first place, as well as by threatening the potential adoption of a constitutional amendment proposed and promulgated in violation of numerous existing constitutional guarantees.

18. The Circuit Court enjoining HB2100 prevents my constituents and me from having to face these dreadful impacts and their associated harm to us.

19. The harm posed by these constitutional violations is immeasurable and incalculable. However, given the singular importance of the Maryland Constitution and the fundamental rights of myself and other Marylanders at stake, the case presents one of extraordinary hardship and the bond should be waived.

FURTHER YOUR AFFIANT SAYETH NOT.

Pursuant to Maryland Rule 1-304, I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of this document are true.

Executed this 12 day of August 2026 at Ocean City, Maryland.

Mary Beth Carozza

Mary Beth Carozza (Aug 12, 2026 07:28:18 EDT)

Mary Beth Carozza

LINDSAY MYDRA WHEATLEY, *et al.*,
Plaintiffs,
v.
MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,
Defendants.

IN THE CIRCUIT COURT
FOR
DORCHESTER COUNTY, MARYLAND
Case No. C-09-CV-26-000285

AFFIDAVIT OF PERSONAL KNOWLEDGE OF SEN. CHRISTOPHER WEST

I, Christopher West, being over the age of 21 and competent to testify, state:

1. My name is Christopher Read West.
2. I am a Plaintiff in the above-entitled action and submit this affidavit in support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction Against Defendants ("**Motion**"). Unless otherwise specified, I have personal knowledge of the facts set forth in the affidavit, and, if called upon as a witness, I could and would testify to such facts under oath. I am familiar with the matters set forth in this affidavit based on my personal knowledge.
3. I reside in Baltimore County.
4. I am a registered voter in the State of Maryland.
5. My current voting precinct is in Baltimore County.
6. I have voted in Maryland elections over the past several years.
7. I am eligible to vote in the upcoming Maryland general election in November 2026, and I plan to vote in that election.
8. I am a duly elected and serving Maryland State Senator serving the citizens of Maryland's 42nd Senatorial District, covering portions of Baltimore County and Carroll County.
9. I am familiar with House Bill 2100 ("**HB2100**") and the changes to the Maryland Constitution it asks voters to adopt; and how HB2100 was enacted.
10. I am aware that on or about July 7, 2026, Democratic lawmakers and Governor Wes Moore announced that the General Assembly would convene in an Extraordinary Session to begin August 3, 2026, to consider legislation placing a redistricting-related constitutional amendment before voters at the November 3, 2026, general election.

11. On July 17, 2026, Governor Moore issued a proclamation convening the General Assembly in a Special and Extraordinary Session commencing on August 3, 2026. A true and correct copy of that proclamation is attached as **Exhibit A**, Executive Order 01.01.2026.14.

12. According to the Governor's proclamation, the purpose of the Extraordinary Session was to "pass[] legislation to amend the State constitution to clarify and reaffirm that the provisions which govern the requirements of our State legislative districts do not apply to Maryland's congressional districts." See **Exhibit A**.

13. On or about August 3, 2026, the General Assembly convened in an Extraordinary Session pursuant to the Governor's proclamation. I was present for the Extraordinary Session. That same day, HB2100 was first introduced into and considered by the House. A true and correct copy of HB2100 as introduced in the House is attached as **Exhibit B**.

14. The House amended HB2100 and then passed it on August 4, 2026. A true and correct copy of HB2100, as amended and adopted by the House, is attached as **Exhibit C**.

15. Certain allegations of the Complaint, including those in paragraphs 52 and 54 thereof, include citations to audiovisual recordings of proceedings before the House and Senate available on the "<https://mgaleg.maryland.gov>" website. As a Member of the Maryland General Assembly, I am familiar with this website and the manner of recordings of the proceedings of the General Assembly. It is part of the ordinary course of business of the Maryland General Assembly to produce these audiovisual recordings and to publish them on the aforesaid website. To the best of my knowledge, the audiovisual recordings of official proceedings of the General Assembly posted to that website are true, accurate, and reliable recordings of the records of such proceedings.

16. On August 4, 2026, the Senate considered and voted to adopt HB2100. I was present for the Extraordinary Session and debate on HB2100 and cast my vote against its passage.

17. I am aware that Governor Moore signed HB2100 into law on August 5, 2026. A true and correct copy of HB2100 as approved by the Governor is attached as **Exhibit D**.

18. I understand, upon information and belief, that on August 7, 2026, the State Board of Elections posted the proposed amendment in HB2100 to its website as "Question 3" for the November 2026 general election. A true and correct copy of the State Board of Elections' website for proposed constitutional amendments, as it existed on August 7, 2026, is attached as **Exhibit E**.

19. The General Assembly passed HB2100 in just two days and suspended applicable rules governing hearings and readings to accelerate its passage. As one example, on a party-line vote, a motion was adopted on August 4, 2026 to limit debate on HB2100 to one hour for each side, including all amendments and floor speeches. As another example, on August 4, 2026, a motion carried in the Senate to suspend Rule 24 of the Rules of the Maryland Senate to allow two readings of HB2100 in the same day. A true, accurate, and complete copy of the record of that vote is available at: <https://mgaleg.maryland.gov/2026RS/votes/senate/1412.pdf> and is attached as **Exhibit F**.

20. It is my position that the Maryland General Assembly failed to comply with the Maryland Constitution and Maryland Declaration of Rights in passing HB2100. The constitutional

violations include, for example, violating voters' rights to due process and free elections in connection with amendments to the Constitution guaranteed by Article XIV, § 1 and Article I, § 7 of the Maryland Constitution and Articles 7 and 24 of Maryland's Declaration of Rights; failing to adhere to Sections 7-103 and 7-105 of the Election Law Article; infringing the Constitutional prohibition against retroactive legislation by virtue of HB2100's attempt to exempt the amendment from the requirements of Sections 7-103 and 7-105 of the Election Law Article for the November 3, 2026, election; and violating the single-subject requirement of Article XIV, § 1, of the Maryland Constitution by logrolling changes to the Maryland Constitution on three subjects into one amendment.

21. In addition to those violations, the misleading, vague, and legal jargon-infused nature of the ballot statement for HB2100—deficiencies discussed more fully in the Complaint—is likely to lead to voter confusion and to voters unknowingly voting to reduce or eliminate all Marylanders' inalienable constitutional rights as it relates to congressional redistricting without the information to make a knowing and informed choice. This, too, infringes Marylanders' rights.

