

IN THE ARKANSAS SUPREME COURT

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

PETITIONERS

v. No. _____

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

RESPONDENT

ORIGINAL ACTION COMPLAINT

For their original action complaint, petitioners state:

1. On July 5, 2024, petitioner Lauren Cowles (“Cowles”), on behalf of petitioner Arkansans for Limited Government (“AFLG”), submitted 101,525 signatures and accompanying paperwork to respondent, Arkansas Secretary of State John Thurston (“Secretary”), for certification of the ballot initiative petition known as the Arkansas Abortion Amendment of 2024 (the “Amendment”).

2. The vast majority of the signatures were collected by volunteers, working across Arkansas for months to obtain the signatures necessary for the Secretary to certify the Amendment for the November 2024 General Election ballot. Despite these efforts, the Secretary did not count the signatures petitioners submitted. Instead, five days later, the Secretary rejected the submission as insufficient, without affording petitioners an opportunity to correct the submission.

3. The Secretary’s rejection of petitioners’ submission was incorrect and unlawful, and petitioners challenge that rejection through this action. The Secretary

rejected the submission for one reason: because, he alleged, petitioners did not comply with Ark. Code Ann. § 7-9-111(f)(2), which concerns submissions of certain statements to the Secretary. But petitioners did comply with § 7-9-111(f)(2). And even if they had not, failure to comply with § 7-9-111(f)(2) is correctable, and they have corrected any perceived failure. Additionally, petition parts and signatures are still valid and should be counted even if there is a lack of compliance with § 7-9-111(f)(2), as the Secretary's office has explicitly represented to this Court in at least two other cases. Finally, the Secretary failed to perform an initial count of all signatures on the initiative petition, despite his statutory obligation to do so.

4. The Secretary's unlawful rejection of petitioners' submission prevents the people of Arkansas from exercising their right to adopt, or reject, the Amendment. This Court should correct the Secretary's error and reaffirm Arkansas's motto, *Regnat Populus*, The People Rule.

Jurisdiction and Parties

5. 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.

6. The Arkansas Supreme Court has original and exclusive jurisdiction to review the sufficiency of all state-wide initiative petitions. Ark. Const. art. 5, § 1.

7. Petitioner Lauren Cowles is an Arkansas citizen, resident, and

registered voter. She is also the Executive Director of AFLG.

8. Petitioner AFLG is an Arkansas ballot question committee registered with the Arkansas Ethics Commission. Ex. 1, Statements of Organization. AFLG is a sponsor of the Amendment.

9. Respondent John Thurston is the Arkansas Secretary of State. As such, he is charged with making an initial determination of the sufficiency of all state-wide petitions, subject to review by this Court. Ark. Const. art. 5, § 1.

Factual Allegations

10. On November 27, 2023, AFLG registered with the Arkansas Ethics Commission as an Arkansas ballot question committee. Ex. 1. AFLG was constituted to support the Amendment, and it has done so through various means, including by arranging for the circulation of the Amendment and filing it with the Secretary of State for verification of signatures.

11. AFLG has been and continues to be a sponsor of the Amendment.

12. On January 23, 2024, the Arkansas Attorney General certified the ballot title and popular name for the Amendment.

13. 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 2024 General Election ballot.

14. AFLG also hired Verified Arkansas, LLC, to provide canvassing

services. Paid canvassers hired by Verified Arkansas also collected signatures for the Amendment.

15. On June 27, 2024, Allison Clark, on behalf of AFLG, sent a Sponsor Affidavit with two exhibits to the Secretary. The 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.” 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.” Exhibit A was a list of approximately 191 paid canvassers, including each canvasser’s name and address, among other information.

16. This was not the first time that AFLG had submitted a Sponsor Affidavit and accompanying list of paid canvassers—it was approximately the seventeenth time. Beginning on or around May 8, 2024, AFLG submitted the Sponsor Affidavit and accompanying paid canvasser list whenever it added paid canvassers.

17. AFLG also sent by email an updated list of paid canvassers to the Secretary on July 4, 2024, in the same form as the previous lists, adding additional paid canvassers. The list submitted on July 4 included approximately 265 paid canvassers.

18. AFLG did not submit a Sponsor Affidavit with the July 4 list because

the Secretary's office specifically told AFLG that such an affidavit was not required.

19. 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 2024 General Election ballot.

20. The submission contained, among other documents, AFLG's count of 101,525 signatures in support of placing the Amendment on the November 2024 General Election ballot. This number of signatures was a conservative count by AFLG. The number of signatures actually submitted to the Secretary by petitioners was likely higher than that number. The 101,525 signatures facially exceeded the requirements for certification on the November 2024 General Election ballot.

