

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

DEBRA MAYS, et al.,

Plaintiffs,

v.

JOHN THURSTON, et al.,

Defendants.

Civil Case No. 4:20-cv-341-JM

**EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Plaintiffs Debra Mays, Rev. Johnny Smith, Jr. and the Christian Ministerial Alliance, by and through their attorneys, respectfully move the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a temporary restraining order and, after further proceedings, a preliminary injunction restraining Defendants and their respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them, from enforcing the requirement that the county clerk receive absentee ballots by 7:30 p.m. on Election Day to be counted (“Election Day Receipt Deadline”) for the March 31, 2020 runoff election.

Plaintiffs are entitled to a temporary restraining order and a preliminary injunction because they are substantially likely to succeed on the merits of their claim that the Election Day Receipt Deadline unconstitutionally burdens the rights of Arkansas voters, particularly Black voters. The United States is in the throes of an unprecedented crisis. As COVID-19 spreads throughout the country, Americans, including Arkansas residents, have been strongly urged by federal and state authorities to socially distance themselves to try to slow the spread of the disease in a communal effort to save their friends, neighbors, and families.

Arkansas voters, including Plaintiffs and their members and constituents, should not also be forced to make the untenable choice between their safety and potentially endangering the lives of others and exercising their fundamental right to vote. Yet, the Election Day Receipt Deadline does just that. It imposes an arbitrary deadline for citizens who reasonably determine they cannot safely vote in person that simply cannot be met in the current crisis. If it is not enjoined and voters are not adequately informed of the injunction during this unprecedented crisis, the Election Day Receipt Deadline will pose significant risks to voters seeking to exercise their right to vote in the upcoming March 31, 2020 election and in any election held while the crisis persists.

Plaintiffs are also entitled to relief because they will suffer irreparable harm absent relief, and traditional legal remedies will not adequately protect their rights. Further, the harm to Plaintiffs and Arkansas voters outweighs any putative harm to the State, and the relief Plaintiffs seek is in the public interest. In order to maintain the status quo pending determination of their motion for preliminary injunction, Plaintiffs seek an immediate temporary restraining order to prevent these immediate and irreparable injuries to Arkansas voters' rights.

Plaintiffs respectfully request that this Court grant an immediate Temporary Restraining Order and, after further proceedings, a Preliminary Injunction that: (a) enjoins the rejection of ballots that are postmarked on or before Election Day and arrive at a polling place or the county clerk's office within, at a minimum, ten days of Election Day and (b) requires that ballots without a postmark or other marking from the United States Postal Service be presumed to have been mailed on or before Election Day. Plaintiffs further request that Defendants provide voters with adequate and accurate notice of its injunction and the procedures for voting absentee during the current crisis.

Dated this 27th day of March, 2020.

Respectfully submitted,

/s/ Omavi Shukur

Omavi Shukur (Arkansas Bar No. 2016067)

Leah C. Aden*

Deuel Ross*

NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor

New York, NY 10006

Phone: (212) 965-2200

Fax: (212) 226-7592

oshakur@naacpldf.org

laden@naacpldf.org

dross@naacpldf.org

**Pro Hac Vice Motions forthcoming*

CERTIFICATE OF SERVICE

I certify that on March 27, 2020, I filed the foregoing Plaintiffs' Emergency Motion for a Temporary Restraining Order and Preliminary Injunction electronically via the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Omavi Shukur

Omavi Shukur

NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor

New York, NY 10006

Phone: (212) 965-2200

Fax: (212) 226-7592

oshukur@naacpldf.org

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

DEBRA MAYS, et al.,

Plaintiffs,

v.

JOHN THURSTON, et al.,

Defendants.

Civil Case No. 4:20-cv-341-JM

**[PROPOSED] ORDER GRANTING PLAINTIFFS’
EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER**

Plaintiffs in this action have moved the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a temporary restraining order enjoining Defendants from enforcing the requirement that the county clerk receive absentee ballots by 7:30 p.m. on Election Day to be counted for the March 31, 2020 runoff election.

For good cause shown, the Court grants the Temporary Restraining Order.

Defendants and their respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them, are enjoined from rejecting of absentee ballots that are postmarked on or before Election Day and arrive at a polling place or the county clerk’s office within, at a minimum, of ten days after Election Day.

