

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
EASTERN (HELENA) DIVISION**

FUTURE MAE JEFFERS, MARY JEFFERS, HENRY PEACOCK, SHIRLEY HARVELL, REV. RONALD WILLIAMS, PEGGY R. WRIGHT, LAURA LOVE, FRANK SHAW, C. W. CAMPBELL, LEO CHITMAN, ETTA CAMPBELL, PLEZ LUCAS, VICKIE ROBERTSON, JOSEPH PERRY, ELBERT SMITH, SANDRA BAGLEY, NIKKI DISMUKE, ALICE W. VALLEY, LAKETHA BROWN FLUKER, KATRINA HARRELL, CHESTER HARRELL, EDDIE O'NEAL, CHRISTOPHER FRANKLIN, JACK BERNARD CRUMBLY

PLAINTIFFS,

**VS. CASE NUMBER: 2:12-cv-0016-JLH
Three Judge Panel: Smith, Holmes and Wright**

MIKE BEEBE, in his capacity as Governor of Arkansas and Chairman of the Arkansas Board of Apportionment, MARK MARTIN, in his capacity as Secretary of State of Arkansas and as a member of the Arkansas Board of Apportionment, and DUSTIN MCDANIEL, in his capacity as Attorney General of Arkansas and a member of the Arkansas Board of Apportionment; and THE ARKANSAS BOARD OF APPORTIONMENT

DEFENDANTS.

FIRST AMENDED COMPLAINT

Come now the plaintiffs by and through their counsel, James F. Valley, and for their cause do state:

Nature of the Case

1. This is an action to enforce Section 2 of the Voting Rights Act of 1965 (42 U. S. C. § 1973) and the Fourteenth and Fifteenth Amendments to the U.S. Constitution. Plaintiffs seek declaratory and injunctive relief against implementing the 2011 Arkansas Board of Apportionment redistricting plan governing the districts from which State Senators will

be elected beginning in November of 2012 on the ground that the plan denies or abridges plaintiffs' right to vote on account of their race or color. Defendants drew that Senate plan with the intent and effect of diluting the voting strength of African American voters in northeastern Arkansas and denying them an equal opportunity to elect candidates of their choice to the Senate.

Jurisdiction and Venue

2. Plaintiffs invoke the jurisdiction of this Court under 28 U. S. C. §§ 1331, 1343(a)(3) and (4), and 2201, and 42 U. S. C. §§ 1973j(f), 1983, and 1988.
3. Venue is proper in this Court under 28 U.S.C. § 1391(b).
4. Plaintiffs request that a three-judge court be convened under 28 U.S.C. § 2284.

Parties

5. The plaintiffs are each and all residents, citizens and registered voters within Crittenden, Lee, St. Francis and Phillips Counties in the State of Arkansas. The race and color of each plaintiff is African American and Black.
6. Plaintiff Future Mae Jeffers is the widow of the late M. C. Jeffers and she resides in Forrest City, St. Francis County, Arkansas.
7. Plaintiff Mary Jeffers resides in Forrest City, St. Francis County, Arkansas. She is the daughter of M.C. Jeffers, the lead plaintiff in *Jeffers v. Clinton*, 740 F. Supp. 585 (E.D. Ark. 1990). She is a member of the city council of Forrest City.
8. Plaintiff Henry Peacock resides in Forrest City, St. Francis County, Arkansas. He is a member of the city council of Forrest City.
9. Plaintiff Shirley Harvell resides in Forrest City, St. Francis County, Arkansas.
10. Plaintiff the Reverend Ronald Williams resides in Forrest City, St. Francis County, Arkansas.
11. Plaintiff Peggy R. Wright resides in Forrest City, St. Francis County, Arkansas.