21. The submission also contained a statement listing the paid canvassers used by AFLG. This listed the same approximately 265 paid canvassers on the list sent to the Secretary on July 4.

22. Before the filing, AFLG had asked the Secretary's office exactly what it would need to sign and submit to the Secretary on the day of filing. In response, the Secretary's office sent AFLG one attachment, the Receipt for Initiative or Referendum Petition, but did not include any other documents. At the filing, the Secretary's attorneys and representatives assured Cowles that she had filed the necessary paperwork with her submission.

23. On July 10, 2024, the Secretary sent a letter to Cowles, stating, "The

first part of our review [of initiative petitions] 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.” Ex. 2, Letter from the Secretary to Cowles.

24. The letter rejected AFLG’s submission for one reason: the Secretary concluded that AFLG failed to comply with Ark. Code Ann. § 7-9-111(f)(2), which requires the person filing the petition to submit certain statements regarding paid canvassers. The letter stated that AFLG “did not submit any statements meeting this requirement.” Ex. 2.

25. According to the Secretary, this required him to reject AFLG’s submission. The Secretary said, even if it did not require him to reject the “submission outright, it would certainly mean that signatures gathered by paid canvassers in your submission could not be counted for any reason.” Ex. 2. The letter stated that, as a “courtesy,” the Secretary’s office determined “the initial count of signatures gathered by paid canvassers in your putative submission. That number was 14,142. After removing those signatures, and assuming your attestation as valid, 87,382 volunteer signatures remain—3,322 signatures less than the required 90,704.” Ex. 2. In other words, the Secretary performed an initial count of signatures gathered by paid canvassers but did not perform an initial count of signatures gathered by volunteer canvassers.

26. The Secretary is not providing petitioners an opportunity to cure or correct any perceived deficiencies in their submission.

27. On July 11, 2024, Cowles responded to the Secretary's letter. Ex. 3. 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. It also explained that any noncompliance with § 7-9-111(f)(2) is correctable. 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." Ex. 3 at 2.

28. The letter enclosed the previous June 27, 2024, sponsor affidavit that AFLG submitted to the Secretary. Ex. 3 at 4-7. It also included a "Sponsor Statement Regarding Compliance with Ark. Code Ann. § 7-9-111(f)(2)" signed by Cowles on behalf of AFLG. Ex. 3 at 8-17. 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." Ex. 3 at 8, ¶ 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.” Ex. 3 at 9, ¶ 7.

29. 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).

Claim for Relief

The Secretary’s Insufficiency Determination

30. Petitioners incorporate into this claim for relief all preceding paragraphs of the complaint.

31. The Secretary has authority to decide the sufficiency of all state-wide petitions in the first instance, “subject to review by the Supreme Court of the State, which shall have original and exclusive jurisdiction over all such causes.” Ark. Const. art. 5, § 1.

32. The Secretary’s July 10, 2024, letter to Cowles was a determination that petitioners’ submission was insufficient. *See id.*; Ark. Code Ann. § 7-9-111(a). The Secretary is not providing AFLG an opportunity to cure or correct any perceived deficiencies in its submission.

33. The Secretary’s insufficiency determination, which is based entirely on noncompliance with Ark. Code Ann. § 7-9-111(f)(2), is incorrect for multiple reasons.

34. First, petitioners complied with Ark. Code Ann. § 7-9-111(f)(2).

Section 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.

35. In compliance with subsection A, on July 5, 2024, at the time of filing the initiative petition, Cowles submitted to the Secretary a statement that identified each of the paid canvassers by name. These same canvassers were also identified to the Secretary in an email from AFLG on July 4, 2024.

36. In compliance with subsection B, AFLG submitted approximately 17 signed statements to the Secretary attesting to the information necessary in subsection B between May 8 and June 27, 2024.

37. Second, even if petitioners failed to comply with § 7-9-111(f)(2), they have corrected such failure, as is permitted by the law. *See* Ark. Const. art. 5, § 1

(“Amendment of Petition”); Ark Code Ann. § 7-9-111(d). In her July 11, 2024, response letter to the Secretary, Cowles included a “Sponsor Statement Regarding Compliance with Ark. Code Ann. § 7-9-111(f)(2)” that complied with the requisites of § 7-9-111(f)(2). Ex. 3 at 8-17.

