

CV-24-492

IN THE ARKANSAS SUPREME COURT

**JENNIFER MCGILL, individually and
on behalf of the ARKANSAS CANVASSING
COMPLIANCE COMMITTEE; &
CHEROKEE NATION
ENTERTAINMENT, LLC**

PETITIONERS

V.

**JOHN THURSTON, in his capacity as
ARKANSAS SECRETARY OF STATE**

RESPONDENT

**LOCAL VOTERS IN CHARGE, A
BALLOT QUESTION COMMITTEE; and
JIM KNIGHT, individually and on behalf of
LOCAL VOTERS IN CHARGE**

INTERVENORS

**INTERVENORS' RESPONSE TO PETITIONERS' MOTION TO
SUPPLEMENT THE RECORD**

The Special Master did not admit Intervenors' Exhibit 9 into the record. During the direct examination of Ms. Nicole Gillum on Thursday, August 29, 2024, counsel for Intervenors sought to admit emails sent by Ms. Gillum. Those emails are Intervenors' Exhibits 6, 7, & 8. Intervenors' Exhibit 9 has nothing to do with Ms. Gillum. Although Intervenors' Exhibit 9 was referenced inadvertently, it was clarified on

the record that Intervenors' Exhibit 8 was the last email sent by Ms. Gillum and that Intervenors were only offering Exhibits 6, 7, & 8. *See* Ex. A at 670:5-671:10. As a result, the Special Master only admitted Intervenors' Exhibits 6, 7, & 8. *See* Ex. A at 671:3-10. Petitioners' motion omits this portion of the official record. It is attached hereto as Exhibit A.

The court reporter's record makes clear what exhibits were admitted. If Petitioners wanted Intervenors' Exhibit 9 in the record, they could have offered it. But they didn't. Further, if Petitioners needed clarification on what was being admitted, they could have asked for it any time before the record closed. But they never did. This is true even though Petitioners were getting daily, rough drafts of the transcripts, and the daily transcript for August 29th also clearly reflects that only Intervenors' Exhibits 6, 7, & 8 were admitted by the Special Master. The relevant portion of the daily transcript is attached hereto as Exhibit B.

Any request to now include Intervenors' Exhibit 9 in the record comes too late. There was no testimony about Intervenors' Exhibit 9. *See* Exhibit A (testimony goes from Intervenors' Exhibit 8 to Intervenors' Exhibit 11.) Adding Exhibit 9 to the record almost a week after trial

ended would deny Intervenors an opportunity to offer rebuttal testimony and evidence. This result would be highly prejudicial and fundamentally unfair. The Special Master should not allow it.

For these reasons, Intervenors respectfully request that Petitioners' Motion to Supplement be denied.

Respectfully submitted,

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By: /s/ Elizabeth Robben Murray
ELIZABETH ROBBEN MURRAY

*Attorneys for Local Voters in Charge, a
ballot question committee, and Jim
Knight, individually and on behalf of
Local Voters in Charge*

CERTIFICATE OF SERVICE

I, Elizabeth Robben Murray, hereby certify that on this 4th day of September, 2024, I filed the foregoing using the Court's electronic filing service, which will serve notice of same on the following counsel of record:

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Attorneys for Respondent

By: /s/ Elizabeth Robben Murray
ELIZABETH ROBBEN MURRAY

EXHIBIT A

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CV-24-492

IN THE ARKANSAS SUPREME COURT

JENNIFER MCGILL, individually and on
behalf of the ARKANSAS CANVASSING
COMPLIANCE COMMITTEE; and
CHEROKEE NATION ENTERTAINMENT, LLC

PETITIONERS

VS.

JOHN THURSTON, in his capacity as
ARKANSAS SECRETARY OF STATE,

RESPONDENT

LOCAL VOTERS IN CHARGE, a ballot
question committee; and JIM KNIGHT,
individually and on behalf of
LOCAL VOTERS IN CHARGE,

INTERVENORS

HEARING - VOLUME 3

BEFORE THE HONORABLE WILLIAM R. WRIGHT

August 29, 2024

The above proceedings were held in the
above-styled and numbered cause on the 29th day of
August, 2024, from 8:00 a.m. to 4:15 p.m., before Dana
Hayden, CCR in and for the State of Arkansas, RMR,
CRR, CRC, reported by machine shorthand.