The Court orders that Defendants and their agents must presume that ballots without a postmark or other marking from the United States Postal Service were mailed on or before Election Day.

The Court further orders Defendants to confer with Plaintiffs’ counsel to devise a plan for immediately notifying all voters eligible to vote in the March 31, 2020 runoff election of this

injunction and the procedures for voting absentee during the current COVID-19 crisis.

DONE and ORDERED this 27th day of March, 2020.

JAMES M. MOODY JR.
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

DEBRA MAYS, et al.,

Plaintiffs,

v.

JOHN THURSTON, et al.,

Defendants.

Civil Case No. 4:20-cv-341-JM

**MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Plaintiffs, Debra Mays, Rev. Johnny Smith, Jr. and the Christian Ministerial Alliance, file this memorandum in support of their emergency motion for a temporary restraining order and a preliminary injunction against Defendants, Secretary of State Thurston and Governor Hutchinson, to address the immediate and severe effects the COVID-19 pandemic is having on the Arkansas runoff election scheduled for March 31, 2020.

Plaintiffs are requesting that the Court grant emergency relief *today* because an Arkansas statute, Ark. Code Ann. § 7-5-411(a)(1)(A), requires election officials to discard absentee ballots received after 7:30 p.m. on Election Day (“Election Day Receipt Deadline” or “challenged provision”). Although Defendants have suspended other absentee balloting deadlines and have the power to suspend this deadline as a result of the COVID-19 pandemic, they have not done so.

Arkansas, Benton, Conway, Craighead, Garland, Grant, Greene, Hot Spring, Jefferson, Lonoke, Saline and White counties are holding runoff elections this coming Tuesday. Yet, absent intervention by the Court, Plaintiffs, their members, and other voters will have no assurance that absentee ballots placed in the mail in the coming days will be counted, leading to the effective

disenfranchisement of potentially thousands of citizens attempting to participate in the election.

With the directives and guidance from the federal and state government for people throughout the country, including in Arkansas, to stay in their homes, voting in person is simply not feasible.

Arkansas will almost certainly have a dramatic increase in voting by-mail in the runoff election and, in all likelihood, in the November general election. With the impending surge in mail-in ballots, there is a strong likelihood that large numbers of Arkansas voters, like Plaintiffs, will not receive their mail-in ballots in time or be able to mail them in time to arrive before the 7:30 p.m. deadline on March 31. Arkansas voters should not be forced to violate state directives and risk their health and that of their families, friends, and communities to exercise their constitutional right to vote.

Absent relief from the Court, those ballots will be thrown away and citizens will be disenfranchised. There is no legitimate reason for the State to continue to impose this Election Day receipt deadline and certainly not the type of extremely compelling state interest that the State must show given the potential widespread disenfranchisement of Arkansas voters.

Accordingly, immediate relief is required to protect the basic rights of Plaintiffs and thousands of other Arkansas citizens. “No right is more precious in a free country than that of having a voice in the election of those who make the laws under which, as good citizens, we must live. Other rights, even the most basic, are illusory if the right to vote is undermined.” *Wesberry v. Sanders*, 376 U.S. 1, 17 (1964). Plaintiffs respectfully request that the Court enjoin Defendants and their agents from rejecting absentee ballots that are postmarked on or before the March 31 election and arrive at the county clerk’s office within a minimum of ten days thereafter.

STATEMENT OF FACTS

The Arkansas runoff election is currently scheduled for Tuesday March 31, 2020. Today, March 26, is less than a week away from the Election Day Receipt Deadline. A voter seeking to vote by-mail absentee must submit an application no later than March 30, 2020. The Governor recently issued Executive Order No. 20-08, which extended the deadline in Arkansas Code § 7-5-404(a)(3)(A)(ii) for absentee ballot applications to be submitted by email, fax, or mail to March 30, 2020. Ex. 1.

Nonetheless, the voter must still receive and mail her or his absentee ballot so that it arrives at the county clerk's office by 7:30 p.m. on Election Day. Ark. Code Ann. § 7-5-411(a)(1)(A). If the absentee ballot arrives after 7:30 p.m. on Election Day—even if cast long before Election Day—it is rejected and the voter is disenfranchised. *Id.*

Voters must navigate these requirements in the midst of an unprecedented public health crisis enveloping the world. Arkansas is not exempt from the coronavirus or COVID-19. As of March 25, at least 232 people in the State had tested positively for the illness and two people have died from it. Ex. 2. And, effective March 11, the Governor declared a state of emergency and has ordered people to work from home, advised them to minimize personal contact, to avoid large gatherings, and to stay home if they are ill, and urged everyone to practice social distancing. Ex. 3. Restaurants, bars, barbershops, and other businesses, Ex. 4, and all public schools have been ordered closed or to limit their services. Ex. 5.

