

CV-24-455

IN THE ARKANSAS SUPREME COURT

**LAUREN COWLES, individually and on behalf
of ARKANSANS FOR LIMITED GOVERNMENT,
an Arkansas ballot question committee**

PETITIONERS

v.

**JOHN THURSTON, in his official capacity
as Arkansas Secretary of State**

RESPONDENT

ORIGINAL ACTION

PETITIONERS' BRIEF

Amanda Orcutt (Ark. Bar No. 2019102)
Peter Shults (Ark. Bar No. 2019021)
Steven Shults (Ark. Bar No. 78139)
Shults Law Firm LLP
200 West Capitol Avenue, Suite 1600
Little Rock, AR 72201
(501) 375-2301
aorcutt@shultslaw.com
pshults@shultslaw.com
sshults@shultslaw.com

Attorneys for Petitioners

TABLE OF CONTENTS

TABLE OF CONTENTS2

ISSUES3

TABLE OF AUTHORITIES.....4

JURISDICTIONAL STATEMENT7

STATEMENT OF THE CASE AND THE FACTS8

ARGUMENT14

 I. Standard of Review14

 II. Petitioners Complied with Ark. Code Ann. § 7-9-111(f)(2)15

 III. The Secretary Cannot Throw Out a Petition or Refuse to Count Signatures
for Failure to Comply with Ark. Code Ann. § 7-9-111(f)(2).....19

 A. Failure to Comply with Ark. Code Ann. § 7-9-111(f)(2) Does Not Result
in a “Do Not Count” Penalty.....19

 B. Failure to Comply with Ark. Code Ann. § 7-9-111(f)(2) is Correctable ...23

 IV. The Secretary Is Estopped from Asserting that Petitioners Failed to
Comply with Ark. Code Ann. § 7-9-111(f)(2).....24

 V. The Secretary’s Application of § 7-9-111(f)(2) Violates Petitioners’ First
Amendment Rights26

REQUEST FOR RELIEF31

CERTIFICATE OF SERVICE34

CERTIFICATE OF COMPLIANCE.....34

INDEX TO ADDENDUM.....35

ISSUES

1. What is the standard under which this Court reviews the Secretary of State's determination that petitioners' submission was insufficient?
2. Did petitioners comply with Ark. Code Ann. § 7-9-111(f)(2)?
3. Does the Secretary of State have authority to throw out a petition or refuse to count signatures due to failure to comply with § 7-9-111(f)(2)?
4. Is the Secretary of State estopped from asserting that petitioners failed to comply with Ark. Code Ann. § 7-9-111(f)(2)?
5. In rejecting petitioners' submission, did the Secretary of State engage in viewpoint discrimination in violation of the First Amendment to the U.S. Constitution?

TABLE OF AUTHORITIES

Cases

| | |
|--|-----------|
| <i>ACW, Inc. v. Weiss</i> , 329 Ark. 302, 947 S.W.2d 770 (1997) | 18 |
| <i>Armstrong v. Thurston</i> , 2022 Ark. 167, 652 S.W.3d 167..... | 15 |
| <i>Bernbeck v. Moore</i> , 126 F.3d 1114 (8th Cir. 1997) | 27 |
| <i>Buckley v. Valeo</i> , 424 U.S. 1 (1976) | 27 |
| <i>Burson v. Freeman</i> , 504 U.S. 191 (1992) | 26-27 |
| <i>Crochet v. Priest</i> , 326 Ark. 338, 931 S.W.2d 128 (1996) | 15 |
| <i>Donovan v. Priest</i> , 326 Ark. 356, 931 S.W.2d 119 (1982) | 15 |
| <i>Ellis v. Hall</i> , 219 Ark. 869, 245 S.W.2d 223 (1952) | 19 |
| <i>Foote’s Dixie Dandy, Inc. v. McHenry</i> , 270 Ark. 816, 607 S.W.2d 323 (1980) | 25-26 |
| <i>Frederick Douglass Found., Inc. v. D.C.</i> , 82 F.4th 1122 (D.C. Cir. 2023) | 28, 31 |
| <i>Henderson v. Russell</i> , 267 Ark. 140, 589 S.W.2d 565 (1979) | 20 |
| <i>Larry Hobbs Farm Equip., Inc. v. CNH Am., LLC</i> , 375 Ark. 379, 291 S.W.3d 190 (2009) | 18, 21 |
| <i>MacSteel Div. of Quanex v. Ark. Okla. Gas Corp.</i> , 363 Ark. 22, 210 S.W.3d 878 (2005) | 21, 23 |
| <i>McDaniel v. Spencer</i> , 2015 Ark. 94, 457 S.W.3d 641..... | 28 |
| <i>Meyer v. Grant</i> , 486 U.S. 414 (1988) | 18, 26-27 |
| <i>Pahls v. Thomas</i> , 718 F.3d 1210 (10th Cir. 2013) | 27 |
| <i>Parker v. Priest</i> , 326 Ark. 123, 930 S.W.2d 322 (1996) | 14 |
| <i>Porter v. McCuen</i> , 310 Ark. 674, 839 S.W.2d 521 (1992) | 14 |

| | |
|--|------------------------------------|
| <i>Reed v. Gilbert</i> , 576 U.S. 155 (2015) | 28 |
| <i>Repub. Party of Ark. v. State ex rel. Hall</i> , 240 Ark. 545, 400 S.W.2d 660 (1966) | 14 |
| <i>Richardson v. Martin</i> , 2014 Ark. 429, 444 S.W.3d 855 | 14 |
| <i>Ridley v. Mass. Bay Transp. Auth.</i> , 390 F.3d 65 (1st Cir. 2004) | 29 |
| <i>Rosenberger v. Rector & Visitors of Univ. of Va.</i> , 515 U.S. 819 (1995) | 27 |
| <i>Spencer v. Martin</i> , No. CV-13-4020 (Ark. Mar. 4, 2014) | 28 |
| <i>Stephens v. Martin</i> , 2014 Ark. 442, 491 S.W.3d 451 | 19 |
| <i>Sturdy v. Hall</i> , 201 Ark. 38, 143 S.W.2d 547 (1940) | 14 |
| <i>Thompson v. Younts</i> , 282 Ark. 524, 669 S.W.2d 471 (1984) | 14 |
| <i>Thurston v. League of Women Voters of Ark.</i> , 2022 Ark. 32, 639 S.W.3d 319 (2022) | 31 |
| <i>Warfield v. Chotard</i> , 202 Ark. 837, 153 S.W.2d 168 (1941) | 14 |
| <i>Washburn v. Hall</i> , 225 Ark. 868, 286 S.W.2d 494(1956) | 14 |
| Statutes and Rules | |
| Act of Apr. 22, 2013, No. 1413, Ark. Acts 6084 | 20 |
| Ark. Code Ann. § 7-5-204 | 32 |
| Ark. Code Ann. § 7-9-101 | 21 |
| Ark. Code Ann. § 7-9-104 | 21 |
| Ark. Code Ann. § 7-9-105 | 21 |
| Ark. Code Ann. § 7-9-107 | 21 |
| Ark. Code Ann. § 7-9-111 | 7, 11-13, 15, 17-24, 26, 28-29, 31 |
| Ark. Code Ann. § 7-9-112 | 7 |

| | |
|---------------------------------|-----------------------|
| Ark. Code Ann. § 7-9-123 | 25 |
| Ark. Code Ann. § 7-9-126 | 10, 13, 18, 20-21, 23 |
| Ark. Code Ann. § 7-9-601 | 18, 21, 23 |
| Ark. Code Ann. § 22-3-223 | 30 |
| Ark. Const. art. 2, § 4 | 18 |
| Ark. Const. art. 5, § 1 | 7, 10-11, 14-15, 23 |
| Ark. Const. amend. 80 | 7 |
| Ark. Sup. Ct. R. 6-5 | 7 |
| U.S. Const. amend. 1 | 26-28, 31 |

Books and Treatises

| | |
|---|----|
| <i>Black’s Law Dictionary</i> (12th ed. 2024) | 21 |
|---|----|

Miscellaneous

| | |
|--|------------|
| Op. Ark. Att’y Gen. No. 51 (2024) | 20 |
| Op. Ark. Att’y Gen. No. 58 (2024) | 18 |
| Petitioner’s Opening Brief, <i>Benca v. Martin</i> , No. CV-16-785 (Ark. Oct. 5, 2016) | 22, 29 |
| Respondent’s Brief and Supplemental Addendum, <i>Benca v. Martin</i> , No. CV-16-785 (Ark. Oct. 12, 2016) | 20, 22, 29 |
| Respondent’s Brief and Supplemental Addendum, <i>Ross v. Martin</i> , No. CV-16-776 (Ark. Oct. 12, 2016) | 20, 22, 29 |

JURISDICTIONAL STATEMENT

This is an original action under Article 5, § 1, of the Arkansas Constitution, Amendment 80, § 2(D)(4), to the Arkansas Constitution, Ark. Code Ann. § 7-9-112, and Arkansas Supreme Court Rule 6-5.

On July 10, 2024, respondent, Arkansas Secretary of State John Thurston (“Secretary”), rejected petitioners’ submission to certify the Arkansas Abortion Amendment of 2024 (“Amendment”) for the November 2024 General Election ballot. The Secretary’s rejection of petitioners’ submission, after petitioners facially submitted more than the required number of signatures for the Secretary to certify the Amendment for placement on the ballot, was a determination that petitioners’ submission was insufficient. Ark. Code Ann. § 7-9-111(a); *see* Ark. Const. art. 5, § 1 (“Sufficiency”). This Court has original and exclusive jurisdiction to review the Secretary’s determination of insufficiency. Ark. Const. art. 5, § 1 (“Sufficiency”).

STATEMENT OF THE CASE AND THE FACTS

On November 27, 2023, petitioner Arkansans for Limited Government (“AFLG”) registered with the Arkansas Ethics Commission as an Arkansas ballot question committee. Complaint (“Compl.”), ¶ 10. AFLG was constituted to support the ballot initiative petition known as the Arkansas Abortion Amendment of 2024 (“Amendment”), and it has done so in various ways, including by arranging for the circulation of the Amendment and filing it with the Secretary of State for certification and placement on the November 2024 General Election ballot. *Id.*, ¶¶ 10-11.

On January 23, 2024, the Arkansas Attorney General certified the ballot title and popular name of the Amendment. *Id.*, ¶ 12. After the Attorney General’s certification, hundreds of volunteers from across Arkansas worked long hours to collect enough signatures for the Amendment to be placed on the November ballot. *Id.*, ¶ 13.

AFLG also hired Verified Arkansas, LLC, to provide canvassing services. *Id.*, ¶ 14. Paid canvassers hired by Verified Arkansas also collected signatures for the Amendment. *Id.* Between May 8 and June 27, Allison Clark signed and submitted on behalf of AFLG approximately seventeen Sponsor Affidavits to the Secretary of State’s office. *Id.*, ¶¶ 15-16. Clark was given authority to sign on AFLG’s behalf by

petitioner Lauren Cowles (“Cowles”), the Executive Director of AFLG. *Id.*, ¶ 15; Addendum (“Add.”) 2 (¶ 6), 39 (¶ 4).

Each Sponsor Affidavit stated, among other things, “The Sponsor has provided each Paid Canvasser listed on the attached Exhibit A a copy of the most recent edition of the Secretary of State’s Initiatives and Referenda Handbook.” Compl., ¶ 15; Add. 42. The Sponsor Affidavit also stated, “The Sponsor has explained to each Paid Canvasser listed on Exhibit A the Arkansas law applicable to obtaining signatures on an initiative or referendum petition.” *Id.* Exhibit A was a list of paid canvassers gathering signatures for the Amendment, including each canvasser’s name and address, among other information. Compl., ¶ 15; Add. 47-49.

Each time new paid canvassers were going to gather signatures for the Amendment, Clark would submit a new Sponsor Affidavit with an updated list of all paid canvassers. Compl., ¶ 16; Add. 38 (¶ 3). The list that accompanied the June 27 Sponsor Affidavit included approximately 191 paid canvassers. Add. 47-49. The Secretary’s office accepted each Sponsor Affidavit and accompanying list of paid canvassers. Clark sent to the Secretary’s office on July 4, 2024, a final list of approximately 265 paid canvassers. Compl., ¶ 17; Add. 39 (¶ 6). Clark did not submit a Sponsor Affidavit with that list because she had been told by the Secretary’s office—in a phone call with Josh Bridges, the Secretary’s Assistant Director of

Elections, on or around July 1, 2024—that such an affidavit was not required. Compl., ¶ 18; Add. 39 (¶ 6).

On July 5, 2024, Cowles, on behalf of AFLG, submitted signatures and accompanying paperwork to the Secretary for his review and certification of the Amendment for the November ballot. Compl., ¶ 19. The submission contained, among other documents, Cowles’s attestation that AFLG was submitting 101,525 signatures in support of placing the Amendment on the ballot. *Id.*, ¶ 20; Add. 2 (¶ 7). This number facially exceeded the 90,704 signatures required for the Amendment to be on the November ballot. Cowles also affirmed that the submission contained the required number of signatures to meet both the fifteen-county requirement in Article 5, § 1, of the Arkansas Constitution and the alleged fifty-county requirement in Ark. Code Ann. § 7-9-126(e). Compl., ¶ 20; Add. 2-3 (¶ 8).

The submission also contained other paperwork, including but not limited to (1) a statement that identified each of the approximately 265 paid canvassers by name and (2) individual affidavits from paid canvassers attesting that they met the legal requirements to be paid canvassers. Compl., ¶ 21; Add. 3 (¶ 11). When Cowles submitted these documents, the Secretary’s representatives took time to review the documents and then assured Cowles that she had submitted all the required documents for a complete submission. Compl., ¶ 22.

On July 10, 2024, the Secretary sent Cowles a letter rejecting her submission.

Add. 19. The letter rejected the submission for one reason: the Secretary concluded that AFLG failed to comply with Ark. Code Ann. § 7-9-111(f)(2). *Id.* The letter stated:

That provision requires the sponsor to submit: (1) a statement identifying the paid canvassers by name, and (2) a signed statement indicating that the sponsor has provided a copy of the most recent edition of the Secretary of State’s initiatives and referenda handbook and explained the requirements under Arkansas law for obtaining signatures on the petition to each paid canvasser before the paid canvasser solicited signatures. . . . You did not submit any statements meeting this requirement. . . . Therefore, I must reject your submission.

Id. The letter also explained that the Secretary’s office had performed an initial count of signatures gathered by paid canvassers, which totaled 14,143 signatures. *Id.*

On July 11, 2024, Cowles responded to the Secretary’s letter. Add 21-23. Cowles’s response explained, among other things, that AFLG had complied with Ark. Code Ann. § 7-9-111(f)(2), that the Secretary had unlawfully rejected the petition parts collected by the paid canvassers, and that the Secretary had failed to fulfill his duties to perform an initial count of all signatures submitted by AFLG. *Id.* It also explained that any noncompliance with § 7-9-111(f)(2) is correctable. Add. 22. Thus, the letter stated, “AFLG presumes that your letter offers AFLG an opportunity to correct pursuant to § 7-9-111(d) and/or Arkansas Constitution Article 5 § 1. AFLG avails itself of this opportunity by submitting the enclosed statement and accompanying documents.” *Id.*

The letter enclosed the previous June 27, 2024, Sponsor Affidavit that AFLG submitted to the Secretary. Add. 24-27. It also included a “Sponsor Statement Regarding Compliance with Ark. Code Ann. § 7-9-111(f)(2)” signed by Cowles on behalf of AFLG. Add. 28-37. The Sponsor Statement stated, “Another copy of the list containing the names of all 266 paid canvassers is attached hereto at **Exhibit A**. There have been no additions or deletions to this list since it was submitted to the Secretary of State on July 4 and July 5, 2024.” Add. 28 (¶ 6). It also stated, “For each of the 266 paid canvassers, AFLG provided a copy of the most recent edition of the Secretary of State’s initiatives and referenda handbook before the paid canvasser solicited signatures.” Add. 29 (¶ 7).

On July 15, 2024, the Secretary responded to Cowles’s letter and reiterated his rejection of petitioners’ submission for noncompliance with Ark. Code Ann. § 7-9-111(f)(2). Add. 54. But the reasons for his rejection changed. First, he no longer faulted petitioners for failing to submit a statement identifying paid canvassers by name, seemingly recognizing that petitioners had submitted such a statement at the filing. *Id.* Second, he admitted that a Sponsor Affidavit was submitted on June 27, 2024, but he now claimed that the affidavit was not “signed by the sponsor.” *Id.* He also indicated, also for the first time, that the Sponsor Affidavit had to be submitted at the time of filing the petition. *Id.*

On July 16, 2024, petitioners filed this action. Also on July 16, petitioners filed a motion to expedite and for emergency relief. On July 19, the Secretary filed a combined motion to dismiss and response to petitioners' motion to expedite and for emergency relief. That document again made new arguments for why petitioners' submission should be rejected, including that the Secretary could reject a submission at a newly created "want of initiation" phase before making a sufficiency determination, that Clark could not be both a paid canvasser and agent of a sponsor, and that a lack of compliance with Ark. Code Ann. § 7-9-111(f)(2) was simultaneously a lack of compliance with Ark. Code Ann. § 7-9-126(b)(8).

After petitioners responded to the Secretary's motion to dismiss, this Court granted petitioners' motion to expedite and ordered the Secretary to perform an initial count of signatures collected by volunteer canvassers. The Secretary performed that count, determining that volunteer canvassers collected 87,675 signatures and that there were 912 additional signatures on petition parts that did not indicate whether the canvasser was volunteer or paid. As explained, the Secretary had already performed an initial count of 14,143 signatures collected by paid canvassers. Thus, the full initial count is complete, with a total of 102,730 signatures, if the 912 signatures were not counted in the initial count of paid canvassers, or 101,818, if they were.

ARGUMENT

I. Standard of Review

The power of Arkansans to propose a constitutional amendment by initiative petition is “the first power reserved by the people,” Ark. Const. art. 5, § 1, and “a cornerstone of our state’s democratic government,” *Parker v. Priest*, 326 Ark. 123, 133, 930 S.W.2d 322, 328 (1996). Because this reservation of power is of primary importance, the Constitution and related statutes must be “liberally construed” in favor of ensuring that Arkansans have the power to vote on a proposed initiative. *Richardson v. Martin*, 2014 Ark. 429, at 8, 444 S.W.3d 855, 860; *Porter v. McCuen*, 310 Ark. 674, 677, 839 S.W.2d 521, 522 (1992); *Thompson v. Younts*, 282 Ark. 524, 530-31, 669 S.W.2d 471, 474-75 (1984). This principle requires rejection of any “strict or technical construction” that might “thwart[]” the people’s power over state law. *Warfield v. Chotard*, 202 Ark. 837, 153 S.W.2d 168, 169 (1941); see *Repub. Party of Ark. v. State ex rel. Hall*, 240 Ark. 545, 549, 400 S.W.2d 660, 662 (1966) (“Regnat Populus—The People Rule—is the motto of Arkansas. It should ever remain inviolate.”). For that reason, “only substantial compliance” with Article 5, § 1, and statutes enacted in aid of that Article, is required. See *Porter*, 310 Ark. at 677, 839 S.W.2d at 522; *Washburn v. Hall*, 225 Ark. 868, 874, 286 S.W.2d 494, 498 (1956); *Sturdy v. Hall*, 201 Ark. 38, 143 S.W.2d 547, 550 (1940). This standard allows courts to “maintain their limited role in this process and permit the people to

pursue their constitutional power.” *Armstrong v. Thurston*, 2022 Ark. 167, at 16, 652 S.W.3d 167, 178 (Wood, J., concurring); *see id.* at 17, 652 S.W.3d at 178-79 (Wood, J., concurring) (“It is for the people—not this court—to exercise the right to amend the constitution, and our court must continue to preserve this first power of the people of Arkansas by not supplanting their decisions with ours.”).

Additionally, the Secretary has the burden of proof in this action. “In the event of legal proceedings to prevent giving legal effect to any petition upon any grounds, the burden of proof shall be upon the person or persons attacking the validity of the petition.” Ark. Const. art. 5, § 1 (subsection (b) of “Amendment of Petition”); *see also Crochet v. Priest*, 326 Ark. 338, 342, 931 S.W.2d 128, 130 (1996); *Donovan v. Priest*, 326 Ark. 356, 357, 931 S.W.2d 119, 120 (1996).

II. Petitioners Complied with Ark. Code Ann. § 7-9-111(f)(2)

The Secretary rejected petitioners’ submission for one reason: alleged failure to comply with Ark. Code Ann. § 7-9-111(f)(2). Add. 19. But petitioners complied with that provision.

Ark. Code Ann. § 7-9-111(f)(2) provides in full:

(2) If signatures were obtained by paid canvassers, the person filing the petitions under this subsection shall also submit the following:

(A) A statement identifying the paid canvassers by name; and

(B) A statement signed by the sponsor indicating that the sponsor:

(i) Provided a copy of the most recent edition of the Secretary of State's initiatives and referenda handbook to each paid canvasser before the paid canvasser solicited signatures; and

(ii) Explained the requirements under Arkansas law for obtaining signatures on an initiative or referendum petition to each paid canvasser before the paid canvasser solicited signatures.

In compliance with subsection A, on July 5, 2024, at the time of filing the Amendment with the Secretary, Cowles submitted to the Secretary a statement that identified each of the paid canvassers by name. Add. 3 (¶ 9), 6-17. These same canvassers were also identified to the Secretary in a July 4, 2024, email from Allison Clark, on behalf of AFLG. Add. 39 (¶ 6), 51-53; *see* Add. 2 (¶ 6). Originally, the Secretary asserted that petitioners did not comply with subsection A. Add. 19. Since that original assertion, however, the Secretary has only argued that petitioners failed to comply with subsection B, seemingly conceding that he was incorrect in asserting that petitioners failed to comply with subsection A.

In compliance with subsection B, AFLG submitted approximately seventeen signed statements to the Secretary attesting to the information necessary in subsection B between May 8 and June 27, 2024. Add. 39 (¶¶ 4-5), 42-45; *see* Add. 39 (¶ 6). AFLG did not submit a signed statement attesting to the information necessary in subsection B when it sent its updated and final list of paid canvassers on July 4 because the Secretary's office told Clark that a signed statement was not

necessary. Add. 39 (¶ 6). Moreover, it is undisputed that the Secretary has in his office all of the information required by § 7-9-111(f)(2), provided by AFLG. Compl., ¶¶ 15-22; Add. 2-3 (¶¶ 5-11, 13), 38-39 (¶¶ 3-6). For these reasons, petitioners complied with § 7-9-111(f)(2).

In this action, the Secretary has not disputed that, on June 27, 2024, Allison Clark sent a Sponsor Affidavit to the Secretary's office, that the Sponsor Affidavit attested to the information requested in § 7-9-111(f)(2)(B), or that the Sponsor Affidavit was signed by Clark as an agent of AFLG. Instead, the Secretary has argued that (1) Clark cannot be an agent of AFLG because she also worked for the company that hired paid canvassers (and was listed as a paid canvasser) and (2) a statement attesting to the information in subsection B must be submitted at the time of filing the petition. Combined Motion to Dismiss and Response to Petitioners' Motion to Expedite and for Emergency Relief ("Mot. to Dismiss") at 6-7. Both of these arguments fail.

First, nothing in the statute prohibits a canvasser, paid or unpaid, from acting as an agent of a sponsor (or, for that matter, acting as another sponsor). To follow the Secretary's logic would mean that no sponsor, as an individual or individual working on behalf of a sponsor entity, could also be a paid canvasser. It would also mean that no sponsor who was paid by any sponsor entity could collect signatures because, according to a recent opinion from the Attorney General, anyone collecting

signatures as part of the course of their employment duties is also a paid canvasser. *See* Op. Ark. Att’y Gen. No. 58 (2024). Such an interpretation limits an individual’s “core political speech” and likely violates the First Amendment to the U.S. Constitution. *See Meyer v. Grant*, 486 U.S. 414, 420-25 (1988) (limitations on ability to circulate petitions are reviewed under strict scrutiny); *see also* Ark. Const. art. 2, § 4. If possible, statutes are to be interpreted consistently with constitutional mandates. *See ACW, Inc. v. Weiss*, 329 Ark. 302, 310, 947 S.W.2d 770, 774 (1997).

