## 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 SARAH THOMPSON IN SUPPORT OF INTERVENOR-PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

- I, Sarah Thompson, 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 Fayetteville, Arkansas. I was a school librarian in Arkansas public schools for thirty years and am now retired.
- 3. I am a volunteer canvasser 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 Arkansas 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 other ballot initiatives in the past. In 2024, I spent about sixty hours canvassing for the Arkansas Abortion Amendment of 2024 and an initiative popularly known as An Act to Exempt Feminine Hygiene Products and Diapers from Sales and Use Tax.
- 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, May 3, 2025, I volunteered to collect signatures for For AR Kids at the Fayetteville Farmers Market in Fayetteville, Arkansas.
- 12. Based on my experience as a canvasser in previous years and my experience canvassing under the new laws, I believe that the new laws make it significantly more difficult to collect signatures from qualified electors in Arkansas because they slow down the time it takes to engage with a single voter and they deter voters from signing a petition.
- 13. On May 3, I volunteered for three hours and collected nine signatures. That equates to a rate of three signatures per hour. In previous years, I was able to collect about ten to twenty signatures per hour in a setting similar to the one at the Fayetteville Farmers Market on May 3.
- 14. On average, I spent about ten to fifteen minutes with each person in order to comply with the requirements of the new laws. In previous years, I spent about three minutes with an individual signer.
- 15. Compared to my experience canvassing in 2024, I also noticed that individuals seem less likely to sign a petition because of the new laws.

- 16. For instance, three people were interested in signing but walked away when I explained that it would take longer to sign because I had to check their identification and they needed to read the ballot title. Three college aged students wanted to sign but refused after seeing how long the ballot title was and learning they would have to read the entire title in front of me. People wanted to go about their day at the Farmers Market and were not willing to spend ten minutes signing a petition.
- 17. I also felt unsure of how to comply with the new rules. For example, several people read the ballot title very quickly and I am unsure how thoroughly they would have been able to read the entire ballot title. I took their word that they read the entire ballot title and allowed them to sign the petition. As far as I know, I complied with the new laws, but I don't know if I should have done anything else to ensure they actually read the entire ballot title.
- 18. I know that I'm guilty of a misdemeanor if I knowingly accept a signature when a voter has not read the ballot title in my presence or had it read aloud to them, and I'm worried about continuing to collect petition signatures if it's not clear whether I'm following the law or not.
- 19. I believe that the new signature-collecting laws make it more difficult for canvassers to collect signatures and they deter people who are interested in signing petitions from doing so.

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

Dated: July 16, 2025

Sarah Thompson