12. Plaintiff Laura Love resides in Forrest City, St. Francis County, Arkansas.
13. Plaintiff Frank Shaw resides in Forrest City, St. Francis County, Arkansas.
14. Plaintiffs C.W. and Etta Campbell reside in the City of West Memphis, Crittenden County, Arkansas.
15. Plaintiff Leo Chitman resides in the City of West Memphis, Crittenden County, Arkansas.
16. Plaintiff Plez Lucas resides in the City of Jennette, Crittenden County, Arkansas.
17. Plaintiff Vickie Robinson resides in the City of West Memphis, Crittenden County, Arkansas.
18. Plaintiff Joseph Perry resides in the City of Marianna, Lee County, Arkansas.
19. Plaintiff Elbert Smith resides in the City of West Memphis, Crittenden County, Arkansas.
20. Plaintiff Sandra Bagley resides in the City of Helena-West Helena, Phillips County, Arkansas.
21. Plaintiff Nikki Dismuke resides in the City of Helena-West Helena, Phillips County, Arkansas.
22. Plaintiff Alice W. Valley resides in the City of Helena-West Helena, Phillips County, Arkansas.
23. Plaintiff Laketha Brown Fluker resides in the City of Helena-West Helena, Phillips County, Arkansas.
24. Plaintiffs Chester and Katrina Harrell reside in the City of Helena-West Helena, Phillips County, Arkansas.
25. Plaintiff Eddie O'Neal resides in the City of Helena-West Helena, Phillips County, Arkansas.
26. Plaintiff Christopher Franklin resides in the City of Helena-West Helena, Phillips County, Arkansas.

27. Plaintiff Jack Bernard Crumbly resides in the City of Widener, St. Francis County, Arkansas, and is a member of the Arkansas Legislature representing Senate District 16 under the plan drawn in 2001. Senator Crumbly's residence is in Senate District 24 under the plan adopted by the Board of Apportionment in 2011.
28. Defendants are the Governor, Attorney General, and Secretary of State of Arkansas, acting in their official capacity under Article VIII, Section 1, of the Arkansas Constitution, as the Arkansas Board of Apportionment.
- a. Defendant Mike Beebe is the Governor of Arkansas. In his official capacity, he is Chairman of the Board of Apportionment.
 - b. Defendant Mark Martin is the Secretary of State of Arkansas. In his official capacity, he is a member of the Board of Apportionment. Defendant Martin is responsible for carrying out elections for the State Senate and State House of Representatives under plans adopted by the Board of Apportionment.
 - c. Defendant Dustin McDaniel is the Attorney General of Arkansas. In his official capacity, he is a member of the Board of Apportionment.

Statement of the Facts

29. At issue in this litigation is Senate District 24, as drawn by the Board of Apportionment based on the 2010 census and adopted in 2011. Most of the area of Senate District 24 is within Senate District 16 as adopted by the Board in 2001.
30. East of the White River, from the Missouri Line to the Louisiana Line, a geographic area that covers over one-third of the State of Arkansas, there is a population of African Americans of voting age that is sufficiently large and geographically compact to constitute a majority in a State Senate district. The area where this is possible includes seven counties: Crittenden, Cross, Lee, Monroe, Phillips, St. Francis, and Woodruff. This area is often referred to as "the Delta."

31. Senate District 24 under the 2011 plan has a Black Voting Age Population (BVAP) of 53%. But history has shown that a BVAP of significantly less than 60% is not sufficient to permit African American voters to elect a candidate of their choice. This is because, notwithstanding that African American voters in Arkansas are politically cohesive and usually vote for the same candidates, bloc voting by Whites usually defeats their preferred candidates where the BVAP in the jurisdiction is significantly less than 60%.
32. As this Court found two decades ago, "there is a history of racial discrimination in the electoral process in Arkansas. . . . [T]he history of racial discrimination has adversely affected opportunities for black citizens in health, education, and employment. The hangover from this history inhibits full participation in the political process." *Smith v. Clinton*, 687 F. Supp. 1310, 1317 (E.D. Ark. 1988).
33. The finding of racially polarized voting in this area was based on the expert testimony of Dr. Allan Lichtman, who analyzed nine elections involving Black candidates in Crittenden County between 1978 and 1988, including three years of legislative elections and three years of presidential and mayoral elections in West Memphis and Earle. "Among black voters, the mean level of support for the black candidates in these nine races was eighty-nine percent. The mean level of support among whites for these black candidates was nine percent." 687 F. Supp. at 1314-17.
34. From that empirical study, and *Ketchum v. Byrne*, 740 F.2d 1398, 1413 (7th Cir. 1984), this Court concluded that: "It is widely understood that 'minorities must have something more than a mere majority even of voting age population in order to have a reasonable opportunity to elect a representative of their choice.' . . . When voting-age population figures are used, a 60% nonwhite majority is appropriate." 687 F. Supp. at 1362-63.
35. The expert testimony of Dr. Richard Engstrom, who analyzed ten races for membership in the Arkansas Legislature between 1978 and 1988 in which a Black candidate ran against a White candidate in a majority-White district, supported a second finding by this

Court of racially polarized voting in East Arkansas. See *Jeffers v. Clinton*, 730 F. Supp. 196, 208-09 (E.D. Ark. 1989).