County clerks offices too, are shuttering or running limited hours and cutting back on in-person polling sites across Arkansas, Ex. 6, including those in Jefferson County where Plaintiffs and their members reside. Ex. 7.

Most Arkansas voters are therefore unlikely to be familiar with the absentee voting process.

Before the COVID-19 pandemic, in mail-in absentee voting, same-day voter registration has been an unpopular option. In 2018, for example, 2% of voters cast mail-in absentee ballots. Ex. 8 at 28. In the 2016 election, about 3% of voters cast mail-in absentee ballots. Ex. 9 at 23.

In light of the current crisis, however, requests for absentee ballots are increasing. As the coronavirus and its effects continue to spread, there is little reason to expect these numbers to abate. Ex. 6.

But not all these absentee ballots will be counted—even if they are cast on or before Election Day. Even voters who have already applied for or who have received their absentee ballots today have mere days to mail the ballots, with a significant risk that they will not arrive by the Election Day Receipt Deadline to be counted. As a result, it is highly likely that many absentee ballots will arrive after 7:30 p.m. on Election Day and, as state law dictates, they will be rejected.

A significant number of mail-in absentee ballots in Arkansas are often rejected because the ballots are not returned by 7:30 p.m. on Election Day or do not meet other absentee voting requirements. In 2018, Arkansas rejected over 7.5% of the absentee ballots cast (1,150 of 17,120). Ex. 8 at 28. In 2016, it rejected 5.4% of absentee ballots (1,614). Ex. 9 at 23. Thus, if, for instance, all 413,254 Arkansans who voted early at in-person sites in 2018 switched to mail-in absentee voting in the 2020, up to 31,000 voters (7.5%) could have their ballots rejected.

Plaintiff the Christian Ministerial Alliance wrote to the Secretary asking that he attempt to address the absentee voting concerns caused by the COVID-19 crisis. Ex. 10. Yet, the Secretary failed to respond to the Alliance's letter or concerns.

LEGAL STANDARD

Under Federal Rule of Civil Procedure 65(b), a court may issue a temporary restraining order without notice to Defendants if “specific facts in an affidavit or a verified complaint clearly

show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition.” Fed. R. Civ. P. 65(b). Where the adverse party has received notice of a motion for a temporary restraining order and a hearing has been held on the motion, it is proper for the court to consider the motion as one for a preliminary injunction. *See Planned Parenthood of Wis., Inc. v. Van Hollen*, 963 F. Supp. 2d 858, 865 (W.D. Wis. 2013).

The same showing is required to obtain either a temporary restraining order or a preliminary injunction. *See ACLU of Minnesota v. Kiffmeyer*, No. 04-CV-4653, 2004 WL 2428690, at *2 (D. Minn. Oct. 28, 2004).

The Court must consider: (1) the probability that the movant will succeed on the merits; (2) the threat of irreparable harm to the movant; (3) the balance between this harm and the injury that granting the injunction will inflict on other parties to the litigation; and (4) the public interest. *Id.* (citing *Dataphase Sys., Inc. v. C L Sys., Inc.*, 640 F.2d 109, 114 (8th Cir. 1981)).

Likelihood of success on the merits is the “most significant” factor. *See League of Women Voters of Missouri v. Ashcroft*, 336 F. Supp. 3d 998, 1002–03 (W.D. Mo. 2018). A court may, however, apply a “sliding scale in weighing whether preliminary relief is warranted.” *Van Hollen*, 963 F. Supp. 2d at 864. “[T]he more net harm an injunction can prevent, the weaker the plaintiff’s claim on the merits can be while supporting some preliminary relief.” *Hoosier Energy Rural Elec. Coop., Inc. v. John Hancock Life Ins. Co.*, 582 F.3d 721, 725 (7th Cir. 2009).

