

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

BONNIE HEATHER MILLER, ROBERT
WILLIAM ALLEN, ADELLA DOZIER
GRAY, and ARKANSAS VOTERS FIRST,

Plaintiffs,

v.

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

Defendant.

Case No. 5:20-cv-05070-pkh

Hon. Paul K. Holmes, III

**BRIEF IN SUPPORT OF PLAINTIFFS' MOTION FOR PRELIMINARY
INJUNCTION**

EXHIBIT 18
Declaration of Adella Dozier Gray

DECLARATION OF ADELLA DOZIER GRAY

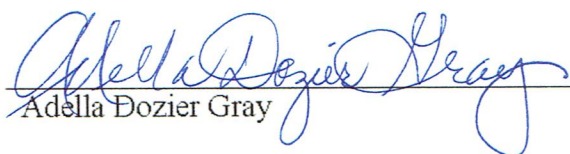
1. My name is Adella Dozier Gray, and I reside at 1749 East Overland Loop, Fayetteville, Arkansas 72703 in Butterfield Trail Village, a continuing care retirement community. Butterfield Trail Village offers its residents four levels of care: independent living, memory care, assisted living, and health care, which is essentially long-term nursing home care. I am 80 years old, and I have lived in Fayetteville since 1973.
2. I feel very strongly about the right to vote, and civic participation has long been a central part of my life. I am a registered voter, and I vote in every election I am able to, including on any ballot measures that come before me. I am also a former elected official. I served three four-year terms as an alderwoman on the Fayetteville City Council from 2007 to 2019 and ran unsuccessfully to serve my district in the Arkansas House of Representatives in 2012.
3. In my time as an elected official, I saw first-hand how important ballot measures are for our democratic system. Constituents would regularly approach me and express their feeling that the system was corrupt and not representing their interests. I felt—and still feel—burdened I could not do more to inform my constituents and engage them in the process. I believe ballot measures give voters a unique and important opportunity to learn about policy issues and empower them to make decisions on issues of significance for our state.
4. The conversations I have had with voters who feel unrepresented also solidified my commitment to doing anything I can to make our elections more fair, including by supporting efforts like the one undertaken by Arkansas Voters First (“AVF”) to take redistricting out of the hands of partisan politicians.
5. When I was an elected official, I knew I had to earn the votes of my constituents by representing their interests or risk losing my job. Aside from my last race for City Council, which was uncontested, every other campaign I have run in was competitive. But I know that is not the case for all elected officials across the State. By giving partisan politicians the opportunity to choose their constituents and draw less competitive districts, I believe Arkansas is doing its voters and our democratic system a great disservice.
6. Although I support adding AVF’s independent redistricting measure to the ballot and hope to vote on it this November, I have not been able to sign my name to a petition to indicate my support. I do not believe I will be able to do so in the near future because of the COVID-19 crisis.
7. Butterfield Trail Village is taking every measure possible to keep COVID-19 out of our community. There are approximately 415 seniors living in Butterfield Trail Village, all of whom are at increased risk because of their age. We have all been advised to limit our contact with other people as much as possible. Because of the

pandemic, I almost never leave my home, except for to go on occasional walks that I take at a safe distance from others. The only direct contact I have with anyone else is with my husband, who lives with me. The communal dining spaces, gyms, and other programming usually open to people in our community have been shut down and visitation from friends or family from outside is being strongly discouraged in an effort to limit possible exposure to COVID-19. Our community has also begun no-contact grocery deliveries, where groceries are left at our doors for us to pick up. All staff are also required to take protective steps, including by wearing masks at all times.

8. If an outside visitor needs to enter the community during this time, their access is severely restricted and highly regulated. The visitor must enter through one monitored entrance, where they must be checked in and have their temperature taken. These rules are enforced by our on-site security. I do not believe a canvasser would be able to gain access to our community to collect signatures for fear they would risk exposing me and my peers to COVID-19.

I declare under penalty of perjury that the foregoing statements are true and correct. Executed on

April 21, 2020, by


Adella Dozier Gray