36. Senate District 22, as drawn by the Board of Apportionment in 1991 and used for the May 23, 2000, primary election, had 2000 Census BVAP of approximately 60%.
37. In the Democratic primary of May 23, 2000, for Senate District 22, Black candidate Alvin Simes defeated White candidate Steve Higginbothom, 5,909 votes to 5,276 votes, which was 52.83% to 47.17%. The voting in that election was racially polarized.
38. In 2001, the Board of Apportionment replaced Senate District 22 in the Delta with Senate District 16. Senate District 16 had a 2000 Census BVAP of 55%.
39. In the Democratic primary of May 21, 2002, for Senate District 16, Black candidate Alvin Simes lost to White candidate Steve Higginbothom, 4,299 votes to 6,079 votes, which was 36.47% to 51.57%. The voting in that election was racially polarized.
40. The BVAP in Senate District 16 increased from 55% at the time of the 2000 Census to 61% at the time of the 2010 Census, April 1, 2010.
41. In the Democratic primary election of May 18, 2010, for Senate District 16, no White candidate filed to run against incumbent Senator Jack Crumbly. According to the 2010 Census, the BVAP of Senate District 16 at that time was 61%.
42. Other elections in the Delta counties from 2000 to 2010 show similar results: racially polarized voting has prevented Black candidates from defeating White candidates unless the BVAP in the jurisdiction exceeds 55%.
43. The 2010 Census reported that Senate District 16 had a population of 68,732, which was 14,580, or 17.5%, less than the ideal population of 83,312.
44. To meet equal population requirements, so that the population of Senate District 16 was no more than five percent below the ideal, its boundaries needed to be redrawn to add at least 10,515 people, to bring its population up to at least 79,147.

45. The 2010 Census reported that the population of District 16 included the following, classified by race:

Table 1 – District 16 Population by Race

Total Population

White	Black	White %	Black %
21,622	45,252	31%	66%

Voting Age Population

White	Black	White %	Black %
18,183	30,602	36%	61%

46. The 2010 Census reported that the White and Black racial classifications of District 16, allocated by county, were as follows:

Table 2 – District 16 Population by Race by County

Total Population

	White	Black	White %	Black %
Crittenden	3,410	16,101	17%	81%
Lee	2,934	4,970	36%	61%
Phillips	4,568	10,375	30%	68%
St. Francis	10,710	13,806	42%	54%

Total	21,622	45,252	31%	66%
Voting Age Population				
	White	Black	White %	Black %
Crittenden	2,888	10,309	22%	77%
Lee	2,573	3,737	40%	58%
Phillips	3,775	6,814	35%	63%
St. Francis	8,947	9,742	46%	50%
Total	18,183	30,602	36%	61%

47. On or about April 4, 2011, plaintiff Senator Jack Crumbly presented to Joe Woodson, staff person for defendant Governor Mike Beebe, Chair of the Board of Apportionment, a proposed map for the successor of District 16, attached to this Complaint as Exhibit 5.

48. The map shown in Exhibit 5 would have altered the boundaries of District 16 by moving further west into St. Francis and Lee counties and further south into Phillips County, areas with high concentrations of African American voters.

49. Phillips, Lee, and St. Francis counties have the first, second, and fifth highest percentage of African American population of any counties in the state.

50. Between April 4, 2011, and July 20, 2011, plaintiff Senator Jack Crumbly had additional conversations with defendant Governor Mike Beebe concerning the boundaries of the district that would succeed District 16 and provided him with additional maps that responded to concerns he raised in those conversations.