ARGUMENT

A. Plaintiffs are likely to succeed on the merits.

The Election Day Receipt Deadline threatens to disenfranchise Plaintiffs and other valid voters during an unprecedented public health crisis and deprive voters of due process in violation of the Constitution. Plaintiffs are therefore highly likely to succeed on the merits of their claims.

1. “*Anderson-Burdick*” Claim.

Plaintiffs are likely to succeed on their First and Fourteenth Amendment claim that the Election Day Receipt Deadline violates their fundamental right to vote.

The challenged provision severely restricts Arkansas voters’ right to vote by forcing them to venture out in public during a public health crisis—contrary to governmental guidance—or else not vote. Under the *Anderson/Burdick* balancing test, the Supreme Court requires courts to “weigh ‘the character and magnitude of the asserted injury to the rights . . . that the plaintiff seeks to vindicate’ against ‘the precise interests put forward by the State as justifications for the burden imposed by its rule,’” considering “‘the extent to which those interests make it necessary to burden the plaintiff’s rights.’” *Burdick v. Takushi*, 504 U.S. 428, 434 (1992) (quoting *Anderson v. Celebrezze*, 460 U.S. 780, 788–89 (1983)). This inquiry is highly fact-specific and the Court must apply a “flexible standard.” *Id.* When voting rights are severely restricted, a law “must be narrowly drawn to advance a state interest of compelling importance.” *Norman v. Reed*, 502 U.S. 279, 280 (1992).

Courts have repeatedly recognized that disenfranchisement severely burdens the right to vote—and that even disenfranchising a small number of voters can give rise to a severe burden. *See, e.g., League of Women Voters of N.C. (“LWV”) v. North Carolina*, 769 F.3d 224, 244 (4th Cir. 2014); *see also Democratic Exec. Comm. of Fla. v. Lee*, 915 F.3d 1312, 1321 (11th Cir. 2019); *Ne. Ohio Coal. for the Homeless v. Husted*, 696 F.3d 580, 597 (6th Cir. 2012).

Here, the Election Day Receipt Deadline operates to disenfranchise thousands of voters. The challenged provision requires that absentee ballots be received by election offices no later than 7:30 p.m. on Election Day. As a result of the COVID-19 pandemic, many voters—including Plaintiffs Ms. Mays and Rev. Smith—have reasonably determined that they cannot safely venture

out in public to vote in person. Indeed, the Governor has strongly urged individuals to stay at home and avoid public gatherings. Plaintiffs and many other individuals will abide by this guidance and will not leave their homes to go to the county clerk's office or a polling place on Election Day or during the early vote period. Thus, they must vote absentee by mail or not at all.

Yet, many Arkansas citizens have not yet applied to vote absentee for the March 31, 2020 runoff election, which means it is unlikely they will be able to receive their ballots, and return them in time to meet the Election Day Receipt Deadline. This is not the fault of the voters. Instead, it is because Defendants only recently extended the deadline to request absentee ballots, Ex. 1, and Defendants have failed to adequately notify Arkansas voters, including Plaintiffs, of the increased access to absentee voting and related changes to the deadlines.

In fact, the Secretary's website does not mention Executive Order No. 20-08, which extended the deadline until March 30 for people to submit absentee ballot applications via email, fax, or mail. As of today, only information about absentee voting in this crisis is a March 18 press release about the runoff, which includes the incorrect March 24 deadline for remotely requesting absentee ballots. Ex. 10. The Jefferson County clerk's website, Ex. 7, also contains deadlines and information about the absentee ballot process that are inconsistent with both Executive Order No. 20-08, Ex. 1, and the Election Day Receipt Deadline.

The March 31 Election Day Receipt Deadline is less than a week away. This means that, despite the Governor's extension of the deadline to remotely request an absentee ballot, thousands of voters will not have a reasonable opportunity to request, receive, and then mail their absentee ballot with an assurance that the ballot will arrive in time to be counted. For example, the Governor's order allows a voter to send an email requesting an absentee ballot on Monday, March 30, 2020. But, due to the challenged provision, the voter's only means of guaranteeing that she can

both receive and submit the absentee ballot before the Election Day Receipt Deadline would be for the voter to appear in-person to cast that ballot by 7:30 on Election Day.

Even voters who have already applied for absentee ballots will have, at most, mere days to receive and mail them, with a significant risk that they will not arrive by the Election Day Receipt Deadline to be counted. As a result, it is highly likely that many absentee ballots will arrive after the Election Day Receipt Deadline due to no fault of the voters. These same impediments to voting will continue for any election that occurs while this crisis persists.