38. Third, all petition parts and signatures are still counted even if there is a lack of compliance with § 7-9-111(f)(2). The Secretary’s office has confirmed at least twice to this Court its agreement with this statement. *See* Respondent’s Brief and Supplemental Addendum at Arg. 5-6, *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). As the Secretary’s office stated, “Section 7-9-111 does not have a ‘do not count’ penalty associated with it. . . . The express designation of a ‘do not count’ penalty in other subsections of this section of the Arkansas Code (and Acts 1413 of 2019 and 1219 of 2015), indicates that the absence of such a provision in 7-9-111 was an intentional omission.” *Benca* Brief at Arg. 6. For that reason, the Secretary’s office agreed that “no signatures” should be disqualified for violation of § 7-9-111. *Id.* at Arg. 7.

39. Fourth, the Secretary has failed his duty to “[p]erform an initial count of the signatures.” Ark. Code Ann. § 126(a). In his July 10 letter to Cowles, the Secretary indicated that he had performed an initial count of the signatures collected by paid canvassers but had not performed an initial count of the signatures collected

by volunteer canvassers. Because he is, at minimum, required to perform an initial count of all signatures before making a sufficiency determination, his sufficiency determination is incorrect.

40. The Secretary's insufficiency determination is therefore contrary to the law and should be vacated.

Prayer for Relief

WHEREFORE, petitioners pray that this Court:

1. Find that the Secretary's determination of insufficiency and rejection of petitioners' submission of the Amendment for certification was incorrect;
2. Vacate the determination of insufficiency;
3. Expedite proceedings and provide emergency relief as will be requested in an accompanying motion to expedite and for emergency relief;
4. Order that the Secretary's incorrect insufficiency determination cannot prejudice petitioners' rights to a full certification and correction process of the Amendment;
5. Order that the Secretary must count all signatures submitted by petitioners, including those gathered by paid canvassers;
6. Order that, if proceedings in this action have not terminated in time for the full certification and correction process to occur before the deadline to certify initiatives for the November 2024 ballot, then the Secretary must certify the

Amendment for the November 2024 General Election ballot; and

7. Provide any other just and proper relief the Court deems necessary.

DATED: July 16, 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/ Peter Shults

Peter Shults
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Steven Shults
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Attorneys for Petitioners

EXHIBIT 1

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)



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

Section One: BQC Name

Name of BQC (in full): Arkansans for Limited Government

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: PO Box 7866

City: Little Rock State: AR Zip: 72217 Telephone Number: 501.553.7054

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: Hershey Garner Title: Chair

Address: PO Box 7866 City: Little Rock State: AR Zip: 72217

Telephone 501.553.7054

Number: Name: James McHugh Title: Treasurer

Address: PO Box 7866 City: Little Rock State: AR Zip: 72217

Telephone 501.553.7054

Number: Name: _____ Title: _____

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

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: First National Bank

Address: 200 W Court Street City: Paragould State: AR Zip: 72450

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.

For AR People

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.

To advocate for the passage of the Arkansas Reproductive Healthcare Amendment; to advocate for personal freedom against government interference in Arkansans' healthcare decisions.

11/27/2023
Date



Signature of BQC Officer

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FILED

DEC 15 2023

ARKANSAS ETHICS
COMMISSION
BY 

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For AR People

Rachel Spencer

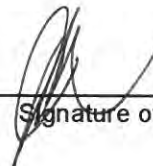
Section Six: Brief Statement

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.

To advocate for the passage of the Arkansas Abortion Amendment or any future iteration of said amendment, which was
originally titled The Arkansas Reproductive Healthcare Amendment; to advocate for personal freedom against
government interference in Arkansans' healthcare decisions.

12/15/23

Date



Signature of BQC Officer

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FILED

APR 25 2024

ARKANSAS ETHICS
COMMISSION

BY

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Revised 12/2017

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For AR People _____

Rachel Spencer

Healthcare Alliance for Reproductive Care (HARC)

Grandmothers for Reproductive Rights (GRR)

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.

To advocate for the passage of the Arkansas Reproductive Healthcare Amendment; to advocate for personal freedom against government interference in Arkansans' healthcare decisions.

7/24/24
Date



Signature of BQC Officer

EXHIBIT 2



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-III(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-III(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

EXHIBIT 3

**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

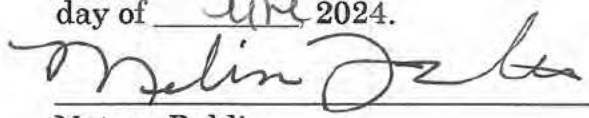
STATE OF ARKANSAS

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	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

EXHIBIT A