51. On information and belief, many other African American voters residing in District 16 expressed concerns similar to Senator Crumbly's at meetings of the Board of Apportionment and directly to individual members of the Board during the period of April through July 2011.
52. The Department of Correction records reflect that on January 13, 2012, there were 834 African-American inmates incarcerated at the East Arkansas Regional Unit located at Brickeys in Lee County. These 834 African-American inmates make up 1% of the population of an ideal Senate District (83,312). However, they cannot vote.
53. At least ten legal alternative maps have been drawn that would not dilute the voting strength of African-Americans in Crittenden, Lee, St. Francis and Phillips Counties. An example from January 2012 is attached to this Complaint as Exhibit 1.
54. More than once, defendant Governor Mike Beebe assured plaintiff Senator Crumbly that the successor to District 16 would be the first Senate district drawn by the defendant Board of Apportionment, and that his concerns would be addressed by the Board in its map for that area.
55. On or about July, 2011, defendant Governor Mike Beebe assured plaintiff Senator Crumbly that the successor to District 16 had been the first Senate district drawn by the defendant Board of Apportionment and that his concerns about the district had been addressed by the Board.
56. On July 29, 2011, defendant Board of Apportionment met and by a 2-1 vote adopted the current maps for the state's 35 senate districts.
57. When defendant Board of Apportionment the new plan public, plaintiffs saw that the concerns of African American voters in District 16 had not been met.

58. Rather than moving west to take in all or more of St. Francis and Lee counties, the boundaries of the new district, renumbered as Senate District 24, had been moved north to take in all of Crittenden County.

59. The attached map, plaintiffs Exhibit 3, shows the areas of 2011 District 24 that overlap with 2001 District 16. It shows how District 24, as drawn by defendant Board of Apportionment, added the rest of Crittenden County, as well as Parkin and Tyrone in Cross County.

60. Whereas African Americans make up about 66% of the total population of District 16, and about 61% of its voting age population, the areas of Crittenden County that were added to create District 24 are about two-thirds White, as shown in the following table:

Table 3 – Crittenden County Whites Added

Total Population

	Population	White	Black	White %	Black %
District 16 Crittenden	19,864	3,410	16,101	17%	81%
Added	31,038	20,036	9,950	65%	32%
District 24 Crittenden	50,902	23,446	26,051	46%	51%

Voting Age Population

	18+Pop	White	Black	White %	Black %
District 16	13,421	2,888	10,309	22%	77%

Crittenden

Added	22,672	15,371	6,654	68%	29%
District 24 Crittenden	36,093	18,259	16,963	51%	47%

61. Since District 16 needed to add only about 10,000 people to meet equal-population requirements, adding more than 30,000 people from Crittenden County meant that about 20,000 people needed to be removed from some other part of the district.

62. Defendant Board of Apportionment chose to remove about 15,000 people from St. Francis County. The population removed included slightly more Whites than Blacks, as shown in the following table:

Table 4 – St. Francis County Whites and Blacks Removed

Total Population

	Population	White	Black	White %	Black %
District 16 St. Francis	25,558	10,710	13,806	42%	54%
Removed	15,062	7,198	7,101	48%	47%
District 24 St. Francis	10,496	3,512	6,705	33%	64%

Voting Age Population

	18+Pop	White	Black	White %	Black %
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District 16					
St. Francis	19,509	8,947	9,742	46%	50%
Removed					
	11,952	6,079	5,230	51%	44%
District 24					
St. Francis	7,557	2,868	4,512	38%	60%

63. A voting age population of 11,952 in St. Francis County that had been included in 2001 District 16 was removed from 2011 District 24.

64. Plaintiff Senator Jack Crumbly resides in St. Francis County. St. Francis County is his base of political support. Removing 11,952 of the voters in his base county removed 61% of his voting base.

65. Defendant Board of Apportionment, in drawing the Senate plan adopted July 29, 2011, did not remove voters from the base county of any other Democratic member of the Arkansas Senate who is seeking re-election in 2012.

66. Defendant Board of Apportionment also adjusted the boundaries of District 16 in Lee and Phillips counties. Those adjustments affected fewer people than in Crittenden and St. Francis counties, but they included removing the African American communities of Haynes and Rondo in Lee County and some African American neighborhoods in Helena-West Helena in Phillips County.

67. The resulting District 24 was left by defendant Board of Apportionment with the largest population of any Senate district: 87,147, which is 3,835, or 4.6%, more than the ideal.

68. St. Francis, Lee, and Phillips counties have economies that are based on agriculture, have limited industrial work, and have struggling schools. Their populations each have

an African American majority. The natural grouping would be to put the three counties together in District 24.

69. Instead, the 2011 Senate plan adopted by defendant Board of Apportionment divides the three Delta counties among three senate districts (23, 24, and 25), with the purpose and effect of cracking a compact African-American population and reducing their ability to elect their choice of candidates to the Arkansas Senate from two (Districts 24 and 25) to one (District 25).