Election deadlines must give way when, as a result of emergency circumstances, those deadlines operate to prevent votes from being cast and counted. *See Fla. Dem. Party v. Scott*, 215 F. Supp. 3d 1250, 1257 (N.D. Fla. 2016) (holding that the state imposed a “severe burden on the right to vote” when the hurricane and subsequent evacuations prevented eligible voters from registering to vote); *Ga. Coal. for the Peoples’ Agenda, Inc., v. Deal*, 214 F. Supp. 3d 1344, 1345 (S.D. Ga. 2016) (granting preliminary injunction to extend voter registration deadline due to a hurricane). Because the Election Day Receipt Deadline “would categorically deny the right to vote” to thousands of individual, it would be “nonsensical to prioritize th[at] deadline[] over the right to vote.” *Fla. Dem. Party*, 215 F. Supp. 3d at 1258.

In an analogous situation, a court allowed ballots received after Election Day to be counted due to the anthrax attacks of 2002. *In re Holmes*, 788 A.2d 291 (N.J. Sup. Ct. 2002). The court held that “rigid application of the rule that all ballots be received by the board by 8:00 P.M. of Election Day would unfairly deprive absentee voters of their franchise as a result of exceptional circumstances neither within their control nor which, in light of human experience, might reasonably be expected.” *Id.* at 295. And courts regularly order the extension of election deadlines to ensure compliance with federal laws that protect the rights of citizens who live overseas to vote

absentee. *See, e.g., United States v. Alabama*, 857 F. Supp. 2d 1236, 1241 (M.D. Ala. 2012); *Doe v. Walker*, 746 F. Supp. 2d 667, 677 (D. Md. 2010); *United States v. Cunningham*, No. 3:08-cv-709, 2009 WL 3350028, at *4 (E.D. Va. Oct. 15, 2009).

Although this motion does not address the Voting Rights Act claim, the *Anderson-Burdick* analysis must also consider the burden on specific groups of voters, such as African Americans. *See, e.g., Michigan State A. Philip Randolph Inst. v. Johnson*, 833 F.3d 656, 664 (6th Cir. 2016).

Here, the failure to provide Black voters with the same notice and opportunity to vote absentee as white voters contributes to this disparate impact. Each of the 22,000 voters eligible to vote in the runoff in Benton County, with an over 90% white population, were mailed notices about the relaxed absentee voter requirements and deadlines. Ex. 6. But, the voters in the majority African American Jefferson County—including Plaintiffs Ms. Mays and Rev. Smith—did not get similar individual notices. *Id.*; *see Spirit Lake Tribe v. Benson Cty.*, No. 2:10-CV-095, 2010 WL 4226614, at *3 (D.N.D. Oct. 21, 2010). (“Native American are more likely to have not received a ballot application, which when coupled with a decreased ability to vote in person, creates a disparate impact”); *Brown v. Post*, 279 F. Supp. 60, 64-65 (W.D. La. 1968) (holding that officials violated Section 2 by soliciting absentee ballots from white voters, but not from Black voters).

Rather, the Jefferson County clerk’s website includes incorrect information about the absentee ballot application and receipt deadlines. Ex. 7. In the midst of this crisis and the changes to absentee voting rules made by Defendants, Defendants must ensure that all voters are given the same, accurate information about absentee voting as others. *See United States v. Post*, 297 F. Supp. 46, 51 (W.D. La. 1969) (holding that officials who, acting in good faith, provided erroneous instructions on voting machines denied Black voters an effective ballot in an election).

There are also significant socioeconomic disparities between Black and white voters in

Arkansas that will result in Black voters disproportionately bearing the burdens of complying with the Election Day Receipt Deadline and the lack of adequate notice to voters about the absentee voting process. *See* Ex. 12 (Cooper Decl. ¶¶ 10-11); Compl., Doc. 1 ¶¶ 45-48, 62-74.

Faced with this clear burden on the right to vote, Arkansas would have to justify—at a minimum—a “precise interest” in maintaining the Election Day Deadline. *Anderson* cite. It cannot do so. No “precise interest” Arkansas articulates can justify the burdens the Challenged Provisions inflicts on its voters. *Anderson*, 460 U.S. at 789. First, while the State has an interest in identifying a deadline for receiving absentee ballots, it has no precise interest in limiting that deadline to Election Day.

