

**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 ELAINE WILLIAMS IN SUPPORT OF INTERVENOR-
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Elaine Williams, 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 Prescott, Arkansas. I previously worked as the director of a Head Start preschool program and am now retired.
3. I am a canvasser and volunteer coordinator for For AR Kids, an Arkansas ballot question committee.
4. For AR Kids is the 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.

5. I have volunteered as a canvasser on various citizen-initiated measures and other political campaigns for over ten years. During For AR Kids' 2024 campaign, I collected over 1,000 signatures and canvassed for hundreds of hours.

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. Based on my experience, I believe that the new laws make it much more difficult to collect signatures because, among other reasons, they slow down the time it takes to talk with a signer and they discourage people from signing the petition.

11. From May 13–17, 2025, I volunteered to collect signatures for For AR Kids every day. In total, I canvassed for twenty-nine hours over five days. On each of these days I canvassed door-to-door in my community, which is a small town of about 3,000 people, and in rural areas around my hometown.

12. During this timeframe, I collected twenty-three signatures and 126 people refused to sign. That equates to less than one signature per hour. When canvassing door-to-door in previous years, I would have expected to collect twelve to fifteen signatures per hour. I am comparing apples to apples, because I went door-to-door last year in my community for the same issue, and that was my experience.

13. On average, I spent about thirty-five minutes with each person to comply with the new laws. In previous years, I spent about seven minutes with each signer.

14. 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 or have it read aloud to them. People also had a lot of questions about the new laws and were skeptical of why so much more was required before they were allowed to

sign the petition compared to last year. I spent a lot of time explaining the new laws and trying to convince people that all of the new requirements, such as checking ID and reading the entire ballot title, were required by law. A lot of people were very skeptical.

15. I also noticed that a lot more people were unwilling to sign the petition because of the new laws. For instance, many people refused when I told them how long the process would take. Some were interested in signing until they realized they would have to read the entire ballot title in my presence or have me read it aloud to them.

16. Some people were scared to sign the petition when I warned that petition fraud is a criminal offense. Each day people would question me when I gave the required warning and then were scared to sign, even though nothing illegal was occurring. Many said they were not going to jail for signing a petition. Some even got angry and told me not to come back. I also heard that a woman was telling people that if they signed the petition they would be arrested.

17. Other people were interested in signing until I asked to see their photo ID. Several even pulled their ID out but then questioned why I needed to see it and decided against showing me their ID or signing the petition.

18. While people had a lot of questions and expressed a lot of concerns about the new laws, no one indicated that they were unwilling to sign because of substantive disagreement with the petition. Many of the same people who signed

the For AR Kids petition last cycle refused to sign this time because of the new laws.

19. Overall, it was very frustrating to canvass under the new rules. Most of the time, I read the ballot title aloud to signers. After reading the ballot title aloud more than a couple of times in a day, my throat began to hurt. When I canvass and have to read the ballot title aloud multiple times, I will have to take breaks to rest my voice, which will limit the number of signatures I am able to collect.

20. I also think the new requirements make the process inefficient. Last year, I had a concise, well-rehearsed speech explaining For AR Kids' initiative that helped people quickly and accurately understand what the proposed amendment would do. Reading the entire ballot title aloud took much longer and was harder for people to understand than when I explained it myself.

21. On June 19, 2025, I collected signatures for three hours at a Juneteenth celebration at the Nevada County Courthouse in Prescott. There were about one hundred people at the event. The host announced to everyone that I was collecting signatures and encouraged people to speak with me. Despite the good attendance and support of the host, I only collected three signatures. Fifty-seven people refused to sign the petition.

22. Almost everyone who refused to sign the petition did so because they are frightened of the new laws, especially the ID verification requirement and the crime notification requirement. People are very distrustful of the new laws and do

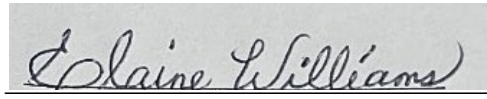
not understand why they are in place now but were not required in the past. People repeatedly told me they would not risk going to jail for signing a petition. When I canvassed at events similar to the Juneteenth event in previous years, I could collect signatures from nearly the entire crowd without any hesitation.

23. At the event, I spoke with two women who are leaders in the Nevada County community. I spent over forty-five minutes talking with them about the new laws and trying to convince them it was safe to sign the petition. They both refused to sign because they were nervous about the new requirements, especially the ID verification requirement and crime notification requirement. They also told me they would encourage others not to sign the petition for the same reason—that signing a petition was no longer safe—and that I should not collect signatures anymore. This conversation left me very discouraged because these women have a lot of sway in our community. I think it will be very hard to collect signatures in our community based on the public distrust the new canvassing laws have created here. I am also concerned that my reputation will be tarnished if I continue collecting signatures in Nevada County.

24. Overall, the new laws make it harder to collect signatures because it takes much longer and fewer people are willing to sign. I am doubtful that we will be able to collect enough signatures under the new laws for For AR Kids' measure to make the 2026 ballot.

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

Dated: July 23, 2025

A handwritten signature in cursive script, reading "Elaine Williams", is displayed within a rectangular box. The signature is written in dark ink on a light background.

Elaine Williams