70. As drawn by defendant Board of Apportionment, the African-American population of District 24 was reduced from 66% of the total population and 61% of the voting age population to 57% of the total population and 53% of the voting age population, as shown in the following table:

Table 5 – District 24 Population by Race

Total Population

White	Black	White%	Black%
35,227	49,716	40%	57%

Voting Age Population

White	Black	White%	Black%
28,132	33,137	45%	53%

71. The map proposed by plaintiffs as Exhibit 1 is similar to the maps provided to defendant Governor Beebe as described above. Rather than adding high concentrations of Whites

by moving north into Crittenden County, it moves west into St. Francis and Lee counties and south into Phillips County, uniting the African American communities in the Delta, rather than dividing them as 2011 District 24 does.

72. How the three different plans — 2001 District 16, 2011 District 24, and Jeffers_01 District 24 — affect African American voters in the Delta is illustrated in plaintiffs’ Exhibit 4. The 2010 Census figures for the three plans are shown in the following table:

Table 6 – Population by Race: 2001 Dist. 16, 2011 Dist. 24, Jeffers_01 Dist. 24

Total Population

	White	Black	White %	Black %
2001 District 16	21,622	45,252	31%	66%
2011 District 24	35,227	49,716	40%	57%
Jeffers_01 District 24	27,397	52,657	33%	64%

Voting Age Population

	White	Black	White %	Black %
2001 District 16	18,183	30,602	36%	61%
2011 District 24	28,132	33,137	45%	53%
Jeffers_01 District 24	22,823	35,749	38%	59%

73. Plaintiffs’ proposed plan, Jeffers_01, attached as plaintiffs’ Exhibit 1, has a BVAP of 59.49%. It has a lower population deviation than 2011 District 24 (-1,105 or -1.33% vs.

3,835 or 4.60%). It splits the same number of counties (4) as 2001 District 16 and 2011 District 24 do. It splits fewer precincts (3) than 2011 District 24 (13).

74. Plaintiffs' proposed plan, Jeffers_03, attached as plaintiffs' Exhibit 6, has a BVAP of 58.41%. It is a statewide plan, but impacts only one other district—Senate District 23. Jeffers_03 District 24 has a lower population deviation than 2011 District 24 867 or 1.04% vs. 3,835 or 4.60%). District 24 splits the same number of counties (4) as 2001 District 16 and 2011 District 24 do, and splits fewer precincts (9) than 2011 District 24 does (13). Jeffers_03 District 23 splits fewer counties (5) than 2011 District 23 does (6), and splits fewer precincts (6) than 2011 District 23 does (10).

75. On information and belief, 2011 District 24 was drawn by defendant Board of Apportionment to avoid contests between White incumbent legislators, at the expense of creating a contest between a White and a Black incumbent legislator.

76. State Representatives Jerry R. Brown, Clark Hall, and Keith Ingram are all White Democratic incumbents residing in 2001 Senate District 17 during their 2011-12 term.

77. Representatives Brown and Hall are serving their third term in the House, and thus are term-limited from running for the House again in 2012.

78. Senator Jim Luker is serving his third term in the Senate, and thus is term-limited from running for the Senate again in 2012.

79. Representative Keith Ingram is currently serving his second term in the Arkansas House of Representatives.

80. On information and belief, members of defendant Board of Apportionment were aware, at the time they drew 2011 Senate District 24, that Representatives Brown, Hall, and Ingram were likely to consider running for the Senate in 2012 if given a favorable district.
81. The 2011 Senate plan for Districts 23 and 24, as drawn by defendant Board of Apportionment, places Representative Jerry R. Brown in the successor to 2001 District 17, which is 2011 Senate District 23, as shown on the map attached as plaintiffs' Exhibit 7.
82. Representatives Hall and Ingram are placed in Senate District 24, along with plaintiff Senator Jack Crumbly.
83. This left Representative Brown as the lone incumbent able to run for the Senate in District 23, since the current incumbent, Senator Jim Luker, is term-limited from running in 2012.
84. On September 14, 2011, Representative Jerry R. Brown announced his intention to run for the Arkansas Senate from District 23.
85. On October 17, 2011, Representative Clark Hall announced his intention to run for Congress from the First Congressional District.
86. On January 17, 2012, Representative Keith Ingram announced his intention to run for the Arkansas Senate from District 24.
87. Defendant Board of Apportionment drew 2011 Senate District 24 so that the number of voters in the base counties of White incumbents was increased, while the number of voters in the base county of the African American incumbent was reduced.