In response to the crisis, the Governor has already suspended other deadlines. He has allowed voters to continue to send in absentee ballot applications via email, fax, or mail through Election Day. Ex. 1. Yet the state is arbitrarily keeping the Election Day Receipt Deadline. This creates a Kafkaesque situation wherein Arkansas voters are allowed to continue requesting ballots, but they have no guarantee that ballots mailed in the next several days will arrive in time to be counted.

While the state has an interest in ensuring the finality of elections, rejecting validly cast ballots that happen to arrive after 7:30 p.m. on Election Day as a result of circumstances caused by a pandemic does not serve that interest. In fact, this purported state interest is undercut by Arkansas’s own processes. Ballots are *still* being processed long after Election Day. Voters who cast provisional ballots have until the Monday *after* Election Day (April 6) to perfect their ballots. Ark. Code. Ann. § 7-5-308(f)(2)(A). And, depending on the elected office at issue, state law gives election officials between 15 and 19 days after Election Day to certify the election results. Ark. Code. Ann. §§ 7-5-701(a)(4), (c)(1).

Therefore, Defendants and their agents have ample time to accept and count validly cast absentee ballots that are postmarked by Election Day but arrive at some point thereafter. Doing so would not violate Arkansas's interest in the finality of elections.

2. Procedural Due Process claim

Plaintiffs are also likely to succeed on their procedural due process claim. Arkansas cannot deprive any person of liberty without “due process of law.” U.S. Const. amend. XIV, § 1. In the current environment of self-quarantines, the shuttering of significant portions of the national and global economies, and social distancing amidst an extraordinary global pandemic, the Election Day Receipt Deadline does just that because it operates to deprive citizens’ liberty interest in voting without process.

In considering a due process challenge such as this one, courts must first consider “‘private interest that will be affected by the official action.’” *Boyd v. Owen*, 481 F.3d 520, 525 (7th Cir. 2007) (quoting *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976)). Next, courts must consider the “fairness and reliability” of the existing procedures and the “probable value, if any, of additional procedural safeguards.” *Mathews*, 424 U.S. at 343. Finally, courts assess the public interest, “includ[ing] the administrative burden and other societal costs that would be associated with” additional or substitute procedures. *Id.* at 347.

Each of these factors weighs heavily in Plaintiffs’ favor here.

First, the right to vote is unquestionably a liberty interest and cannot be “confiscated without due process.” *Raetzl v. Parks/Bellefont Absentee Election Bd.*, 762 F. Supp. 1354, 1357 (D. Ariz. 1990). This liberty interest extends to by-mail voting in Arkansas. *See, e.g., Saucedo v. Gardner*, 335 F. Supp. 3d 202, 215 (D.N.H. 2018) (“voter has a sufficient liberty interest once ‘the State permits voters to vote absentee.’”) (quoting *Zessar v. Helander*, 2006 WL 642646, at *5

(N.D. Ill. Mar. 13, 2006)).

Second, the challenged provision is neither fair nor reliable in the context of a growing global pandemic. The administrative burden on Arkansas in extending time in which a likely avalanche of absentee ballots may be received and counted is marginal compared to the deprived liberty interest. *Mathews*, 424 U.S. at 335.

Third, the degree of deprivation resulting from the Election Day Receipt Deadline is extraordinarily high. This deprivation is neither hypothetical nor speculative; it is happening each day that the coronavirus spreads, governments respond to the growing threat, and individuals opt to take extraordinary precautions to avoid the pandemic in the form of physical isolation. Already, Arkansas voters have requested—and continue to request—increased levels of absentee voting. *See* Ex. 6.

B. An injunction is necessary to avoid irreparable harm.

The Election Day Receipt Deadline operates to inflict two irreparable harms on Arkansas voters. First, it results in disenfranchisement of Plaintiffs and other voters. The loss of these constitutional “freedoms . . . unquestionably constitutes irreparable injury.” *Elrod v. Burns*, 427 U.S. 347, 373 (1976). And “[c]ourts routinely deem restrictions on fundamental voting rights irreparable injury.” *LWV*, 769 F.3d at 247 (collecting citations); *see also League of Women Voters of Missouri v. Ashcroft*, 336 F. Supp. 3d 998, 1005 (W.D. Mo. 2018); *Kiffmeyer*, 2004 WL 2428690, at *2 (finding that the denial of the right to vote constitutes irreparable injury).

