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Harmeet K. Dhillon
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Sent by email to William.Mohrman@usdoj.gov

Dear Assistant Attorney General Dhillon:

I write in response to your letter dated July 7, 2026. You requested a letter in response informing “how the state of Maryland intends to ensure it is complying with” the list maintenance mandates of the NVRA, HAVA, Title III of the Civil Rights Act of 1960, and the Voting Rights Act of 1965 at both the state and local level.

As the State Administrator and staff of the Maryland State Board of Elections (SBE), we serve as the definitive and trusted source for all electoral information within the State. It is absolutely vital that the public possess a clear and accurate understanding of the detailed, often complex, and statutorily-defined administrative processes that govern election law.

Narratives surrounding voter registration, especially those circulating on various social media platforms, frequently misconstrue the law or certain rights. This often leads to the proliferation of misinformation—inaccurate information spread unintentionally—and disinformation—false information spread with the intent to deceive. The integrity of our elections hinges on our ability to counteract this trend.

Under Maryland law, the State Administrator, local boards, and election directors each perform voter registration list maintenance duties. Under Maryland Code, Election Law Article § 3-501, election directors in Maryland’s counties and in Baltimore City have authority to remove voters from the registration list upon their request and upon learning of their loss of eligibility. Election Law § 3-502(b)-(c) charges the appropriate election official with sending a confirmation notice upon learning that a voter may have moved, while § 3-502(d)-(e) give election directors responsibility for updating or removing records in accordance with the NVRA and State laws. Section § 3-504 describes the following roles:

- The State Administrator secures records of deaths, convictions, and name changes from State and federal agencies;
- The local boards receive jurisdiction-specific cuts of this information, as well as obituaries and reports of destruction of residences within their jurisdictions; and
- Election directors send confirmation notices and remove voters from the

registration list when statutorily-required conditions are met.

In addition, Chapters 6 and 7 of Title 33, Subtitle 5 of the Code of Maryland Regulations (COMAR) elaborate on responsibilities of the State Board and State Administrator, and local boards and election directors, in the voter registration list maintenance program. Provisions include, for example, that under COMAR § 33.05.06.06, the State Board receives reports from the jury commissioner; the State Administrator delivers county-specific information to local boards; and election directors communicate with voters and update or cancel their registration records. Under COMAR § 33.05.07.01(B), election directors mail nonforwardable specimen ballots to all registered voters in their jurisdictions as part of the State's process to identify individuals who may have become ineligible by reason of a change of address. COMAR § 33.05.07.04 requires election directors to act as soon as reasonably possible to update records in the statewide voter registration list.

Maryland voter registration list maintenance procedures are dictated by state law, which derive from NVRA requirements. In general, the NVRA requires that:

- State programs make a reasonable effort to remove the names of ineligible voters by reason of death or change of residence, 52 USC § 20507(a)(4);
- State programs be uniform, nondiscriminatory, and not result in removal of registered voters solely by reason of failure to vote, 52 USC § 20507(b);
- States not remove a registrant on grounds of change of address unless they confirm, or fail to respond to a confirmation notice and do not vote in two general elections for Federal office after receiving a confirmation notice, 52 USC § 20507(d)(1); and
- State programs must be completed not later than 90 days before a primary or general election for Federal office, 52 USC § 20507(c)(2)(A).

Maryland procedures for voter registration list maintenance are set forth in the Election Law Article, Title 3, Subtitle 5, and COMAR Title 33, Subtitle 5, Chapters 6 and 7. Maryland's list maintenance processes are generally explained on the State Board of Elections Website:

https://elections.maryland.gov/voter_registration/list_maintenance.html.

Furthermore, Maryland is a member of the Electronic Registration Information Center (ERIC) and follows the coalition's bylaws and the procedures set forth in its Membership Agreement, both of which may be reviewed and downloaded at the following URL: <https://ericstates.org/wp-content/uploads/documents/ERIC-Bylaw-MA-FINAL.pdf>. As summarized on the Voter Registration List Maintenance section of our website, "Each ERIC member shares their voter registration data along with data provided by each Department of Motor Vehicles. This allows the data to be matched with member states and against the Social Security Administration's death records and the National Change of Address (NCOA) program through the U.S. Postal Service. Maryland receives 5 reports from ERIC: in-state duplicate records, death notifications, in-state address changes, cross-state address changes and a report from NCOA regarding address updates." The State Administrator sends county-specific cuts of ERIC data to local boards and election directors to take appropriate action, in accordance with standard procedures.

Without exhaustion, we highlight here key provisions that guarantee compliance with NVRA requirements for voter registration list maintenance:

- Election Law Article § 3-502(c) requires election directors who receive notice of a move outside their jurisdiction to send a confirmation notice, and § 3-502(d) prohibits removal of a voter who receives this notice unless the voter confirms their move, or fails to respond and to vote in the two general elections following issuance of the confirmation notice.
- COMAR § 33.05.07.01(C) requires that confirmation mailings and subsequent actions to remove voters or place them in inactive status must be completed at least 90 days before an election.
- Election Law Article § 3-504(a)(1) requires the State Department of Health to report deaths to the State Administrator. Under § 3-504(a)(2) the State Administrator also must seek arrangements that provide access to Social Security Administration death notices, while local boards are empowered to make arrangements to receive change of address information from approved sources under § 3-504(b)(4). When an election director receives a report of death from one of these sources or an obituary or other reliable report, the election director requests confirmation if appropriate, and cancels registration for deceased voters in accordance with provisions in § 3-504(c).
- COMAR § 33.05.06.05(A) further specifies that election directors cancel registration immediately upon receiving a report of a voter's death from a state vital statistics agency, and § 33.05.06.05(B) requires them to send a confirmation letter when a death report comes from another credible source.
- Election Law Article § 1-201 provides that the purposes of the State's election laws include fair and equitable treatment of all voters and assurance that all qualified persons may register.

The right to vote is a sacred right that has been expanded through sacrifices of many before us. It is a privilege and honor to work in this field empowering individuals to make their voices heard. The State Board works diligently to ensure that every eligible Marylander can register to vote in accordance with federal and State laws. And as referenced above, election officials in Maryland continue that diligent work to maintain up to date voter rolls.

Improper cancellation leads to disenfranchisement of an eligible voter. That is why it is a detailed process. It must be certain. Maryland's process errs on the side of removing any doubt in the cancellation before potentially disenfranchising a voter. As the Maryland Declaration of Rights states "the right of the People to participate in the Legislature is the best security of liberty and the foundation of all free Government; . . . and every citizen having the qualifications prescribed by the Constitution, ought to have the right of suffrage."

Sincerely,



Jared DeMarinis
Maryland State Administrator of Elections