1 APPEARANCES

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EXHIBITS FOR THE PETITIONERS

8	NO.	DESCRIPTION	OFFERED	ADMITTED
9	7	Composite of all of the affidavits that Mr. Dewey executed along with the exhibit that was attached to it	500	573
10				
11				
12	8	4/18/2024 Sponsor Affidavit of Berta Erickson with attachments	653	654
13				
14	9	4/22/2024 Sponsor Affidavit of Stephanie Marcynyszyn, with attachments	653	654
15				
16				
17	11	7/5/2024 Affidavit of James Knight with attachments	570	570
18				
19	25	Total compilation of the return envelopes	464	465
20	27	Reports that Local Voters in Charge filed with the Arkansas Ethics Commission, INTERVENORS_0000002367 through 2486	599	599
21				
22				
23	32	Summary of gift card purchases	499	499
24				
25	35	Kandis R. Studdard curriculum vitae	395	395

1	56	Total signatures related to canvasser Terryke Anderson	411	412
2				
3	57	Total signatures related to canvasser Susan Bolding	418	419
4				
5	58	Total signatures related to canvasser Kendarious Brown	419	420
6				
7	59	Total signatures related to canvasser Latrice Brown	420	420
8				
9	61	Total signatures related to canvasser Ieshia Davis	425	425
10	62	Total signatures related to canvasser Bellen Earls	426	426
11	63	Total signatures related to canvasser Regina Eden	429	429
12	64	Total signatures related to canvasser Christine Garden	430	430
13	65	Total signatures related to canvasser Ta'Kobey Gary	431	431
14				
15	66	Total signatures related to canvasser Kimberly Gillion	432	432
16	67	Total signatures related to canvasser Gene Hampton	432	433
17	68	Total signatures related to canvasser Ron Harris	433	433
18	69	Total signatures related to canvasser Kristen Hernandez	434	434
19	70	Total signatures related to canvasser Lina M. Ortiz Isaza	435	435
20				
21	71	Total signatures related to canvasser Brian Jentsch	436	436
22	72	Total signatures related to canvasser Jasmine Kendrick	439	439
23				
24	73	Total signatures related to Stephen Lane	440	440
25	75	Total signatures related to canvasser Darius Owens	441	441
	76	Total signatures related	441	442

1		to canvasser Sharhonda Randolph		
2	77	Total signatures related to canvasser Shaneeka Roberts	442	443
3	78	Total signatures related to canvasser Dajuan Robinson	443	443
4	79	Total signatures related to canvasser Danny Smith	444	444
5	80	Total signatures related to canvasser Kamel Smith	445	445
6	81	Total signatures related to Ashanti Sprouse	446	446
7	82	Total signatures related to canvasser Jacqueline Sturdivant	446	447
8	83	Total signatures related to canvasser Mya Taylor	447	447
9	84	Total signatures related to canvasser Zariya Tillman	448	448
10	85	Total signatures related to Sammy Turney	449	449
11	86	Total signatures related to canvasser Aaron White	450	450
12	87	Total signatures related to canvasser Reagan Allen	410	410
13	88	Total signatures related to canvasser Catherine Chodyna	424	425
14	89	Total signatures related to canvasser Jessica Jones	460	460
15	90	Total signatures related to canvasser Madison Kralicek	461	462
16	91	Total signatures related to canvasser Nickolas Lloyd	463	463
17	339	Video - Toad Suck Days	521	522
18	416	Video - Toad Suck Days	577	582
19	417	Contract between PCI Consultants and Local Voters in Charge, INTERVENORS_9507 through 9518	600	600
20				
21				
22				
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1		EXHIBITS (continued)		
2	421	Total signatures related to canvasser Hannah Jeremiah	438	438
3	422	Total signatures related to canvasser VonChasity	451	455
4	423	McDaniel		
5		Total signatures related to canvasser VonChasity	457	458
6		McDaniel		
7	425	Total signatures related to canvasser Sarah Weaver	459	459
8				
9	427	List of videos identified by date that the video was taken according to the Google Drive	407	408
10				
11	433	Document that lists different categories of videos	406	406
12				
13	434	Compilation of paid canvassers working for Elite-Dewey team and the verified signatures	624	628
14				
15				
16	435	Compilation of paid canvassers working for Elite-Erickson team and the verified signatures	624	628
17				
18				
19	74	Total signatures related to canvasser Iverson Moore	450	450
20				