Once the election comes and goes, “there can be no do-over and no redress.” *LWV*, 769 F.3d at 247; *see also Gen. Motors Corp. v. Harry Brown’s, LLC*, 563 F.3d 312, 319 (8th Cir. 2009) (“Irreparable harm occurs when a party has no adequate remedy at law”).

Second, the challenged law contributes to public health risks. It operates to encourage

determined registrants and voters, like Plaintiffs and its organizational members, to venture out into the world and interact face-to-face with people—despite what numerous governmental entities are warning against doing. At worst, the challenged law risks exposing Arkansas voters to an ailment that has already claimed thousands of lives nationally and internationally. *Cf. Harris v. Bd. of Supervisors*, 366 F.3d 754, 766 (9th Cir. 2004) (affirming preliminary injunction barring county from closing hospital because doing so would cause irreparable harm to patients and cause “exacerbation of the current overcrowded situation and additional suffering . . . avoided” by enjoining closure). “[T]he denial of injunctive relief after a district court has found a risk of imminent and substantial danger to public health or to the environment should be rare.” *LAJIM, LLC v. Gen. Electric Co.*, 917 F.3d 933, 942 (7th Cir. 2019). The statements of Defendants show that the risk of substantial danger to the public health is substantial, imminent, and ongoing. *See* Exs. 1, 3, 4-5, 8.

C. Traditional legal remedies will not adequately protect Plaintiffs’ rights.

Because Plaintiffs and their members and constituents face the inability to vote in-person without exposing themselves to the coronavirus and negatively impacting public health, traditional legal remedies are inadequate. Money damages cannot adequately remedy a constitutional violation. *Christian Legal Soc’y v. Walker*, 453 F.3d 853, 859 (7th Cir. 2006) (reversing denial of preliminary injunction on complaint alleging First Amendment claims).

More specifically, money damages cannot cure disenfranchisement post hoc. *Cf. Libertarian Party of Ark. v. Thurston*, 394 F. Supp. 3d 882, 919 (E.D. Ark. 2019). Given the close proximity of the runoff election, it is certain that an election will occur, necessitating action from this Court to ensure that Plaintiffs’ and their constituents’ rights are not violated.

D. The balance of hardships weighs in favor of an injunction.

The balance of the equities favors Plaintiff.

An injunction would protect the fundamental right to vote for potentially thousands of voters and the health of the public by removing barriers to voting during a time of an unprecedented public health crisis. “It would be untenable to permit a law with a discriminatory effect to remain in operation for [an upcoming] election.” *Veasey*, 830 F.3d at 270.

While Defendants and their agents will have a handful more administrative tasks, mild inconvenience is outweighed by the vindication of constitutional rights. *See Taylor v. Louisiana*, 419 U.S. 522, 535 (1975) (holding “administrative convenience” cannot justify practices that impinge upon fundamental rights). “Any potential hardship [to Arkansas] . . . pales in comparison to that imposed by unconstitutionally depriving those voters of their right to vote and to have their votes counted.” *Fla. Dem. Party v. Detzner*, No. 4:16-cv-607, 2016 WL 6090943, at *26 (N.D. Fla. Oct. 16, 2016).

“The potential hardships that [Defendants and their agents] might experience are minor when balanced against the right to vote, a right that is essential to an effective democracy.” *United States v. Georgia*, 892 F. Supp. 2d 1367, 1377 (N.D. Ga. 2012). “[I]nconvenience” to officials, including having to adjust their schedules, does not amount to substantial harm. *See Covington v. North Carolina*, 270 F. Supp. 3d 881, 895 (M.D. N.C. 2017) (three-judge court). Likewise, the increased administrative burden of “disseminating information” and “training poll managers. . . is minimal compared to the potential loss of a right to vote.” *Ga. Coal. for People’s Agenda, Inc. v. Kemp*, 347 F. Supp. 3d 1251, 1268 (N.D. Ga. 2018). Under state law, Defendants unquestionably have the authority to take the necessary action now to protect the right to vote in this state of emergency.