22. The Maryland General Assembly's unconstitutional and unlawful passage of HB2100 imposes irreparable harm on me and other Maryland voters—harms that no amount of money can make whole.

23. As a State Senator, I will make every effort to inform my constituents of the contents and impact of HB2100. However, the untimely passage of HB2100 deprives me of the time mandated by law to inform my constituents. Section 7-103 of the Election Law requires ballot statements to be drafted by July 1, 2026. Given that the Governor did not sign HB2100 into law until August 5, 2026, I have 36 less days to inform my constituents. Eliminating those days necessarily affords substantially less time to inform voters about this proposed amendment. I cannot get those days back.

24. Further, as a Maryland voter, I face the reality that the inclusion of HB2100 on the November 3, 2026, general election ballot may change the outcome of that election because the mere presence of HB2100's proposed amendment on that ballot creates the possibility that Maryland's Constitution could be unconstitutionally amended. And I believe effect of an election being held under these circumstances would be to undermine my and the public's confidence in the integrity of our state's electoral processes—another injury that cannot be remedied.

25. Further, passage of the amendment could result in the constitutional rights of myself and other Marylanders to be abridged as to the subject of, at the very least, the criteria the General Assembly uses to configure congressional districting plans. It would also eliminate essential anti-gerrymandering protections in Article III, § 4 of the Maryland Constitution as to congressional plans. The loss, or threatened loss, of fundamental rights guaranteed by the Maryland Constitution and Declaration of Rights is also an injury that is irreparable.

26. The logrolling present in HB2100 (i.e., the combining of changes to Maryland's Constitution on three different and non-interrelated subjects into a single amendment), conduct which violates the single-subject requirement of Article XIV, § 1, of the Maryland Constitution, compounds this harm. If the three changes to Maryland's Constitution proposed in HB2100 were voted on as separate amendments, it could well be the case that only *one or more* of the proposed

changes would be adopted into law, as voters would have freedom of choice. For example, a voter might agree to allow the General Assembly to confer original jurisdiction on the Maryland Supreme Court to review the congressional districting plan of Maryland—but not amend Article III, § 4 or amend the Constitution to provide that the Constitution and Declaration of Rights supply no criteria for congressional district boundaries.

27. These harms are happening to me now. I am actively informing my constituents as to the unconstitutionality of the enactment of HB2100 and its stripping of constitutional protections for districting. However, the general election in November 2026 is fast approaching, and I only represent 1/47th of the citizens of Maryland.

28. Absent an injunction, substantial injustice will result—myself and other voters being improperly asked to vote to amend the Declaration of Rights and the Maryland Constitution, the State’s founding documents. The State’s failure to comply with the Maryland Constitution, Declaration of Rights, and Election Code in passing HB2100 and putting it on the November 3, 2026 ballot will change the outcome of the November 3, 2026, general election by, among other things, permitting a vote on the ballot question in the first place.

29. The Circuit Court enjoining HB2100 would prevent my constituents and me from having to face these terrible possibilities and their associated harm to us.

30. The harm posed by these constitutional violations is immeasurable and incalculable. However, given the singular importance of the Maryland Constitution and the fundamental rights of myself and other Marylanders at stake, the case presents one of extraordinary hardship and the bond should be waived.

FURTHER YOUR AFFIANT SAYETH NOT.

Pursuant to Maryland Rule 1-304, I solemnly affirm under the penalties of perjury and upon personal knowledge that the contents of this document are true.

Executed this 12th day of August 2026 at Rehoboth Beach, Delaware.

Christopher Read West
Christopher Read West (Aug 12, 2026 09:09:15 EDT)
CHRISTOPHER WEST

EXHIBIT F

**Senate of Maryland
2026 Special Session**

HB 2100 Third Reading (HB) Calendar No.73 The Speaker Election Districts - General Assembly and Representatives in Congress Suspended Rule 24 to allow two readings of a bill in the same day	(EEE) (Const)
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32 Yeas 13 Nays 1 Not Voting 0 Excused 1 Absent

Voting Yea - 32

Mr. President	Feldman	Jackson	Lewis Young	Sydnor
Augustine	Gile	James	Love	Waldstreicher
Beidle	Guzzone	Kagan	McCray	Washington, A.
Benson	Harris	King	Muse	Washington, M.
Brooks	Hayes	Kramer	Rosapepe	Watson
Charles	Henson	Lam	Smith	Zucker
Ellis	Hettleman			

Voting Nay - 13

Bailey	Folden	Jennings	Ready	Simonaire
Carozza	Gallion	Mautz	Salling	West
Corderman	Hershey	McKay		

Not Voting - 1

Attar

Excused from Voting - 0

Excused (Absent) - 1

Hester

IN THE
CIRCUIT COURT FOR DORCHESTER COUNTY

LINDSAY WHEATLEY, *et al.*,
Plaintiffs,

v.

MARYLAND STATE BOARD
OF ELECTIONS, *et al.*,

Defendants.

*

*

*

* No. C-09-CV-26-000285

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AFFIDAVIT OF MELISSIA DORSEY

1. I, Melissia Dorsey, am over 18 years of age, and am competent to testify to the facts set forth herein.
2. I have personal knowledge of the matters contained herein.
3. I have worked for the Maryland State Board of Elections (“SBE”) since July 2021.

I currently serve as the Assistant Deputy of Election Policy. My work requires, among other things, overseeing the preparation, printing, and delivery of all mail-in ballot materials for use in Maryland elections. This includes the preparation, printing, and delivery of all mail-in ballots, ballot envelopes, and testing materials for mail-in ballots scanners for the 2026 general election.