INTERVENORS' EXHIBITS:

22	NO.	DESCRIPTION	OFFERED	ADMITTED
23	1	2024 Initiatives and Referenda Handbook, INTERVENORS_0000006590 through	479	479
24		INTERVENORS_0000006659		
25				

1		INTERVENORS' EXHIBITS (continued)		
2	2	Instructions to Canvassers and Signers, INTERVENORS_0000006589	481	481
3				
4	3	Fact sheet for the campaign, INTERVENORS_0000006588	482	483
5				
6	4	Part of the packet that came with the petition, Intv. Add. 1 through Intv. Add. 5	484	484
7				
8				
9	5	Instructions to Canvassers and Signers with copy of petition (whole packet), INTERVENORS_0000009502 through INTERVENORS_00000095026	486	486
10				
11				
12				
13	6	4/1/2024 email from Nicole Gillum Re: AR State Police Background Checks with attachment, INTERVENORS_0000008140 through 8142	670	671
14				
15				
16				
17	7	4/2/2024 email from Nicole Gillum Re: Example Paid Canvasser Excel Sheet, with attachment, INTERVENORS_0000008127 through 8139	670	671
18				
19				
20				
21	8	4/9/2024 email from Nicole Gillum Re: Promoter/Canvassers Guidelines, INTERVENORS_0000008143 through 8145	670	671
22				
23				
24	61	Sponsor affidavit signed by Phil Dewey	474	474
25				

1 A. Yes.

2 MS. MURRAY: Your Honor, we would move
3 at this time for the admission of
4 Intervenors' Exhibit 3.

5 MR. COUCH: I have no objection to that.

6 THE COURT: I thought it was --

7 MR. COUCH: I thought it was already in
8 evidence.

9 THE COURT: If not, it will be
10 introduced.

11 MS. MURRAY: I knew the others had.
12 Okay.

13 Q. And then we have proposed constitutional
14 amendment, which is Exhibit 4, and has been admitted.
15 And was that the fully printed-out amendment that you
16 referred them, the trainers to, or PCI to?

17 A. Yes.

18 Q. And then I'd like to direct your attention, if
19 we could, to Exhibits -- Intervenors' Exhibits 6, 7,
20 and 8. And the first page of Intervenors' Exhibit 8
21 has a Bates number of 8140 or -- or 6, I'm sorry, has
22 a Bates number of 8140. Do you see that?

23 A. On Exhibit 8?

24 Q. On Exhibit 6. I'm sorry.

25 A. Oh, sorry.

1 Q. Strike that.

2 A. Yes.

3 Q. And would you describe for the Court the email
4 in this exhibit, and did you draft it?

5 A. Yes, I did draft it. It's an email from myself
6 to Angelo Paparella and Dana Gonzalez with PCI. And
7 I'm going over the paid canvasser backgrounds checks.
8 Sorry. Let me read through it.

9 Yeah, so I'm telling them -- this is
10 before the start -- or before we were able to actually
11 start processing background checks. The state police
12 required that in order for our private investigator to
13 be able to input them into the system, the canvassers
14 would have to fill out this form, have it notarized
15 and then that's what the PI would use to run their
16 information through our various background checks.

17 Q. And did you know who the managers were at that
18 time for the campaign? I know this is dated April 1?

19 A. Yeah, I did not know their names at that point,
20 but I knew that we had a Little Rock central manager,
21 a Northwest Arkansas, and I think that at that time,
22 they were considering having another one that would
23 work at the western portion of the state. So I knew
24 we had three.

25 Q. And you did send this email?

1 A. Yes.

2 Q. And page 3 of that is the consent form that a
3 potential canvasser had to sign, correct?

4 A. Yes.

5 MS. MURRAY: We would move for the
6 admission of Exhibit 3, Your Honor -- or 6.
7 I'm sorry.

8 THE COURT: No objection?

9 MS. MURRAY: And I don't know if they
10 have any objections to 7, 8, 9. I know 9 I
11 think were emails also.

12 MR. COUCH: I have no objection to 7, 8,
13 or 9, Your Honor.

14 THE COURT: Let's go ahead and introduce
15 Exhibits 6, 7, 8, and 9.

16 MS. MURRAY: 8 is the last one of hers.

17 MR. COUCH: All right.

18 MS. MURRAY: We would move for 6, 7, and
19 8 to be admitted, Your Honor.

20 (Intervenors' Exhibit 6 offered into
21 evidence.)