Second, § 7-9-111(f)(2), on its face, does not require a subsection B statement to be submitted at the time of filing. This is in contrast to other sections of the statute that explicitly require certain documents to be filed at or before the time of filing the petition. *Compare* Ark. Code Ann. § 7-9-111(f) *with id.* § 7-9-126(a) (“Upon the initial filing of an initiative petition”) *and id.* § 7-9-601(a)(3) (“Upon filing the petition with the Secretary of State, the sponsor shall submit”). The express designation of a timing requirement in other sections, and the lack of one in § 7-9-111(f)(2), demonstrates that there is no requirement that the § 7-9-111(f)(2) statements be submitted at the time of filing the petition. *See Larry Hobbs Farm Equip., Inc. v. CNH Am., LLC*, 375 Ark. 379, 384-86, 291 S.W.3d 190, 194-96 (2009) (“[T]he express designation of one thing may be properly construed to mean the exclusion of another.”).

III. The Secretary Cannot Throw Out a Petition or Refuse to Count Signatures for Failure to Comply with Ark. Code Ann. § 7-9-111(f)(2)

The Secretary's rejection of petitioners' submission depends not only on the incorrect assertion that petitioners failed to comply with § 7-9-111(f)(2) but also on the incorrect assertion that failure to comply with § 7-9-111(f)(2) allows the Secretary to throw out a petition entirely or refuse to count signatures. But the law does not allow the Secretary to throw out a petition or refuse to count signatures because of such noncompliance. Instead, the Secretary must count such signatures, and any failure to comply with § 7-9-111(f)(2) is correctable.

A. Failure to Comply with Ark. Code Ann. § 7-9-111(f)(2) Does Not Result in a "Do Not Count" Penalty

The Secretary has declined to include in his initial-count tally the 14,143 signatures gathered by paid canvassers. Even if petitioners did not comply with § 7-9-111(f)(2), the Secretary would still have to include these signatures in his initial count. As this Court has held, the "only concern when examining the propriety of the Secretary of State's decision to grant or not grant the cure period is whether, on the face of the petition, the signatures were of a sufficient number." *Stephens v. Martin*, 2014 Ark. 442, at 12, 491 S.W.3d 451, 457 (emphasis added); *see also Ellis v. Hall*, 219 Ark. 869, 870-71, 245 S.W.2d 223, 224 (1952). In addition to contradicting this Court's holding in *Stephens*, the Secretary's decision to throw out signatures in the initial count for violation of § 7-9-111(f)(2) contradicts the statute

and the Secretary's office's own practice in this Court.

The Secretary cannot reject petition parts or signatures for noncompliance with § 7-9-111(f)(2) because § 7-9-126 provides the exclusive list of reasons for not counting petition parts or signatures. The Secretary's office has at least twice represented to this Court its agreement with this interpretation of § 7-9-111(f)(2) and § 7-9-126. *See* Respondent's Brief and Supplemental Addendum at Arg. 6-7, *Benca v. Martin*, No. CV-16-785 (Ark. Oct. 12, 2016) ("*Benca* Brief"); Respondent's Brief and Supplemental Addendum at Arg. 12-13, *Ross v. Martin*, No. CV-16-776 (Ark. Oct. 12, 2016) ("*Ross* Brief"). The Attorney General also endorsed this reading. Op. Ark. Att'y Gen. No. 51 (2024) ("By statute, the Secretary of State is only authorized not to count signatures for specific reasons"). Despite requesting the Attorney General's opinion, *see id.*, the Secretary has decided to ignore it to reject petitioners' submission.

The Secretary's interpretation also is inconsistent with the overall statutory scheme. The legislature added both § 7-9-111(f)(2) and § 7-9-126 as part of Act 1413 of 2013. *See* Act of Apr. 22, 2013, No. 1413, Ark. Acts 6084. If the legislature intended noncompliance with § 7-9-111(f)(2) to lead to any kind of rejection, it would have said so. *See Henderson v. Russell*, 267 Ark. 140, 143-44, 589 S.W.2d 565, 568 (1979) ("The primary rule in construing a statute is to ascertain and give effect to the intent of the General Assembly and this intent is obtained by considering

the entire act.”). Indeed, § 7-9-126 incorporates by reference four other statutory sections for which the failure to comply creates a “do not count” penalty—§§ 7-9-104, 105, 107, and 601. Section 7-9-111(f) is not among them. This Court does not read words into a statute. *See, e.g., MacSteel Div. of Quanex v. Ark. Okla. Gas Corp.*, 363 Ark. 22, 30, 210 S.W.3d 878, 883 (2005). It is “a fundamental principle of statutory construction that the express designation of one thing may be properly construed to mean the exclusion of another.” *Larry Hobbs Farm Equip., Inc.*, 375 Ark. at 384-86, 291 S.W.3d at 194-96.

The Secretary has also argued that a violation of § 7-9-111(f)(2) is simultaneously a violation of § 7-9-126(b)(8)—which occurs when a “petition part has a material defect that, on its face, renders the petition part invalid”—and therefore renders all petition parts invalid. This argument contradicts the plain language of the statute in two ways. First, as discussed above, § 7-9-111(f)(2) cannot be read into § 7-9-126 where the legislature intended only certain statutes to be incorporated by reference. Second, the law defines “petition part” as a “signature sheet” with the required information. Ark. Code Ann. § 7-9-101(7). The Secretary cannot look to the existence or nonexistence of other documents in determining whether a petition part “on its face” has a material defect. *See Black’s Law Dictionary* (12th ed. 2024) (defining “on its face” as “1. Literally; self-evidently” and “2. (Of a document) having the appearance (of something)”).

The Secretary's practice in this Court also supports petitioners' conclusion that § 7-9-111(f)(2) is not fatal. In fact, the Secretary's office has at least twice argued to this Court petitioners' exact position. In *Ross v. Martin*, the sponsor did not comply with § 7-9-111(f)(2). *Ross* Brief at R. Ab. 5, Arg. 12. The appointed Special Master did not throw out the entire petition or even reduce the signature count, since a failure to strictly comply with § 7-9-111(f)(2) is not a "do not count" offense. *Id.* at Arg. 12-14. The Secretary's office asserted that the Master's finding was "correct and should be accepted." *Id.* at Arg. 12; *see also Benca* Brief at Arg. 5-7 ("The express designation of a 'do not count' penalty in other subsections of the Arkansas Code (and Acts 1413 of 2013 and 1219 of 2015), indicates that the absence of such a provision in 7-9-111 was an intentional omission.").

Similarly, in *Benca*, Josh Bridges, the current Assistant Director of Elections, testified on behalf of the Secretary's office to the Special Master that failure to comply with § 7-9-111(f)(2) does not result in the Secretary's rejection of any petition parts or signatures. *See* Petitioner's Opening Brief, Abstract and Addendum at Abstract 124-25, *Benca v. Martin*, No. CV-16-785 (Ark. Oct. 5, 2016) ("*Benca* Brief II") ("It is my understanding there's no statutory prohibition if those things are not given to the Secretary. It is my understanding that [the Constitution] must be liberally construed to effectuate its purpose to allow sponsors and voters to amend the laws of the State of Arkansas.").

The Secretary now takes the opposite position. His newfound argument that “shall” turns § 7-9-111(f)(2) into a “do not count” provision—or a reason to invalidate an entire petition, Mot. to Dismiss at 9—violates basic rules of statutory interpretation and would lead to an absurd result. Other provisions in the statute include “shall” plus a “do not count” penalty. *See* Ark. Code Ann. §§ 7-9-126(b)-(c), 7-9-601. The Secretary’s interpretation would render “do not count” superfluous, since the same effect would occur with or without that term. *See MacSteel Div. of Quanex*, 363 Ark. at 30, 210 S.W.3d at 883 (“We construe the statute so that no word is left void, superfluous, or insignificant”). The Secretary has relied on *Zook v. Martin*, *Arkansans for Healthy Eyes v. Thurston*, and *Benca* to argue that “shall” in § 7-9-111(f)(2) mandates a “do not count” directive, *see* Mot. to Dismiss at 9, but such reliance is misplaced. Those cases turned on signature rejection for noncompliance with § 7-9-601, and noncompliance with § 7-9-601 is expressly included in § 7-9-126 as a reason to reject. *See* Ark. Code Ann. §§ 7-9-126(b)(4); 7-9-601(f). Not so here.

B. Failure to Comply with Ark. Code Ann. § 7-9-111(f)(2) is Correctable

Even if petitioners did not comply with § 7-9-111(f)(2) on or before July 5, they have corrected such perceived failure, as is permitted by the law. *See* Ark. Const. art. 5, § 1 (“Amendment of Petition”); Ark Code Ann. § 7-9-111(d). Article 5, § 1, of the Arkansas Constitution allows for “correction or amendment” if the

Secretary decides an initiative petition is insufficient, as does Ark. Code Ann. § 7-9-111(d). Moreover, the inclusion of “Corrections” in the title of § 7-9-111 makes clear that this section deals with correctable actions. Ark. Code Ann. § 7-9-111 (“Determination of sufficiency of petition--Corrections”). Petitioners “corrected” any perceived noncompliance in a “Sponsor Statement Regarding Compliance with Ark. Code Ann. § 7-9-111(f)(2)” enclosed with Cowles’s response to the Secretary’s July 10 letter. Add. 3 (¶ 13), 28-37.

IV. The Secretary Is Estopped from Asserting that Petitioners Failed to Comply with Ark. Code Ann. § 7-9-111(f)(2)

Petitioners have claimed, with supporting evidence, that they diligently attempted to follow the correct procedures and that the Secretary’s office repeatedly told them they were doing so, before he abruptly rejected their petition.

The Secretary has admitted, for example, that before July 5, 2024, AFLG emailed a staff member at the Secretary of State’s office and asked for a copy of any document that needed to be signed when dropping off petitions. Compl., ¶ 22; Answer, ¶ 22. The Secretary admitted that his office responded by sending only the Receipt for Initiative or Referendum Petition and not any other documents. *Id.*

Petitioners have also explained that, at the filing, the Secretary’s attorneys and representatives assured Cowles that she had filed the necessary paperwork with her submission. Compl., ¶ 22. Similarly, the Secretary admits that Clark signed at least thirteen Sponsor Affidavits that she submitted to the Secretary’s office with

accompanying lists of paid canvassers. Answer, ¶ 16. The Secretary’s office received those Affidavits and had a duty to file and preserve them as evidence of procedural steps taken by AFLG. *See* Ark. Code Ann. § 7-9-123. If the Secretary’s office was not accepting these Sponsor Affidavits as evidence of procedural steps taken, then it would have made AFLG aware of such non-acceptance. This is especially true because the Secretary’s office was in regular contact with Clark and other representatives of AFLG.

The only logical conclusion from these facts—many of which are undisputed—is that the Secretary’s office pulled a bait and switch on petitioners. The Secretary’s office accepted the ways in which petitioners tried to comply with the requirements for submitting a petition and made it known to petitioners that they had met these requirements. Petitioners relied on these statements, as the Secretary’s office knew they would. Then the Secretary suddenly rejected petitioners’ submission.

Petitioners’ reliance is similar to the reliance at issue in *Foote’s Dixie Dandy, Inc. v. McHenry*, where this Court held that the government was estopped when “a form was not filed which would have been routinely approved if it had been filed,” there was no evidence of bad faith, and “an important agent of the State of Arkansas, clothed with considerable authority, had told Foote’s that it did not have to file any further documentation.” 270 Ark. 816, 824-25, 607 S.W.2d 323, 326-27 (1980); *see*

id. at 823, 607 S.W.2d at 326 (“The requirements of morals and justice demand that our administrative agencies be accountable for their mistakes. Detrimental reliance on their misrepresentations or mere unconscientiousness should create an estoppel The contrary conclusion sacrifice[s] to form too much of the American spirit of fair play in both our judicial and administrative processes.”). Those same principles exist here. The Secretary and his staff spent months approving of petitioners’ actions, only to pull a “gotcha” after doing so. This Court should not countenance those unfair actions, and the Secretary should be estopped from rejecting petitioners’ submission based on failure to comply with § 7-9-111(f)(2).

V. The Secretary’s Application of § 7-9-111(f)(2) Violates Petitioners’ First Amendment Rights

The Secretary rejected petitioners’ submission for noncompliance with § 7-9-111(f)(2). This is the first time that has ever happened. When the Secretary’s office concluded that other petitioners failed to comply with § 7-9-111(f)(2), it did not penalize those initiative petitions. The Secretary’s unique application of § 7-9-111(f)(2) to petitioners—in stark contrast to previous applications of the same provision and in furtherance of the Secretary’s public opposition to the Amendment—constitutes viewpoint discrimination in violation of the First Amendment to the U.S. Constitution.

The First Amendment, as applied against State action under the Fourteenth Amendment, *see Burson v. Freeman*, 504 U.S. 191, 196 (1992), “was fashioned to

assure unfettered interchange of ideas for the bringing about of political and social changes desired by the people.” *Meyer*, 486 U.S. at 421. Governmental restrictions on “the discussion of political policy generally or advocacy of the passage or defeat of legislation” are “wholly at odds with the guarantees of the First Amendment.” *Id.* at 428 (citing *Buckley v. Valeo*, 424 U.S. 1, 50 (1976)). Laws enacted to prevent fraud in the initiative process necessarily implicate “the people’s constitutional right to express core political speech.” *See Bernbeck v. Moore*, 126 F.3d 1114, 1116 (8th Cir. 1997) (applying strict scrutiny to find a petition circulation law violated the First Amendment).

The First Amendment prohibits the regulation of speech “based on its substantive content or the message it conveys.” *Rosenberger v. Rector & Visitors of Univ. of Va.*, 515 U.S. 819, 828 (1995). As a result, governmental discrimination against speech “because of its message is presumed to be unconstitutional.” *Id.* “The government must abstain from regulating speech when the specific motivating ideology or the opinion or perspective of the speaker is the rationale for the restriction.” *Id.* at 829. Consequently, viewpoint discrimination is a “particularly ‘egregious form’” of content-based restriction that violates the First Amendment. *Pahls v. Thomas*, 718 F.3d 1210, 1229 (10th Cir. 2013) (quoting *Rosenberger*, 515 U.S. at 829).

Viewpoint discrimination in violation of the First Amendment exists when

similarly situated people or groups attempt to engage in First Amendment activity and the government allows some to engage in the activity while prohibiting others. *See Frederick Douglass Found., Inc. v. D.C.*, 82 F.4th 1122, 1146-47 (D.C. Cir. 2023). Viewpoint discrimination violates the First Amendment “regardless of the government’s benign motive . . . or lack of animus.” *Id.* at 1145 (quoting *Reed v. Gilbert*, 576 U.S. 155, 165 (2015)). And “selective enforcement of a content-neutral law may violate the First Amendment.” *Frederick Douglass Found., Inc.*, 82 F.4th at 1143.

The Secretary’s application of § 7-9-111(f)(2) to petitioners constitutes viewpoint discrimination in violation of the First Amendment. This is because the Secretary’s office has treated petitioners differently than it has treated other similarly situated parties. The only parties similarly situated to petitioners are sponsors for other ballot initiatives who, according to the Secretary, have failed to comply with § 7-9-111(f)(2). There are only two such sponsors: (1) for the 2016 Amendment to Limit Attorney Contingency Fees and Non-Economic Damages in Medical Lawsuits and (2) for the 2016 Arkansas Medical Cannabis Act.¹ During the 2016 cycle,

¹ The group of potential comparators is small. The part of Act 1413 of 2013 that includes § 7-9-111(f)(2) was enjoined during the 2014 election cycle. *See Spencer v. Martin*, No. CV-13-4020 (Ark. Mar. 4, 2014), *reversed in part by McDaniel v.*

sponsors of four amendments submitted petitions to the Secretary’s office—two contained § 7-9-111(f)(2) statements and two did not. Add. 82-83. When the two sponsors allegedly failed to comply with § 7-9-111(f)(2), the Secretary’s office did not throw out petitions or signatures or treat the sponsors any differently than the sponsors who did comply. To the contrary, as explained above, the Secretary’s office (including Bridges, the current Assistant Director of Elections) defended to this Court the sponsors’ right to have signatures counted despite alleged non-compliance with § 7-9-111(f)(2). *See Ross* Brief at Arg. 12-14; *Benca* Brief at Arg. 5-7; *Benca* Brief II at Abstract 124-25.

The contrast between the treatment of petitioners and the treatment of similarly situated parties is sufficient, by itself, to demonstrate viewpoint discrimination. But the Secretary’s public opposition to the Amendment and support for the group directly opposing it provides even more evidence of viewpoint discrimination. *See Ridley v. Mass. Bay Transp. Auth.*, 390 F.3d 65, 86 (1st Cir. 2004) (“Suspicion that viewpoint discrimination is afoot is at its zenith when the speech restricted is speech critical of the government, because there is a strong risk that the

Spencer, 2015 Ark. 94, 457 S.W.3d 641. Because initiative petitions are considered only during election years, the only relevant cycles are 2016, 2018, 2020, 2022, and 2024.

government will act to censor ideas that oppose its own.”).

Arkansas Right to Life is the organization responsible for the “Decline to Sign” campaign in direct opposition to the Amendment and an officially registered ballot question committee formed “to advocate the defeat of the Arkansas Abortion Amendment of 2024 in the 2024 General Election.” Add. 81. The Secretary actively and publicly supports Arkansas Right to Life. According to public expenditure reports, since announcing his candidacy for State Treasurer in August 2023, the Secretary’s campaign has made exactly one donation over \$100—to Arkansas Right to Life. Add. 60. The same month as the donation, January 2024, the Secretary helped lead the Arkansas March for Life, an event organized by Arkansas Right to Life during which their executive director described the Amendment as “a death warrant on innocent unborn children.” Add. 62-63, 67. Additionally, the Secretary has “final approval” over the selection of an artist to design a Monument to Unborn Children on State Capitol grounds. *See* Ark. Code Ann. § 22-3-223(b)(2)(B). The artist he chose created a website to fundraise for the monument, which also directs visitors to donate to Arkansas Right to Life and links to the “Decline to Sign” campaign section on the Arkansas Right to Life website. Add. 79, 70-73. The Secretary was “proud” that Arkansas Right to Life endorsed his 2022 campaign for reelection and espoused his “unwavering support of the pro-life movement.” Add. 69.

The Secretary’s viewpoint is clear. He wants to keep the Amendment off the ballot. Doing so furthers his anti-abortion personal beliefs and political interests. To keep the Amendment off the ballot, he has treated petitioners differently from similarly situated parties engaging in the same activity protected by the First Amendment. This viewpoint discrimination infringes petitioners’ First Amendment rights and harms the integrity of the ballot initiative process. *See Frederick Douglass Found., Inc.*, 82 F.4th at 1131 (“To permit one side to have a monopoly in expressing its views is the antithesis of constitutional guarantees.”); *Thurston v. League of Women Voters of Ark.*, 2022 Ark. 32, at 13, 639 S.W.3d 319, 325 (2022) (Wood, J., concurring) (“[I]t is the people of Arkansas—not government bureaucrats—who are truly sovereign under our constitution.”).

REQUEST FOR RELIEF

For the reasons stated, this Court should rule in petitioners’ favor as a matter of law. Alternatively, if the Court finds that material facts are in dispute, the Court should appoint a Special Master to resolve them. Additionally, petitioners request that this Court:

1. Order that the Secretary proceed with the Amendment to the signature-verification stage of the certification process;
2. Order that the Secretary cannot throw out petition parts or signatures for petitioners’ alleged violation of § 7-9-111(f)(2);

3. Order that the Secretary include in the counting, verification, and certification process petition parts and signatures submitted by paid canvassers;

4. Order that the Secretary ensure and protect petitioners' right to a full verification and certification process—including, if necessary, the right to a full 30-day cure period for any future determination of insufficiency;

5. Order the Secretary to conditionally certify the Amendment for inclusion on the November 2024 General Election ballot if the full verification and certification process—including any 30-day cure period—has not terminated before the deadline to certify petitions for the November 2024 General Election ballot (*see* Ark. Code Ann. § 7-5-204(c)(1));

6. Order the Secretary to conditionally certify the Amendment for inclusion on the November 2024 General Election ballot pending resolution of this action (*see* Ark. Code Ann. § 7-5-204(c)(1)); and,

7. If the Court does not immediately rule in petitioners' favor, Grant petitioners' motion for emergency relief and the relief requested therein.

DATED: August 2, 2024.

SHULTS LAW FIRM LLP
200 West Capitol Avenue, Suite 1600
Little Rock, AR 72201-3621
Telephone: (501) 375-2301
Facsimile: (501) 375-6861

By: /s/ Amanda Orcutt

Amanda Orcutt
Ark. Bar No. 2019102
aorcutt@shultslaw.com

Peter Shults
Ark. Bar No. 2019021
pshults@shultslaw.com

Steven Shults
Ark. Bar No. 78139
sshults@shultslaw.com

Attorneys for Petitioners

CERTIFICATE OF SERVICE

I certify that, on August 2, 2024, I filed this Petitioners' Brief with the Clerk of Arkansas Supreme Court using the electronic filing system, which shall send notification to all counsel of record.

/s/ Amanda Orcutt

Amanda Orcutt

CERTIFICATE OF COMPLIANCE

I certify that this Petitioners' Brief complies with Administrative Order No. 19 and Administrative Order 21, Section 9, and conforms to the word count limitations contained in Rule 4-2(d), containing 6,113 words. This brief was prepared utilizing Microsoft Word and Times New Roman 14-point font.

/s/ Amanda Orcutt

Amanda Orcutt

INDEX TO ADDENDUM

Affidavit of Lauren Cowles with Exhibits dated July 15, 2024 Add. 1

Affidavit of Allison Clark with Exhibits dated July 16, 2024 Add.38

Letter from John Thurston to Lauren Cowles dated July 15, 2024 Add. 54

January 2024 Campaign Contribution and Expenditure Report
of John Thurston Add. 55

Photos from the 46th Annual March for Life, January 2024 Add. 62

Arkansas Democrat Gazette article dated January 22, 2024 Add. 64

Arkansas Right to Life endorsement of John Thurston, 2022 Add. 69

Arkansas Right to Life webpage screenshot on the Living Wall Add. 70

Living Wall website screenshot Add. 74

Arkansas Right to Life BQC Statement of Organization Add. 80

Arkansas Winning Initiative, Inc., Sponsor Statement dated
July 8, 2016 Add. 82

Arkansans United for Medical Marijuana Sponsor Statement
dated July 8, 2016Add. 83

IN THE ARKANSAS SUPREME COURT

LAUREN COWLES, individually and on behalf
of ARKANSANS FOR LIMITED GOVERNMENT,
a ballot question committee

PETITIONERS

v.

No. CV-24-455

JOHN THURSTON, in his official capacity
as Secretary of State

RESPONDENT

AFFIDAVIT OF LAUREN COWLES

I, Lauren Cowles, declare as follows:

1. I am over the age of 18, competent to testify, and have personal knowledge of the facts and information set forth in this affidavit.

2. I am the Executive Director of Arkansans for Limited Government (“AFLG”), an Arkansas ballot question committee and a sponsor of the ballot initiative petition with the popular title Arkansas Abortion Amendment of 2024 (the “Amendment”).

3. In my capacity as Executive Director of AFLG, I worked with Arkansans across the state to collect sufficient signatures to place the Amendment on the November 2024 General Election ballot. The vast majority of signatures collected were from hundreds of volunteers.

4. AFLG also hired Verified Arkansas, LLC, to provide canvassing services. Paid canvassers hired by Verified Arkansas also collected signatures for the Amendment.

5. Before the first paid canvassers began collecting signatures, I sent to the office of the Arkansas Secretary of State (“Secretary”) a list of the paid canvassers, in an excel spreadsheet, accompanied by a “Sponsor Affidavit” that provided information about legal compliance related to the paid canvassers.

6. Each time Verified Arkansas brought on more paid canvassers to collect signatures for the Amendment, I or Allison Clark sent to the Secretary an updated list of paid canvassers and an accompanying Sponsor Affidavit. Allison Clark signed the Sponsor Affidavits on behalf of AFLG. I gave her and she accepted authority to do so. I also gave her and she accepted authority to send the updated paid canvasser lists and Sponsor Affidavits to the Secretary on behalf of AFLG. She undertook this authority to submit updated lists and accompanying Sponsor Affidavits on behalf of AFLG subject to AFLG’s control. In total, I believe that AFLG sent 17 Sponsor Affidavits and 19 canvasser lists by email to the Secretary. I understand that the last updated list sent to the Secretary by email was from Allison Clark on July 4, 2024.

