

**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 CHERI ERTMAN IN SUPPORT OF INTERVENOR-
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Cheri Ertman, 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 formerly managed dental offices and am now retired.

3. I am a volunteer canvasser 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. 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 also volunteered to collect signatures for the Educational Rights Amendment of 2024, which was sponsored by For AR Kids. That year, I spent over fifty hours collecting petition signatures.

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. 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 much more challenging to collect signatures because, among other reasons, they slow down the time it takes to have someone sign the petition.

12. On Saturday, May 3, 2025, I volunteered to collect signatures for For AR Kids at a Cinco de Mayo event in Springdale, Arkansas.

13. In total, I canvassed for three hours and collected seven signatures. That amounts to about two signatures per hour. In a similar setting in previous years, I would have expected to collect ten to fifteen signatures per hour.

14. I spent about six to ten minutes with each person in order to comply with the requirements of the new laws. In previous years, I estimate that I spent about three to five minutes with each signer.

15. 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. The changes seem cumbersome and slow down an already complicated process. People also had a lot of questions about the new laws, which slowed down the process even further. It was frustrating because it limited the number of people I

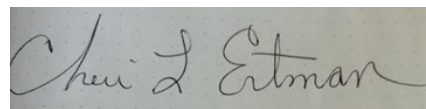
was able to speak with at the event and the number of signatures I was able to collect.

16. I also faced a situation in which I was unsure of how to comply with the new laws. I informed a woman that she had to read the entire ballot title in front of me before signing the petition. She was in a hurry because she had her children with her. She only looked at the ballot title for about a minute before telling me she had read it. I am unsure of how thoroughly she would have been able to read the entire ballot title but took her word and allowed her to sign the petition. As far as I know, I complied with the new laws, but I don't know if I'm supposed to do something more to make sure someone "really" read the entire ballot title.

17. I know that Act 274 imposes a misdemeanor charge if a canvasser knowingly allows a person to sign a petition without reading the ballot title in the canvasser's presence. I'm nervous to continue collecting petition signatures since I'm unsure how to follow the law and may be exposing myself to criminal liability.

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

Dated: July 21, 2025

A rectangular box containing a handwritten signature in cursive script, which reads "Cheri L. Ertman".

Cheri Ertman