

**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 19**  
Declaration of Robert William Allen

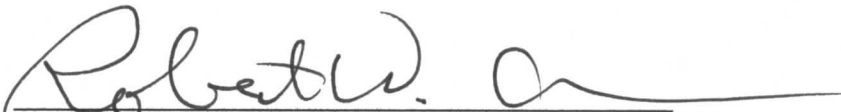
### **DECLARATION OF ROBERT WILLIAM ALLEN**

1. My name is Robert William Allen, and I reside at 576 Silex Road Dover, Arkansas 72837, where I have lived since 1982. I am 73 years old and a retired professor. I taught chemistry for 33 years at Arkansas Tech University, with a focus on organic chemistry, environmental chemistry, and toxicology.
2. Three years ago, I was diagnosed with bladder cancer. The cancer has not responded well to treatment, and it has progressed to stage IV. In an effort to prolong my life, I am currently undergoing intensive chemotherapy.
3. Civic engagement is and has long been extremely important to me. I am a registered Arkansas voter and have voted in every election I can remember since I first cast a ballot in 1968. I have also long been involved in environmental advocacy and was on the board of the Arkansas chapter of the Sierra Club until recently, when I stepped back because of my illness. I also write on issues of public concern at the intersection of science, the environment, and politics in a column published by my local newspaper and in a personal blog I maintain online.
4. Through this work, I have come to see ballot referendums as a crucial component of Arkansas's democratic system. I believe they provide voters with avenues to achieve policy change that would be otherwise impossible through the traditional political branches.
5. Not only do I vote on ballot measures that come before me as a voter, I also regularly sign petitions to support adding ballot initiatives to the ballot.
6. I have not been able to sign the petition to add Arkansas Voters First's ("AVF") independent redistricting measure to the ballot, because COVID-19 has made it extremely unsafe for me to leave my home. Even before I began intensive chemotherapy three weeks ago, I was unable to leave my home because of the risk of COVID-19. Because my chemotherapy has rendered me severely immunocompromised, however, the risk of leaving the house has grown exponentially. My doctors have advised that I have contact with as few people as possible. If I were to, for example, contract a common cold or get a tick bite outside my house, it could be life threatening. I only leave home for my weekly chemotherapy appointments. Aside from my healthcare providers, the only person I see is my wife, who takes care of all grocery shopping and errands. Because of my condition and the risks of COVID-19, though, both my wife and I limit our in-person contacts to only those that are necessary.
7. My home is also in a very isolated, rural area. We are about half a mile from our nearest neighbor. Although we have access to the internet and a landline, our contact with other people is restricted. Because our house is in a valley, we do not have access to radio, cellphone, or cable service.

8. Although I have not been able to sign AVF's petition, I do want to vote on the independent redistricting measure they hope to add to the ballot this November. If it were possible to provide an e-signature without my wife or I having to have contact with a third party, I would sign AVF's petition. I support independent redistricting, because I believe it is necessary to take this power out of the hands of partisan politicians to ensure our system is one of fair representation.

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

Apr. 12, 2020, by

  
Robert William Allen