7. On July 5, 2024, I, on behalf of AFLG, submitted to the Secretary at least 101,525 signatures, along with accompanying paperwork, in support of placing the Amendment on the November 2024 General Election ballot.

8. I submitted more signatures than the 90,704 required by the Secretary and Arkansas law, and the signatures also met the 15-county requirement in Article

5, § 1, of the Arkansas Constitution and the 50-county requirement in Ark. Code Ann. § 7-9-126(e).

9. At the time I filed the Amendment with the Secretary, I also submitted a statement that identified each of the paid canvassers by name. That statement is attached as Exhibit A to this affidavit.

10. The same canvassers were also identified to the Secretary in an excel spreadsheet attached to an email from Allison Clark, on behalf of AFLG, to the Secretary's office on July 4, 2024.

11. At the time I filed the Amendment with the Secretary, I also submitted an affidavit attesting to the number of signatures I and AFLG were submitting, which was a conservative count, and I submitted affidavits of individual paid canvassers attesting that they met the legal requirements to be paid canvassers.

12. On July 10, 2024, five days after my submission, the Secretary sent me a letter informing me of his decision to reject my submission for noncompliance with Ark. Code Ann. § 7-9-111(f)(2). That letter is Exhibit B to this affidavit.

13. On July 11, 2024, I responded to the Secretary's letter. That response, with its attachments, is Exhibit C to this affidavit. One of the attachments was a "Sponsor Statement Regarding Compliance with Ark. Code Ann. § 7-9-111(f)(2)," in which I corrected the perceived errors that the Secretary alleged regarding my submission.



Lauren Cowles


STATE OF ARKANSAS)
)
COUNTY OF PULASKI)

ACKNOWLEDGMENT

Subscribed and sworn to before me, a notary public, on July 15, 2024.

My commission expires:

10/5/2024



Notary Public

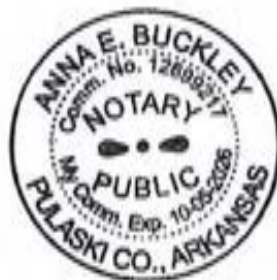


EXHIBIT A

FILED

JUL 05 2024

Arkansans For Limited Government

Verified Arkansas Paid Canvasser Information

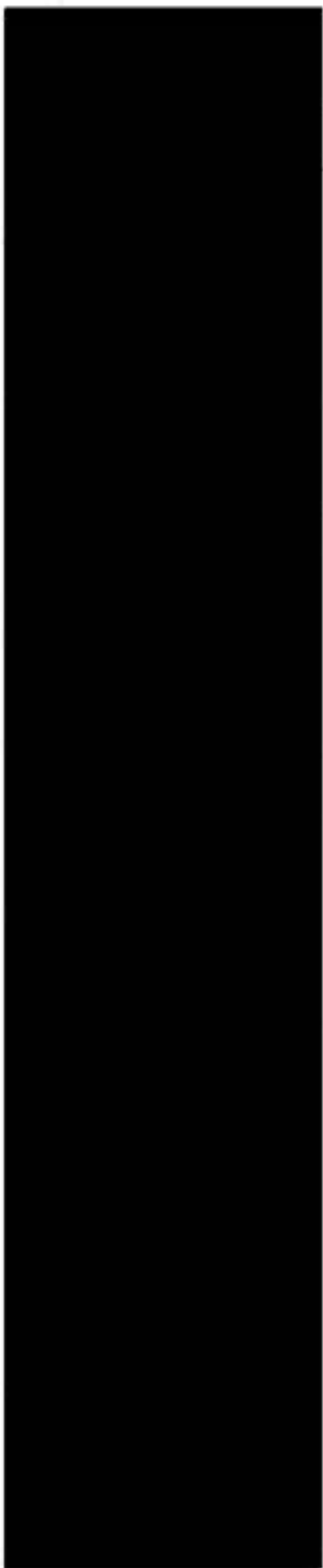
The list of Paid Canvassers may be sent by email to electionsemail@sos.arkansas.gov.

| First Name | Middle Name | Last Name | Address (No PO Boxes/Business Address) | Phone Number |
|------------|-------------|--------------|--|--------------|
| Latwan | Gabriel | Crutch | | |
| Khalid | Jamill | Jones | | |
| Carla | Lavette | Williams | | |
| Brenda | Hamm | Woodard | | |
| Karen | Lynn | Hitt | | |
| Ella | Mola | Rucker | | |
| Nevaeh | L | Holman | | |
| Evelyn | Kay | Akins | | |
| Khyra | Yolanda | Garrett | | |
| Contonnia | | Brown | | |
| Rayana | Dametria | Jordon | | |
| Nikyra | Inesha | Phillips | | |
| Jamyia | | Bonner | | |
| Lavonna | Nesha | Eichelberger | | |
| James | Donald | Roberts | | |
| Kristina | Nicole | Townsend | | |
| Samantha | Marie | Lawrence | | |
| Sara | | Stumpenhaus | | |
| Kenton | David | Byrd | | |
| Meagan | Irene | Garrett | | |
| Winona | clystine | Ahart | | |
| Dustin | Cale | Sebala | | |
| Ashley | Marie | Ewald | | |
| Amanda | Lynn | Bradley | | |
| Paula | Jo | White | | |
| Chad | Everett | Grayham | | |
| Beverly | Gail | Rasberry | | |
| Rebecca | Lynnette | Millen | | |
| Teisha | Renee | Caldwell | | |
| Phyllis | | Thompson | | |
| James | Dallas | Dorcy | | |
| Kahley | Brianna | McBride | | |
| Leona | R | Allison | | |
| Falana | L | Moore | | |
| Jo | Marie | Cunning | | |
| Daphne | Lynn | McCoy | | |
| Rebecca | Ann | Roberts | | |
| Kaylee | Nicole | Payne | | |
| Elijah | | Farah | | |
| Fatimah | Adnan Ali | Alrubaye | | |
| Kirsty | Nicole | Bartalone | | |
| Destiny | Noelle | Sinclair | | |

**Arkansas
Secretary of State**

| City | State | Zip Code | Date of Submission | Certified that a non-Paid Canvasser / |
|------|-------|----------|--------------------|---------------------------------------|
| | AR | | 5/7/2024 | yes |
| | AR | | 5/7/2024 | yes |
| | AR | | 5/7/2024 | yes |
| | AR | | 5/7/2024 | yes |
| | AR | | 5/7/2024 | yes |
| | AR | | 5/10/2024 | yes |
| | AR | | 5/10/2024 | yes |
| | AR | | 5/10/2024 | yes |
| | AR | | 5/10/2024 | yes |
| | AR | | 5/10/2024 | yes |
| | AR | | 5/10/2024 | yes |
| | AR | | 5/10/2024 | yes |
| | AR | | 5/14/2024 | yes |
| | AR | | 5/14/2024 | yes |
| | AR | | 5/14/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/17/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |
| | AR | | 5/21/2024 | yes |

| | | |
|-------------|---------------|----------------|
| Charles | A | Beasley |
| Ailson | Victoria | Guthrie |
| Tracy | | Jackson |
| Leroy | | Hood |
| Dustin | Allan | Goss |
| Shannon | Danielle | Hays |
| Adrianna | Michelle | Saldana Avalos |
| Carla | Louise | Hill |
| Richard | Jamie | Olszewski |
| Stone | James | Law |
| Oriann | | Elieisar |
| Mary | A | Logan |
| Tamara | R | Heard |
| La'Zaria | A'breanna | Johnson |
| Aidan | Loch | Douglas |
| Destiny | Alexis | Mays |
| Jason | Marc | Parnell |
| Kyler | Gavin | Amann |
| Melissa | Carrina | Villalobos |
| Wanda | Kay | Evans |
| Alisia | Ellen Ivy | Fawcett |
| Brandi | Leigh | DePriest |
| Katlyn | Dailah | Lindsey |
| Jace | Jeffery | Potts |
| Ozzy | Chloe | Watts |
| Gary | Hilton | Sisco |
| Clara | Caitlyn Wells | Bartel |
| Tina | Louise | Crossland |
| Thomas | Darnell | Hill |
| Jacob | Matthew | Scott |
| James | Edward | Briggs |
| Christopher | Allen Michael | Costes |
| Zayda | Raelyn | Kingfisher |
| David | Joel | Bateman |
| Phillip | Syn'Quen | Hollis |
| Marcos | Dean | Martinez |
| Aston | Dezjuan | Cooper |
| Me'kayle | Shancheiland | Taylor |
| Andrez | Fidensio | Gutierrez |
| Dustin | Lee | Goff |
| Samantha | Blaine | Kee |
| Kara | Lynn | Wilhite |
| Laney | McKay | Wagner |
| Jerralynn | Marie | Wilmoth |
| Hunter | Sterling | Hight |
| Cyrene | Robin | Carter |



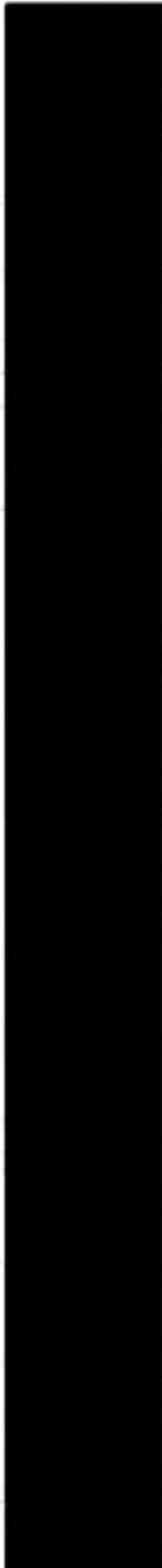
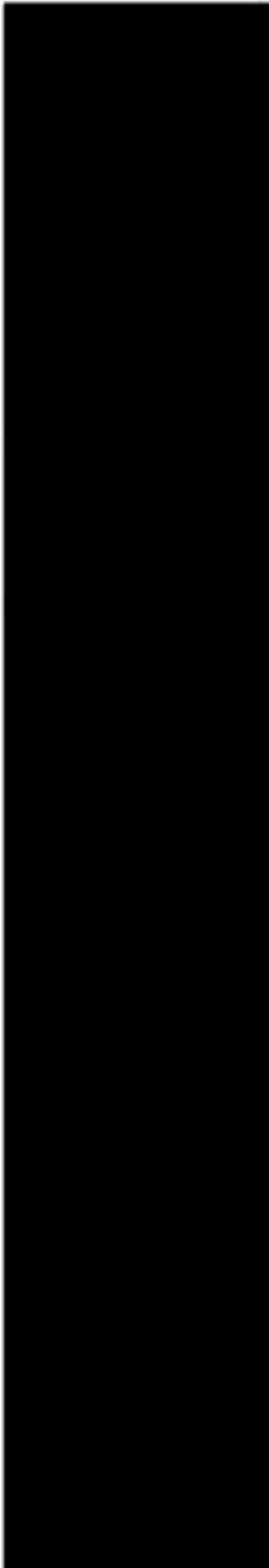
| | | | |
|----|-----------|-----|-----|
| AR | 5/21/2024 | yes | yes |
| AR | 5/21/2024 | yes | yes |
| AR | 5/21/2024 | yes | yes |
| AR | 5/21/2024 | yes | yes |
| AR | 5/23/2024 | yes | yes |
| AR | 5/23/2024 | yes | yes |
| AR | 5/23/2024 | yes | yes |
| AR | 5/23/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/24/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/30/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |

| | | |
|------------|--------------|------------|
| Sarah | Louise | Yerxa |
| MaryJo | | Moore |
| George | Alton | Roberts |
| Lydia | Claire | Alpert |
| Elisabeth | Anne | O'Connell |
| Johnathan | Lamar | Holley |
| India | Donald | Ford |
| Krista Ann | Lee | Hooper |
| Steven | Ray | Turner |
| Karen | | Taylor |
| Danny | R | Yerxa |
| Emma | Olivia | Hidy |
| Felice | Angelique | Lamoreux |
| Ashley | Elizabeth | Leach |
| Jaylei | Lacole | Massey |
| Rachel | Abigail | Brashear |
| Cassandra | Lynn | Blakney |
| Florence | May | Russell |
| Diamonah | L | Cook |
| Daniel | Scott | Anderson |
| Chelsea | Layne | Burbank |
| Charity | Faith | Moore |
| Lindsay | Ross | Chambers |
| Briana | T | Diaz |
| Alexis | Simone | Lyons |
| Corbin | | Keeler |
| Shemonia | D | Peair |
| Georgia | Mae | Harrell |
| Mildred | Mae | Holiman |
| Patty | J | Findlay |
| Zacary | Elijah | Darrah |
| William | G | Partain |
| Thomas | A | Jones |
| Samantha | Rose | Baker |
| Christina | Momoko | Smith |
| Whitney | Lea | Neighbors |
| Abigail | Payne | Moussa |
| Ted | A | Brannon |
| Rowan | Alexandra | Fox |
| Landon | Cody | Montgomery |
| Asia | Ariana Ayana | Wilson |
| Destiny | Marie | Maine |
| Bethany | Erin | Manning |
| Antonia | Desiree | Jones |
| Elisabeth | Meilin | Larsen |
| James | Coleman | McLarty |



| | | | |
|----|-----------|-----|-----|
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 5/31/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/6/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/7/2024 | yes | yes |
| AR | 6/14/2024 | yes | yes |
| AR | 6/14/2024 | yes | yes |
| AR | 6/14/2024 | yes | yes |
| AR | 6/14/2024 | yes | yes |

| | | |
|-------------|-------------|---------------|
| Natale | Ray | Casteel |
| Lucas | Joseph | Dumaine |
| Dani | Jean | Taylor |
| Samuel | Christopher | Giltehaus |
| Amber | Corrin | Antinora |
| Journey | Sky | Graham |
| Tatiauna | | Inman-Quijada |
| Makayla | Neshae | Harris |
| Grayson | D | Cogswell |
| Wykeve | T | Freeman |
| Brandon | | Gibbins |
| Tony | W | Davis |
| Riley | Attikus | Casher |
| Christopher | Aydlin | Mills |
| Justin | Clay | Burkhart |
| Kennedy | A | Norwood |
| Keith | | Rivera-Rivera |
| Trance | Andrew | Rogers |
| Saniya | Creggett | Makayla |
| Rhone | Jaedon | Kuta |
| Reginald | | Liner |
| Shannon | Gail | Bass |
| Jessica | Anne | Roberson |
| Ashley | Brooke | Nellis |
| Wendy | Jo | Peer |
| Kayla | Marie | Ikeler |
| Vincenzo | Albera | Redditt |
| Robert | Norris | Burns |
| Allison | Bracy | Clark |
| John | Alonzo | Flowers |
| Jackie | Dawn | Yarbrough |
| Kimberly | Wynne | SantaCruz |
| Aleatha | Miranda | Cummings |
| Ashley | Renee | Pledger |
| Aeja | Rae | LeMaster |
| Benjamin | | Otto |
| Soleia | Bernice | Meers |
| Alyce | Loretta | Cummins |
| Jacob | Flynn | Turmann |
| Clayton | Kyle | Bowles |
| Tyra | Ashley | James |
| Grant | Zachary | Smith |
| Destiny | Dakota | Mclaughlin |
| Justin | Lance | Thomasson |
| Elizabeth | Kate | McDole |
| Brittini | Paige | Gunn |



| | | |
|-------------|------------|-----------|
| Madison | Alexus | Fisher |
| Alexander | Lomas | Huerta |
| Amanda | Ann | Rowe |
| Brandon | Stiven | Mayora |
| Taylor | A | Jacobs |
| Latisha | Nicole | Berry |
| Ladarius | Tavon | Smith |
| Jase | Michael | Woods |
| Tank | Jamal | Peoples |
| Adam | Reese | Mannis |
| Tyler | Austin | Draper |
| Leana | Lynn | Adams |
| Terri | | Lucy |
| Arelli | Alexandria | Alvarado |
| Joshua | | Barnes |
| Emmaleigh | Summer | Bass |
| Kametric | | Burley |
| Shiquita | Antionette | Burley |
| Andrew | Scott | Chambers |
| Justin | Daune | Cole |
| Keaton | James | Collatt |
| Heavenly | Skyy | Dixon |
| Mahogany | | Finley |
| Cameron | Celeste | Fisher |
| Colin | | Foley |
| Solomon | Arnez | Glover |
| Temeka | Lashel | Guess |
| Dazure | | Hale |
| Oliver | Henry | Holt |
| Shalara | Elaine | Hopkins |
| Jenae | Nicole | Jackson |
| Desmon | Jeques | Johnson |
| Nicole | Meredith | Jovanovic |
| Deadrain | Michell | Lancs |
| Khristopher | Bradley | Latin |
| Tera | | Lewis |
| Mya | Marie | Little |
| Nicole | | McGuffy |
| Jacquiline | D | Moody |
| Iverson | Soloman | Moore |
| Dreama | | Parham |
| Andrea | | Phillips |
| Mikayla | Adrianna | Rankin |
| Nina | M | Richards |
| Jeremy | Wayne | Scercy |
| Jeremy | Wayne | Scercy |



| | | |
|------------|--------------|-------------|
| Dezmonia | Lashae | Scott |
| Jeremy | Wayne | Searcy |
| James | | Slack |
| Justin | | Stone |
| Kia | | Swinson |
| Adrianna | | Thompson |
| Kiera | Jasmine | Tofes |
| Jaxon | Lamar | Vanwinkle |
| Iesha | | Washington |
| Charlesaia | | Woods |
| Aladrea | Lynnette | Woods |
| Pamela | | Mitchell |
| Fareed | Saimar | AbuZayed |
| Andrew | Scott | Chambers |
| Jordan | Camille | Bush |
| Nia | Nicole | Jones |
| Lanaysha | Lorrayne | Brown |
| Tara | Annette Jean | Lewis |
| Kanye | | Jordan |
| Kierra | D | Williams |
| Atache | Marie | Hill |
| Yakeem | O | Young |
| Kennedy | Victoria | Valley |
| Willie | Ann | Jones |
| Leslie | Deniece | Triggs |
| Marshae | Renae | Elliott |
| Deona | LaShawn | Elliott |
| Joni | Marie | Hollowel |
| Dalia | Muhamed | Daboul |
| Lisa | | Southerland |
| Eboni | | Heaggans |
| Camille | | Richardson |
| Barry | D | Jefferson |
| John | J | Goss |
| Tosha | Renee | Duer |
| Alexis | M | Duer |
| Tiffany | S | Hipps |
| Gwendolyn | Yvette | Staten |
| Gideon | Shawn | Derzon |
| Caleb | Robert | Austed |

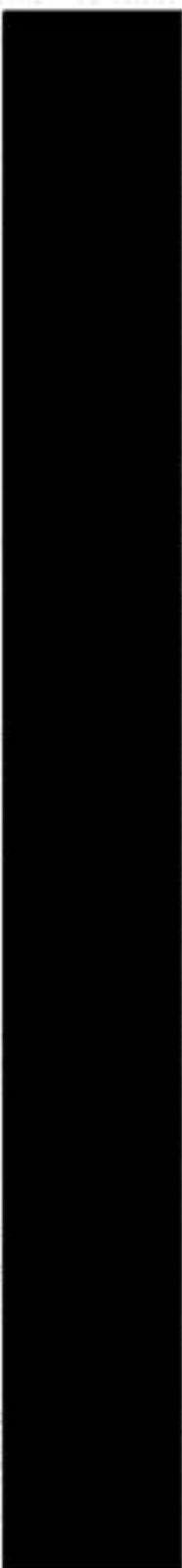
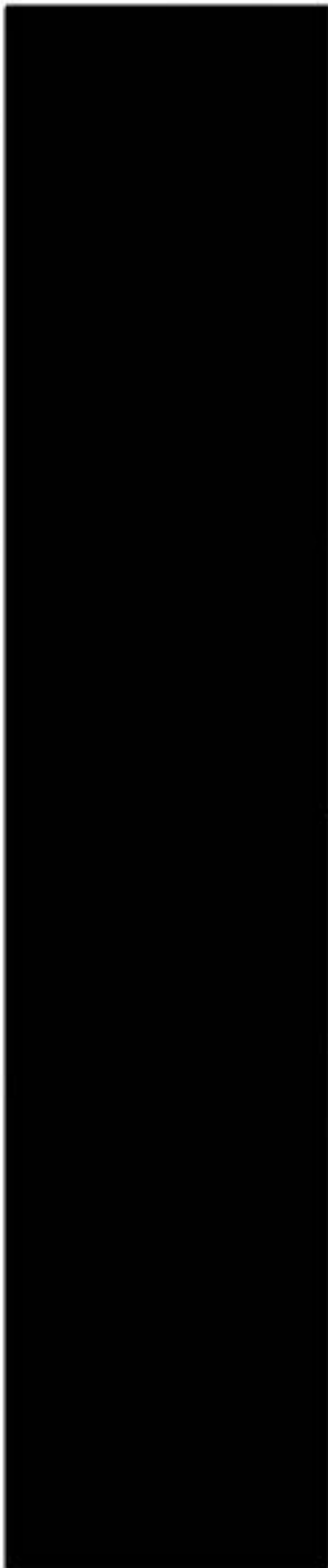


EXHIBIT B



JOHN THURSTON

ARKANSAS SECRETARY OF STATE

July 10, 2024

Sent via email & regular mail

Lauren Cowles
P.O. Box 7866
Little Rock, AR 72217

RE: Proposed Constitutional Amendment
Popular Name: Arkansas Abortion Amendment of 2024

Dear Ms. Cowles:

The Secretary of State is officially charged under Article 5, § 1 of the Arkansas Constitution to review statewide initiatives and referenda petitions. The first part of our review is to ensure that the sponsor has complied with all statutory requirements for submitting a petition. Because you failed at this first step, it is my duty to reject your submission.

I have determined that you failed to comply with Ark. Code Ann. § 7-9-111(f)(2). That provision requires the sponsor to submit (1) a statement identifying the paid canvassers by name, and (2) a signed statement indicating that the sponsor has provided a copy of the most recent edition of the Secretary of State's initiatives and referenda handbook and explained the requirements under Arkansas law for obtaining signatures on the petition to each paid canvasser before the paid canvasser solicited signatures. In *McDaniel v. Spencer* in 2015, the Arkansas Supreme Court expressly found this requirement to be constitutional. You did not submit any statements meeting this requirement. By contrast, other sponsors of initiative petitions complied with this requirement. Therefore, I must reject your submission.

Even if your failure to comply with Ark. Code Ann. § 7-9-111(f)(2) did not require me to reject your submission outright, it would certainly mean that signatures gathered by paid canvassers in your submission could not be counted for any reason. You submitted an affidavit attesting that the total number of signatures submitted was 101,525. As a courtesy to you, I instructed my office to determine the initial count of signatures gathered by paid canvassers in your putative submission. That number was 14,143. After removing those signatures, and assuming your attestation as valid, 87,382 volunteer signatures remain—3,322 signatures less than the required 90,704. Therefore, even if I could accept your submission, I would be forced to find that your petition is insufficient on its face for failure to obtain the required 90,704 signatures.

Sincerely,


John Thurston
Arkansas Secretary of State

State Capitol • Suite 256 • 500 Woodlane Street • Little Rock, Arkansas 72201-1094
501-682-1010 • Fax 501-682-3510
e-mail: arsos@sos.arkansas.gov • www.sos.arkansas.gov

Addendum 19

EXHIBIT C

ARKANSANS FOR LIMITED GOVERNMENT

July 11, 2024

The Honorable John Thurston
Arkansas Secretary of State
State Capitol
501 Woodlane Avenue
Suite 526
Little Rock, AR 72201

VIA EMAIL (ARSOS@SOS.ARKANSAS.GOV) AND HAND DELIVERY

Re: Response to Your Letter of July 10, 2024

Dear Secretary Thurston,

Arkansans for Limited Government (“AFLG”) is a Sponsor of the initiative petition for the Arkansas Abortion Amendment of 2024. AFLG has received your letter dated July 10, 2024, wherein you claim that AFLG has failed to comply with the statutory requirements contained in Ark. Code Ann. § 7-9-111(f)(2), leading you to “reject” AFLG’s submission. Contrary to your claim, AFLG met the requirements of Ark. Code Ann. § 7-9-111(f)(2). Additionally, this letter explains that you have unlawfully rejected the petition parts in question. Finally, the letter explains that, regardless of your erroneous position that the petition parts from paid canvassers should not be counted, you have failed to fulfill your duty to perform an initial count of all signatures submitted by AFLG, and you must continue counting.

