

**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 ALISON GUTHRIE IN SUPPORT OF INTERVENOR-  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Alison Guthrie, 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 was born and raised in Arkansas. I lived in Arkansas until last year, when I moved to Illinois to attend graduate school. I am currently a citizen and resident of Illinois.
3. In 2024, before I moved to Illinois, I spent hundreds of hours canvassing and collected over 6,000 signatures for several ballot initiatives in Arkansas. I volunteered to collect signatures for the proposed constitutional

amendment popularly known as the Arkansas Education Amendment of 2024 and an initiative popularly known as An Act to Exempt Feminine Hygiene Products and Diapers from Sales and Use Tax. I volunteered and later became a paid canvasser for the Arkansas Abortion Amendment of 2024 and the Arkansas Government Disclosure Act of 2024. I worked as a paid canvasser on the Arkansas Medical Marijuana Amendment of 2024.

4. Since I worked as a paid canvasser for the Arkansas Abortion Amendment of 2024 and the Arkansas Medical Marijuana Amendment of 2024, sponsors of those ballot initiatives were required to disclose my name and residential address to the Arkansas Secretary of State before I could begin collecting signatures. Ark. Code Ann. § 7-9-601(a)(2)(C).

5. The information submitted under Ark. Code Ann. § 7-9-601(a)(2)(C) is subject to public disclosure through the Arkansas Freedom of Information Act (“FOIA”). The Family Council, a group opposed to the proposed initiatives, obtained the information of paid canvassers, including myself, through a FOIA request to the Secretary of State.

6. On May 22, 2024, the Family Council released my name and hometown on their website as a paid canvasser for the Arkansas Medical Marijuana Amendment of 2024.

7. On June 6, 2024, the Family Council posted a list of paid canvassers for the Arkansas Abortion Amendment of 2024. The list included my name and hometown.

8. The Family Council released the names and hometowns of 381 medical marijuana canvassers and 79 abortion amendment canvassers in order to intimidate us. Releasing the information posed a serious threat to both the paid canvassers and their families.

9. At the time, I lived with my disabled mother and brother. I was scared for our safety after my information was shared with the opposition group's supporters. It would not have been hard for people to discover my home address and phone number knowing my name and hometown.

10. I was already hyper-vigilant about being harassed by counter-protestors. They had already written down canvassers' license plate numbers, taken our photographs, and followed us home. I know that I was personally photographed. I was also followed in my car after a canvassing event. I tried to take a few distracting turns to lose the person following me. They eventually sped up to pass me and screamed something at me, though I could not make out what was said.

11. My vigilance ramped up after my name and hometown were shared publicly. I updated my push notifications to alert me any time there was movement on my home camera system and I checked my phone for every alert. I constantly looked in my rearview mirror, always checking my neighborhood for cars I did not recognize. I always doublechecked the locks and alarm systems at my house. I started to see every person walking toward me as a potential attacker. Because of the list, I felt I must always be looking over my shoulder.

12. Not only did having my name and hometown shared with people opposed to the initiatives I canvassed for threaten my physical safety—it had a negative impact on my mental health as well. I had at least two panic attacks at signature-collecting events. It invaded my peace of mind and privacy. Based on my conversations with other paid canvassers, I know that it similarly affected many of them.

13. The pre-disclosure requirement is problematic. Without it, the opposition group that doxed me and other paid canvassers would not have been able to gain access to our names and hometowns. As a result, my safety would not have been threatened, and my mental health would not have suffered.

14. I believe that this law harms paid canvassers and initiative sponsors because it opens the door for opposition groups to intimidate, threaten, and harass paid canvassers who are trying to lawfully participate in the ballot and initiative process. People are probably less likely to work as paid canvassers knowing that their personal information might be shared online with people opposed to their efforts.

15. There are two other laws I am concerned with because they affect my ability to canvass in Arkansas.

16. Ark. Code Ann. § 7-9-103(a)(6), passed in 2021, requires all canvassers, whether volunteer or paid, to be Arkansas residents.

17. Act 453 of 2025 imposes an additional requirement that paid canvassers be domiciled in Arkansas if acting as a paid canvasser for a statewide initiative or referendum petition in the state.

18. I have been a resident of Illinois since July 2024. Since I am not a resident of or domiciled in Arkansas, I cannot volunteer or work as a canvasser for any ballot initiatives in the state.

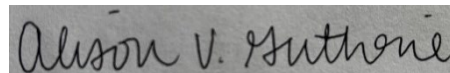
19. Since moving to Illinois about eleven months ago, I have been back to Arkansas four times. I plan to continue returning to Arkansas about every three months to visit friends and family. I am in graduate school, so during school breaks I am able to spend weeks at a time in Arkansas.

20. I would like to canvass for For AR Kids, an Arkansas ballot question committee and sponsor this election cycle. However, I am unable to do so since I am not a resident of Arkansas.

21. I have hundreds of hours of experience collecting signatures for ballot initiatives in Arkansas. I was born and raised in Arkansas, living there for over thirty years before moving away for graduate school last year. I care deeply about my home state and should be able to continue investing in it by serving as a canvasser when I visit.

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

Dated: July 16, 2025

A handwritten signature in cursive script, reading "Alison V. Guthrie", is written in black ink on a light-colored background.

Alison V. Guthrie