88. The base county of White Representative Keith Ingram is Crittenden. As compared to 2001 Senate District 16, the number of voters in Crittenden County within 2011 Senate District 24 was increased by 22,672, as shown in Table 3 above.
89. The base county of African American Senator Jack Crumbly is St. Francis. As compared to 2001 Senate District 16, the number of voters in St. Francis County within 2011 Senate District 24 was reduced by 11,592, as shown in Table 4 above.
90. On information and belief, the intent of defendant Board of Apportionment in adding to District 24 the predominantly White voters of Crittenden County and removing 61% of the voting base of plaintiff Senator Jack Crumbly in St. Francis County was to enable White candidate Keith Ingram to defeat Black candidate Jack Crumbly. On information and belief, if not enjoined by this Court, those changes are likely to have the intended effect.
91. The 2011 plan creates a Senate District 24 that is no longer an effective majority-minority district because its African-American voting strength is significantly reduced in a part of the state where African Americans face some of the toughest challenges --- ranging from ballot access to unemployment, education, criminal justice and a host of other important issues. Each of these issues contributes to the African-American community's inability to elect a candidate of its choice, unless placed in a district with a BVAP exceeding 55%.

First Cause of Action

92. The allegations contained in the preceding paragraphs are alleged as if fully set forth herein.
93. The Senate plan adopted by the Arkansas Board of Apportionment in July 2011, specifically Senate District 24, violates Section 2 of the Voting Rights Act, as amended, 42 U. S. C. § 1973. The plan denies or abridges the Plaintiffs' right to vote on account of

their race and color, by diluting their voting strength as African American citizens in Arkansas. The plan does not afford Plaintiffs an equal opportunity to participate in the political process and to elect representatives of their choice and denies Plaintiffs the right to vote in elections without discrimination on account of their race and color, in violation of 42 U.S.C. § 1973.

Second Cause of Action

94. The allegations contained in the preceding paragraphs are alleged as if fully set forth herein.

95. The Arkansas Senate plan was adopted by the Board of Apportionment in July 2011 with an intent to, and it does, deny or abridge the right of African American citizens residing in northeastern Arkansas to vote on account of their race and color. This intentional discrimination is in violation of the Fourteenth and Fifteenth Amendments to the U.S. Constitution and 42 U. S. C. § 1983.

BASIS FOR EQUITABLE RELIEF

96. Plaintiffs have no plain, adequate or complete remedy at law to redress the wrongs alleged in this Complaint and this suit for declaratory judgment and injunctive relief is their only means of securing adequate redress from all of the Defendants' unlawful practices.

97. Plaintiffs will continue to suffer irreparable injury from all of the Defendants' intentional acts, policies, and practices set forth herein unless enjoined by this Court.

Attorney's Fees

98. In accordance with 42 U. S. C. Section 1973-1(e) and 1988, Plaintiffs are entitled to recover reasonable attorney's fees, expenses and costs.

Prayer for Relief

99. Plaintiffs respectfully request the Court to grant the following relief:

- a. Assume jurisdiction and request the convening of a three-judge court under 28 U.S.C. § 2284.
- b. A declaratory judgment that the actions of the Defendants violate the rights of the plaintiffs as protected by Section 2 of the Voting Rights Act of 1965, 42 U. S. C. § 1973; and the Fourteenth and Fifteenth Amendments to the U.S. Constitution.
- c. A permanent injunction enjoining and forbidding the use of the state senate plan adopted by Defendants on July 29, 2011.
- d. A permanent injunction requiring the Defendants, their successors in office, agents, employees, attorneys, and those persons acting in concert with them or at their discretion, to develop and adopt a redistricting plan for Senate District 24 and adjacent districts that does not dilute African-American voting strength for the office of Arkansas State Senator.
- e. An order retaining jurisdiction over this matter until all Defendants have complied with all orders and mandates of this Court.
- f. An order requiring Defendants to pay all of Plaintiffs' costs, including reasonable attorney's fees.
- g. Such other and further relief as the Court may deem just and proper.

Respectfully Submitted,



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CERTIFICATE OF SERVICE

I, James F. Valley, certify that on March 2, 2012, consistent with the requirements of FRCP 5, I served a complete copy of this document with any attachments to counsel as listed below:

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