The text of § 7-9-111(f)(2) states, in full:

If signatures were obtained by paid canvassers, the person filing the petitions under this subsection shall also submit the following:

(A) A statement identifying the paid canvassers by name;
and

(B) A statement signed by the sponsor indicating that the sponsor:

(i) Provided a copy of the most recent edition of the Secretary of State’s initiatives and referenda handbook to each paid canvasser before the paid canvasser solicited signatures; and

(ii) Explained the requirements under Arkansas law for obtaining signatures on an initiative or referendum petition to each paid canvasser before the paid canvasser solicited signatures.

In compliance with § 7-9-111(f)(2), AFLG submitted to you on June 27, 2024, the enclosed Sponsor Affidavit that meets these requirements. Specifically, the Sponsor Affidavit attached a list

ARKANSANS FOR LIMITED GOVERNMENT

that identified paid canvassers by name and contained a statement, signed by AFLG, indicating that AFLG provided those paid canvassers with a copy of the most recent edition of the Secretary of State's initiatives and referenda handbook and explained the requirements under Arkansas law for obtaining signatures on an initiative or referendum. In addition, even if the Sponsor Affidavit had failed to meet the statutory requirements in some technical way, AFLG's compliance efforts with respect to § 7-9-111(f)(2) are abundant, well-documented, and repeatedly acknowledged by your office, which is required to file and preserve AFLG's submissions. Ark. Code Ann. § 7-9-123. Further, on July 5, in compliance with § 7-9-111(f)(2)(A), AFLG submitted to you again a list of all 266 paid canvassers, which your staff explicitly told AFLG was not required. AFLG also on July 5 submitted 266 affidavits, signed by each individual canvasser, affirming that AFLG provided them the information required by § 7-9-111(f)(2)(B). In drafting the paid canvasser affidavits, AFLG copied the exact language of a sample affidavit provided by your office to AFLG. These materials had already been provided to you, and were only provided again in an abundance of caution, even against the insistence of your staff that some of this information was not required.

Your letter fails to specify in what manner AFLG failed to comply with the plain language of the statute, leaving AFLG to guess at your reasoning. AFLG therefore submits a new statement, enclosed with this letter, restating its compliance with the requirements of § 7-9-111(f)(2). This "correction" is explicitly permissible in this scenario. Indeed, the title of § 7-9-111 reads, "Determination of sufficiency of petition—Corrections." Based on this language, AFLG presumes that your letter offers AFLG an opportunity to correct pursuant to § 7-9-111(d) and/or Arkansas Constitution Article 5 § 1. AFLG avails itself of this opportunity by submitting the enclosed statement and accompanying documentation.

Additionally, your rejection of petition parts defies the statute. The law is clear that petition parts can only be excluded from the initial count for a limited number of reasons. Section 7-9-126(b) provides the exclusive and exhaustive list of reasons for rejecting a petition part for initial counting purposes. You do not allege that the petitions submitted by AFLG are deficient in any of the ways listed in § 7-9-126(b). Further, § 7-9-111 does not have a "do not count" penalty associated with it, a point that you yourself made to the Arkansas Supreme Court in response to an effort to disqualify a ballot initiative. *See Respondent's Brief and Supplemental Addendum*, at Arg. 5, *Benca v. Martin*, No. CV-16-785 (Ark. Oct. 12, 2016). As you also pointed out in that brief, "the express designation of a 'do not count' penalty in other subsections of the Arkansas Code . . . indicates that the absence of such a provision in 7-9-111 was an intentional omission." AFLG agrees. Because the alleged deficiency you point out is not associated with a "do not count" penalty, and because you have not alleged that AFLG is deficient in any of the ways outlined in § 7-9-126(b), you must count the paid canvasser petition parts, or, at a minimum, allow AFLG the opportunity to correct.

Finally, regardless of your erroneous position that the paid canvasser petition parts should not be counted, you have a duty to count every signature on every other petition part. Your July 10 letter makes clear that you relied upon AFLG's representation regarding the total number of signatures collected, not your own count. AFLG's conservative, internal signature count has no bearing on your independent duty as the official charged with verifying signatures to perform an initial count of all signatures. *See Ark. Code Ann. § 7-9-126(a)*. You must continue counting.

ARKANSANS FOR
LIMITED GOVERNMENT

For the reasons detailed above, please confirm as soon as possible, and no later than Monday, July 15, that the submission of the initiative petition facially contains the required number of signatures and that your office is proceeding to verify *all* of the submitted signatures, including those contained on petition parts from paid canvassers.

Sincerely,



Lauren Cowles
Executive Director
Arkansans for Limited Government

cc: Mr. Josh Bridges (via email only – josh.bridges@sos.arkansas.gov)
Ms. Leslie Bellamy (via email only – leslie.bellamy@sos.arkansas.gov)

Enclosures:

Affidavit of Sponsor Regarding Additional Paid Canvassers, dated June 27, 2024
Sponsor Statement regarding compliance with Ark. Code Ann. § 7-9-111(f)(2) (with paid canvasser list)

Affidavit of Sponsor Regarding Additional Paid Canvassers

STATE OF ARKANSAS

COUNTY OF PULASKI

Having been duly sworn, the undersigned hereby states and affirms under oath as follows:

I, Allison Clark, state under oath the following:

1. I make the following statements based upon my own personal knowledge.
2. I am over the age of 18, of sound mind, and otherwise qualified to make this affidavit.
3. I am providing this affidavit on behalf of and at the direction of Arkansans For A Limited Government a Ballot Question Committee and Sponsor of an initiative petition popularly known as THE ARKANSAS ABORTION AMENDMENT 2024
4. I am the Controller of Verified Arkansas LLC ("VA"), a company hired by Arkansans For Limited Government to provide canvassing services. As part of its responsibilities, VA hires, trains and manages paid canvassers who are employees of VA.
5. The Sponsor has provided each Paid Canvasser listed on the attached Exhibit A a copy of the most recent edition of the Secretary of State's Initiatives and Referenda Handbook.

6. The Sponsor has explained to each Paid Canvasser listed on Exhibit A the Arkansas law applicable to obtaining signatures on an initiative or referendum petition.

7. The Sponsor is submitting herewith as Exhibit A a list of additional Paid Canvassers' names and current residential addresses to the Arkansas Secretary of State.

8. The Sponsor has instructed each Paid Canvasser listed on Exhibit A to provide sufficient information of the Paid Canvasser's identity to allow the Sponsor to obtain the criminal history and criminal record of the Paid Canvasser within thirty (30) days before the date that the Paid Canvasser will begin to collect signatures.

9. The Sponsor has obtained the criminal history and criminal record of each Paid Canvasser listed on Exhibit A.

10. Where indicated by such criminal history or criminal record, the Sponsor has contacted the appropriate authority in the state or jurisdiction if a criminal history or criminal record indicates an open or pending matter if that open matter would be a disqualifying offense.

11. The Sponsor has obtained at Sponsor's cost, from the Division of Arkansas State Police a current criminal history and criminal record search on each Paid Canvasser being registered with the Arkansas Secretary of State.

12. The criminal history and criminal record search for each Paid Canvasser was obtained from the Division of Arkansas State Police within 30 days before the date the Paid Canvasser will begin collecting signatures.

13. The Sponsor agrees that it will not pay or offer to pay a Paid Canvasser on a basis related to the number of signatures obtained on a statewide initiative petition or statewide referendum petition.


14. The Sponsor certifies that each Paid Canvasser in the Sponsor's employ has no disqualifying offenses.

15. The Sponsor is herewith submitting as Exhibit B to the Secretary of State each additional Paid Canvasser's signed statement that they have not pleaded guilty or nolo contendere to or been found guilty of any of the following offenses in any state of the United States, the District of Columbia, Puerto Rico, Guam, or any other United State protectorate:

- i. A felony;
- ii. Violation of election laws;
- iii. Fraud;
- iv. Forgery;
- v. Counterfeiting;
- vi. Identity Theft;
- vii. A crime of violence, including assault, battery or intimidation;
- viii. Harassment;
- ix. Terroristic threatening;
- x. A sex offense, including sexual harassment;
- xi. A violation of the drug and narcotics laws;
- xii. Breaking and entering;
- xiii. Trespass;
- xiv. Destruction or damage of property;
- xv. Vandalism;
- xvi. Arson; or
- xvii. A crime of theft, including robbery, burglary, and simple theft or larceny.

Dated this 27 day of June, 2024.

Arkansans For Limited Government



Allison Clark

ACKNOWLEDGMENT

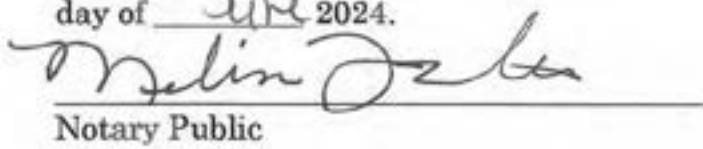
STATE OF ARKANSAS

COUNTY OF Pulaski

On this the 27 day of June, 2024, before me, a Notary Public, duly commissioned, qualified and acting within the aforesaid State and County, appeared in person the within named Allison Clark to me personally well known, who stated and acknowledged that he had so signed, executed and delivered the foregoing instrument for the consideration, uses, and purposes therein mentioned and set forth.

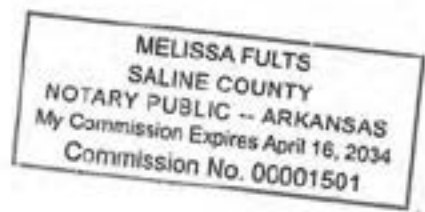
IN WITNESS WHEREOF, I hereunto set my hand and official seal this 27

day of June 2024.


Notary Public

My Commission Expires:

4/16/34



**SPONSOR STATEMENT REGARDING
COMPLIANCE WITH ARK. CODE ANN. § 7-9-111(f)(2)**

I, Lauren Cowles, being duly sworn, depose and say 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 statement.

2. I am providing this statement, in the form of an affidavit, on behalf of Arkansans for Limited Government (“AFLG”), a Ballot Question Committee and a Sponsor of the initiative petition popularly known as the Arkansas Abortion Amendment of 2024.

3. I am the Executive Director of AFLG. As part of my responsibilities in that role, I worked with Verified Arkansas LLC (“VA”), a company AFLG hired to provide canvassing services related to the Arkansas Abortion Amendment of 2024. As part of its responsibilities, VA hires, trains, and manages paid canvassers who are employees of VA.

4. VA employed 266 paid canvassers to perform canvassing services for AFLG related to the Arkansas Abortion Amendment of 2024. AFLG submitted to the Secretary of State’s office on a rolling basis lists containing the names of the paid canvassers. AFLG submitted, in total, 19 lists to the Secretary of State, each subsequent list cumulative of the previous list, with the final list containing the names of all 266 paid canvassers.

5. AFLG submitted the final list containing the names of all 266 paid canvassers to the Secretary of State’s office electronically on July 4, 2024, and in hard copy on July 5, 2024.

6. Another copy of the list containing the names of all 266 paid canvassers is attached hereto at **Exhibit A**. There have been no additions or deletions to this list since it was submitted to the Secretary of State on July 4 and July 5, 2024.

7. For each of the 266 paid canvassers, AFLG provided a copy of the most recent edition of the Secretary of State’s initiatives and referenda handbook before the paid canvasser solicited signatures.

8. For each of the 266 paid canvassers, AFLG explained the requirements under Arkansas law for obtaining signatures on an initiative or referendum petition before the paid canvasser solicited signatures.

9. AFLG required each paid canvasser to sign an affidavit attesting, among other things, that AFLG provided the paid canvasser a copy of the most recent edition of the Secretary of State’s initiatives and referenda handbook and that AFLG explained the requirements under Arkansas law for obtaining signatures on an initiative or referendum petition. Each paid canvasser acknowledged these facts and signed the affidavit before they began soliciting signatures.

10. As evidence of AFLG’s compliance with Ark. Code Ann. § 7-9-111(f)(2), petition parts containing signatures solicited by a paid canvasser do not contain signatures that predate that paid canvasser’s affidavit.

11. When AFLG filed the petition with signatures with the Secretary of State on July 5, 2024, AFLG submitted hard copies of all 266 paid canvasser affidavits to the Secretary of State’s office.

12. AFLG also submitted, on a rolling basis with the lists of paid canvassers, sponsor affidavits attesting to AFLG’s compliance with the requirements of Ark. Code Ann. § 7-9-111(f)(2). AFLG submitted, in total, 17 sponsor affidavits to the Secretary of State.

13. AFLG submitted 2 final lists of paid canvassers to the Secretary of State’s office on June 29 and July 4, 2024. AFLG did not submit sponsor affidavits with the final 2 lists of paid

canvassers because the Secretary of State's office told VA that sponsor affidavits were not required with each submission of paid canvasser names.

14. During the initiative petition process, AFLG worked in good faith and cooperated with the Secretary of State's office. AFLG relied on representations regarding compliance from officials at the Secretary of State's office. When AFLG filed the petition with signatures with the Secretary of State on July 5, 2024, members of the Secretary of State's office led AFLG to believe that no additional steps or compliance measures were necessary to allow the Secretary of State to determine the facial validity of the petition.

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

Executed on: 7.11.24



Lauren Cowles
Executive Director
Arkansans for Limited Government

STATE OF ARKANSAS)
)
COUNTY OF PULASKI)

ACKNOWLEDGMENT

Subscribed and sworn before me, Anna E. Buckley, the undersigned Notary Public, within and for the above County and State, on July 11, 2024.

My commission expires:

10/5/2026



Anna E. Buckley
Notary Public

Arkansans For Limited Government
 Verified Arkansas Paid Canvasser Information
 The list of Paid Canvassers may be sent by email to electionsemail@sos.arkansas.gov.

| First Name | Middle Name | Last Name | Address (No PO Boxes/Business Addresses) | Phone Number | City | State | Zip Code | Date of Submission to SOS | Certified that a criminal history and criminal record search was timely completed and passed for each Paid Canvasser | Paid Canvasser Affidavit signed |
|------------|-------------|--------------|--|--------------|------|-------|----------|---------------------------|--|---------------------------------|
| Latwan | Gabriel | Crutch | | | | AR | | 5/7/2024 | yes | yes |
| Khalid | Jamill | Jones | | | | AR | | 5/7/2024 | yes | yes |
| Carla | Lavette | Williams | | | | AR | | 5/7/2024 | yes | yes |
| Brenda | Hamm | Woodard | | | | AR | | 5/7/2024 | yes | yes |
| Karen | Lynn | Hitt | | | | AR | | 5/7/2024 | yes | yes |
| Ella | Mola | Rucker | | | | AR | | 5/10/2024 | yes | yes |
| Nevaeh | L | Holman | | | | AR | | 5/10/2024 | yes | yes |
| Evelyn | Kay | Akins | | | | AR | | 5/10/2024 | yes | yes |
| Khyra | Yolanda | Garrett | | | | AR | | 5/10/2024 | yes | yes |
| Contonnia | | Brown | | | | AR | | 5/10/2024 | yes | yes |
| Rayana | Dametria | Jordon | | | | AR | | 5/10/2024 | yes | yes |
| Nikyra | Inesha | Phillips | | | | AR | | 5/10/2024 | yes | yes |
| Jamyia | | Bonner | | | | AR | | 5/14/2024 | yes | yes |
| Lavonna | Nesha | Eichelberger | | | | AR | | 5/14/2024 | yes | yes |
| James | Donald | Roberts | | | | AR | | 5/14/2024 | yes | yes |
| Kristina | Nicole | Townsend | | | | AR | | 5/17/2024 | yes | yes |
| Samantha | Marie | Lawrence | | | | AR | | 5/17/2024 | yes | yes |
| Sara | | Stumpenhous | | | | AR | | 5/17/2024 | yes | yes |
| Kenton | David | Byrd | | | | AR | | 5/17/2024 | yes | yes |
| Meagan | Irene | Garrett | | | | AR | | 5/17/2024 | yes | yes |
| Winona | clystine | Ahart | | | | AR | | 5/17/2024 | yes | yes |
| Dustin | Cale | Sebala | | | | AR | | 5/17/2024 | yes | yes |
| Ashley | Marie | Ewald | | | | AR | | 5/17/2024 | yes | yes |
| Amanda | Lynn | Bradley | | | | AR | | 5/17/2024 | yes | yes |
| Paula | Jo | White | | | | AR | | 5/17/2024 | yes | yes |
| Chad | Everett | Grayham | | | | AR | | 5/17/2024 | yes | yes |
| Beverly | Gail | Rasberry | | | | AR | | 5/17/2024 | yes | yes |
| Rebecca | Lynnette | Millen | | | | AR | | 5/17/2024 | yes | yes |
| Teisha | Renee | Caldwell | | | | AR | | 5/17/2024 | yes | yes |
| Phyllis | | Thompson | | | | AR | | 5/17/2024 | yes | yes |
| James | Dallas | Dorcy | | | | AR | | 5/17/2024 | yes | yes |
| Kahley | Brianna | McBride | | | | AR | | 5/21/2024 | yes | yes |
| Leona | R | Allison | | | | AR | | 5/21/2024 | yes | yes |
| Falana | L | Moore | | | | AR | | 5/21/2024 | yes | yes |

EXHIBIT A

| | | | | | | | | | |
|-------------|---------------|---------------|--|--|----|--|-----------|-----|-----|
| Jo | Marie | Cunning | | | AR | | 5/21/2024 | yes | yes |
| Daphne | Lynn | McCoy | | | AR | | 5/21/2024 | yes | yes |
| Rebecca | Ann | Roberts | | | AR | | 5/21/2024 | yes | yes |
| Kaylee | Nicole | Payne | | | AR | | 5/21/2024 | yes | yes |
| Elijah | | Farah | | | AR | | 5/21/2024 | yes | yes |
| Fatimah | Adnan Ali | Alrubaye | | | AR | | 5/21/2024 | yes | yes |
| Kirsty | Nicole | Bartalone | | | AR | | 5/21/2024 | yes | yes |
| Destiny | Noelle | Sinclair | | | AR | | 5/21/2024 | yes | yes |
| Charles | A | Beasley | | | AR | | 5/21/2024 | yes | yes |
| Alison | Victoria | Guthrie | | | AR | | 5/21/2024 | yes | yes |
| Tracy | | Jackson | | | AR | | 5/21/2024 | yes | yes |
| Leroy | | Hood | | | AR | | 5/21/2024 | yes | yes |
| Dustin | Allan | Goss | | | AR | | 5/23/2024 | yes | yes |
| Shannon | Danielle | Hays | | | AR | | 5/23/2024 | yes | yes |
| Adrianna | Michelle | Saldana Avalo | | | AR | | 5/23/2024 | yes | yes |
| Carla | Louise | Hill | | | AR | | 5/23/2024 | yes | yes |
| Richard | Jamie | Olszewski | | | AR | | 5/24/2024 | yes | yes |
| Stone | James | Law | | | AR | | 5/24/2024 | yes | yes |
| Oriann | | Elieisar | | | AR | | 5/24/2024 | yes | yes |
| Mary | A | Logan | | | AR | | 5/24/2024 | yes | yes |
| Tamara | R | Heard | | | AR | | 5/24/2024 | yes | yes |
| La'Zaria | A'breanna | Johnson | | | AR | | 5/24/2024 | yes | yes |
| Aidan | Loch | Douglas | | | AR | | 5/24/2024 | yes | yes |
| Destiny | Alexis | Mays | | | AR | | 5/24/2024 | yes | yes |
| Jason | Marc | Parnell | | | AR | | 5/24/2024 | yes | yes |
| Kyler | Gavin | Amann | | | AR | | 5/24/2024 | yes | yes |
| Melissa | Carrina | Villalobos | | | AR | | 5/24/2024 | yes | yes |
| Wanda | Kay | Evans | | | AR | | 5/30/2024 | yes | yes |
| Alisia | Ellen Ivy | Fawcett | | | AR | | 5/30/2024 | yes | yes |
| Brandi | Leigh | DePriest | | | AR | | 5/30/2024 | yes | yes |
| Katlyn | Dalilah | Lindsey | | | AR | | 5/30/2024 | yes | yes |
| Jace | Jeffery | Potts | | | AR | | 5/30/2024 | yes | yes |
| Ozzy | Chloe | Watts | | | AR | | 5/30/2024 | yes | yes |
| Gary | Hilton | Sisco | | | AR | | 5/30/2024 | yes | yes |
| Clara | Caitlyn Wells | Bartel | | | AR | | 5/30/2024 | yes | yes |
| Tina | Louise | Crossland | | | AR | | 5/30/2024 | yes | yes |
| Thomas | Darnell | Hill | | | AR | | 5/30/2024 | yes | yes |
| Jacob | Matthew | Scott | | | AR | | 5/30/2024 | yes | yes |
| James | Edward | Briggs | | | AR | | 5/30/2024 | yes | yes |
| Christopher | Allen Michael | Costes | | | AR | | 5/30/2024 | yes | yes |
| Zayda | Raelyn | Kingfisher | | | AR | | 5/30/2024 | yes | yes |

EXHIBIT A

| | | | | | | | | | |
|------------|-------------|-----------|------------|------------|----|------------|-----------|-----|-----|
| David | Joel | Bateman | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/30/2024 | yes | yes |
| Phillip | Syn'Quen | Hollis | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/30/2024 | yes | yes |
| Marcos | Dean | Martinez | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/30/2024 | yes | yes |
| Aston | Dezjuan | Cooper | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/30/2024 | yes | yes |
| Me'kayle | Shancheland | Taylor | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Andrez | Fidensio | Gutierrez | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Dustin | Lee | Goff | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Samantha | Blaine | Kee | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Kara | Lynn | Wilhite | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Laney | McKay | Wagner | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Jerralynn | Marie | Wilmoth | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Hunter | Sterling | Hight | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Cyrene | Robin | Carter | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Sarah | Louise | Yerxa | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| MaryJo | | Moore | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| George | Alton | Roberts | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Lydia | Claire | Alpert | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Elisabeth | Anne | O'Connell | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Johnathan | Lamar | Holley | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| India | Donald | Ford | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Krista Ann | Lee | Hooper | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Steven | Ray | Turner | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Karen | | Taylor | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Danny | R | Yerxa | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Emma | Olivia | Hidy | [REDACTED] | [REDACTED] | AR | [REDACTED] | 5/31/2024 | yes | yes |
| Felice | Angelique | Lamoreux | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Ashley | Elizabeth | Leach | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Jaylei | Lacole | Massey | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Rachel | Abigail | Brashear | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Cassandra | Lynn | Blakney | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Florence | May | Russell | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Diamonah | L | Cook | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Daniel | Scott | Anderson | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Chelsea | Layne | Burbank | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Charity | Faith | Moore | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Lindsay | Ross | Chambers | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Briana | T | Diaz | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Alexis | Simone | Lyons | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Corbin | | Keeler | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Shemonia | D | Peair | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |
| Georgia | Mae | Harrell | [REDACTED] | [REDACTED] | AR | [REDACTED] | 6/6/2024 | yes | yes |

