

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

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

RESPONSE IN OPPOSITION TO ORIGINAL ACTION PETITION

Come now Intervenors, Local Voters in Charge, a ballot question committee, and Jim Knight, individually and on behalf of Local Voters in Charge, by and through their undersigned counsel, and for their Response in Opposition to the Original Action Petition, state as follows:

1. Intervenors state that Amendment 100 speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 1 are denied.
2. Intervenors admit the allegations in paragraph 2.

3. Intervenors state that paragraph 3 contains a legal conclusion, to which no response is required. To the extent a response is required, Intervenors state that the Proposed Amendment speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 3 are denied.

4. Intervenors admit the allegations in paragraph 4.

5. Intervenors admit that Local Voters in Charge is a registered ballot question committee and that it sponsored the Initiative Petition. As worded, Intervenors deny the remaining allegations in paragraph 5.

6. As worded, Intervenors deny the allegations in paragraph 6.

7. As worded, Intervenors deny the allegations in paragraph 7.

8. Intervenors deny the allegations in paragraph 8.

9. Intervenors acknowledge that Petitioners are challenging the Respondent's certification but deny that the certification is invalid.

10. Intervenors deny the allegations in paragraph 10.

11. Intervenors deny the allegations in paragraph 11.

12. Intervenors deny the allegations in paragraph 12.

13. Intervenors are without sufficient knowledge or information to either admit or deny the allegations in paragraph 13; therefore, the allegations are denied.

14. Intervenors are without sufficient knowledge or information to either admit or deny the allegations in paragraph 14; therefore, the allegations are denied.

15. Intervenors are without sufficient knowledge or information to either admit or deny the allegations in paragraph 15; therefore, the allegations are denied.

16. Intervenors admit the allegations in paragraph 16.

17. Intervenors admit the allegations in paragraph 17.

18. Intervenors state that Arkansas Supreme Court Rule 6-5 speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 18 are denied.

19. Intervenors adopt and incorporate their responses to paragraphs 1 through 18 in their entirety.

20. Intervenors state that Amendment 7 and Ark. Code. Ann. § 7-9-126(e) speak for themselves and deny any allegations inconsistent therewith. Intervenors further state that Respondent verified no less than 116,200 signatures. Any remaining allegations in paragraph 20 are denied.

21. As worded, Intervenors deny the allegations in paragraph 21.

22. Intervenors deny the allegations in paragraph 22.

23. Intervenors adopt and incorporate their responses to paragraphs 1 through 22 in their entirety.

24. Intervenors state that that the affidavits referenced as Exhibits G and H speak for themselves and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 24 are denied.

25. Intervenors deny the allegations in paragraph 25.

26. Intervenors state that paragraph 26 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 26.

27. Intervenors deny the allegations in paragraph 27.

28. Intervenors adopt and incorporate their responses to paragraphs 1 through 27 in their entirety.

29. Intervenors state that Ark. Code Ann. § 7-9-601(a) speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 29 are denied.

30. Intervenors state that paragraph 30 purports to state a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors state that Ark. Code Ann. § 7-9-601 speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 30 are denied.

31. Intervenors deny the allegations in paragraph 31.

32. As worded, Intervenors deny the allegations in paragraph 32.

33. Intervenors deny the allegations in paragraph 33.

34. Intervenors state that Arkansas Attorney General Op. No. 2024-053 speaks for itself. Intervenors further state that Opinion No. 2024-053 is not binding

precedent, and it is the Court's duty to decide what a statute means. Any remaining allegations in paragraph 34 are denied.

35. Intervenors deny the allegations in paragraph 35.

36. Intervenors deny the allegations in paragraph 36.

37. Intervenors adopt and incorporate their responses to paragraphs 1 through 36 in their entirety.

38. Intervenors state that Ark. Code Ann. § 7-9-601(b)(3) speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 38 are denied.

39. Intervenors deny the allegations in paragraph 39.

40. Intervenors state that paragraph 40 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 40.

41. Intervenors state that paragraph 41 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, the allegations in paragraph 41 are denied.

42. Intervenors state that paragraph 42 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 42.

43. As worded, Intervenors deny the allegations in paragraph 43.

44. Intervenors state that paragraph 44 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors state that Ark. Code Ann. § 7-9-601(b)(3) speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 44 are denied.

45. Intervenors state that paragraph 45 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 45.

46. Intervenors state that paragraph 46 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 46.

47. Intervenors state that Ark. Code Ann. §§ 7-9-126(b)(4)(A) and 7-9-601(f) speak for themselves and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 47 are denied.

48. Intervenors state that Ark. Code Ann. § 7-9-601(f) speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 48 are denied.