4. Federal law requires that SBE transmit mail-in ballots to qualified overseas voters by the 45th day before an election. 52 U.S.C. § 20302(a)(8)(A). For the 2026 presidential general election, that deadline falls on Saturday, September 19, 2026.
5. Similarly, State law requires SBE to transmit a mail-in ballot to each voter who has made a timely request to vote by mail by the 43rd day before an election. Md. Code. Ann., Election Law Article, § 9-306(c)(1). For the 2026 general election, that deadline falls on Monday, September 21, 2026.
6. Therefore, by the third weekend in September, mail-in ballots, instructions and other inserts, and ballot envelopes (together known as “ballot packets”) for every overseas and domestic voter, who has made a timely request, must be printed and ready for mailing.
7. Mail-in ballots cannot differ from ballots voted in person. Functionally, then, by the third weekend in September, the form and content of Maryland’s ballot can no longer be changed.
8. The timeline estimates provided in this affidavit are specific to mail-in ballots transmitted by the United States Postal Service, and are in addition to those provided by Natasha Walker for the preparation of ballot materials related to in-person voting and web delivery.
9. SBE cannot produce the required quantity of ballot materials and securely mail them on its own. Instead, through the State procurement process, SBE has publicly contracted with a third-party vendor (Taylor Print and Visual Impressions) for the printing and mailing of all ballot materials. The contract, #D38B1600011,

- approved by the Board of Public Works on December 1, 2021, remains in effect through the 2026 election cycle.
10. SBE cannot presently provide or procure a different solution for preparing and printing mail-in ballot materials for the 2026 gubernatorial general election.
 11. The process for printing, assembling, and mailing mail-in ballot packets began with SBE securely transmitting to the third-party vendor digital image files of the ballot envelopes, and other ballot packet inserts. Once ballots are finalized, they will be transmitted to the vendor.
 12. Once the ballot design is completed and made public for three days, the vendor begins printing “test decks,” samples of thousands of ballots. These test decks are printed materials created to run through the State’s voting system equipment. Test decks are used to ensure that the final ballots, as designed by SBE, can be accurately and reliably read by the voting system equipment.
 13. Currently, printing of test decks is scheduled to be completed by September 6, 2026. If a change to the ballot is necessary and the process of sending ballots to the vendor is delayed, printing of test decks must be completed by September 8, 2026, in order to have enough time for the vendor to produce mail-in ballot packets to meet the federal and state deadlines.
 14. Once the test decks are printed, the third-party vendor ships each of the 23 counties and Baltimore City the test decks specific to that jurisdiction. Receipt of the test decks by the jurisdiction can require up to three days.

15. Each county and Baltimore City must then scan each test deck it receives. This requires election officials to manually run documentary material through ballot scanners, comparing the results of the scanning to the known information attendant to the test deck.
16. Scanning of test decks and reporting of results generally requires 2-3 days, and is currently scheduled to be completed by September 10, 2026. If changes to the ballot result in additional time to create final ballot PDFs, this deadline can be moved to no later than September 11, 2026.
17. Upon confirmation from all counties and Baltimore City that the test decks scan reliably through the statewide voting system, the effort to print ballots and ballot envelopes can begin.
18. Ballot printing and ballot packet assembly requires the third-party vendor at least 6-7 business days for 500,000 ballot packets, and more for larger quantities
19. SBE anticipates directing the printing and assembly of at least 500,000 ballot packets for the 2026 general election. Accordingly, SBE anticipates that the entire process for printing and assembling mail-in ballot packets prior to the deadline imposed by 52 U.S.C. § 20302 will require 13-16 days.
20. Considering all that has been described, the State Board must ascertain the questions and candidates to be included on the ballot on or before September 3, 2026.
21. I solemnly affirm under the penalties of perjury that foregoing contents of this Affidavit are true to the best of my personal knowledge, information, and belief.

8/14/2026

Date

Melissia Dorsey

Melissia Dorsey

IN THE
CIRCUIT COURT FOR DORCHESTER COUNTY

LINDSAY WHEATLEY, *et*
al.,
Plaintiffs,

v.

MARYLAND STATE BOARD
OF ELECTIONS, *et al.*,

Defendants.

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No. C-09-CV-26-000285

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AFFIDAVIT OF NATASHA WALKER

1. I, Natasha Walker, am over 18 years of age, and am competent to testify to the facts set forth herein.
2. I have personal knowledge of the matters contained herein.
3. I have been employed by the Maryland State Board of Elections (“SBE”) since 2003. I currently serve as Director of Voting and Election Management Systems and have been performing the functions of that job since October, 2023. My work requires, among other things, coordinating the preparation of ballots in advance of the primary and general elections
4. The deadline for a candidate to decline the nomination of their party so that his or her name would not appear on the general election ballot was Tuesday, August 4, 2026 at 5:00 p.m.

5. Vacancies on the ballot created by a declination of a nomination had to be filled by the appropriate authority before August 7, 2026 at 5:00 p.m.
6. The last day for which a candidate's death or disqualification, having become known to SBE or the appropriate local board, would result in the candidate's removal from the general election ballot was August 10, 2026.
7. Vacancies on the ballot created by the death or disqualification of a candidate must be filled by the appropriate authority before August 14, 2026.
8. On August 18, 2026, SBE will begin creating ballot databases, importing the ballot data, and laying out the different ballots that will be in use across the state for the general election.
9. By August 24, 2026, local boards of election ("LBEs") will receive ballot proofing packages to review and approve the ballots pertinent to their respective jurisdictions. This process takes approximately one week for larger jurisdictions.
10. On August 31, 2026, ballots must be certified pursuant to Md. Code Ann. EL § 9-207(a)(2) and placed on SBE's website for public viewing. In total, 1,991 ballot styles will be in use across the State during the 2026 general election.
11. Any addition or removal of a ballot question during the period prior to certification will require SBE to correct the relevant databases and redo the process

of laying out affected ballots, and will require affected LBEs to re-review and re-approve affected ballots pertinent to their jurisdictions.

12. Pursuant to Maryland Code Annotated, Election Law § 9-207(a)(2), the certification of ballots must take place “at least 64 days before the election,” which, for the 2026 gubernatorial general election, imposes a deadline of August 31, 2026. However, because mail-in ballots must be made available to military and overseas voters no later than 45 days before the election (this year, September 19, 2026) pursuant to 52 U.S.C. § 20302(a)(8)(A), SBE strives to certify ballots as early as possible to allow for the completion of the several steps required to take place before the military/overseas mailing deadline.

13. SBE creates multiple ballot formats for the various needs of the election. Specimen ballots are designed for voter education. Ballots voted in-person (during early voting and on election day) and mail-in ballots do not differ, but the process of their preparation does. Test decks for mail-in ballots are scanned through specific scanners used only during the mail-in canvass; test decks for in-person ballots must be scanned on every scanner in the State used during early voting and election day. In-person test deck scanning requires weeks in larger jurisdictions. Finally, web-delivery ballots must be designed to print on the 8 ½ x 11-inch paper found in consumer printers, rather than the 17-inch paper used for all other types of ballots.