EXHIBIT A

| | | | | | | | | |
|-------------|--------------|---------------|--|----|--|-----------|-----|-----|
| Mildred | Mae | Holiman | | AR | | 6/6/2024 | yes | yes |
| Patty | J | Findlay | | AR | | 6/6/2024 | yes | yes |
| Zacary | Elijah | Darrah | | AR | | 6/6/2024 | yes | yes |
| William | G | Partain | | AR | | 6/7/2024 | yes | yes |
| Thomas | A | Jones | | AR | | 6/7/2024 | yes | yes |
| Samantha | Rose | Baker | | AR | | 6/7/2024 | yes | yes |
| Christina | Momoko | Smith | | AR | | 6/7/2024 | yes | yes |
| Whitney | Lea | Neighbors | | AR | | 6/7/2024 | yes | yes |
| Abigail | Payne | Moussa | | AR | | 6/7/2024 | yes | yes |
| Ted | A | Brannon | | AR | | 6/7/2024 | yes | yes |
| Rowan | Alexandra | Fox | | AR | | 6/7/2024 | yes | yes |
| Landon | Cody | Montgomery | | AR | | 6/7/2024 | yes | yes |
| Asia | Ariana Ayana | Wilson | | AR | | 6/7/2024 | yes | yes |
| Destiny | Marie | Maine | | AR | | 6/7/2024 | yes | yes |
| Bethany | Erin | Manning | | AR | | 6/14/2024 | yes | yes |
| Antonia | Desiree | Jones | | AR | | 6/14/2024 | yes | yes |
| Elisabeth | Meilin | Larsen | | AR | | 6/14/2024 | yes | yes |
| James | Coleman | McLarty | | AR | | 6/14/2024 | yes | yes |
| Natalie | Ray | Casteel | | AR | | 6/14/2024 | yes | yes |
| Lucas | Joseph | Dumaine | | AR | | 6/14/2024 | yes | yes |
| Dani | Jean | Taylor | | AR | | 6/14/2024 | yes | yes |
| Samuel | Christopher | Giltehaus | | AR | | 6/14/2024 | yes | yes |
| Amber | Corrin | Antinora | | AR | | 6/14/2024 | yes | yes |
| Journey | Sky | Graham | | AR | | 6/14/2024 | yes | yes |
| Tatiauna | | Inman-Quijada | | AR | | 6/14/2024 | yes | yes |
| Makayla | Neshae | Harris | | AR | | 6/14/2024 | yes | yes |
| Grayson | D | Cogswell | | AR | | 6/14/2024 | yes | yes |
| Wykeve | T | Freeman | | AR | | 6/14/2024 | yes | yes |
| Brandon | | Gibbins | | AR | | 6/14/2024 | yes | yes |
| Tony | W | Davis | | AR | | 6/14/2024 | yes | yes |
| Riley | Attikus | Casher | | AR | | 6/17/2024 | yes | yes |
| Christopher | Aydin | Mills | | AR | | 6/17/2024 | yes | yes |
| Justin | Clay | Burkhart | | AR | | 6/17/2024 | yes | yes |
| Kennedy | A | Norwood | | AR | | 6/17/2024 | yes | yes |
| Keith | | Rivera-Rivera | | AR | | 6/17/2024 | yes | yes |
| Trance | Andrew | Rogers | | AR | | 6/17/2024 | yes | yes |
| Saniya | Creggett | Makayla | | AR | | 6/21/2024 | yes | yes |
| Rhone | Jaedon | Kuta | | AR | | 6/21/2024 | yes | yes |
| Reginald | | Liner | | AR | | 6/21/2024 | yes | yes |
| Shannon | Gail | Bass | | AR | | 6/21/2024 | yes | yes |
| Jessica | Anne | Roberson | | AR | | 6/21/2024 | yes | yes |

EXHIBIT A

| | | | | | | | | | |
|-----------|------------|------------|--|--|----|--|-----------|-----|-----|
| Ashley | Brooke | Nellis | | | AR | | 6/21/2024 | yes | yes |
| Wendy | Jo | Peer | | | AR | | 6/21/2024 | yes | yes |
| Kayla | Marie | Ikeler | | | AR | | 6/21/2024 | yes | yes |
| Vincenzo | Albera | Redditt | | | AR | | 6/21/2024 | yes | yes |
| Robert | Norris | Burns | | | AR | | 6/21/2024 | yes | yes |
| Allison | Bracy | Clark | | | AR | | 6/21/2024 | yes | yes |
| John | Alonzo | Flowers | | | AR | | 6/21/2024 | yes | yes |
| Jackie | Dawn | Yarbrough | | | AR | | 6/21/2024 | yes | yes |
| Kimberly | Wynne | SantaCruz | | | AR | | 6/21/2024 | yes | yes |
| Aleatha | Miranda | Cummings | | | AR | | 6/21/2024 | yes | yes |
| Ashley | Renee | Pledger | | | AR | | 6/21/2024 | yes | yes |
| Aeja | Rae | LeMaster | | | AR | | 6/24/2024 | yes | yes |
| Benjamin | | Otto | | | AR | | 6/24/2024 | yes | yes |
| Soleia | Bernice | Meers | | | AR | | 6/24/2024 | yes | yes |
| Alyce | Loretta | Cummins | | | AR | | 6/24/2024 | yes | yes |
| Jacob | Flynn | Turmann | | | AR | | 6/24/2024 | yes | yes |
| Clayton | Kyle | Bowles | | | AR | | 6/24/2024 | yes | yes |
| Tyra | Ashley | James | | | AR | | 6/24/2024 | yes | yes |
| Grant | Zachary | Smith | | | AR | | 6/24/2024 | yes | yes |
| Destiny | Dakota | Mclaughlin | | | AR | | 6/24/2024 | yes | yes |
| Justin | Lance | Thomasson | | | AR | | 6/24/2024 | yes | yes |
| Elizabeth | Kate | McDole | | | AR | | 6/24/2024 | yes | yes |
| Brittini | Paige | Gunn | | | AR | | 6/24/2024 | yes | yes |
| Madison | Alexus | Fisher | | | AR | | 6/24/2024 | yes | yes |
| Alexander | Lomas | Huerta | | | AR | | 6/25/2024 | yes | yes |
| Amanda | Ann | Rowe | | | AR | | 6/25/2024 | yes | yes |
| Brandon | Stiven | Mayora | | | AR | | 6/25/2024 | yes | yes |
| Taylor | A | Jacobs | | | AR | | 6/25/2024 | yes | yes |
| Latisha | Nicole | Berry | | | AR | | 6/25/2024 | yes | yes |
| Ladarius | Tavon | Smith | | | AR | | 6/25/2024 | yes | yes |
| Jase | Michael | Woods | | | AR | | 6/25/2024 | yes | yes |
| Tarik | Jamal | Peoples | | | AR | | 6/25/2024 | yes | yes |
| Adam | Reese | Mannis | | | AR | | 6/27/2024 | yes | yes |
| Tyler | Austin | Draper | | | AR | | 6/27/2024 | yes | yes |
| Leana | Lynn | Adams | | | AR | | 6/29/2024 | yes | yes |
| Terri | | Lucy | | | AR | | 6/29/2024 | yes | yes |
| Arelli | Alexandria | Alvarado | | | AR | | 7/3/2024 | yes | yes |
| Joshua | | Barnes | | | AR | | 7/3/2024 | yes | yes |
| Emmaleigh | Summer | Bass | | | AR | | 7/3/2024 | yes | yes |
| Kametric | | Burley | | | AR | | 7/3/2024 | yes | yes |
| Shiquita | Antionette | Burley | | | AR | | 7/3/2024 | yes | yes |

EXHIBIT A

| | | | | | | | | |
|-------------|----------|------------|--|--|----|----------|-----|-----|
| Andrew | Scott | Chambers | | | AR | 7/3/2024 | yes | yes |
| Justin | Daune | Cole | | | AR | 7/3/2024 | yes | yes |
| Keaton | James | Collatt | | | AR | 7/3/2024 | yes | yes |
| Heavenly | Skyy | Dixon | | | AR | 7/3/2024 | yes | yes |
| Mahogany | | Finley | | | AR | 7/3/2024 | yes | yes |
| Cameron | Celeste | Fisher | | | AR | 7/3/2024 | yes | yes |
| Colin | | Foley | | | AR | 7/3/2024 | yes | yes |
| Solomon | Arnez | Glover | | | AR | 7/3/2024 | yes | yes |
| Temeka | Lashel | Guess | | | AR | 7/3/2024 | yes | yes |
| Daizure | | Hale | | | AR | 7/3/2024 | yes | yes |
| Oliver | Henry | Holt | | | AR | 7/3/2024 | yes | yes |
| Shalara | Elaine | Hopkins | | | AR | 7/3/2024 | yes | yes |
| Jenae | Nicole | Jackson | | | AR | 7/3/2024 | yes | yes |
| Desmon | Jeques | Johnson | | | AR | 7/3/2024 | yes | yes |
| Nicole | Meredith | Jovanovic | | | AR | 7/3/2024 | yes | yes |
| Deadrain | Michell | Lanos | | | AR | 7/3/2024 | yes | yes |
| Khristopher | Bradley | Latin | | | AR | 7/3/2024 | yes | yes |
| Tera | | Lewis | | | AR | 7/3/2024 | yes | yes |
| Mya | Marie | Little | | | AR | 7/3/2024 | yes | yes |
| Nicole | | McGuffy | | | AR | 7/3/2024 | yes | yes |
| Jacquiline | D | Moody | | | AR | 7/3/2024 | yes | yes |
| Iverson | Soloman | Moore | | | AR | 7/3/2024 | yes | yes |
| Dreama | | Parham | | | AR | 7/3/2024 | yes | yes |
| Andrea | | Phillips | | | AR | 7/3/2024 | yes | yes |
| Mikayla | Adrianna | Rankin | | | AR | 7/3/2024 | yes | yes |
| Nina | M | Richards | | | AR | 7/3/2024 | yes | yes |
| Jeremy | Wayne | Scercy | | | AR | 7/3/2024 | yes | yes |
| Jeremy | Wayne | Scercy | | | AR | 7/3/2024 | yes | yes |
| Dezmonia | Lashae | Scott | | | AR | 7/3/2024 | yes | yes |
| Jeremy | Wayne | Searcy | | | AR | 7/3/2024 | yes | yes |
| James | | Slack | | | AR | 7/3/2024 | yes | yes |
| Justin | | Stone | | | AR | 7/3/2024 | yes | yes |
| Kia | | Swinson | | | AR | 7/3/2024 | yes | yes |
| Adrianna | | Thompson | | | AR | 7/3/2024 | yes | yes |
| Kiera | Jasmine | Toles | | | AR | 7/3/2024 | yes | yes |
| Jaxon | Lamar | Vanwinkle | | | AR | 7/3/2024 | yes | yes |
| Iesha | | Washington | | | AR | 7/3/2024 | yes | yes |
| Charleseia | | Woods | | | AR | 7/3/2024 | yes | yes |
| Aladrea | Lynnette | Woods | | | AR | 7/3/2024 | yes | yes |
| Pamela | | Mitchell | | | AR | 7/4/2024 | yes | yes |
| Fareed | Salmar | AbuZayed | | | AR | 7/4/2024 | yes | yes |

EXHIBIT A

| | | | | | | | | |
|-----------|--------------|-------------|--|----|--|----------|-----|-----|
| Andrew | Scott | Chambers | | AR | | 7/4/2024 | yes | yes |
| Jordan | Camille | Bush | | AR | | 7/4/2024 | yes | yes |
| Nia | Nicole | Jones | | AR | | 7/4/2024 | yes | yes |
| Lanaysha | Lorrayne | Brown | | AR | | 7/4/2024 | yes | yes |
| Tera | Annette Jean | Lewis | | AR | | 7/4/2024 | yes | yes |
| Kanye | | Jordan | | AR | | 7/4/2024 | yes | yes |
| Kierra | D | Williams | | AR | | 7/4/2024 | yes | yes |
| Atache | Marie | Hill | | AR | | 7/4/2024 | yes | yes |
| Yakeem | O | Young | | AR | | 7/4/2024 | yes | yes |
| Kennedy | Victoria | Valley | | AR | | 7/4/2024 | yes | yes |
| Willie | Ann | Jones | | AR | | 7/4/2024 | yes | yes |
| Leslie | Deniece | Triggs | | AR | | 7/4/2024 | yes | yes |
| Marshae | Renae | Elliott | | AR | | 7/4/2024 | yes | yes |
| Deona | LaShawn | Elliott | | AR | | 7/4/2024 | yes | yes |
| Joni | Marie | Hollowel | | AR | | 7/4/2024 | yes | yes |
| Dalia | Muhamed | Daboul | | AR | | 7/4/2024 | yes | yes |
| Lisa | | Southerland | | AR | | 7/4/2024 | yes | yes |
| Eboni | | Heaggans | | AR | | 7/4/2024 | yes | yes |
| Camille | | Richardson | | AR | | 7/4/2024 | yes | yes |
| Barry | D | Jefferson | | AR | | 7/4/2024 | yes | yes |
| John | J | Goss | | AR | | 7/4/2024 | yes | yes |
| Tosha | Renee | Duer | | AR | | 7/4/2024 | yes | yes |
| Alexis | M | Duer | | AR | | 7/4/2024 | yes | yes |
| Tiffany | S | Hipps | | AR | | 7/4/2024 | yes | yes |
| Gwendolyn | Yvette | Staten | | AR | | 7/4/2024 | yes | yes |
| Gideon | Shawn | Derzon | | AR | | 7/4/2024 | yes | yes |
| Caleb | Robert | Austed | | AR | | 7/4/2024 | yes | yes |

EXHIBIT A

IN THE ARKANSAS SUPREME COURT

LAUREN COWLES, individually and on behalf
of ARKANSANS FOR LIMITED GOVERNMENT,
a ballot question committee

PETITIONERS

v.

No. CV-24-455

JOHN THURSTON, in his official capacity
as Secretary of State

RESPONDENT

AFFIDAVIT OF ALLISON CLARK

I, Allison Clark, declare as follows:

1. I am over the age of 18, competent to testify, and have personal knowledge of the facts and information set forth in this affidavit.

2. I am the Controller for Verified Arkansas LLC, a company hired by Arkansans for Limited Government (“AFLG”) to provide canvassing services. Verified Arkansas hired paid canvassers to collect signatures for the ballot initiative petition known as the Arkansas Abortion Amendment of 2024.

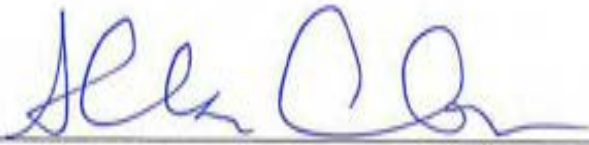
3. Before Verified Arkansas’s paid canvassers began canvassing for the Amendment, I compiled a list of paid canvassers in an excel spreadsheet and made a “Sponsor Affidavit” that provided information about legal compliance related to the paid canvassers. Each time Verified Arkansas brought on more paid canvassers to collect signatures for the Amendment, I updated the list of paid canvassers and made an accompanying Sponsor Affidavit. As each Sponsor Affidavit explains, I provided the Sponsor Affidavits on behalf of and at the direction of Arkansans for

Limited Government, a ballot question committee and sponsor of the Amendment.

4. The first couple of lists and accompanying Sponsor Affidavits were sent to the office of the Arkansas Secretary of State (“Secretary”) by Lauren Cowles, Executive Director of AFLG. After that, Lauren gave me, and I accepted, authority to send the updated lists and accompanying Sponsor Affidavits on behalf of AFLG. In total, I believe that AFLG sent 17 Sponsor Affidavits and 19 canvasser lists to the Secretary. I undertook this authority to submit updated lists and accompanying Sponsor Affidavits on behalf of AFLG subject to AFLG’s control.

5. On June 27, I sent a Sponsor Affidavit and accompanying list to the Secretary. The Sponsor Affidavit is attached as Exhibit A to this affidavit, and its accompanying list is attached as Exhibit B. The accompanying list I sent was in an excel spreadsheet, and that has been turned into PDF form for this filing.

6. I also sent a final updated paid canvasser list to the Secretary on July 4, 2024, which is attached as Exhibit C. This list was also sent in an excel spreadsheet and has been turned into PDF form for this filing. I did not send an accompanying Sponsor Affidavit because I was specifically told by the Secretary’s office that such an affidavit was not required. I was told this in a phone call with Josh Bridges, the Secretary’s Assistant Director of Elections, on or around July 1, 2024.


Allison Clark

STATE OF ARKANSAS)
)
COUNTY OF PULASKI)

ACKNOWLEDGMENT

Subscribed and sworn to before me, a notary public, on July 16, 2024.

My commission expires:


Notary Public

10/5/2026



EXHIBIT A

Affidavit of Sponsor Regarding Additional Paid Canvassers

STATE OF ARKANSAS

COUNTY OF PULASKI

Having been duly sworn, the undersigned hereby states and affirms under oath as follows:

I, Allison Clark, state under oath the following:

1. I make the following statements based upon my own personal knowledge.
2. I am over the age of 18, of sound mind, and otherwise qualified to make this affidavit.
3. I am providing this affidavit on behalf of and at the direction of Arkansans For A Limited Government a Ballot Question Committee and Sponsor of an initiative petition popularly known as THE ARKANSAS ABORTION AMENDMENT 2024
4. I am the Controller of Verified Arkansas LLC ("VA"), a company hired by Arkansans For Limited Government to provide canvassing services. As part of its responsibilities, VA hires, trains and manages paid canvassers who are employees of VA.
5. The Sponsor has provided each Paid Canvasser listed on the attached Exhibit A a copy of the most recent edition of the Secretary of State's Initiatives and Referenda Handbook.

6. The Sponsor has explained to each Paid Canvasser listed on Exhibit A the Arkansas law applicable to obtaining signatures on an initiative or referendum petition.

7. The Sponsor is submitting herewith as Exhibit A a list of additional Paid Canvassers' names and current residential addresses to the Arkansas Secretary of State.

8. The Sponsor has instructed each Paid Canvasser listed on Exhibit A to provide sufficient information of the Paid Canvasser's identity to allow the Sponsor to obtain the criminal history and criminal record of the Paid Canvasser within thirty (30) days before the date that the Paid Canvasser will begin to collect signatures.

9. The Sponsor has obtained the criminal history and criminal record of each Paid Canvasser listed on Exhibit A.

10. Where indicated by such criminal history or criminal record, the Sponsor has contacted the appropriate authority in the state or jurisdiction if a criminal history or criminal record indicates an open or pending matter if that open matter would be a disqualifying offense.

11. The Sponsor has obtained at Sponsor's cost, from the Division of Arkansas State Police a current criminal history and criminal record search on each Paid Canvasser being registered with the Arkansas Secretary of State.

12. The criminal history and criminal record search for each Paid Canvasser was obtained from the Division of Arkansas State Police within 30 days before the date the Paid Canvasser will begin collecting signatures.

13. The Sponsor agrees that it will not pay or offer to pay a Paid Canvasser on a basis related to the number of signatures obtained on a statewide initiative petition or statewide referendum petition.

14. The Sponsor certifies that each Paid Canvasser in the Sponsor's employ has no disqualifying offenses.

15. The Sponsor is herewith submitting as Exhibit B to the Secretary of State each additional Paid Canvasser's signed statement that they have not pleaded guilty or nolo contendere to or been found guilty of any of the following offenses in any state of the United States, the District of Columbia, Puerto Rico, Guam, or any other United State protectorate:

- i. A felony;
- ii. Violation of election laws;
- iii. Fraud;
- iv. Forgery;
- v. Counterfeiting;
- vi. Identity Theft;
- vii. A crime of violence, including assault, battery or intimidation;
- viii. Harassment;
- ix. Terroristic threatening;
- x. A sex offense, including sexual harassment;
- xi. A violation of the drug and narcotics laws;
- xii. Breaking and entering;
- xiii. Trespass;
- xiv. Destruction or damage of property;
- xv. Vandalism;
- xvi. Arson; or
- xvii. A crime of theft, including robbery, burglary, and simple theft or larceny.

Dated this 27 day of June, 2024.

Arkansans For Limited Government



Allison Clark

ACKNOWLEDGMENT

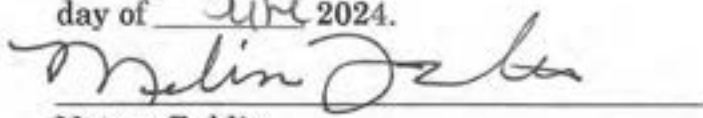
STATE OF ARKANSAS

COUNTY OF Pulaski

On this the 27 day of June, 2024, before me, a Notary Public, duly commissioned, qualified and acting within the aforesaid State and County, appeared in person the within named Allison Clark to me personally well known, who stated and acknowledged that he had so signed, executed and delivered the foregoing instrument for the consideration, uses, and purposes therein mentioned and set forth.

IN WITNESS WHEREOF, I hereunto set my hand and official seal this 27

day of June 2024.


Notary Public

My Commission Expires:
4/16/34

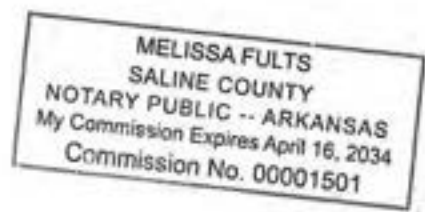


EXHIBIT B

Arkansans For Limited Government
 Verified Arkansas Paid Canvasser Information
 The list of Paid Canvassers may be sent by email to electionsemail@sos.arkansas.gov.

