

**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 JULIA TAYLOR IN SUPPORT OF INTERVENOR-  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Julia Taylor, 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 resident of Little Rock, Arkansas. I am a former elementary school teacher and am now a self-employed Pilates instructor. In July 2025, I also began working as an education organizer at Arkansas Appleseed Legal Justice Center.

3. I am a volunteer canvasser and coordinator for For AR Kids, an Arkansas ballot question committee.

4. 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.

5. 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.

6. I have volunteered as a canvasser for various ballot initiative and referendum campaigns since 2022. In 2024, I volunteered as a canvasser and volunteer coordinator for For AR Kids. Altogether, I have spent hundreds of hours volunteer canvassing in Arkansas.

7. 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.

8. 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.

9. 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.

10. 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.

11. On Saturday and Sunday, May 3 and 4, 2025, I volunteered to collect signatures for For AR Kids outside of the Little Rock Zoo in Little Rock, Arkansas. As is typical on weekend days at the Little Rock Zoo, throngs of people went in and out of the Zoo on May 3 and 4.

12. I collected signatures with another volunteer, Ulrike Meyer, both days. We canvassed for about three hours on May 3 and about two hours on May 4.

13. Based on my past experience and my experience canvassing under the new laws, I believe that the new laws make it much harder to collect signatures from qualified electors in Arkansas because they slow down the time it takes to interact with a voter and they deter voters from signing a petition.

14. In total, Ms. Meyer and I canvassed for five hours and collected twenty-one signatures. That equates to about two signatures each per hour. In a

similar setting in previous years, I would have expected each of us to collect around ten signatures each per hour.

15. On average, I spent about eight minutes with each person in order to comply with the requirements of the new laws. In previous years, I estimate that I spent about two to three minutes with each signer.

16. It took significantly more time to interact with each signer because of the time it took to check their identification and allow them to read the ballot title.

17. Explaining the new rules also slowed down the signature-collecting process. Ms. Meyer and I decided to canvass together because we were nervous that people would question us and push back when we asked to see their photo identification or made them read the ballot title. Several people had questions about the new requirements, which took extra time to explain.

18. This was frustrating because other people would pass by as I interacted with a signer. If it had not taken so long to go through the steps to allow one person to sign the petition, I could have interacted with more people and collected more signatures.

19. Compared to my experience canvassing in previous years, I also noticed that individuals seem less likely to sign a petition because of the new laws.

20. For instance, eight people wanted to sign the petition but were unable because they did not have any form of identification with them. Two people wanted to sign, but refused to show proof of identity, so I could not let them sign.

21. Moreover, twenty-three people were initially interested in signing but walked away after learning how long it would take to complete all of the required steps. Of these individuals, five people walked away after we told them they would have to read the entire ballot title in front of us or have it read aloud to them.

22. Based on my experience and the reactions we received from passersby, I believe Ms. Meyer and I could have collected more than three times as many signatures if we had not been required to check identification or make signers read the entire ballot title.

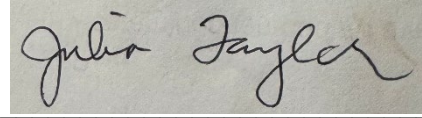
23. On June 8, 2025, I collected signatures at the Berniece Garden Farmers Market in Little Rock, Arkansas. The Farmers Market was very busy and had a steady flow of traffic. I canvassed for one hour and fifteen minutes and collected eight signatures. It took about five to eight minutes to interact with each signer. However, six people refused to sign the petition. Two people would have signed but did not have ID with them, two people refused because they did not have the time to complete all of the required steps, and two people did not give a reason. Of note, one woman signed the petition but her husband refused after seeing that it took his wife eight minutes to sign.

24. I also coordinate volunteers for For AR Kids. Based on my conversations with potential volunteers, the new rules deter people from signing up to be volunteer canvassers because they think it is pointless and it will be impossible to collect enough signatures to qualify for the ballot under these new laws.

25. In my experience, the new laws make it more difficult for canvassers to collect signatures and they deter people who are interested in signing from doing so.

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

Dated: July 18, 2025

A rectangular box containing a handwritten signature in cursive script that reads "Julia Taylor".

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Julia Taylor