14. On September 3, 2026, SBE will begin the process of creating PDFs of all 1,991 of the general election ballots for each of the different ballot formats that will be in use (including specimen ballots, election day ballots, test deck ballots, mail-in ballots, and 11-inch ballots for web delivery). Start to finish, this process takes approximately eight days. PDFs for in-person ballots, mail-in ballots, and their respective test decks are completed first. Any change to the ballots during this period would require PDFs of the affected ballots across all formats to be redone.

15. On September 6, 2026, SBE expects to begin the printing of all test decks and all ballots. This includes test decks for all ballots voted in-person, mail-in ballots, and specimen ballots. This process typically takes 3 weeks, and at the conclusion of the printing process approximately 20,000,000 different physical ballot sheets will have been generated. After the date that printing begins, changes to ballots would be costly and disruptive. The pre-print production process takes approximately 2 days to lay out the ballot styles and create the metal printing plates for each ballot style. When ballot styles change, new ballot style PDF's must be sent to the printer and the pre-print production process must be redone. Any ballots printed for the impacted jurisdiction must be disposed of to ensure that the wrong ballot styles do not get sent to the jurisdiction.

16. On September 3, 2026, SBE expects to import final ballot style data into its MDVOTERS database. Once this is done, local boards of election must verify that styles are aligned with the correct precincts and splits. For larger jurisdictions this

process takes approximately 2 days, and any change to the ballots during or after this process would require the ballot styles to be reimported and would require affected LBEs to re-verify all ballot styles to precinct associations.

17. On September 6, 2026, SBE expects to finalize the ballot style process in the MDVOTERS database by assigning voters who have requested a mail-in ballot to the current election. Once the mail-in voters have been assigned to the current election, there is no way to unassign them without intervention from the MDVOTERS development team. After speaking with the development team, it is my understanding that it would take approximately 5 days to return to the point where absentee voters can be assigned to the current election again.

18. On September 8, 2026, SBE expects to begin testing of its web delivery system. Under Maryland law, voters may request that mail-in ballots be delivered to them via the web. In order to test SBE's web delivery system, SBE must transmit ballot style and content data to its programmer, who then performs quality assurance testing using real absentee voters. The testing process takes approximately ten days, and must be completed before the September 19, 2026 deadline for making mail-in ballots available to military and overseas voters. Also, the testing process may not begin until mail-in ballots are assigned to voters.

19. While ballots are being prepared, SBE also conducts testing of its election results site and news feed, to allow for real-time election results reporting to the

public. The process draws on finalized ballot information to produce XML and CSV files of all final contest and candidate data for the purpose of producing test results files and HTML test results pages. This process begins at the time of ballot certification and takes approximately two months to complete. This testing process must be complete by October 30, 2026.

20. Upon test deck delivery, the local boards of elections begin Logic and Accuracy testing on all voting equipment that will be used in the election. Logic and Accuracy on the equipment to be used during early voting must be completed by October 20, 2026. Logic and Accuracy for the equipment to be used on election day must be completed by October 26, 2026.

21. Early voting for the 2026 gubernatorial general election is scheduled to begin October 22, 2026, and conclude on October 29, 2026.

22. Election day for the 2026 gubernatorial general election is November 3, 2026.

23. Considering all that has been described, the State Board must ascertain the questions and candidates to be included on the ballot on or before September 3, 2026.

24. I solemnly affirm under the penalties of perjury that foregoing contents of this Affidavit are true to the best of my personal knowledge, information, and belief.

8/17/2026

Date

Natasha Walker

Natasha Walker

IN THE
CIRCUIT COURT FOR DORCHESTER COUNTY

LINDSAY WHEATLEY, *et al.*,
Plaintiffs,

v.

MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,
Defendants.

* No. C-09-CV-26-000285
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* * * * *

AFFIDAVIT OF DAVID MORGAN

1. I, David Morgan, am over 18 years of age, and am competent to testify to the facts set forth herein.
2. I have personal knowledge of the matters contained herein.
3. I have been employed by the Maryland State Board of Elections ("SBE") since February 5, 2025. I currently serve as Information Technology Technical Specialist and have been performing the functions of that job since February 5, 2025. My work requires, among other things, maintaining and updating SBE's public facing website..
4. After the enactment of Chapter 881 of 2026, the State Board of Elections posted both the full text of the proposed amendment, the ballot question authored by the General Assembly, and a link to the enactment proposing the amendment on its website at 1:30 p.m. on Friday, August 7, 2026.
5. On August 9, 2026, I performed a search to determine how many users visited SBE's ballot question webpage. That search determined that, between August 5 and August 7, 2026, the State Board's ballot question webpage tracked approximately 176

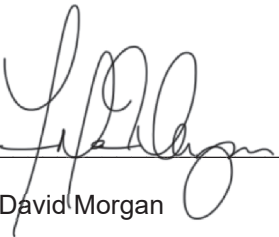
active users. Since this time, the updated metrics estimate that 151 active users visited the page during that timeframe. Due to the nature of Google Analytics reporting, the original number is an estimate based on an algorithm. The later number, while also based on an algorithm, is more precise.

6. The Department of Legislative services drafted a plain language summary of the proposed amendment. The Office of the Attorney General transmitted a letter on August 7, 2026, approving the summary. The summary was submitted to the State Board on August 11, 2026, and posted publicly by the State Board the same day

7. I solemnly affirm under the penalties of perjury that foregoing contents of this Affidavit are true to the best of my personal knowledge, information, and belief.