| First Name | Middle Name | Last Name | Address (No PO Boxes/Business Addresses) | Phone Number | City | State | Zip Code | Date of Submission to SOS | Certified that a criminal history and criminal record search was timely completed for each Paid Canvasser | Paid Canvasser Affidavit signed |
|-------------|---------------|----------------|--|--------------|------|-------|----------|---------------------------|---|---------------------------------|
| Latwan | Gabriel | Crutch | | | | AR | | 5/7/2024 | yes | yes |
| Khalid | Jamill | Jones | | | | AR | | 5/7/2024 | yes | yes |
| Carla | Lavette | Williams | | | | AR | | 5/7/2024 | yes | yes |
| Brenda | Hamm | Woodard | | | | AR | | 5/7/2024 | yes | yes |
| Karen | Lynn | Hitt | | | | AR | | 5/7/2024 | yes | yes |
| Ella | Mola | Rucker | | | | AR | | 5/10/2024 | yes | yes |
| Nevaeh | L | Holman | | | | AR | | 5/10/2024 | yes | yes |
| Evelyn | Kay | Akins | | | | AR | | 5/10/2024 | yes | yes |
| Khyra | Yolanda | Garrett | | | | AR | | 5/10/2024 | yes | yes |
| Contonnia | | Brown | | | | AR | | 5/10/2024 | yes | yes |
| Rayana | Dametria | Jordon | | | | AR | | 5/10/2024 | yes | yes |
| Nikyra | Inesha | Phillips | | | | AR | | 5/10/2024 | yes | yes |
| Jamyia | | Bonner | | | | AR | | 5/14/2024 | yes | yes |
| Lavonna | Nesha | Eichelberger | | | | AR | | 5/14/2024 | yes | yes |
| James | Donald | Roberts | | | | AR | | 5/14/2024 | yes | yes |
| Kristina | Nicole | Townsend | | | | AR | | 5/17/2024 | yes | yes |
| Samantha | Marie | Lawrence | | | | AR | | 5/17/2024 | yes | yes |
| Sara | | Stumpfenhaus | | | | AR | | 5/17/2024 | yes | yes |
| Kenton | David | Byrd | | | | AR | | 5/17/2024 | yes | yes |
| Meagan | Irene | Garrett | | | | AR | | 5/17/2024 | yes | yes |
| Winona | clystine | Ahart | | | | AR | | 5/17/2024 | yes | yes |
| Dustin | Cale | Sebala | | | | AR | | 5/17/2024 | yes | yes |
| Ashley | Marie | Ewald | | | | AR | | 5/17/2024 | yes | yes |
| Amanda | Lynn | Bradley | | | | AR | | 5/17/2024 | yes | yes |
| Paula | Jo | White | | | | AR | | 5/17/2024 | yes | yes |
| Chad | Everett | Grayham | | | | AR | | 5/17/2024 | yes | yes |
| Beverly | Gail | Rasberry | | | | AR | | 5/17/2024 | yes | yes |
| Rebecca | Lynnette | Millen | | | | AR | | 5/17/2024 | yes | yes |
| Teisha | Renee | Caldwell | | | | AR | | 5/17/2024 | yes | yes |
| Phyllis | | Thompson | | | | AR | | 5/17/2024 | yes | yes |
| James | Dallas | Dorcy | | | | AR | | 5/17/2024 | yes | yes |
| Kahley | Brianna | McBride | | | | AR | | 5/21/2024 | yes | yes |
| Leona | R | Allison | | | | AR | | 5/21/2024 | yes | yes |
| Falana | L | Moore | | | | AR | | 5/21/2024 | yes | yes |
| Jo | Marie | Cunning | | | | AR | | 5/21/2024 | yes | yes |
| Daphne | Lynn | McCoy | | | | AR | | 5/21/2024 | yes | yes |
| Rebecca | Ann | Roberts | | | | AR | | 5/21/2024 | yes | yes |
| Kaylee | Nicole | Payne | | | | AR | | 5/21/2024 | yes | yes |
| Elijah | | Farah | | | | AR | | 5/21/2024 | yes | yes |
| Fatimah | Adnan Ali | Alrubaye | | | | AR | | 5/21/2024 | yes | yes |
| Kirsty | Nicole | Bartalone | | | | AR | | 5/21/2024 | yes | yes |
| Destiny | Noelle | Sinclair | | | | AR | | 5/21/2024 | yes | yes |
| Charles | A | Beasley | | | | AR | | 5/21/2024 | yes | yes |
| Alison | Victoria | Guthrie | | | | AR | | 5/21/2024 | yes | yes |
| Tracy | | Jackson | | | | AR | | 5/21/2024 | yes | yes |
| Leroy | | Hood | | | | AR | | 5/21/2024 | yes | yes |
| Dustin | Allan | Goss | | | | AR | | 5/23/2024 | yes | yes |
| Shannon | Danielle | Hays | | | | AR | | 5/23/2024 | yes | yes |
| Adrianna | Michelle | Saldana Avalos | | | | AR | | 5/23/2024 | yes | yes |
| Carla | Louise | Hill | | | | AR | | 5/23/2024 | yes | yes |
| Richard | Jamie | Olszewski | | | | AR | | 5/24/2024 | yes | yes |
| Stone | James | Law | | | | AR | | 5/24/2024 | yes | yes |
| Oriann | | Elleisar | | | | AR | | 5/24/2024 | yes | yes |
| Mary | A | Logan | | | | AR | | 5/24/2024 | yes | yes |
| Tamara | R | Heard | | | | AR | | 5/24/2024 | yes | yes |
| La'Zaria | A'breanna | Johnson | | | | AR | | 5/24/2024 | yes | yes |
| Aidan | Loch | Douglas | | | | AR | | 5/24/2024 | yes | yes |
| Destiny | Alexis | Mays | | | | AR | | 5/24/2024 | yes | yes |
| Jason | Marc | Parnell | | | | AR | | 5/24/2024 | yes | yes |
| Kyler | Gavin | Amann | | | | AR | | 5/24/2024 | yes | yes |
| Melissa | Carrina | Villalobos | | | | AR | | 5/24/2024 | yes | yes |
| Wanda | Kay | Evans | | | | AR | | 5/30/2024 | yes | yes |
| Alisia | Ellen Ivy | Fawcett | | | | AR | | 5/30/2024 | yes | yes |
| Brandi | Leigh | DePriest | | | | AR | | 5/30/2024 | yes | yes |
| Katlyn | Dalilah | Lindsey | | | | AR | | 5/30/2024 | yes | yes |
| Jace | Jeffery | Potts | | | | AR | | 5/30/2024 | yes | yes |
| Ozzy | Chloe | Watts | | | | AR | | 5/30/2024 | yes | yes |
| Gary | Hilton | Sisco | | | | AR | | 5/30/2024 | yes | yes |
| Clara | Caitlyn Wells | Bartel | | | | AR | | 5/30/2024 | yes | yes |
| Tina | Louise | Crossland | | | | AR | | 5/30/2024 | yes | yes |
| Thomas | Darnell | Hill | | | | AR | | 5/30/2024 | yes | yes |
| Jacob | Matthew | Scott | | | | AR | | 5/30/2024 | yes | yes |
| James | Edward | Briggs | | | | AR | | 5/30/2024 | yes | yes |
| Christopher | Allen Michael | Costes | | | | AR | | 5/30/2024 | yes | yes |
| Zayda | Raelyn | Kingfisher | | | | AR | | 5/30/2024 | yes | yes |
| David | Joel | Bateman | | | | AR | | 5/30/2024 | yes | yes |
| Phillip | Syn'Quen | Hollis | | | | AR | | 5/30/2024 | yes | yes |
| Marcos | Dean | Martinez | | | | AR | | 5/30/2024 | yes | yes |
| Aston | Dezjuan | Cooper | | | | AR | | 5/30/2024 | yes | yes |

| | | | | | | | | |
|-------------|--------------|---------------|--|--|----|-----------|-----|-----|
| Me'kayle | Shancheland | Taylor | | | AR | 5/31/2024 | yes | yes |
| Andrez | Fidensio | Gutierrez | | | AR | 5/31/2024 | yes | yes |
| Dustin | Lee | Goff | | | AR | 5/31/2024 | yes | yes |
| Samantha | Blaine | Kee | | | AR | 5/31/2024 | yes | yes |
| Kara | Lynn | Wilhite | | | AR | 5/31/2024 | yes | yes |
| Laney | McKay | Wagner | | | AR | 5/31/2024 | yes | yes |
| Jerralynn | Marie | Wilmoth | | | AR | 5/31/2024 | yes | yes |
| Hunter | Sterling | Hight | | | AR | 5/31/2024 | yes | yes |
| Cyrene | Robin | Carter | | | AR | 5/31/2024 | yes | yes |
| Sarah | Louise | Yerxa | | | AR | 5/31/2024 | yes | yes |
| MaryJo | | Moore | | | AR | 5/31/2024 | yes | yes |
| George | Alton | Roberts | | | AR | 5/31/2024 | yes | yes |
| Lydia | Claire | Alpert | | | AR | 5/31/2024 | yes | yes |
| Elisabeth | Anne | O'Connell | | | AR | 5/31/2024 | yes | yes |
| Johnathan | Lamar | Holley | | | AR | 5/31/2024 | yes | yes |
| India | Donald | Ford | | | AR | 5/31/2024 | yes | yes |
| Krista Ann | Lee | Hooper | | | AR | 5/31/2024 | yes | yes |
| Steven | Ray | Turner | | | AR | 5/31/2024 | yes | yes |
| Karen | | Taylor | | | AR | 5/31/2024 | yes | yes |
| Danny | R | Yerxa | | | AR | 5/31/2024 | yes | yes |
| Emma | Olivia | Hidy | | | AR | 5/31/2024 | yes | yes |
| Felice | Angelique | Lamoreux | | | AR | 6/6/2024 | yes | yes |
| Ashley | Elizabeth | Leach | | | AR | 6/6/2024 | yes | yes |
| Jaylei | Lacole | Massey | | | AR | 6/6/2024 | yes | yes |
| Rachel | Abigail | Brashear | | | AR | 6/6/2024 | yes | yes |
| Cassandra | Lynn | Blakney | | | AR | 6/6/2024 | yes | yes |
| Florence | May | Russell | | | AR | 6/6/2024 | yes | yes |
| Diamonah | L | Cook | | | AR | 6/6/2024 | yes | yes |
| Daniel | Scott | Anderson | | | AR | 6/6/2024 | yes | yes |
| Chelsea | Layne | Burbank | | | AR | 6/6/2024 | yes | yes |
| Charity | Faith | Moore | | | AR | 6/6/2024 | yes | yes |
| Lindsay | Ross | Chambers | | | AR | 6/6/2024 | yes | yes |
| Briana | T | Diaz | | | AR | 6/6/2024 | yes | yes |
| Alexis | Simone | Lyons | | | AR | 6/6/2024 | yes | yes |
| Corbin | | Keeler | | | AR | 6/6/2024 | yes | yes |
| Shemonia | D | Peair | | | AR | 6/6/2024 | yes | yes |
| Georgia | Mae | Harrell | | | AR | 6/6/2024 | yes | yes |
| Mildred | Mae | Holiman | | | AR | 6/6/2024 | yes | yes |
| Patty | J | Findlay | | | AR | 6/6/2024 | yes | yes |
| Zacary | Elijah | Darrah | | | AR | 6/6/2024 | yes | yes |
| William | G | Partain | | | AR | 6/7/2024 | yes | yes |
| Thomas | A | Jones | | | AR | 6/7/2024 | yes | yes |
| Samantha | Rose | Baker | | | AR | 6/7/2024 | yes | yes |
| Christina | Momoko | Smith | | | AR | 6/7/2024 | yes | yes |
| Whitney | Lea | Neighbors | | | AR | 6/7/2024 | yes | yes |
| Abigail | Payne | Moussa | | | AR | 6/7/2024 | yes | yes |
| Ted | A | Brannon | | | AR | 6/7/2024 | yes | yes |
| Rowan | Alexandra | Fox | | | AR | 6/7/2024 | yes | yes |
| Landon | Cody | Montgomery | | | AR | 6/7/2024 | yes | yes |
| Asia | Ariana Ayana | Wilson | | | AR | 6/7/2024 | yes | yes |
| Destiny | Marie | Maine | | | AR | 6/7/2024 | yes | yes |
| Bethany | Erin | Manning | | | AR | 6/14/2024 | yes | yes |
| Antonia | Desiree | Jones | | | AR | 6/14/2024 | yes | yes |
| Elisabeth | Meilin | Larsen | | | AR | 6/14/2024 | yes | yes |
| James | Coleman | McLarty | | | AR | 6/14/2024 | yes | yes |
| Natalie | Ray | Casteel | | | AR | 6/14/2024 | yes | yes |
| Lucas | Joseph | Dumaine | | | AR | 6/14/2024 | yes | yes |
| Dani | Jean | Taylor | | | AR | 6/14/2024 | yes | yes |
| Samuel | Christopher | Giltehaus | | | AR | 6/14/2024 | yes | yes |
| Amber | Corrin | Antinora | | | AR | 6/14/2024 | yes | yes |
| Journey | Sky | Graham | | | AR | 6/14/2024 | yes | yes |
| Tatiauna | | Inman-Quijada | | | AR | 6/14/2024 | yes | yes |
| Makayla | Neshae | Harris | | | AR | 6/14/2024 | yes | yes |
| Grayson | D | Cogswell | | | AR | 6/14/2024 | yes | yes |
| Wykeve | T | Freeman | | | AR | 6/14/2024 | yes | yes |
| Brandon | | Gibbins | | | AR | 6/14/2024 | yes | yes |
| Tony | W | Davis | | | AR | 6/14/2024 | yes | yes |
| Riley | Attikus | Casher | | | AR | 6/17/2024 | yes | yes |
| Christopher | Aydin | Mills | | | AR | 6/17/2024 | yes | yes |
| Justin | Clay | Burkhart | | | AR | 6/17/2024 | yes | yes |
| Kennedy | A | Norwood | | | AR | 6/17/2024 | yes | yes |
| Keith | | Rivera-Rivera | | | AR | 6/17/2024 | yes | yes |
| Trance | Andrew | Rogers | | | AR | 6/17/2024 | yes | yes |
| Saniya | Creggett | Makayla | | | AR | 6/21/2024 | yes | yes |
| Rhone | Jaedon | Kuta | | | AR | 6/21/2024 | yes | yes |
| Reginald | | Liner | | | AR | 6/21/2024 | yes | yes |
| Shannon | Gail | Bass | | | AR | 6/21/2024 | yes | yes |
| Jessica | Anne | Roberson | | | AR | 6/21/2024 | yes | yes |
| Ashley | Brooke | Nellis | | | AR | 6/21/2024 | yes | yes |
| Wendy | Jo | Peer | | | AR | 6/21/2024 | yes | yes |
| Kayla | Marie | Ikeler | | | AR | 6/21/2024 | yes | yes |
| Vincenzo | Albera | Redditt | | | AR | 6/21/2024 | yes | yes |
| Robert | Norris | Burns | | | AR | 6/21/2024 | yes | yes |
| Allison | Bracy | Clark | | | AR | 6/21/2024 | yes | yes |
| John | Alonzo | Flowers | | | AR | 6/21/2024 | yes | yes |
| Jackie | Dawn | Yarbrough | | | AR | 6/21/2024 | yes | yes |
| Kimberly | Wynne | SantaCruz | | | AR | 6/21/2024 | yes | yes |

| | | | | | | | | |
|-----------|---------|------------|--|----|--|-----------|-----|-----|
| Aleatha | Miranda | Cummings | | AR | | 6/21/2024 | yes | yes |
| Ashley | Renee | Pledger | | AR | | 6/21/2024 | yes | yes |
| Aeja | Rae | LeMaster | | AR | | 6/24/2024 | yes | yes |
| Benjamin | | Otto | | AR | | 6/24/2024 | yes | yes |
| Soleia | Bernice | Meers | | AR | | 6/24/2024 | yes | yes |
| Alyce | Loretta | Cummins | | AR | | 6/24/2024 | yes | yes |
| Jacob | Flynn | Turmann | | AR | | 6/24/2024 | yes | yes |
| Clayton | Kyle | Bowles | | AR | | 6/24/2024 | yes | yes |
| Tyra | Ashley | James | | AR | | 6/24/2024 | yes | yes |
| Grant | Zachary | Smith | | AR | | 6/24/2024 | yes | yes |
| Destiny | Dakota | Mclaughlin | | AR | | 6/24/2024 | yes | yes |
| Justin | Lance | Thomasson | | AR | | 6/24/2024 | yes | yes |
| Elizabeth | Kate | McDole | | AR | | 6/24/2024 | yes | yes |
| Brittni | Paige | Gunn | | AR | | 6/24/2024 | yes | yes |
| Madison | Alexus | Fisher | | AR | | 6/24/2024 | yes | yes |
| Alexander | Lomas | Huerta | | AR | | 6/25/2024 | yes | yes |
| Amanda | Ann | Rowe | | AR | | 6/25/2024 | yes | yes |
| Brandon | Stiven | Mayora | | AR | | 6/25/2024 | yes | yes |
| Taylor | A | Jacobs | | AR | | 6/25/2024 | yes | yes |
| Latisha | Nicole | Berry | | AR | | 6/25/2024 | yes | yes |
| Ladarius | Tavon | Smith | | AR | | 6/25/2024 | yes | yes |
| Jase | Michael | Woods | | AR | | 6/25/2024 | yes | yes |
| Tarik | Jamal | Peoples | | AR | | 6/25/2024 | yes | yes |
| Adam | Reese | Mannis | | AR | | 6/27/2024 | yes | yes |
| Tyler | Austin | Draper | | AR | | 6/27/2024 | yes | yes |

EXHIBIT C

Arkansans For Limited Government
 Verified Arkansas Paid Canvasser Information
 The list of Paid Canvassers may be sent by email to electionsemail@sos.arkansas.gov.

| First Name | Middle Name | Last Name | Address (No PO Boxes/Business Addresses) | Phone Number | City | State | Zip Code | Date of Submission to SOS | Certified that a criminal history and criminal record search was timely completed and passed for each Paid Canvasser | Paid Canvasser Affidavit signed |
|-------------|---------------|----------------|--|--------------|------|-------|----------|---------------------------|--|---------------------------------|
| Latwan | Gabriel | Crutch | | | | AR | | 5/7/2024 | yes | yes |
| Khalid | Jamill | Jones | | | | AR | | 5/7/2024 | yes | yes |
| Carla | Lavette | Williams | | | | AR | | 5/7/2024 | yes | yes |
| Brenda | Hamm | Woodard | | | | AR | | 5/7/2024 | yes | yes |
| Karen | Lynn | Hitt | | | | AR | | 5/7/2024 | yes | yes |
| Ella | Mola | Rucker | | | | AR | | 5/10/2024 | yes | yes |
| Nevaeh | L | Holman | | | | AR | | 5/10/2024 | yes | yes |
| Evelyn | Kay | Akins | | | | AR | | 5/10/2024 | yes | yes |
| Khyra | Yolanda | Garrett | | | | AR | | 5/10/2024 | yes | yes |
| Contonnia | | Brown | | | | AR | | 5/10/2024 | yes | yes |
| Rayana | Dametria | Jordon | | | | AR | | 5/10/2024 | yes | yes |
| Nikyra | Inesha | Phillips | | | | AR | | 5/10/2024 | yes | yes |
| Jamyia | | Bonner | | | | AR | | 5/14/2024 | yes | yes |
| Lavonna | Nesha | Eichelberger | | | | AR | | 5/14/2024 | yes | yes |
| James | Donald | Roberts | | | | AR | | 5/14/2024 | yes | yes |
| Kristina | Nicole | Townsend | | | | AR | | 5/17/2024 | yes | yes |
| Samantha | Marie | Lawrence | | | | AR | | 5/17/2024 | yes | yes |
| Sara | | Stumpenhous | | | | AR | | 5/17/2024 | yes | yes |
| Kenton | David | Byrd | | | | AR | | 5/17/2024 | yes | yes |
| Meagan | Irene | Garrett | | | | AR | | 5/17/2024 | yes | yes |
| Winona | clystine | Ahart | | | | AR | | 5/17/2024 | yes | yes |
| Dustin | Cale | Sebala | | | | AR | | 5/17/2024 | yes | yes |
| Ashley | Marie | Ewald | | | | AR | | 5/17/2024 | yes | yes |
| Amanda | Lynn | Bradley | | | | AR | | 5/17/2024 | yes | yes |
| Paula | Jo | White | | | | AR | | 5/17/2024 | yes | yes |
| Chad | Everett | Grayham | | | | AR | | 5/17/2024 | yes | yes |
| Beverly | Gail | Rasberry | | | | AR | | 5/17/2024 | yes | yes |
| Rebecca | Lynnette | Millen | | | | AR | | 5/17/2024 | yes | yes |
| Teisha | Renee | Caldwell | | | | AR | | 5/17/2024 | yes | yes |
| Phyllis | | Thompson | | | | AR | | 5/17/2024 | yes | yes |
| James | Dallas | Dorcy | | | | AR | | 5/17/2024 | yes | yes |
| Kahley | Brianna | McBride | | | | AR | | 5/21/2024 | yes | yes |
| Leona | R | Allison | | | | AR | | 5/21/2024 | yes | yes |
| Falana | L | Moore | | | | AR | | 5/21/2024 | yes | yes |
| Jo | Marie | Cunning | | | | AR | | 5/21/2024 | yes | yes |
| Daphne | Lynn | McCoy | | | | AR | | 5/21/2024 | yes | yes |
| Rebecca | Ann | Roberts | | | | AR | | 5/21/2024 | yes | yes |
| Kaylee | Nicole | Payne | | | | AR | | 5/21/2024 | yes | yes |
| Elijah | | Farah | | | | AR | | 5/21/2024 | yes | yes |
| Fatimah | Adnan Ali | Alrubaye | | | | AR | | 5/21/2024 | yes | yes |
| Kirsty | Nicole | Bartalone | | | | AR | | 5/21/2024 | yes | yes |
| Destiny | Noelle | Sinclair | | | | AR | | 5/21/2024 | yes | yes |
| Charles | A | Beasley | | | | AR | | 5/21/2024 | yes | yes |
| Alison | Victoria | Guthrie | | | | AR | | 5/21/2024 | yes | yes |
| Tracy | | Jackson | | | | AR | | 5/21/2024 | yes | yes |
| Leroy | | Hood | | | | AR | | 5/21/2024 | yes | yes |
| Dustin | Allan | Goss | | | | AR | | 5/23/2024 | yes | yes |
| Shannon | Danielle | Hays | | | | AR | | 5/23/2024 | yes | yes |
| Adrianna | Michelle | Saldana Avalos | | | | AR | | 5/23/2024 | yes | yes |
| Carla | Louise | Hill | | | | AR | | 5/23/2024 | yes | yes |
| Richard | Jamie | Olszewski | | | | AR | | 5/24/2024 | yes | yes |
| Stone | James | Law | | | | AR | | 5/24/2024 | yes | yes |
| Oriann | | Elieisar | | | | AR | | 5/24/2024 | yes | yes |
| Mary | A | Logan | | | | AR | | 5/24/2024 | yes | yes |
| Tamara | R | Heard | | | | AR | | 5/24/2024 | yes | yes |
| La'Zaria | A'breanna | Johnson | | | | AR | | 5/24/2024 | yes | yes |
| Aidan | Loch | Douglas | | | | AR | | 5/24/2024 | yes | yes |
| Destiny | Alexis | Mays | | | | AR | | 5/24/2024 | yes | yes |
| Jason | Marc | Parnell | | | | AR | | 5/24/2024 | yes | yes |
| Kyler | Gavin | Amann | | | | AR | | 5/24/2024 | yes | yes |
| Melissa | Carrina | Villalobos | | | | AR | | 5/24/2024 | yes | yes |
| Wanda | Kay | Evans | | | | AR | | 5/30/2024 | yes | yes |
| Alisia | Ellen Ivy | Fawcett | | | | AR | | 5/30/2024 | yes | yes |
| Brandi | Leigh | DePriest | | | | AR | | 5/30/2024 | yes | yes |
| Katlyn | Dalliah | Lindsey | | | | AR | | 5/30/2024 | yes | yes |
| Jace | Jeffery | Potts | | | | AR | | 5/30/2024 | yes | yes |
| Ozzy | Chloe | Watts | | | | AR | | 5/30/2024 | yes | yes |
| Gary | Hilton | Sisco | | | | AR | | 5/30/2024 | yes | yes |
| Clara | Caitlyn Wells | Bartel | | | | AR | | 5/30/2024 | yes | yes |
| Tina | Louise | Crossland | | | | AR | | 5/30/2024 | yes | yes |
| Thomas | Darnell | Hill | | | | AR | | 5/30/2024 | yes | yes |
| Jacob | Matthew | Scott | | | | AR | | 5/30/2024 | yes | yes |
| James | Edward | Briggs | | | | AR | | 5/30/2024 | yes | yes |
| Christopher | Allen Michael | Costes | | | | AR | | 5/30/2024 | yes | yes |
| Zayda | Raelyn | Kingfisher | | | | AR | | 5/30/2024 | yes | yes |
| David | Joel | Bateman | | | | AR | | 5/30/2024 | yes | yes |
| Phillip | Syn'Quen | Hollis | | | | AR | | 5/30/2024 | yes | yes |
| Marcos | Dean | Martinez | | | | AR | | 5/30/2024 | yes | yes |
| Aston | Dezjuan | Cooper | | | | AR | | 5/30/2024 | yes | yes |
| Me'kayle | Shancheland | Taylor | | | | AR | | 5/31/2024 | yes | yes |
| Andrez | Fidensio | Gutierrez | | | | AR | | 5/31/2024 | yes | yes |
| Dustin | Lee | Goff | | | | AR | | 5/31/2024 | yes | yes |
| Samantha | Blaine | Kee | | | | AR | | 5/31/2024 | yes | yes |
| Kara | Lynn | Wilhite | | | | AR | | 5/31/2024 | yes | yes |
| Laney | McKay | Wagner | | | | AR | | 5/31/2024 | yes | yes |
| Jerralynn | Marie | Wilmoth | | | | AR | | 5/31/2024 | yes | yes |
| Hunter | Sterling | Hight | | | | AR | | 5/31/2024 | yes | yes |
| Cyrene | Robin | Carter | | | | AR | | 5/31/2024 | yes | yes |

