

**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 LAUREN COWLES IN SUPPORT OF INTERVENOR-  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Lauren Cowles, 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 Little Rock, Arkansas. In 2024, I served as the volunteer Executive Director of Arkansans for Limited Government (“AFLG”), an Arkansas ballot question committee and a sponsor of the initiative petition popularly known as the Arkansas Abortion Amendment of 2024.

3. To qualify for the 2024 Arkansas general election ballot, AFLG needed to collect 90,704 signatures from qualified electors in Arkansas. This number

reflected ten percent of people who voted in the last Arkansas gubernational election.

4. In 2023, the Arkansas General Assembly passed Ark. Code Ann. § 7-9-126(e) which requires sponsors of initiated measures to obtain a specified number of signatures in fifty of the state's seventy-five counties ("the Fifty-County Requirement"). For initiated constitutional amendments, this law requires sponsors to obtain signatures from five percent of the number of voters in each county who participated in the last gubernatorial election.

5. The Fifty-County Requirement detrimentally affected AFLG's ability to collect enough signatures from volunteer canvassers to qualify for the 2024 Arkansas general election ballot and thus allow Arkansas voters to have their voices heard on this topic.

6. AFLG ran an aggressive volunteer signature-collection campaign in 2024. We trained over 800 volunteers, 150 to 250 of which became extremely active canvassers. Each volunteer attended an hour-long training session in which experienced canvassers explained the ballot initiative process, the details of our proposed amendment, and the laws related to collecting petition signatures.

7. The Secretary of State authorized AFLG to start collecting signatures at the end of January 2024 and we started training volunteers and collecting signatures in February 2024. Our volunteer canvassers collected 87,382 signatures—just 3,322 signatures shy of the 90,704-signature requirement.

8. Additionally, AFLG hired Verified Arkansas, LLC (“VA”), to provide canvassing services related to the Arkansas Abortion Amendment of 2024. VA hired 266 paid canvassers to perform canvassing services for AFLG. Paid canvassers hired by VA collected 14,143 signatures. In total, AFLG collected an estimated 101,525 petition signatures.

9. In the end, the Arkansas Secretary of State rejected AFLG’s submission of over 101,000 signatures because AFLG allegedly did not comply with a specific requirement related to paid canvassers. The Secretary of State concluded that the 14,143 signatures collected by paid canvassers would not be counted.

10. I believe that AFLG’s volunteer canvassers would have collected more than 90,704 signatures if we had not had to meet the Fifty-County Requirement.

11. The Fifty-County Requirement created a logistical nightmare for the campaign. It was difficult to ensure that we had sufficient volunteers in the smaller and more remote counties to collect the required number of signatures from fifty counties.

12. Most of AFLG’s volunteers live in Central and Northwest Arkansas. Most work full-time jobs and were limited to canvassing on nights and weekends. Sometimes they did not have enough time to travel to distant counties. Other times volunteers spent half of their day travelling to a remote county and the other half canvassing. If they had been able to spend the entire day canvassing closer to home in a more populated part of the state, they could have collected many more signatures.

13. The Fifty-County Requirement makes it extraordinarily burdensome for initiatives such as the Arkansas Abortion Amendment of 2024 to qualify for the general election ballot.

14. Initiative sponsors will be irreparably harmed if they are required to comply with the Fifty-County Requirement because it places such a heavy burden on the sponsors and makes it nearly impossible for sponsors to collect enough signatures to qualify for the general election ballot.

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

Dated: July 17, 2025

  
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Lauren Cowles