08-18-2026

Date



David Morgan

IN THE
CIRCUIT COURT FOR DORCHESTER COUNTY

LINDSAY WHEATLEY, <i>et al.</i> ,	*	No. C-09-CV-26-000285
<i>Plaintiffs,</i>	*	
v.	*	
	*	
MARYLAND STATE BOARD OF ELECTIONS, <i>et al.</i> ,	*	
<i>Defendants.</i>	*	

AFFIDAVIT OF ERIN HUSTINGS

1. I, Erin Hustings, am over 18 years of age, and am competent to testify to the facts set forth herein.
2. I have personal knowledge of the matters contained herein.
3. I have been employed by the Maryland State Board of Elections ("SBE") since May 2025. I currently serve as an Administrator II and have been performing the functions of that job since May 2025. My work requires, among other things, managing the public posting of State and local ballot questions in compliance with State and federal law. This includes, but is not limited to, Election Law Sections 7-103 and 7-105, and the federal Voting Rights Act, which requires various election-related materials to be published in both English and Spanish. This effort involves coordinating the receipt and publication of information and documentation from several State agencies, as well as a private translation vendor.
4. To comply with State laws requiring the posting of ballot questions for comments, and the addition of ballot question summaries, related legislation, and proposed

constitutional amendment text in advance of the election, the following process was followed for each ballot question. An accordion was created on the website with all questions for the State or county, and instructions and deadlines were posted for members of the public wishing to provide comments. The letter or number identifying each ballot question served as a header. Under each header the plain language summary and the for/against statements were posted. As comments were received, SBE forwarded them to the entity responsible for drafting question text. Agencies that amended their proposed ballot question text in response to comments received provided updated text, which we used to update our webpage. To meet the additional posting requirements, a link to the "Amendment Text," a link to related legislation, and the Department of Legislative Services Ballot Question Summaries were provided at the top of the SBE accordion. Clicking on the link would take the voter to the respective document or website. Updating state ballot questions was, therefore, a multistep process.

5. Prior to the enactment of Chapter 881 of 2026, on or about July 7, 2026, SBE posted on its website the three statewide ballot questions approved by the general assembly to be included on the 2026 general election ballot. Those questions were Question 1: Ch. 155 of the 2026 Legislative Session, Question 2: Ch. 156 of the 2026 Legislative Session, and Question 3: Ch. 878 of the 2026 Legislative Session. Question 1 and Question 2 were identical due to the way in which they were adopted during the legislative session. Until the special legislative session, these three questions were the only state questions that were to appear on the general election ballot.

6. On August 5, 2026, SBE learned through news media reports that, during a special legislative session, the General Assembly had passed Chapter 881 of 2026 and removed the duplicative question from the ballot by removing Chapter 156 of the 2026

Legislative Session. This meant that several updates needed to be made to the SBE website. First, the text in the SBE accordion needed to be updated to reflect the new ballot questions. Second, the "Amendment Text" document and links to related legislation needed to be updated. Third, the Ballot Question Summary document provided by DLS needed to be updated.

7. It is my understanding that Chapter 881 is to be included on the ballot exactly as it was passed by the General Assembly. Therefore, the language to be included on the SBE accordion was to mirror exactly the language in the bill, including the summary and for/against statements.

8. As a starting point, on that day, I reviewed the General Assembly website's records concerning the bills that made these changes, and found that they did not yet include Chapter numbers. While the text of the ballot question was available two key pieces of information were missing, preventing SBE from updating the text on the "SBE" accordion of the ballot question website: (1) the updated numerical order of the ballot questions and (2) the Chapter number for the Election Districts ballot question.

9. Additional updates were necessary to comply with federal election laws as well, which required gathering additional information. SBE needed new website material to be translated into Spanish to meet federal legal requirements. This was not yet available, such that an update could be made to the website. As a result, I prepared a draft Amendment Text document to provide to our webmaster with all information publicly available at the time.

10. On August 6, 2026, upon checking the General Assembly website, Chapter numbers were located for the new laws affecting ballot questions, HB2100 and HB2101. I edited the Amendment Text document I had prepared for upload to the State Board of

Elections' website that concerned Statewide ballot questions, adding the proposed changes that HB 2100 would make, and removing Ch. 156.

11. Next, I requested confirmation from senior management of the revised order of statewide questions. I understand that the State Board of Elections staff sought and obtained information from the Office of the Attorney General that the consequence of the legislative action would be that original Question 2 would be eliminated; original Question 3 would become Question 2; and the measure created by Ch. 881 would become Question 3. Based on this information, on the evening of August 6, 2026, I transmitted the update to the accordion text and Amendment Text for statewide questions to the webmaster to update the State Board of Elections' website.

12. On August 7, 2026, the State Board of Elections posted the full text of the proposed amendment, the ballot question authored by the General Assembly, and a link to the enactment proposing the amendment for current Question 3.

13. On or about August 10, 2026, a review of the SBE accordion revealed that the chapter number for Question 3 - Election Districts had not been updated when the language was updated on August 6, 2026. As a result, the Chapter number was updated from Chapter 878 to Chapter 881. Notably, only the text for the link was inaccurate. Users who accessed that link would have been directed to the correct page on the Maryland General Assembly website.

14. The Department of Legislative services drafted a Ballot Question Summary of the proposed amendment. The Office of the Attorney General transmitted a letter on August 7, 2026, approving the summary. The summary was submitted to the State Board of Elections on August 11, 2026, and posted publicly by the State Board of Elections the same day.

15. On August 11, 2026, my internal request for the Spanish translation was submitted to SBE's vendor. The Spanish translation was received on August 12, 2026 and posted to the website. No further changes were made to the information about statewide ballot questions on the State Board of Elections' webpage after this date.

16. I solemnly affirm under the penalties of perjury that foregoing contents of this Affidavit are true to the best of my personal knowledge, information, and belief.

8/20/26

Date

Erin Hustings

Erin Hustings

LINDSAY WHEATLEY, et al.,

Plaintiffs,

v.

MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,

Defendants.

IN THE CIRCUIT COURT

FOR

DORCHESTER COUNTY, MARYLAND

Case No. C-09-CV-26-000285

ORDER

Upon consideration of the State Defendants' Joint Motion to Transfer Venue (the "Motion") and Plaintiffs' Memorandum in Opposition to Defendants' Motion to Transfer Venue, it is **ORDERED** that the Motion is **DENIED**.

08/19/2026 15:09:49



Judge

William H. Jones

Dorchester County Circuit Court

Entered: Clerk, Circuit Court for
Dorchester County, MD
August 19, 2026

LINDSAY WHEATLEY, *et al.*

*

IN THE CIRCUIT COURT***Plaintiffs***

*

FOR DORCHESTER COUNTY**v.**

*

*

STATE OF MARYLAND**MARYLAND STATE BOARD
OF ELECTIONS, *et al.***

*

Case No.: C-09-CV-26-000285***Defendants***

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OPINION AND ORDER OF COURT

A hearing was held on August 27, 2026, in the Circuit Court for Dorchester County, Maryland to consider the parties' cross Motions for Summary Judgment. The Plaintiffs were represented by Strider Dickson, Esq. and Victoria Brohawn, Esq., and Defendants were represented by Daniel Kobrin, Esq.

