

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

LEAGUE OF WOMEN VOTERS OF ARKANSAS,
SAVE AR DEMOCRACY, BONNIE HEATHER
MILLER, and DANIELLE QUESNELL

Plaintiffs

and

PROTECT AR RIGHTS and FOR AR KIDS

Intervenor-Plaintiffs

v.

Case No. 5:25-cv-05087-TLB

COLE JESTER, Arkansas Secretary of State,
in his official capacity

Defendant

and

TIM GRIFFIN, Arkansas Attorney General,
in his official capacity

Intervenor-Defendant

**DECLARATION OF JUDY HARRISON IN SUPPORT OF INTERVENOR-
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Judy Harrison, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over the age of 18, am competent to testify, and have personal knowledge of the facts and information set forth in this declaration.

2. I am a citizen and resident of Arkadelphia, Arkansas. I worked as a public educator for more than fifty years and am now retired. I am a volunteer canvasser for For AR Kids, an Arkansas ballot question committee.

3. For AR Kids is a sponsor of a proposed amendment to the Arkansas Constitution popularly known as the Educational Rights Amendment of 2026. For AR Kids is trying to qualify the proposed amendment for the November 2026

Arkansas general election ballot. The Attorney General approved the popular name and ballot title of the proposed amendment on February 26, 2025.

4. For AR Kids is now in the signature-collecting phase of its campaign. To qualify for the ballot, For AR Kids must collect 90,704 valid signatures from qualified electors in Arkansas by July 3, 2026.

5. For AR Kids tried to qualify a similar measure for the 2024 Arkansas general election ballot. In 2024, I spent about 500 hours volunteering for For AR Kids as a canvasser and volunteer coordinator.

6. During the 2025 legislative session, the Arkansas General Assembly passed three new laws—Act 218, Act 240, and Act 274 (“the new laws”)—that make the signature-collecting process significantly more difficult.

7. Act 218 requires canvassers to verbally warn petition signers that “petition fraud is a criminal offense” before allowing them to sign. If a verbal warning is impossible, the canvasser must provide a separate written notification. If a canvasser fails to provide this warning before allowing a person to sign a petition, the canvasser can be charged with a misdemeanor.

8. Act 240 requires canvassers to view a potential signer’s photo identification “to verify the identity” of the potential signer before collecting their signature. If the canvasser cannot verify the identity of the potential signer, she may not collect the person’s signature.

9. Act 274 requires that a person may only sign a petition “[a]fter reading the ballot title of the petition in the presence of a canvasser or having the ballot title

read to him or her in the presence of a canvasser.” If a canvasser fails to read the ballot title aloud or have the signer read the ballot title in the canvasser’s presence before signing a petition, the canvasser can be charged with a misdemeanor.

10. On Monday, May 5, 2025, I volunteered to collect signatures for For AR Kids in front of the Clark County Courthouse in Arkadelphia, Arkansas. The Courthouse is in downtown Arkadelphia and the foot traffic outside the Courthouse varies depending on which days court is in session. The traffic was slower on May 5, with someone passing by about every ten minutes.

11. On May 5, I volunteered for three hours and only collected one signature. Although I asked other people to sign, most refused or ignored me.

12. Based on my experience canvassing under the new laws compared to previous years, the new laws make it harder to collect signatures because they increase the time it takes to have someone sign the petition and deter people from signing. I collected in the same location often in 2024 and had a lot more success than I did on May 5.

13. In the past, it took me no more than two minutes to collect a signature from a qualified elector. Because of the time it took to notify the signer that petition fraud is a crime, check her ID, and have her read the ballot title, it took the person who signed the petition on May 5 about ten minutes to complete all of the steps and sign.

14. On Tuesday, May 6, 2025, I canvassed outside of Family Dollar in Arkadelphia for two hours. I did not collect any signatures that day.

15. A couple of people were interested in signing the petition but said they did not have time to go through all of the steps required to sign.

16. One person wanted to sign the petition, but they did not have any form of identification with them so they were not able to sign.

17. Collectively on these two occasions, I canvassed for five hours and only collected one signature.

18. On Wednesday, May 7, 2025, I attended the Clark County Democratic Women meeting to collect signatures. As I expected, I was able to collect many more signatures (eleven total) before this captive and friendly audience than I was in front of the courthouse and at Family Dollar. However, I cannot collect signatures from only friendly groups like this. To successfully canvass, I have to talk to voters on the street. In 2024, I spent most of my time talking to unknown voters and collecting signatures in public places, not going to targeted audiences.

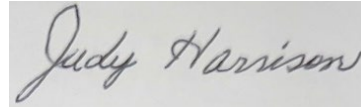
19. I read the ballot title aloud to everyone at the Clark County Democratic Women meeting. By the end of reading the ballot title my voice started to give out. I am 75 years old and reading the ballot title aloud multiple times would be too physically taxing on my voice. So I now know that I'm not capable of reading the ballot title aloud repeatedly, and so I could only possibly attempt to collect signatures from voters who are able or willing to read the ballot title themselves.

20. I wholeheartedly believe in For AR Kids' proposed measure and have dedicated many hours to it. However, I am not able to canvass under these new conditions. I do not plan to canvass anymore this election cycle if these rules are in

effect. I believe that these laws are too physically and mentally demanding and that it will be impossible to collect enough signatures under these conditions to qualify for the ballot.

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

Dated: July 17, 2025

A rectangular box containing a handwritten signature in cursive script that reads "Judy Harrison".

Judy Harrison