49. Intervenors deny the allegations in paragraph 49.

50. Intervenors adopt and incorporate their responses to paragraphs 1 through 49 in their entirety.

51. Intervenors deny the allegations in paragraph 51.

52. Intervenors state that Ark. Code Ann. § 7-9-103(c)(6) speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 52 are denied.

53. Intervenors state that Ark. Code Ann. §§ 5-55-601(b)(2)(F) and 5-55-601(c) speak for themselves and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 53 are denied.

54. Intervenors state that Ark. Code Ann. § 7-9-601(d)(3)(B)(ii) speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 54 are denied.

55. Intervenors state that paragraph 55 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 55.

56. Intervenors deny the allegations in paragraph 56.

57. Intervenors deny the allegations in paragraph 57.

58. Intervenors adopt and incorporate their responses to paragraphs 1 through 57 in their entirety.

59. Intervenors state that paragraph 59 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors state that Ark. Code Ann. § 7-9-108(b) and the case law

speak for themselves and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 59 are denied.

60. Intervenors deny the allegations in paragraph 60.

61. Intervenors state that Ark. Code Ann. § 7-9-126(b) speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 61 are denied.

62. Intervenors deny the allegations in paragraph 62.

63. Intervenors adopt and incorporate their responses to paragraphs 1 through 62 in their entirety.

64. Intervenors deny the allegations in paragraph 64.

65. Intervenors deny the allegations in paragraph 65.

66. Intervenors deny the allegations in paragraph 66.

67. Intervenors adopt and incorporate their responses to paragraphs 1 through 66 in their entirety.

68. Intervenors state that Ark. Code Ann. §§ 7-9-108 and 7-9-109 speak for themselves and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 68 are denied.

69. Intervenors deny the allegations in paragraph 69.

70. As worded, Intervenors deny the allegations in paragraph 70.

71. Intervenors deny the allegations in paragraph 71.

72. Intervenors deny the allegations in paragraph 72.

73. Intervenors state that the ballot title speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 73 are denied.

74. Intervenors deny the allegations in paragraph 74.

75. Intervenors adopt and incorporate their responses to paragraphs 1 through 74 in their entirety.

76. Intervenors state that paragraph 76 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 76.

77. Intervenors state that paragraph 77 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 77.

78. Intervenors state that paragraph 78 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 78.

79. Intervenors state that paragraph 79 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 79.

80. Intervenors deny the allegations in paragraph 80.

81. Intervenors state that paragraph 81 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 81.

82. Intervenors adopt and incorporate their responses to paragraphs 1 through 81 in their entirety.

83. Intervenors deny the allegations in paragraph 83.

84. Intervenors state that paragraph 84 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 84.

85. Intervenors state that paragraph 85 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 85.

86. Intervenors state that paragraph 86 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 86.

87. Intervenors deny the allegations in paragraph 87.

88. Intervenors adopt and incorporate their responses to paragraphs 1 through 87 in their entirety.

89. Intervenors state that paragraph 89 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 89.

90. Intervenors state that the popular name speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 90 are denied.

91. Intervenors state that paragraph 91 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 91.

92. Intervenors state that paragraph 92 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 92.

93. Intervenors state that paragraph 93 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 93.

94. Intervenors deny the allegations in paragraph 94.

95. Intervenors adopt and incorporate their responses to paragraphs 1 through 94 in their entirety.

96. As worded, Intervenors deny the allegations in paragraph 96.

97. Intervenors deny the allegations in paragraph 97.

98. Intervenors deny the allegations in paragraph 98.

99. Intervenors adopt and incorporate their responses to paragraphs 1 through 98 in their entirety.

100. Intervenors state that Ark. Code Ann. § 7-9-107(d)(1) speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 100 are denied.

101. Intervenors state that paragraph 101 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 101.

102. Intervenors state that the Attorney General Opinion marked as Exhibit A speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 102 are denied.

103. Intervenors state that the Attorney General Opinion marked as Exhibit A speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 103 are denied.

104. As worded, Intervenors deny the allegations in paragraph 104.

105. As worded, Intervenors deny the allegations in paragraph 105.

106. Intervenors state that the text of the Proposed Amendment speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 106 are denied.

107. Intervenors state that paragraph 107 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 107.

108. Intervenors state that paragraph 108 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 108.

109. Intervenors state that Article 5 of the Arkansas Constitution speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 109 are denied.

110. Intervenors state that paragraph 110 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 110.

111. Intervenors state that paragraph 111 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 111.

112. Intervenors state that paragraph 112 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 112.

113. Intervenors deny the allegations in paragraph 113.

114. Intervenors adopt and incorporate their responses to paragraphs 1 through 113 in their entirety.

115. Intervenors state that the Attorney General Opinion marked as Exhibit A speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 115 are denied.

116. Intervenors state that the Attorney General Opinion marked as Exhibit A speaks for itself and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 116 are denied.