STATEMENT OF FACTS

On July 17, 2026, Governor Moore issued a proclamation convening the Maryland General Assembly in an Extraordinary Session commencing August 3, 2026, for the stated purpose of "passing legislation to amend the State constitution to clarify and reaffirm that the provisions which govern the requirements of our State legislative districts do not apply to Maryland's congressional districts." Pl. Ex. A, Executive Order 01.01.2026.14. House Bill 2100 (hereinafter "HB 2100") was introduced in the House on August 3, 2026, for the purpose of altering Article III, § 4 of the Maryland Constitution such that only General Assembly districts are required to consist of adjoining territory, be compact in form, be of substantially equal population, and with due regard to natural boundaries and political subdivisions. The Bill also added Article III, §§ 62(a) and 62(b) which provide that the Maryland General Assembly may grant the Supreme Court

of Maryland original jurisdiction to review the State’s congressional districting plans and that no provision of the Maryland Constitution applies to the State’s congressional districting. HB 2100 stated the question used on the ballot shall appear as follows:

The proposed Constitutional Amendment clarifies that certain standards in the Maryland Constitution apply only to districts used to elect members of the General Assembly; authorizes the General Assembly to grant original jurisdiction to the Supreme Court of Maryland to review the congressional districting plan of the State; and requires the criteria for boundaries of congressional district to be determined by applicable federal laws.

Though HB 2100’s original language preceding the proposed ballot question language included that, “[a]t that general election, a question substantially similar to the following shall be submitted to the qualified voters of the State,” that language was stricken by amendment in the House and replaced with, “[n]otwithstanding any other provision of law, at that general election, the following question shall be submitted to the qualified voters of the State.” Pl. Ex. C, House Bill 2100, Section 3(b)(2).

HB 2100 passed both chambers of the General Assembly on August 4, 2026, and Governor Moore signed the Bill into law on August 5, 2026. On August 7, 2026, the State Board of Elections posted the full text of the proposed amendment on its website, labelled as “Question 3,” for the November 2026 general election.

PROCEDURAL HISTORY

Plaintiffs timely filed this Petition for Review under Md. Code Ann., Election Law § 12-202 and Complaint for Declaratory and Injunctive Relief on August 10, 2026. In the Petition/Complaint, Plaintiffs ask the Court to enjoin the inclusion of the ballot question posed by HB 2100 on the November 3, 2026, ballot, asserting that Defendants failed to comply with constitutional and statutory requirements for the content and notice of a ballot question for a proposed constitutional amendment, and violated the constitutional mandate that the proposed

amendment present a single subject matter for voters' consideration. Plaintiffs raise three issues in the Complaint: Violation of Maryland's Constitution and Declaration of Rights (Count I), Violation of Election Law Article (Count II), and Violation of Maryland's Single-Subject Requirement under Article XIV, § 1 (Count III). Defendants filed a Motion for Summary Judgment on August 21, 2026, claiming that Plaintiffs cannot prevail on any of the counts alleged in the Complaint as the Maryland General Assembly is not bound by the provisions of Election Law Article §§ 7-103 and 7-105 of the Annotated Code of Maryland (hereinafter "EL § 7-103/7-105") when the legislature opts to draft its own ballot question and because the contents of the proposed amendment concern a single subject: state and federal districting plans. On August 26, 2027, Plaintiffs filed a cross Motion for Summary Judgment, alleging that they are entitled to judgment in their favor as a matter of law. Both Motions for Summary Judgment are now properly before the Court for consideration.

STANDARD OF REVIEW

To prevail in a suit filed under Election Law § 12-202 of the Annotated Code of Maryland, a plaintiff must prove by clear and convincing evidence: (1) the absence of any other adequate remedy in the Election Law Article, (2) an act or omission related to an election, (3) that the act or omission is unlawful according to a "law applicable to the elections process," and (4) that the act or omission "may change or has changed the outcome" of the election at issue.

Following a motion for summary judgment pursuant to Maryland Rule 2-501, granting the motion in favor of the moving party is appropriate if (1) there is no genuine dispute as to any material fact and (2) the moving party is entitled to judgment as a matter of law. For the purpose of summary judgment, a material fact is one where "the resolution of which will somehow affect the outcome of the case." *Lowman v. Consolidated Rail Corp.*, 68 Md. App. 64, 69 (1986). In

order to succeed on a motion for summary judgment, the moving party, through affidavits or other sworn statements of fact based on personal knowledge, bears the burden to demonstrate that no material fact is actually disputed. *See Sterling v. Johns Hopkins Hosp.*, 145 Md. App. 161, 168 (2002).

DISCUSSION

The parties agree that the case is ripe for ruling on the cross Motions for Summary Judgment as there is no dispute of material facts and the prevailing party is entitled to judgment as a matter of law. Plaintiffs' Petition for Review Under Md. Code Ann., Election Law § 12-202 and Complaint for Declaratory and Injunctive Relief raised three counts: (1) Violation of Maryland's Constitution and Declaration of Rights, (2) Violation of Election Law Article Sections 7-103 and 7-105, and (3) Violation of Maryland's Single-Subject Requirement.

1. VIOLATION OF MARYLAND'S CONSTITUTION AND DECLARATION OF RIGHTS

Plaintiffs contend that HB 2100's language violates the Maryland Constitution and Declaration of Rights specifically that HB2100's proposed ballot question does not provide adequate notice to voters because the ballot question is misleading and confusing so that an average voter would not be able to make an intelligent choice. The proposed ballot question from HB 2100 states:

The proposed Constitutional Amendment clarifies that certain standards in the Maryland Constitution apply only to districts used to elect members of the General Assembly; authorizes the General Assembly to grant original jurisdiction to the Supreme Court of Maryland to review the congressional districting plan of the State; and requires the criteria for boundaries of congressional districts to be determined by applicable federal laws.