22 (Intervenors' Exhibit 7 offered into
23 evidence.)

24 (Intervenors' Exhibit 8 offered into
25 evidence.)

1 MR. COUCH: No objection.

2 MS. BROYLES: No objection.

3 THE COURT: Thank you. They are
4 admitted.

5 (Intervenors' Exhibit 6 received into
6 evidence.)

7 (Intervenors' Exhibit 7 received into
8 evidence.)

9 (Intervenors' Exhibit 8 received into
10 evidence.)

11 Q. Tuesday, April 2, in Exhibit 7 now, if you would
12 turn to that, is that another email that you drafted
13 and sent to Angelo and Dana at PCI Consultants?

14 A. Yes.

15 Q. And what is the topic of it?

16 A. "Example Paid Canvasser Excel Sheet."

17 Q. And it reads -- you attach an example of what
18 the paid canvasser submission list to the Secretary of
19 State should look like?

20 A. Yes.

21 Q. Are you talking there about the submission sheet
22 that must accompany, when you register, you have to
23 have an Excel or list of the paid canvassers you're
24 registering with that submission; is that correct?

25 A. Yes.

1 Q. And if you've already submitted ten canvassers
2 to be registered the day before, they have to also
3 appear on that running spreadsheet; is that correct?

4 A. Yes. So every time you submit canvassers to be
5 eligible to petition, you essentially add onto that
6 list. Sometimes we would do it daily, sometimes three
7 times a day. But you would just add on as you
8 onboarded canvassers.

9 Q. And the third page of this exhibit is a sample
10 of that spreadsheet, correct?

11 A. An example. An old one and how I wanted this
12 one to look with all of the information that needed to
13 be on there.

14 Q. And this was actually a sample of what had been
15 submitted in 2022 by Fair Play for Arkansas --

16 A. Yes.

17 Q. -- proposed amendment? And had you been
18 involved in that process also?

19 A. Yes, I was involved, not in a paid role. I
20 mean, I would couch it to in a volunteer capacity in
21 that campaign.

22 Q. You're from Russellville, aren't you?

23 A. I am.

24 Q. And did you, in addition to sending this email,
25 did you have discussions with Angelo and/or Dana about

1 this registration process?

2 A. Yes. I talked to Dana three or four times a day
3 regularly. So, yes, we talked through this. She's
4 very meticulous. So I know I had conversations with
5 her over the phone about how to submit, you know,
6 which email it needed to go to, you know, that Josh
7 would be receiving -- or Josh Bridges with the
8 Secretary of State, I believe, received most of these.
9 And, you know, I was bcced on every single one, so I
10 knew when they were being submitted. I would check
11 and make sure that all of the affidavits were correct.
12 Kind of daily little audits to make sure we weren't
13 missing somebody. So, yes, I was involved with that
14 and told her how I wanted the submissions to happen.

15 Q. And then Exhibit 8, which is a email on Tuesday,
16 April 9?

17 A. Yes.

18 Q. That concerns promoters and canvasser
19 guidelines, doesn't it?

20 A. Yes.

21 Q. Before we talk about that, in addition to
22 sending all this information about onboarding and
23 registration of paid canvassers by email and the phone
24 calls you discuss, did you assist in setting up a
25 meeting in April for Angelo and Dana to visit with the

1 Secretary of State's office?

2 A. Yes.

3 Q. And would you explain what went through and who
4 was present at the meeting and when did it occur?

5 A. I don't know the exact date. It would have been
6 early April because I think it was before any
7 signatures had been collected. To my recollection, it
8 was before signatures had been collected.

9 Angelo and Dana flew in from California.
10 I know I was in that meeting.

11 Q. Let me direct your attention to Exhibit 11,
12 which is already --

13 A. Okay.

14 Q. It's an exhibit to Josh Bridges' deposition.

15 MS. MURRAY: Your Honor, we'll offer
16 that at this time.

17 (Intervenors Exhibit 11 previously
18 offered and received on 8/27/2024.)