| | | | | | | |
|-------------|--------------|---------------|----|-----------|-----|-----|
| Sarah | Louise | Yerxa | AR | 5/31/2024 | yes | yes |
| MaryJo | | Moore | AR | 5/31/2024 | yes | yes |
| George | Alton | Roberts | AR | 5/31/2024 | yes | yes |
| Lydia | Claire | Alpert | AR | 5/31/2024 | yes | yes |
| Elisabeth | Anne | O'Connell | AR | 5/31/2024 | yes | yes |
| Johnathan | Lamar | Holley | AR | 5/31/2024 | yes | yes |
| India | Donald | Ford | AR | 5/31/2024 | yes | yes |
| Krista Ann | Lee | Hooper | AR | 5/31/2024 | yes | yes |
| Steven | Ray | Turner | AR | 5/31/2024 | yes | yes |
| Karen | | Taylor | AR | 5/31/2024 | yes | yes |
| Danny | R | Yerxa | AR | 5/31/2024 | yes | yes |
| Emma | Olivia | Hidy | AR | 5/31/2024 | yes | yes |
| Felice | Angelique | Lamoreux | AR | 6/6/2024 | yes | yes |
| Ashley | Elizabeth | Leach | AR | 6/6/2024 | yes | yes |
| Jaylei | Lacole | Massey | AR | 6/6/2024 | yes | yes |
| Rachel | Abigail | Brashear | AR | 6/6/2024 | yes | yes |
| Cassandra | Lynn | Blakney | AR | 6/6/2024 | yes | yes |
| Florence | May | Russell | AR | 6/6/2024 | yes | yes |
| Diamonah | L | Cook | AR | 6/6/2024 | yes | yes |
| Daniel | Scott | Anderson | AR | 6/6/2024 | yes | yes |
| Chelsea | Layne | Burbank | AR | 6/6/2024 | yes | yes |
| Charity | Faith | Moore | AR | 6/6/2024 | yes | yes |
| Lindsay | Ross | Chambers | AR | 6/6/2024 | yes | yes |
| Briana | T | Diaz | AR | 6/6/2024 | yes | yes |
| Alexis | Simone | Lyons | AR | 6/6/2024 | yes | yes |
| Corbin | | Keeler | AR | 6/6/2024 | yes | yes |
| Shemonia | D | Peair | AR | 6/6/2024 | yes | yes |
| Georgia | Mae | Harrell | AR | 6/6/2024 | yes | yes |
| Mildred | Mae | Holiman | AR | 6/6/2024 | yes | yes |
| Patty | J | Findlay | AR | 6/6/2024 | yes | yes |
| Zacary | Elijah | Darrah | AR | 6/6/2024 | yes | yes |
| William | G | Partain | AR | 6/7/2024 | yes | yes |
| Thomas | A | Jones | AR | 6/7/2024 | yes | yes |
| Samantha | Rose | Baker | AR | 6/7/2024 | yes | yes |
| Christina | Momoko | Smith | AR | 6/7/2024 | yes | yes |
| Whitney | Lea | Neighbors | AR | 6/7/2024 | yes | yes |
| Abigail | Payne | Moussa | AR | 6/7/2024 | yes | yes |
| Ted | A | Brannon | AR | 6/7/2024 | yes | yes |
| Rowan | Alexandra | Fox | AR | 6/7/2024 | yes | yes |
| Landon | Cody | Montgomery | AR | 6/7/2024 | yes | yes |
| Asia | Ariana Ayana | Wilson | AR | 6/7/2024 | yes | yes |
| Destiny | Marie | Maine | AR | 6/7/2024 | yes | yes |
| Bethany | Erin | Manning | AR | 6/14/2024 | yes | yes |
| Antonia | Desiree | Jones | AR | 6/14/2024 | yes | yes |
| Elisabeth | Meilin | Larsen | AR | 6/14/2024 | yes | yes |
| James | Coleman | McLarty | AR | 6/14/2024 | yes | yes |
| Natalie | Ray | Casteel | AR | 6/14/2024 | yes | yes |
| Lucas | Joseph | Dumaine | AR | 6/14/2024 | yes | yes |
| Dani | Jean | Taylor | AR | 6/14/2024 | yes | yes |
| Samuel | Christopher | Giltehaus | AR | 6/14/2024 | yes | yes |
| Amber | Corrin | Antinora | AR | 6/14/2024 | yes | yes |
| Journey | Sky | Graham | AR | 6/14/2024 | yes | yes |
| Tatiauna | | Inman-Quijada | AR | 6/14/2024 | yes | yes |
| Makayla | Neshae | Harris | AR | 6/14/2024 | yes | yes |
| Grayson | D | Cogswell | AR | 6/14/2024 | yes | yes |
| Wykeve | T | Freeman | AR | 6/14/2024 | yes | yes |
| Brandon | | Gibbins | AR | 6/14/2024 | yes | yes |
| Tony | W | Davis | AR | 6/14/2024 | yes | yes |
| Riley | Attikus | Casher | AR | 6/17/2024 | yes | yes |
| Christopher | Aydin | Mills | AR | 6/17/2024 | yes | yes |
| Justin | Clay | Burkhart | AR | 6/17/2024 | yes | yes |
| Kennedy | A | Norwood | AR | 6/17/2024 | yes | yes |
| Keith | | Rivera-Rivera | AR | 6/17/2024 | yes | yes |
| Trance | Andrew | Rogers | AR | 6/17/2024 | yes | yes |
| Saniya | Creggett | Makayla | AR | 6/21/2024 | yes | yes |
| Rhone | Jaedon | Kuta | AR | 6/21/2024 | yes | yes |
| Reginald | | Liner | AR | 6/21/2024 | yes | yes |
| Shannon | Gail | Bass | AR | 6/21/2024 | yes | yes |
| Jessica | Anne | Roberson | AR | 6/21/2024 | yes | yes |
| Ashley | Brooke | Nellis | AR | 6/21/2024 | yes | yes |
| Wendy | Jo | Peer | AR | 6/21/2024 | yes | yes |
| Kayla | Marie | Ikeler | AR | 6/21/2024 | yes | yes |
| Vincenzo | Albera | Redditt | AR | 6/21/2024 | yes | yes |
| Robert | Norris | Burns | AR | 6/21/2024 | yes | yes |
| Allison | Bracy | Clark | AR | 6/21/2024 | yes | yes |
| John | Alonzo | Flowers | AR | 6/21/2024 | yes | yes |
| Jackie | Dawn | Yarbrough | AR | 6/21/2024 | yes | yes |
| Kimberly | Wynne | SantaCruz | AR | 6/21/2024 | yes | yes |
| Aleatha | Miranda | Cummings | AR | 6/21/2024 | yes | yes |
| Ashley | Renee | Pledger | AR | 6/21/2024 | yes | yes |
| Aeja | Rae | LeMaster | AR | 6/24/2024 | yes | yes |
| Benjamin | | Otto | AR | 6/24/2024 | yes | yes |
| Soleia | Bernice | Meers | AR | 6/24/2024 | yes | yes |
| Alyce | Loretta | Cummins | AR | 6/24/2024 | yes | yes |
| Jacob | Flynn | Turmann | AR | 6/24/2024 | yes | yes |
| Clayton | Kyle | Bowles | AR | 6/24/2024 | yes | yes |
| Tyra | Ashley | James | AR | 6/24/2024 | yes | yes |
| Grant | Zachary | Smith | AR | 6/24/2024 | yes | yes |
| Destiny | Dakota | Mclaughlin | AR | 6/24/2024 | yes | yes |
| Justin | Lance | Thomasson | AR | 6/24/2024 | yes | yes |
| Elizabeth | Kate | McDole | AR | 6/24/2024 | yes | yes |
| Brittni | Paige | Gunn | AR | 6/24/2024 | yes | yes |
| Madison | Alexus | Fisher | AR | 6/24/2024 | yes | yes |
| Alexander | Lomas | Huerta | AR | 6/25/2024 | yes | yes |
| Amanda | Ann | Rowe | AR | 6/25/2024 | yes | yes |
| Brandon | Stiven | Mayora | AR | 6/25/2024 | yes | yes |

| | | | | | | |
|-------------|--------------|-------------|----|-----------|-----|-----|
| Taylor | A | Jacobs | AR | 6/25/2024 | yes | yes |
| Latisha | Nicole | Berry | AR | 6/25/2024 | yes | yes |
| Ladarius | Tavon | Smith | AR | 6/25/2024 | yes | yes |
| Jase | Michael | Woods | AR | 6/25/2024 | yes | yes |
| Tarik | Jamal | Peoples | AR | 6/25/2024 | yes | yes |
| Adam | Reese | Mannis | AR | 6/27/2024 | yes | yes |
| Tyler | Austin | Draper | AR | 6/27/2024 | yes | yes |
| Leana | Lynn | Adams | AR | 6/29/2024 | yes | yes |
| Terri | | Lucy | AR | 6/29/2024 | yes | yes |
| Arelli | Alexandria | Alvarado | AR | 7/3/2024 | yes | yes |
| Joshua | | Barnes | AR | 7/3/2024 | yes | yes |
| Emmaleigh | Summer | Bass | AR | 7/3/2024 | yes | yes |
| Kametric | | Burley | AR | 7/3/2024 | yes | yes |
| Shiquita | Antionette | Burley | AR | 7/3/2024 | yes | yes |
| Andrew | Scott | Chambers | AR | 7/3/2024 | yes | yes |
| Justin | Daune | Cole | AR | 7/3/2024 | yes | yes |
| Keaton | James | Collatt | AR | 7/3/2024 | yes | yes |
| Heavenly | Skyy | Dixon | AR | 7/3/2024 | yes | yes |
| Mahogany | | Finley | AR | 7/3/2024 | yes | yes |
| Cameron | Celeste | Fisher | AR | 7/3/2024 | yes | yes |
| Colin | | Foley | AR | 7/3/2024 | yes | yes |
| Solomon | Arnez | Glover | AR | 7/3/2024 | yes | yes |
| Temeka | Lashel | Guess | AR | 7/3/2024 | yes | yes |
| Daizure | | Hale | AR | 7/3/2024 | yes | yes |
| Oliver | Henry | Holt | AR | 7/3/2024 | yes | yes |
| Shalara | Elaine | Hopkins | AR | 7/3/2024 | yes | yes |
| Jenae | Nicole | Jackson | AR | 7/3/2024 | yes | yes |
| Desmon | Jeques | Johnson | AR | 7/3/2024 | yes | yes |
| Nicole | Meredith | Jovanovic | AR | 7/3/2024 | yes | yes |
| Deadrain | Michell | Lanos | AR | 7/3/2024 | yes | yes |
| Khristopher | Bradley | Latin | AR | 7/3/2024 | yes | yes |
| Tera | | Lewis | AR | 7/3/2024 | yes | yes |
| Mya | Marie | Little | AR | 7/3/2024 | yes | yes |
| Nicole | | McGuffy | AR | 7/3/2024 | yes | yes |
| Jacquiline | D | Moody | AR | 7/3/2024 | yes | yes |
| Iverson | Soloman | Moore | AR | 7/3/2024 | yes | yes |
| Dreama | | Parham | AR | 7/3/2024 | yes | yes |
| Andrea | | Phillips | AR | 7/3/2024 | yes | yes |
| Mikayla | Adrianna | Rankin | AR | 7/3/2024 | yes | yes |
| Nina | M | Richards | AR | 7/3/2024 | yes | yes |
| Jeremy | Wayne | Scercy | AR | 7/3/2024 | yes | yes |
| Jeremy | Wayne | Scercy | AR | 7/3/2024 | yes | yes |
| Dezmonia | Lashae | Scott | AR | 7/3/2024 | yes | yes |
| Jeremy | Wayne | Searcy | AR | 7/3/2024 | yes | yes |
| James | | Slack | AR | 7/3/2024 | yes | yes |
| Justin | | Stone | AR | 7/3/2024 | yes | yes |
| Kia | | Swinson | AR | 7/3/2024 | yes | yes |
| Adrianna | | Thompson | AR | 7/3/2024 | yes | yes |
| Kiera | Jasmine | Toles | AR | 7/3/2024 | yes | yes |
| Jaxon | Lamar | Vanwinkle | AR | 7/3/2024 | yes | yes |
| Iesha | | Washington | AR | 7/3/2024 | yes | yes |
| Charleseia | | Woods | AR | 7/3/2024 | yes | yes |
| Aladrea | Lynnette | Woods | AR | 7/3/2024 | yes | yes |
| Pamela | | Mitchell | AR | 7/4/2024 | yes | yes |
| Fareed | Salmar | AbuZayed | AR | 7/4/2024 | yes | yes |
| Andrew | Scott | Chambers | AR | 7/4/2024 | yes | yes |
| Jordan | Camille | Bush | AR | 7/4/2024 | yes | yes |
| Nia | Nicole | Jones | AR | 7/4/2024 | yes | yes |
| Lanaysha | Lorrayne | Brown | AR | 7/4/2024 | yes | yes |
| Tera | Annette Jean | Lewis | AR | 7/4/2024 | yes | yes |
| Kanye | | Jordan | AR | 7/4/2024 | yes | yes |
| Kierra | D | Williams | AR | 7/4/2024 | yes | yes |
| Atache | Marie | Hill | AR | 7/4/2024 | yes | yes |
| Yakeem | O | Young | AR | 7/4/2024 | yes | yes |
| Kennedy | Victoria | Valley | AR | 7/4/2024 | yes | yes |
| Willie | Ann | Jones | AR | 7/4/2024 | yes | yes |
| Leslie | Deniece | Triggs | AR | 7/4/2024 | yes | yes |
| Marshae | Renae | Elliott | AR | 7/4/2024 | yes | yes |
| Deona | LaShawn | Elliott | AR | 7/4/2024 | yes | yes |
| Joni | Marie | Hollowel | AR | 7/4/2024 | yes | yes |
| Dalia | Muhamed | Daboul | AR | 7/4/2024 | yes | yes |
| Lisa | | Southerland | AR | 7/4/2024 | yes | yes |
| Eboni | | Heaggans | AR | 7/4/2024 | yes | yes |
| Camille | | Richardson | AR | 7/4/2024 | yes | yes |
| Barry | D | Jefferson | AR | 7/4/2024 | yes | yes |
| John | J | Goss | AR | 7/4/2024 | yes | yes |
| Tosha | Renee | Duer | AR | 7/4/2024 | yes | yes |
| Alexis | M | Duer | AR | 7/4/2024 | yes | yes |
| Tiffany | S | Hipps | AR | 7/4/2024 | yes | yes |
| Gwendolyn | Yevette | Staten | AR | 7/4/2024 | yes | yes |
| Gideon | Shawn | Derzon | AR | 7/4/2024 | yes | yes |
| Caleb | Robert | Austed | AR | 7/4/2024 | yes | yes |



JOHN THURSTON
ARKANSAS SECRETARY OF STATE

July 15, 2024

Sent via email & regular mail

Lauren Cowles
P.O. Box 7866
Little Rock, AR 72217

RE: Response to Your Letter of July 11, 2024

Dear Ms. Cowles:

I have received your letter delivered to my office on July 11, 2024. My position remains unchanged.

The law requires "the person filing the petitions" to "also submit" a statement "signed by the sponsor." Ark. Code Ann. § 7-9-III(f)(2). You claim that an affidavit submitted on June 27, 2024, fulfills these requirements. It does not. First, the June 27 affidavit is not "signed by the sponsor."

Second, the affidavit was not submitted with the petition, as the statute requires. The text of Ark. Code Ann. § 7-9-III(f) ties the filing of the signed statement to the date of filing petitions: "If signatures *were obtained* by paid canvassers, the person *filing* the petitions...*shall also submit*...[a] statement signed by the sponsor," covering "each paid canvasser..." (Emphases added.) The use of the past tense "were obtained" and the reference to "each paid canvasser" only make sense if the statements required by 7-9-III(f) are filed with a complete petition.

Each of these defects independently required me to reject your petition.

Sincerely,

John Thurston
Arkansas Secretary of State

CAMPAIGN CONTRIBUTION AND EXPENDITURE REPORT

State and District Candidates Only

To be filed with:
John Thurston, Secretary of State
 State Capitol, Room 026
 Little Rock, AR 72201-1094
 Phone (501) 682-5070
 Fax (501) 682-3408

Check if this report is an amendment

For assistance in completing this form contact:
Arkansas Ethics Commission
 Post Office Box 1917
 Little Rock, AR 72203
 Phone (501) 324-9600
 Toll Free (800) 422-7773

**THIS FORM CANNOT BE USED FOR THE FINAL REPORT- ALL INFORMATION IN THIS REPORT MUST BE COMPLETE
 THIS REPORT MUST BE FILED WITH THE SECRETARY OF STATE**

1. Name of Candidate:

John Thurston

Address

21914 Jonita Road

City, State and Zip

Little Rock, AR 72206

Phone Number

(501) 882-2221

Office Sought

State Treasurer

District

Does the candidate have a campaign committee? Yes No
 If yes, complete the following:

Name of Chairperson/Treasurer:

Mailing Address:

Phone Number

2. Type of Election: Primary

Year of Election: 2024

(Secretary of State File Stamp)

02/19/2024 12:54:17 PM

3. Type of Report: **2024 January Monthly Report - Primary** covering 01/01/2024 through 01/31/2024. Due on 02/20/2024

| SUMMARY | FOR REPORTING PERIOD | CUMULATIVE TOTAL |
|---|----------------------|------------------|
| 4. Balance of campaign funds at beginning of reporting period | \$7,363.75 | |
| 5. Interest (if any) earned on campaign account | \$0.00 | \$0.00 |
| 6. Total Loans (enter total from line 12) | \$0.00 | \$0.00 |
| 7. Total Monetary Contributions (enter total from line 18) | \$3,300.00 | \$4,400.00 |
| 8. Total Expenditures (enter total from line 27) | \$591.75 | \$11,853.04 |
| 9. Balance of campaign funds at close of reporting period | \$10,072.00 | |

10. () **NO ACTIVITY** (check if you have not received contributions, loans, or made expenditures during this reporting period)

I certify to the best of my knowledge and belief that the information disclosed in this report is a complete, true, and accurate financial statement of my (the candidate's) campaign contributions and expenditures.

John Thurston

Signature of Candidate or Candidate's Representative

Sworn to and subscribed before me, a Notary Public, in and for _____ County, Arkansas, on this _____ day of _____

(Legible Notary seal)

Notary Signature _____

My Commission Expires _____

Note: If faxed, notary seal must be legible (i.e., either stamped or raised and inked) and the original must follow within ten (10) days.

*Balance of Campaign Funds at the beginning of reporting period = Balance of Campaign Funds at close of reporting period as of 01/31/2024 + any funds previously collected for the general election.

Ark. Code Ann. § 7-6-202 provides that a person who knowingly fails to comply with the provisions of subchapter 2 of chapter 6, Title 7 of the Arkansas Code shall upon conviction be guilty of a Class A misdemeanor.

Addendum 55

11. LOAN INFORMATION

Do not list loans previously reported.

| DATE | NAME AND ADDRESS OF LENDING INSTITUTION | GUARANTOR(S) IF ANY | AMOUNT |
|--|---|---------------------|--------|
| NO DATA ENTERED | | | |
| 12. TOTAL LOANS DURING REPORTING PERIOD | | | \$0.00 |

IMPORTANT

The limits on campaign contributions do not apply to loans or contributions made by a candidate from his or her own personal funds to the campaign, or to personal loans made by financial institutions to the candidate and applied to his or her campaign. Any loans made by a candidate to his or her campaign and any loans made by a financial institution to a candidate and applied to his or her campaign shall be reported in Section 11.

If a candidate desires to use or raise campaign funds to repay himself or herself for personal funds that he or she contributed to the campaign, then he or she would need to report those personal funds as a loan in Section 11.

If a candidate does not desire to use or raise campaign funds to repay himself or herself for personal funds that he or she contributed to the campaign, then those personal funds would not be reported in Section 11. Instead, they would be reported as a campaign contribution either in Section 15 or on line 17, depending upon the amount.

If a candidate has unpaid loans at the time of the primary, runoff or general election, the source, description and amount of each such loan should be itemized in Section 28. A candidate ending his or her campaign in debt is permitted to raise funds to retire the debt subject to the restrictions contained in Ark. Code Ann. § 7-6-219.

13. NONMONEY CONTRIBUTIONS (Does not include volunteer services by individuals)

| Date of Receipt | Full Name and Address of Contributor | Description of Nonmoney Item | Election | Value of Nonmoney Item | Cumulative Total from this Contributor |
|----------------------------------|--------------------------------------|------------------------------|----------|------------------------|--|
| NO DATA ENTERED | | | | | |
| 14. TOTAL NONMONEY CONTRIBUTIONS | | | | \$0.00 | |

IMPORTANT

In addition to monetary contributions, candidates are required to report the receipt of any nonmonetary (“in-kind”) contributions. A candidate receives an in-kind contribution whenever a contributor provides him with an item or service without charge or for a charge which is less than the fair market value of the item or service in question.

The value of an in-kind contribution is the difference between the fair market value and the amount charged. In-kind contributions are addressed in greater detail in Sections 205 and 206 of the Commission’s Rules on Campaign Finance & Disclosure.

15. ITEMIZED MONETARY CONTRIBUTIONS OVER \$200

| Date of Receipt | Full Name and Address of Contributor | Place Of Business/ Employer/Occupation | Election | Amount of Contribution | Cumulative Total from this Contributor |
|---|---|---|----------|------------------------|--|
| 01/04/2024 | Huck PAC PO Box 242267, Little Rock, AR 72223 | | Primary | \$3,300.00 | \$3,300.00 |
| 16. TOTAL ITEMIZED MONETARY CONTRIBUTIONS OVER \$200 | | | | \$3,300.00 | |
| 17. TOTAL NONITEMIZED MONETARY CONTRIBUTIONS | | | | \$0.00 | |
| 18. TOTAL MONETARY CONTRIBUTIONS THIS REPORT (includes totals from lines 16 and 17) | | | | \$3,300.00 | |

19. CAMPAIGN EXPENDITURES BY CATEGORY

| CATEGORY | TOTAL AMOUNT |
|--|-----------------|
| Filing Fee | \$0.00 |
| Television Advertising | \$0.00 |
| Radio Advertising | \$0.00 |
| Newspaper Advertising | \$0.00 |
| Other Advertising | \$0.00 |
| Office Supplies | \$0.00 |
| Rent | \$176.00 |
| Utilities | \$0.00 |
| Telephone | \$0.00 |
| Postage | \$0.00 |
| Direct Mail | \$0.00 |
| Travel Expenses | \$0.00 |
| Entertainment | \$0.00 |
| Fundraising | \$0.00 |
| Repayment of Loans | \$0.00 |
| Returned Contributions | \$0.00 |
| Repayment of Debts | \$0.00 |
| Consultant Fees | \$0.00 |
| Polls | \$0.00 |
| Paid Campaign Workers | \$0.00 |
| Other (Donation) | \$315.75 |
| Other (Dinner Ticket) | \$100.00 |
| 20. TOTAL CAMPAIGN EXPENDITURES | \$591.75 |

21. PAID CAMPAIGN WORKERS

(Include any person you paid to work on your campaign, does not have to be full-time worker)

| NAME OF WORKER | AMOUNT PAID |
|---|---------------|
| NO DATA ENTERED | |
| 22. TOTAL AMOUNT PAID CAMPAIGN WORKERS | \$0.00 |

23. ITEMIZED CAMPAIGN EXPENDITURES OVER \$100

| Name and Address of Supplier/Payee | Description of Expenditure | Date of Expenditure | Amount of Expenditure |
|---|----------------------------|---------------------|-----------------------|
| Arkansas Right to Life PO Box 1697, Little Rock, AR 72203 | Donation | 01/04/2024 | \$315.75 |
| United States Postal Service 600 E Capitol Ave, Little Rock, AR 72202 | PO Box Rental | 01/16/2024 | \$176.00 |
| Arkansas State University Foundation 2626 Alumni BLVD, Jonesboro, AR 72401 | Dinner Tickets | 01/19/2024 | \$100.00 |
| 24. TOTAL ITEMIZED EXPENDITURES THIS REPORT | | | \$591.75 |
| 25. TOTAL NONITEMIZED EXPENDITURES THIS REPORT | | | \$0.00 |
| 26. TOTAL PAID CAMPAIGN WORKERS THIS REPORT (enter total from line 22) | | | \$0.00 |
| 27. TOTAL EXPENDITURES THIS REPORT (includes lines 24, 25 and 26) | | | \$591.75 |

NOTE : All Expenditures Reflected on Lines 24,25 and 26 should Be Totalled by Category In Section 19

28. OUTSTANDING CAMPAIGN DEBTS
(INCLUDING UNPAID LOANS)

| Name and Address of Creditor | Description of Debts | Current Balance |
|------------------------------|----------------------|-----------------|
| NO DATA ENTERED | | |
| 29. TOTAL DEBTS | | \$0.00 |



Arkansas Right to Life · Follow

January 22 · 🌐



Ken Yang

January 21 · 🌐

The [Arkansas Right to Life's](#) March for Life is always a reminder we can never stop standing and being a voice for the unborn. I've had the privilege of fighting at the Capitol and helping pass many [#ProLife](#) laws over the past decade. Thank you to all those that continue making Arkansas the most pro-life state in the nation.

👍❤️ 6

👍 Like

💬 Comment

🔗 Share





ADVERTISEMENT

Participants brave freezing cold in Little Rock for 46th annual March for Life

January 22, 2024 at 6:58 a.m.

by [Daniel McFadin](#)





Canaa Lee, lower center, attends the March for Life on the steps of the Arkansas state Capitol on Sunday, Jan. 21, 2024. (Arkansas Democrat-Gazette/Colin Murphey)

A few hundred people braved sub-freezing temperatures Sunday afternoon to walk almost a mile to the state Capitol in Little Rock as part of this year's 46th annual March for Life.