117. As worded, Intervenors deny the allegations in paragraph 117.

118. As worded, Intervenors deny the allegations in paragraph 118.

119. Intervenors state that paragraph 119 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 119.

120. Intervenors deny the allegations in paragraph 120.

121. Intervenors adopt and incorporate their responses to paragraphs 1 through 120 in their entirety.

122. Intervenors state that paragraph 122 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 122.

123. Intervenors state that paragraph 123 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 123.

124. Intervenors state that paragraph 124 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 124.

125. Intervenors adopt and incorporate their responses to paragraphs 1 through 124 in their entirety.

126. Intervenors state that paragraph 126 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 126.

127. Intervenors deny the allegations in paragraph 127.

128. Intervenors deny the allegations in paragraph 128.

129. Intervenors state that paragraph 129 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 129.

130. Intervenors state that paragraph 130 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 130.

131. Intervenors state that paragraph 131 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 131.

132. Intervenors state that paragraph 132 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 132.

133. Intervenors state that paragraph 133 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 133.

134. Intervenors state that paragraph 134 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 134.

135. Intervenors deny the allegations in paragraph 135.

136. Intervenors adopt and incorporate their responses to paragraphs 1 through 135 in their entirety.

137. Intervenors state that the United States and Arkansas Constitutions speak for themselves and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 137 are denied.

138. Intervenors state that paragraph 138 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response

is required, Intervenors are without sufficient knowledge or information to either admit or deny the allegations in paragraph 138; therefore, the allegations are denied.

139. Intervenors state that paragraph 139 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors are without sufficient knowledge or information to either admit or deny the allegations in paragraph 139; therefore, the allegations are denied.

140. Intervenors deny the allegations in paragraph 140.

141. Intervenors state that paragraph 141 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 141.

142. Intervenors state that paragraph 142 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 142.

143. Intervenors state that paragraph 143 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 143.

144. Intervenors deny the allegations in paragraph 144.

145. Intervenors state that paragraph 145 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 145.

146. Intervenors state that paragraph 146 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 146.

147. Intervenors adopt and incorporate their responses to paragraphs 1 through 146 in their entirety.

148. Intervenors state that the United States and Arkansas Constitutions speak for themselves and deny any allegations inconsistent therewith. Any remaining allegations in paragraph 148 are denied.

149. Intervenors state that paragraph 149 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 149.

150. Intervenors state that paragraph 150 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 150.

151. Intervenors state that paragraph 151 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 151.

152. Intervenors state that paragraph 152 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 152.

153. Intervenors state that paragraph 153 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 153.

154. Intervenors adopt and incorporate their responses to paragraphs 1 through 153 in their entirety.

155. Intervenors state that paragraph 155 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 155.

156. Intervenors state that paragraph 156 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 156.

157. Intervenors state that paragraph 157 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 157.

158. Intervenors state that paragraph 158 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 158.

159. Intervenors state that paragraph 159 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 159.

160. Intervenors state that paragraph 160 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 160.

161. Intervenors state that paragraph 161 contains legal conclusions, rather than factual allegations, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 161.

162. Intervenors state that paragraph 162 contains legal conclusions, rather than factual allegations, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 162.

163. Intervenors state that paragraph 163 contains a legal conclusion, rather than a factual allegation, and thus no response is required. To the extent a response is required, Intervenors deny the allegations in paragraph 163.

164. Intervenors acknowledge that Petitioners request expedited consideration but deny that Petitioners are entitled to any of the relief requested.

165. Intervenors acknowledge that Petitioners request the appointment of a Special Master but deny that Petitioners are entitled to any of the relief requested.

166. Intervenors acknowledge that Petitioners request injunctive relief, or alternatively, that any votes cast on the Proposed Amendment be stricken and invalidated but deny that Petitioners are entitled to any of the relief requested.

167. All allegations not specifically admitted herein are denied.

168. Pleading affirmatively, the Original Action Petition should be dismissed for failing to state facts upon which relief can be granted.

169. Pleading affirmatively, Petitioners have not met the requirements for the issuance of either a preliminary or permanent injunction.

170. Intervenors plead that Cherokee Nation Entertainment, LLC is not a proper party to this Original Action.

171. Intervenors reserve the right to amend and plead further as investigation and discovery continue.

WHEREFORE, Intervenors, Local Voters in Charge, a ballot question committee, and Jim Knight, individually and on behalf of Local Voters in Charge, pray that the Original Action Petition be denied and dismissed.

Respectfully submitted,

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By: /s/ Elizabeth Robben Murray
ELIZABETH ROBBEN MURRAY

Attorney 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 _____ day of August, 2024, I electronically filed this Motion using the Court’s electronic filing system, which shall send notification of such filing to the following counsel of record:

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