19 MS. MURRAY: Do you have any objection
20 to that? Exhibit 11.

21 MR. COUCH: No, Your Honor. We talked
22 about that in Josh's deposition. No
23 objection.

24 THE COURT: You didn't offer his
25 deposition.

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REPORTER CERTIFICATION

I, DANA HAYDEN, Certified Court Reporter for the State of Arkansas, do hereby certify to the following:

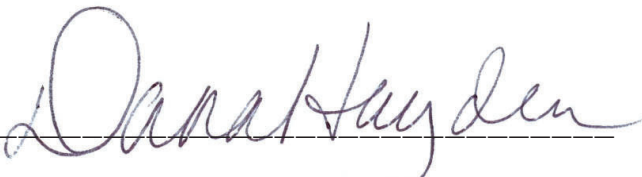
1) that the foregoing pages contain and are a true and correct transcription of the proceedings as reported verbatim by me via realtime stenography to the best of my ability and transcribed at or under my direction and supervision;

2) that I am neither counsel for, related to, nor employed by any of the parties to the action in which this proceeding was taken; and that I am not a relative or employee of any attorney employed by the parties hereto;

3) that I am not financially interested or otherwise interested in the outcome of this action that affects or has substantial tendency to affect impartiality.

Witness my hand and seal this 2nd day of September 2024.

DANA HAYDEN
CERTIFIED COURT REPORTER
ARKANSAS SUPREME COURT
LS NO. 714



DANA HAYDEN, CCR, RMR, CRR, CRC
LS Certificate #714, State of Arkansas
Arkansas Realtime Reporting
1130 E Millsap Rd
Fayetteville AR 72703
479-301-2040



EXHIBIT B

DRAFT TRANSCRIPT

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2 to Angelo Paparella and Dana Gonzalez with PCI. And
3 I'm going over the paid canvasser backgrounds checks.
4 Sorry. Let me read through it.

5 Yeah, so I'm telling them -- this is
6 before the start -- or before we were able to start
7 processing backgrounds checks. The state police
8 required that in order for our private investigator to
9 be able to input them into the system, the canvassers
10 would have to fill out this form, have it notarized
11 and then that's what the PI would use to run their
12 information through our various background checks.

13 Q. And did you know who the managers were at that
14 time for the campaign? I know this is dated April 1?

15 A. Yeah, I did not know their names at that point,
16 but I knew that we had a Little Rock central manager,
17 a Northwest Arkansas, and I think at that time they
18 were considering having another one that would work at
19 the western portion of the state. So I knew we had
20 three.

21 Q. And you did send this email?

22 A. Yes.

23 Q. And page 3 of that is the consent form that a
24 potential canvasser had to sign, correct?

25 A. Yes.

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DRAFT TRANSCRIPT

MS. MURRAY: We would move for the admission of Exhibit 3, Your Honor -- or 6. I'm sorry.

THE COURT: No objection?

MS. MURRAY: And I don't know if they have any objections to 7, 8, 9. I know 9 which are emails also.

MR. COUCH: I have no objection to 7, 8, or 9, Your Honor.

THE COURT: Let's go ahead and introduce Exhibits 6, 7, 8, and 9.

MS. MURRAY: 8 is the last one of hers.

MR. COUCH: All right.

MS. MURRAY: We would move for 6, 7, and 8 to be admitted, Your Honor.

MR. COUCH: No objection.

MS. BROYLES: No objection.

THE COURT: Thank you. They are admitted.

Q. Tuesday, April 2, in Exhibit 7 now, if you would turn to that, is that another email that you drafted and sent to Angelo and Dana at PCI Consultants?

A. Yes.

Q. And what is the topic of it?

DRAFT TRANSCRIPT

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A. Example paid canvasser Excel spreadsheet.

Q. It reads, if you attach an example of what the paid canvasser submission list to the Secretary of State should look like?

A. Yes.

Q. Are you talking there about the submission sheet that must accompany, when you register, you have to have an Excel or list of the paid canvassers you're registering with that submission; is that correct?

A. Yes.

Q. And if you've already submitted ten canvassers to be registered the day before, they have to also appear on that running spreadsheet; is that correct?

A. Yes. So every time you submit canvassers to be eligible to petition, you essentially add onto that list. Sometimes we would do it daily, sometimes three times a day. But you would just add on as you onboarded canvassers.

Q. And the third page of this exhibit is a sample of that spreadsheet, correct?

A. An example. An old one and how I wanted this one to look with all of the information that needed to be on there.

Q. And this was actually a sample of what had been