Plaintiffs allege that the words "clarifies" and "certain standards" are misleading and provide an incomplete description of HB 2100's effects. Plaintiffs and Defendants dispute whether

the state of the law in Maryland as it relates to the application of Maryland Constitutional standards to congressional districts needs to be clarified. Plaintiffs contend that the law is clear that Maryland Constitutional standards apply to districting plans at the State and Federal level. *See, Szeliga, et al. v. Lamone, et al.*, C-02-CV-21-1816, Circuit Court for Anne Arundel County. Defendants state that the *Szeliga* case is not binding precedent, there are two federal district court cases that take the opposite position, and the issue has not been resolved by a Maryland appellate court. Plaintiffs also assert that the term “certain standards” is not acceptable because the question does not get rid of certain standards and leave some standards remaining, instead it removes all standards in the Maryland Constitution from applying to congressional districting plans. Plaintiffs also contend that the General Assembly’s failure to follow requirements under the Election Law Article provides insufficient notice to voters. Specifically, Plaintiffs state that the General Assembly’s failure to comply with the Election Law Article’s timing provisions and opportunity for public comment have infringed on voters’ constitutional rights to due process and adequate notice. Plaintiffs additionally claim that the ballot question is misleading because it fails to comply with EL § 7-103(b)(6) which requires a question to provide “a brief statement explaining what the practical outcome of each voting choice would be.” Plaintiffs point to the other proposed ballot questions for November 3, 2026, Pl. Ex. E to Pl. Pet./Compl., all of which provide an explanation of the outcome of a vote for either option. Only the question proposed by the General Assembly related to redistricting fails to provide an explanation.

Defendants’ position is that the language of the ballot question is sufficient for a voter to make a reasonable choice, the language used is not misleading, and the Court should be deferential to the language proposed by the General Assembly. Defendants also contend that the state of the law on the application of Article III, § 4 is not clear, so the word “clarifies” is accurate and not

misleading. Further, Defendants assert that if the first clause is read in conjunction with the last clause, it is clear that all standards in the Maryland Constitution would not apply to congressional districts, such that the phrase “certain standards” is not misleading or confusing to voters.

The Court finds that the language used in Question 3, as well as the General Assembly’s failure to comply with the provisions of the Election Law Article, fail to provide adequate notice to voters as required by the Maryland Constitution and the Declaration of Rights. Further, the language is misleading and does not provide voters with adequate information or an explanation for an informed vote. While the decision in *Szeliga* has not been addressed by the appellate courts in Maryland, it does not appear that there was confusion as to the law. In the Preamble to House Bill 2100, the General Assembly stated that *Szeliga* “held that Article III, § 4 districting standards apply to congressional districts.” The next section of the Preamble states that, “This amendment clarifies the long-standing understanding and case law that Article III, § 4 governs only General Assembly districting plans, not congressional plans.” This statement is in direct conflict with the prior statement. There is no long-term understanding or case that provides for the standards under Article III, § 4 not to be applicable to congressional districts. The only case cited held the opposite. *See Szeliga*. The term “clarifies” is misleading in the ballot question as there is no confusion that needed to be clarified. The Court also finds that the term “certain standards” is misleading and confusing to a voter. The practical effect of HB 2100 is to remove all Maryland Constitutional standards and protections from congressional districting plans. That is not clear from the ballot question. Defendants argue that the voter has to read the first clause with the third clause to interpret the overall effect on congressional districting plans. It should not be this confusing for a voter.

Even if the Court was satisfied that the terminology used was not misleading, the complexity of the terminology, along with the General Assembly's failure to abide by time constraints to provide notice, to provide time for public comment, and significantly to provide a brief statement explaining the practical outcome of each voting choice—which could have helped to clarify the effect of the question—cumulatively undermine the Court's confidence that the ballot question and the procedure employed by the General Assembly adequately apprised voters of the amendment and its function. The Court finds that the ballot language and the General Assembly's failure to abide by the Election Law Article has resulted in voters not being provided with adequate notice of the purpose and effect of the ballot question so that they can make an informed vote.

2. VIOLATION OF ELECTION LAW ARTICLE SECTIONS 7-103 AND 7-105

Plaintiffs contend under Count II of the Petition/Complaint that the General Assembly, due to the timing of the special session on August 3rd and 4th, 2026, and the wording of the ballot question, has violated multiple provisions of EL §§ 7-103 and 7-105. The General Assembly has passed a series of laws which cover the process of proposing a ballot question to amend the Maryland Constitution. These laws have been amended multiple times including amendments that took effect June 1, 2026, under Senate Bill 29, which among other requirements provided for specific timelines for ballot questions, some of which timelines the General Assembly did not abide by with the question at issue in this case. Defendants contend that it has not violated these laws because a ballot question drafted by the General Assembly pursuant to Article XIV of the Maryland Constitution is not subject to the same laws that the General Assembly passed to be applicable to ballot questions drafted by other governmental entities. Defendants argue that the process and time restrictions in EL §§ 7-103 and 7-105 do not apply to a ballot question when it is

drafted by the General Assembly, the question language is contained in the enactment, and the enactment clearly specifies that the exact language included is to be used on the ballot.

Defendants do not cite to any authority for its position but instead state that it is implicit that the General Assembly's constitutional authority under Article XIV cannot be limited by law. In other words, that the General Assembly does not have the authority to enact laws that limit its own constitutional authority. The Court is not convinced that the laws are a limitation of its constitutional authority. Title 7 of the Election Law Article provides numerous affirmative statements to evidence the General Assembly's intent that Title 7 applies to all ballot questions. Section 7-101 of the Election Article states that, "This title applies to the following types of ballot questions: . . . (ii) an amendment pursuant to Article XIV of the Maryland Constitution. . . . (6) a question referred to the voters pursuant to an enactment of the General Assembly." Section 7-101 also includes a catch all that the title applies to "(10) any other question that will be voted on in an election conducted pursuant to this article." Defendants contend that EL § 7-103(c)(1) does not apply because the General Assembly did not delegate the drafting of the ballot question to the Secretary of State, but that section states that, "the Secretary of State shall prepare and certify to the State Board the information required under subsection (b) of this section, for all statewide ballot questions." The section states that it applies to all statewide ballot questions and does not have an exclusion for a ballot question drafted by the General Assembly pursuant to Article XIV of the Constitution. EL § 7-103(b) additionally requires each question that appears on the ballot to contain certain information.