The march, which began at the corner of South State Street and Capitol Avenue, was put on by Arkansas Right to Life, the state's affiliate of the National Right to Life Committee.

During the event, many in the crowd held red signs, shaped like stop signs, that read "Stop abortion now."

Some of those signs were being handed out by Dale Flamand, 69, a member of the Knights of Columbus. The Knights are a Catholic men's charitable and

fraternal organization with about 7,000 members in Arkansas.

"This is probably my 12th year [to attend the March for Life] ... pretty much 12 straight," Flamand said.

"We still have the need to protect the unborn children out there," Flamand added. "That's what's going on. We know that our lives are important. And all lives are important, especially the ones that have no voice. A child in the womb doesn't have a voice. I know that there's a lot of controversy about the rape and incest part of it, which is a sad, sad situation. But there's still an innocent involved. And that's the child in the womb."

Mike Seals of Eureka Springs also participated in the event.

Seals held a large red flag that said "Jesus is King," which he said he flew in downtown Eureka Springs for six years.

Seals was attending the march "because I believe that every life is a unique recipe that the world needs."

"I've always had a real heart for the unborn," Seals continued. "My third child, Jonathan ... We couldn't have any more children. My wife had had five miscarriages. And so we went to look to adopt, and we found a couple that was considering abortion. And we said, 'We're interested in having your child,' and so they decided to keep the child. We picked him up at the hospital the day that he was born. And he works at the Stephens building in security in downtown Little Rock here. So that was an example of why I like women with unplanned pregnancies to have options, because there are people like me out there that can't have another child."

Rose Mimms, the Arkansas Right to Life's executive director, was one of several who spoke once the march reached the Capitol steps.

During her speech, Mimms decried efforts by the abortion-rights community to enshrine abortion protections in the state's constitution.

Twice in the last three months, Attorney General Tim Griffin has rejected the Arkansans for Limited Government committee's proposed ballot language for a constitutional amendment that would overhaul the state's restrictive abortion law.

Arkansas' current law bans abortions except to save the mother's life and in medical emergencies, and has no exceptions for rape or incest.

Mimms said Arkansas Right to Life was "currently engaged in the toughest battle yet for the lives of our unborn children in Arkansas," and that it "isn't waiting for the approval of the ballot title" to announce its own "Decline to Sign" campaign.

The campaign's goal is "to ask all Arkansans unwilling to sign a death warrant on innocent unborn children to politely decline to sign when approached" by what Mimms described would be "paid canvassers," before asking everyone present to "make a generous donation or monthly pledge to Arkansas Right to Life to help us."

The event ended with remarks by Gov. Sarah Huckabee Sanders.

Earlier Sunday, Sanders had spoken about Arkansas' abortion restrictions in an appearance on CBS' "Face the Nation."

"Instead of giving a long speech, I'm going to issue a call to action," Sanders said at a podium on the Capitol steps. "I can't tell you how proud I am to be the governor of the most pro-life state in the country.

"But we shouldn't be satisfied with that. We shouldn't be satisfied with being the most pro-life community, the most pro-life state, until we see the United States of America is the most pro-life country the world has ever known. It's the reason we fight and help a child that is sick and dying with cancer.

"It's the reason our military leaves no man on the battlefield. Because we understand what separates us, we understand that a value and a fight for life is what separates good from evil. And we can never sit back and we can never be

satisfied until good wins out. And that doesn't happen by just being the most pro-life state."

Sanders said the pro-life marchers' fight "has only just begun.

"There are a lot more lives that we need to save. There are a lot more stories we need to help tell. And we need to make sure that we take the mission that we have here in Arkansas, the most pro-life state, to the very top and solidify our country as the most pro-life country that the world has ever seen."

Attempts to get a comment on Sunday's march from Planned Parenthood Great Plains, which covers Arkansas, were unsuccessful.

ADVERTISEMENT



John Thurston for Arkansas · Follow

April 11, 2022 · 🌐

...

I'm proud to have received an endorsement from [Arkansas Right to Life](#) for my record, leadership, and unwavering support of the pro-life movement. As Secretary of State, I will continue protecting our Arkansas values.



**PROTECTING
CONSERVATIVE VALUES**



**SECRETARY OF STATE
JOHN THURSTON**

RE-ELECT JOHN

ELECTION DAY: MAY 24 ⓘ

VOTEJOHNTHURSTON.COM

John Thurston for Secretary of State – Vote for John Thurston, "Solid, Proven Leadership"

[Learn more](#)

👍👎❤️ 1K

597 comments 192 shares

👍 Like

💬 Comment

➦ Share

ABOUT ▾

OUR ISSUES ▾

NEWS & EVENTS ▾

POLITICAL ACTION ▾

OUTREACH ▾

GET INVOLVED ▾

SHOP

RESOURCES

ARTL CHAPTER RESOURCES

SANCTITY OF LIFE SUNDAY

DECLINE TO SIGN CAMPAIGN

LIVING WALL: A MONUMENT TO THE UNBORN

Living Wall: A Monument to the Unborn

On March 16, 2023, Republican Governor Sarah Huckabee Sanders officially enacted **SB307** (Act 310) from the Regular Session of 2023 authorizing the establishment of a sacred “monument to the unborn” within the esteemed grounds of the Arkansas State Capitol. Senate Bill 307 was introduced by Senators Kim Hammer, Tyler Dees, and John Payton, along with Representative Mary Bentley, to create a monument to the unborn and amend the law concerning the duties of the Secretary of State.

Senate Bill 307 establishes a trust fund called the “Monument to Unborn Children Display Fund” to receive gifts, grants, and donations. This fund is designated to erect and maintain a monument on the

Addendum 70

State Capitol grounds commemorating unborn children aborted during the era of *Roe v. Wade* (1973).

Timeline of Events

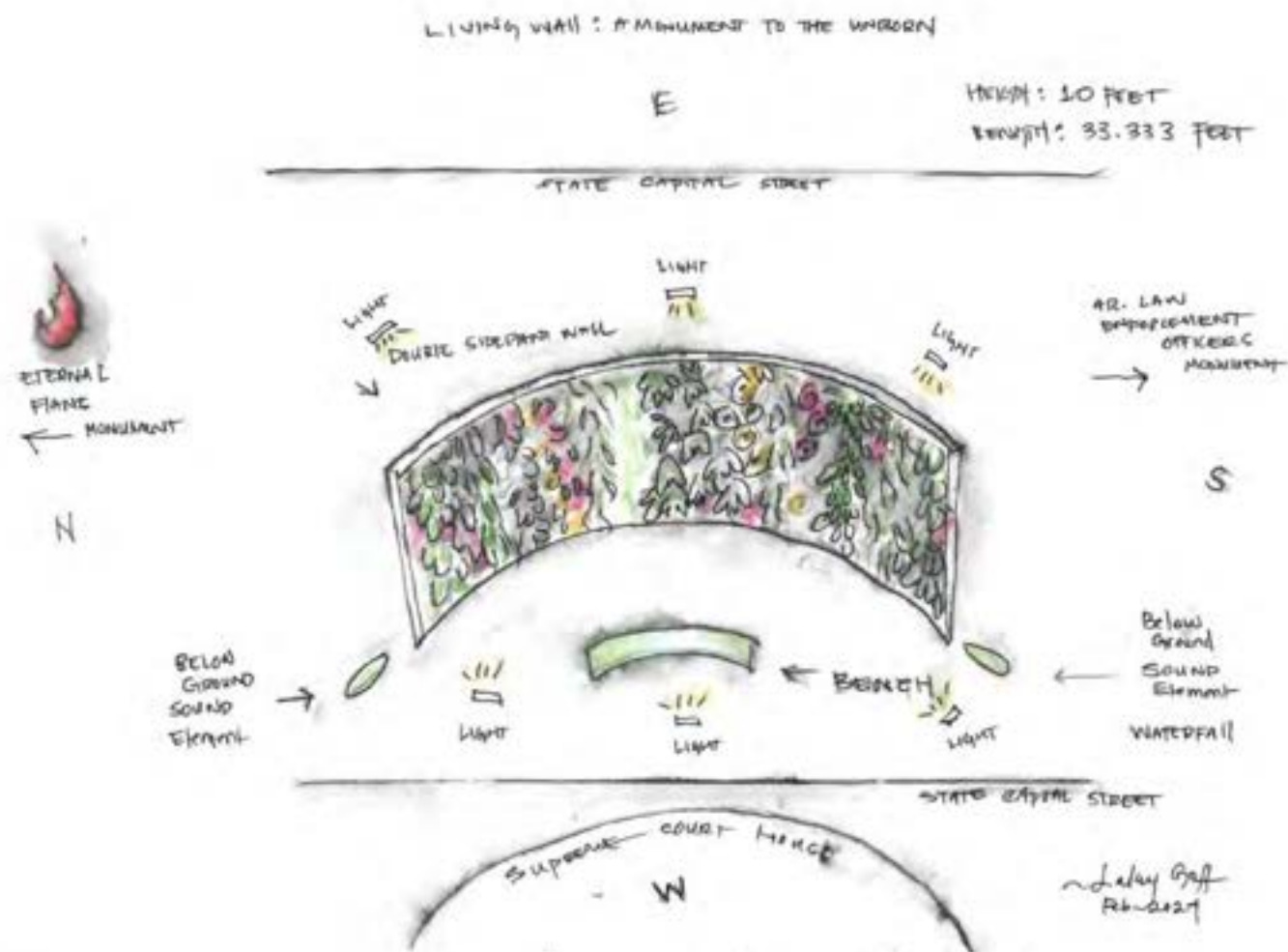
January 22, 1973: *Roe v. Wade* Established: *Roe v. Wade*, decided by the U.S. Supreme Court on January 22, 1973, legalized abortion nationwide by ruling that state laws restricting it were unconstitutional.

June 22, 2023: Supreme Court Overturns *Roe v. Wade*: After 50 years, in a decision to overturn *Roe v. Wade*, the U.S. Supreme Court has ended constitutional protections for abortion, consequently safeguarding the lives of unborn babies in nearly half of the United States, including Arkansas.

March 16, 2023: Governor Sarah Huckabee Sanders Signs Senate Bill 307: Republican Governor Sarah Huckabee Sanders officially enacts SB307 (Act 310), authorizing the establishment of a sacred “monument to the unborn” within the esteemed grounds of the Arkansas State Capitol.

September 1, 2023: Secretary of State Opens Submissions for Monument Designs: Act 310 granted Secretary of State John Thurston the authority to facilitate and oversee the placement of a “monument to the unborn” on the grounds of the Capitol. The Capitol Arts and Grounds Commission will decide where the monument will be placed (yet to be determined).

December 13, 2023: Capitol Grounds Commission Selects Artist Lakey Goff: The Capitol Arts and Grounds Commission selects Artist Lakey Goff’s idea and design for the proposed Living Wall Monument of the Unborn (below).



Living Wall Advisory Board: Bill Smith, pastor; James Worrell, advisor; Emily Knox, horticulturist and musician; Karin Rogers, lead intercessor.

Arkansas State Legislature: Governor Sarah Huckabee Sanders, Secretary of State John Thurston, Senator Kim Hammer, Senator John Payton, Representative Mary Bentley.

Other Contributors: Rose Mimms, Arkansas Right to Life; Adam Fretz, web designer; Peter Goff, artist; Stephen, sound professional; Logan Crow, first donation seed; Frank and Patricia Goff, prayer warriors.

Artist: Lakey Goff

DONATE

LIVING WALL MONUMENT TO THE UNBORN

STATE CAPITOL | LITTLE ROCK | ARKANSAS

" For you created my inmost being;
you knit me together in my mother's womb.
I praise you because I am fearfully and wonderfully made;
your works are wonderful,
I know that full well.
My frame was not hidden from you
when I was made in the secret place,
when I was woven together in the depths of the earth.
Your eyes saw my unformed body;
all the days ordained for me were written in your book
before one of them came to be. "

Psalm 139:13-16

▶ Sound of Many Waters



CLICK TO HEAR WATERFALL

[ABOUT](#) [DONATE](#)
[CONTACT](#)

LIVING WALL
ARKANSAS

[Login](#)

Addendum 74

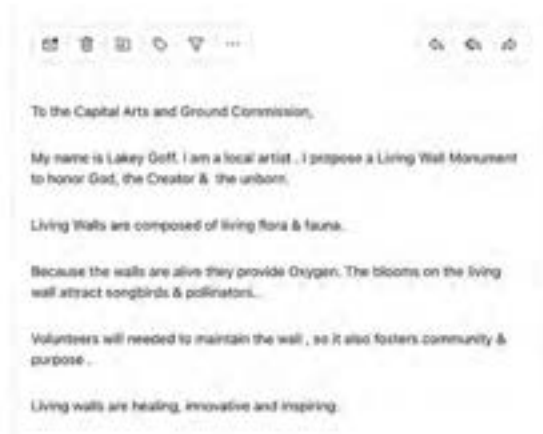


WHAT IS A LIVING WALL

A living wall is composed of living flora and fauna like Baltic Ivy, Common Periwinkle, Coral Bells, Golden Star, Japanese Spurge and Wintercreeper. Living walls are healing, innovative and inspiring. These were used at the World Trade Center Living Wall. Because the walls are "alive" they will provide oxygen. The blooms on the living wall also attract songbirds and pollinators. There will also be recordings of various waterfalls from Arkansas playing at the monument. Volunteers will maintain the living wall, as to foster community and purpose.

LIVING WALL MONUMENT PROPOSAL

September 2023, the Arkansas Secretary of State requested design submissions for a Monument to Honor the Unborn. Below is the original proposal of the artist selected, Lakey Goff.



[ABOUT](#) [DONATE](#)
[CONTACT](#)

LIVING WALL
ARKANSAS

[Login](#)

Addendum 75

LIVING WALL ARKANSAS MONUMENT FOR THE UNBORN

66 types of plants: 3,848 Batts Ivy, 3,657 Common Periwinkle, 3,490 Coral Bells, 5,782 Golden Star, 3,734 Japanese Spurge and 1,844 vines of Wintercreeper.

LIVWALL.COM is a company that we could partner with to install & maintain the monument

Psalm 139: 13-15 is the Living word of God describing we are created & will be displayed on the wall.

There will also be recordings of the sound of various waterfalls in Arkansas, playing at the monument.

Revelation 19:6

6 "And I heard as it were the voice of a great multitude, and as the voice of many waters, and as the voice of mighty thunderings, saying, Alleluia: for the Lord God omnipotent reigneth."

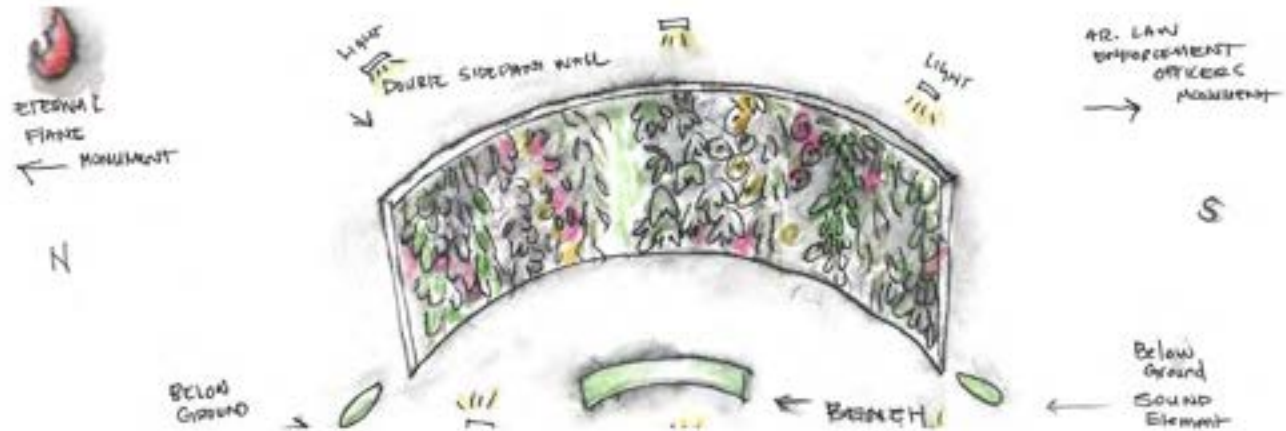
Thank you for your consideration.

Grace & Peace multiplied to you.

Lakey Doff

LIVING WALL MONUMENT DESIGN

The original proposed art is seen below.



ABOUT DONATE CONTACT

LIVING WALL ARKANSAS

Login

Addendum 76



The Vertical Garden, Mexico City

FAQS OF THE LIVING WALL PROJECT

WHAT IS THE LIVING WALL TO THE UNBORN?

The Living Wall to the Unborn monument being constructed on the Arkansas State Capitol grounds in Little Rock is a profound expression of faith and respect for the lives entrusted to us by the Creator.

Embracing the symbolism of a living "green" wall, this monument intertwines living plants in a vertical structure, echoing the interconnectedness of all life .

Much like the green wall enriches the environment and brings forth beauty, the Living Wall to the Unborn stands as a living testament, a sanctuary of prayer and reflection, symbolizing the sanctity of every soul created by the Creator of all, Jesus.

Colossians 1:16

[ABOUT](#) [DONATE](#)
[CONTACT](#)

LIVING WALL
ARKANSAS

[Login](#)

Addendum 77

The monument, dedicated to celebrating the overturning of Roe v. Wade and honoring God's gift of life, relies on the generosity of individuals like YOU.

Your private donations fuel our mission to commemorate and cherish the precious lives of unborn children, ensuring their memory endures for generations to come.

There are two different ways to GIVE to this project. Online through the Arkansas Right to Life website or via Mail with a written check to the Secretary of State Trust Fund for the Unborn Children Display Fund.

HOW DO MY DONATIONS HELP WITH THE PROJECT?

The Monument to Unborn Children Display Act, as detailed in Senate Bill 307, (ACT), establishes the Monument to Unborn Children Display Fund.

This fund, managed by the Treasurer of State, the Auditor of State, and the Chief Fiscal Officer of the State, is designated to receive gifts, grants, and donations for the purpose of erecting and maintaining a monument on the State Capitol grounds in Arkansas.

The monument commemorates unborn children aborted during the era of Roe v. Wade.

The selection of the artist, design of the monument with input from pro-life groups in Arkansas will be overseen by the

[ABOUT](#) [DONATE](#)
[CONTACT](#)

LIVING WALL
ARKANSAS

[Login](#)

Addendum 78

The Secretary of State is authorized to accept gifts, grants, and donations for the fund, enter into contracts for the design and construction of the monument, and ensure its ongoing maintenance and repair.

WHEN IS THE LIVING WALL BEING BUILT?

Construction of the Living Wall begins Summer 2024.

Stay tuned for exciting updates on the progress of the LIVING WALL Monument to the Unborn.

“ For who has despised the day of small things? ” Zachariah 4:10

LIVING WALL LOCATION:

ARKANSAS STATE CAPITOL
500 Woodlane St
Little Rock, AR 72201

CONTACT ARKANSAS RIGHT TO LIFE:

[DONATE TO LIVING WALL](#)

[DECLINE TO SIGN](#)

ABOUT DONATE
CONTACT

LIVING WALL
ARKANSAS

Login

Addendum 79

**BALLOT QUESTION COMMITTEE (BQC)*
STATEMENT OF ORGANIZATION**

To be filed with:
Arkansas Ethics Commission
Post Office Box 1917
Little Rock, AR 72203
Phone (501) 324-9600
Fax (501) 324-9606

(Arkansas Ethics Commission File Stamp)

FILED

FEB 27 2024

Check if this is an amendment to a previously filed statement of organization

BY 
ARKANSAS ETHICS
COMMISSION

Section One: BQC Name

Name of BQC (in full): Arkansas Right to Life Inc.

Section Two: BQC Address & Phone Number

If BQC has no office address, use the address of the BQC officer authorized to receive notices on behalf of the BQC.

Address: 1515 S. University Avenue
City: Little Rock State: AR Zip: 72204 Telephone Number: 501-663-4287

Section Three: BQC Officers and Directors

Provide the name, title, address, and telephone number of the treasurer and other principal officers and directors of the BQC.

Name: Wayne Mays Title: President
Address: 3857 LeMason St. City: Springdale State: AR Zip: 72764
Telephone Number: _____

Name: David Bordovsky Title: Treasurer
Address: 416 Dak Manor Circle City: Springdale State: AR Zip: 72764
Telephone Number: _____

Name: Rose Mimms Title: Ex. Director
Address: 10 Dobbin Drive City: Austin State: AR Zip: 72007
Telephone Number: _____

Name: _____ Title: _____
Address: _____ City: _____ State: _____ Zip: _____
Telephone Number: _____

* The term "ballot question committee" is defined in Ark. Code Ann. § 7-9-402(2)(A) and (B) and § 600(c)(1) and (2) of the Ethics Commission's Rules on Ballot and Legislative Question Committees.

Section Four: Financial Information

Provide the name and address of each financial institution in which the BQC deposits money or anything else of monetary value.

Name of Financial Institution: Arvest Bank

Address: 500 Broadway City: Little Rock State: AR Zip: 72201

Name of Financial Institution: _____

Address: _____ City: _____ State: _____ Zip: _____

Section Five: Members

Provide the name of each person who is a member of the committee. A person that is not an individual may be listed by its name without also listing its own members, if any.

Section Six: Brief Statement

Provide a brief statement identifying the substance of each ballot question as to which the BQC will expressly advocate the qualification, disqualification, passage, or defeat, and, if known, the date each ballot question shall be presented to a popular vote at an election.

We are working to advocate the defeat of the Arkansas Abortion Amendment of 2024 in the 2024 General Election.

02/27/24
Date


Signature of BQC Officer

AFFIDAVIT CONCERNING PETITION PARTS AND SIGNATURES

I, Jim Thompson, being of lawful age and duly sworn upon my oath, do hereby state as follows:

1. My name is Jim Thompson. I am President of Arkansas Winning Initiative, Inc., ("AWI") a Ballot Question Committee and a Sponsor of a Constitutional Amendment Initiative with the Popular Name, AN AMENDMENT TO ALLOW THREE CASINOS TO OPERATE IN ARKANSAS, ONE EACH IN THE FOLLOWING COUNTIES: BOONE COUNTY, OPERATED BY ARKANSAS GAMING AND RESORTS, LLC; MILLER COUNTY, OPERATED BY MILLER COUNTY GAMING, LLC; AND WASHINGTON COUNTY, OPERATED BY WASHINGTON COUNTY GAMING, LLC.

2. The business address of AWI is 734 Brewer Road, Stuttgart, Arkansas 72160.

3. The total number of Petition Parts being filed today with the Secretary of State is 16,467.

4. The total number of signatures being filed today with the Secretary of State is 92,279.

I have read the foregoing statements and they are true and correct to the best of my knowledge and belief.

In witness whereof, I hereunto set my hand this 8th day of July, 2016.

Jim Thompson (Signature)
JIM THOMPSON (Print name)

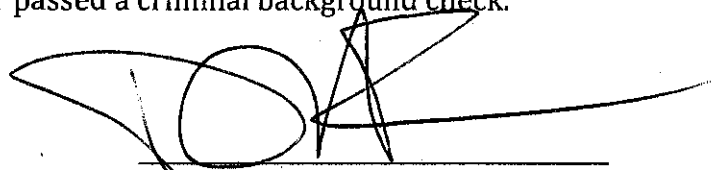
FILED
JUL 08 2016
Arkansas
Secretary of State

Subscribed and sworn to before me this 8th day of July, 2016.

Johanna Walker
Notary Public
My Commission Expires
Johanna Walker
Arkansas

July 8, 2016

Attached is a list of Paid Canvassers. Each Paid Canvasser was provided a copy of the most recent edition of the Secretary of State's Initiative and Referendum Handbook prior to gathering signatures. The requirements under Arkansas law for obtaining signatures was explained to each Paid Canvasser prior to gathering signatures. Each Paid Canvasser passed a criminal background check.

A handwritten signature in black ink, appearing to read 'D. Couch', written over a horizontal line.

David A. Couch
Arkansans United for Medical Marijuana