The provisions of Title 7 of the Election Law Article provide a statutory scheme to provide due process for a proposed Amendment to the Maryland Constitution to be placed on the ballot. Defendants now argue that scheme does not apply to the General Assembly by a simple decision

to draft the text of the ballot question itself, rather than delegating that task, by putting the text in the enactment, and having the enactment state that the selected ballot question language is to be used on the ballot. EL § 7-105(b)(3). In this case, this would excuse the General Assembly from violating EL § 7-103(c)(1) (that on or before July 1 the Secretary of State shall prepare and certify to the State Board the information in subsection (b) for all statewide ballot questions), § 7-105(b) (that the notice required under this section would be prepared and submitted to the State Board of Elections on or before August 3), § 7-105(e) (the State Board has to post the notice required on or before August 5), and § 7-103(c)(5) (the State Board shall make the information submitted available to the public for a 15-day comment period). As it relates to the ballot question in this case, the State did not even attempt to comply with the 15-day comment period for the public.

The General Assembly passed election laws to provide a statutory process for the placing of Constitutional amendment questions on the ballot, not as a mechanism to limit the General Assembly's constitutional power pursuant to Article XIV to propose amendments to the Constitution. The laws establish process and procedure to guarantee the due process of placing proposed Constitutional amendments on the ballot. The General Assembly should not be able to opt out of its own statutory process, some of which process was just enacted and effective June 1, 2026. HB 2100 itself evidences that the General Assembly knew it had a compliance problem with its election laws as HB 2100 states in section 3(b)(2) just before the ballot question that, "Notwithstanding any other provision of law, at that general election, the following question shall be submitted to the qualified voters of the State." The General Assembly attempted to opt out of its own laws by stating that the question shall be submitted to the voters with no regard for any other provision of law. The General Assembly failed to abide by the laws it had enacted as recently as this year. The laws are not a limitation to the General Assembly's constitutional authority but

are an enacted process for the exercise of that authority. Due to this failure, the Court finds that Question 3 as proposed by House Bill 2100 is unlawful and will not be placed on the ballot.

3. VIOLATION OF MARYLAND'S SINGLE-SUBJECT REQUIREMENT

Plaintiffs allege under Count III of the Complaint that HB 2100 as drafted and passed by the General Assembly to be voted on by eligible voters violates Article XIV, § 1 of the Constitution which requires constitutional amendments to concern a single subject. They argue that the three elements of the proposed amendment—that criteria provided by the Maryland Constitution only apply to General Assembly districts, that the General Assembly is authorized to grant the Supreme Court of Maryland original jurisdiction over congressional district plan review, and that no provision of the Maryland Constitution shall apply to congressional districts, rather federal standards are applicable—serve distinct, disjointed purposes. Defendants in their opposition assert that all three changes to be performed by the amendment if passed fit neatly under the subject of state districting.

The single-subject requirement of Article XIV, § 1 does not prohibit a proposed amendment from providing for multiple constitution changes. Rather, such a multiple-purpose amendment must ensure that each change included involves “interlocking concepts” that are “so functionally interrelated as to present a single subject.” *Andrews v. Governor of Maryland*, 294 Md. 285, 300 (1982). Defendants correctly argue that the General Assembly’s authority to propose constitutional amendments enjoys wide discretion, however, it is not unlimited discretion. Although Defendants assert that no Maryland court “has ever detected such a clear violation,” Def. Mem. Supp. Summ. J. 41., this does not bar the Court from ever finding such a violation. Plaintiffs direct the Court to several cases from other States where the courts found a violation of their States’ single-subject requirement. As the Supreme Court of Maryland stated, “We cannot assume that

the Legislature would propose an amendment, which might contain matters obviously not related, but if it did, then the Courts would have the power to pass upon the proposal and to determine whether or not Article XIV had been followed.” *Hillman v. Stockett*, 183 Md. 641, 653 (1944).

The Court finds that the three clauses in the ballot question are not interlocking concepts that are so functionally related to present a single subject. Specifically, the Court does not agree that the question of whether the voters want to authorize the General Assembly to grant original jurisdiction to the Supreme Court is an interlocking concept with whether certain standards in the Maryland Constitution apply to congressional districts and State districts or only to State districts and that only federal law applies to congressional districts. A voter may want to cast a different vote on whether the voter wants Maryland Constitution standards to apply only to districts for members of the General Assembly and for only federal law to apply to congressional districting plans versus authorizing the General Assembly to grant jurisdiction to the Supreme Court. A vote for or against authorizing the General Assembly to grant jurisdiction to the Supreme Court would not create confusion as to an opposite vote on the other clauses. The Court finds that the text of the proposed ballot question violates the single subject clause of Article XIV of the Maryland Constitution.

ORDER

WHEREAS, the Court finds that Plaintiffs have proven by clear and convincing evidence that there is an absence of any other adequate remedy in the Election Law Article, the act at issue is related to an election, that the act is unlawful according to a law applicable to the election process, and that the act may change the outcome of the election at issue; and

WHEREAS, the Court finds that, pursuant to Section 12-202 of the Election Law Article of the Annotated Code of Maryland, Plaintiffs are entitled to judicial relief; and

WHEREAS, the Court finds that there is no dispute as to any material fact; and

WHEREAS, the Court finds that Plaintiffs are entitled to judgment as a matter of law under each Count of the Complaint.

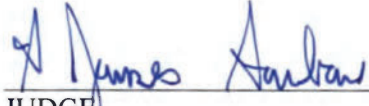
THEREFORE, in consideration of the pleadings filed, arguments made by the parties at the motions hearing on August 27, 2026, and the reasons stated in the attached Opinion, it is this 28th day of August, 2026, by the Circuit Court for Dorchester County, State of Maryland, hereby

ORDERED, that Plaintiffs' Motion for Summary Judgment is **GRANTED**; and it is further

ORDERED, that Defendants' Motion for Summary Judgment is **DENIED**; and it is further

ORDERED, that the State Board of Elections is **ENJOINED** from including statewide ballot Question 3 on the November 3, 2026, ballot; and it is further

ORDERED, that the execution of this injunction is **STAYED** pending an appeal of this ruling to the Supreme Court of Maryland.


JUDGE

MARYLAND STATE BOARD OF
ELECTIONS, *et al.*,

Appellants,

v.

MICHAEL L. HOWELL, *et al.*,

Appellees.

* IN THE

* SUPREME COURT

* OF MARYLAND

* September Term, 2026

* Nos. 21, 22

* * * * *

CERTIFICATE OF SERVICE

I certify that, on this 1st day of September, 2026, the Supplemental Record Extract in the captioned case was filed electronically and served electronically by the MDEC system on all persons entitled to service.

/s/ Daniel M. Kobrin

Daniel M. Kobrin