E. An injunction is in the public interest.

Without question, an injunction that is aimed to protect the public from more exposure to the coronavirus *and* avoid disenfranchisement is in the public interest. “[I]njunctions protecting First Amendment freedoms are always in the public interest.” *Christian Legal Soc’y*, 453 F.3d at 859. “The vindication of constitutional rights . . . serve[s] the public interest almost by definition,” including specifically when the right at issue is the right to vote. *League of Women Voters of Fla. v. Browning*, 863 F. Supp. 2d 1155, 1167 (N.D. Fla. 2012). This is because “[t]he public interest . . . favors permitting as many qualified voters to vote as possible.” *Obama for Am. v. Husted*, 697 F.3d 423, 437 (6th Cir. 2012). Enjoining the challenged provision here would do precisely that—allow as many qualified Arkansas voters as possible to safely vote.

CONCLUSION

For the reasons stated, Plaintiffs respectfully request that the Court issue an order that requires Defendants to accept ballots that are postmarked before or on Election Day that arrive within 10 days of Election Day and to provide adequate notice to voters and election officials of this extension and the absentee voting process.

Dated this 27th day of March, 2020.

Respectfully submitted,

/s/ Omavi Shukur

Omavi Shukur (Arkansas Bar No. 2016067)

Leah C. Aden*

Deuel Ross*

NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor

New York, NY 10006

Phone: (212) 965-2200

Fax: (212) 226-7592

oshakur@naacpldf.org

laden@naacpldf.org

dross@naacpldf.org

**Pro Hac Vice Motions forthcoming*

CERTIFICATE OF SERVICE

I certify that on March 27, 2020, I filed the foregoing Plaintiffs' Emergency Motion for a Temporary Restraining Order and Preliminary Injunction electronically via the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Omavi Shukur

Omavi Shukur

NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor

New York, NY 10006

Phone: (212) 965-2200

Fax: (212) 226-7592

oshukur@naacpldf.org

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

DEBRA MAYES, et al.,

Plaintiffs,

v.

JOHN THURSTON, et al.

Defendants.

Civil Case No. 4:20-cv-341-JM

DECLARATION OF DEUEL ROSS

DEUEL ROSS declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am over the age of 18 and competent to make this declaration. I am an attorney for Plaintiffs. I am barred in New York and have moved to be admitted *Pro Hac Vice* before this Court in the above-captioned matter. I submit this declaration on behalf of the Plaintiffs to provide true and correct copies of certain documents submitted in connection with Plaintiffs' Emergency Motion for a Temporary Restraining Order and Preliminary Injunction.
2. A true and correct copy of Executive Order No. 20-08 issued by the Governor of Arkansas on March 20, 2020, is attached hereto as Exhibit 1.
3. A true and correct copy of "Two die of coronavirus in Arkansas," an Arkansas Democrat Gazette news article, dated March 24, 2020, is attached hereto as Exhibit 2.
4. A true and correct copy of Executive Order No. 20-06 issued by the Governor of Arkansas on March 11, 2020, is attached hereto as Exhibit 3.
5. A true and correct copy of memorandum from the Arkansas Department of Health, dated March 23, 2020, is attached hereto as Exhibit 4.

6. A true and correct copy of an Associated Press article entitled “Arkansas Expands Restrictions, School Closure Over Virus,” dated March 19, 2020, is attached hereto as Exhibit 5.

7. A true and correct copy of an Arkansas Democrat Gazette article entitled “Election officials in Arkansas proceed carefully,” dated March 22, 2020, is attached hereto as Ex. 6.

8. A true and correct copy of an undated Press Release issued by the Jefferson County Clerk Shawndra Taggart is attached hereto as Ex. 7.

9. A true and correct copy of the 2018 Election Administration and Voting Survey Report by the U.S. Election Assistance Commission is attached hereto as Exhibit 8.

10. A true and correct copy of the 2016 Election Administration and Voting Survey Report by the U.S. Election Assistance Commission is attached hereto as Exhibit 9.

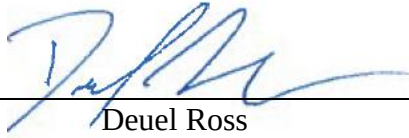
11. A true and correct copy of a Letter from Deuel Ross, et al. to the Arkansas Secretary of State, dated March 24, 2020, is attached hereto as Exhibit 10.

12. A true and correct copy of a Press Release issued by the Arkansas Secretary of State, dated March 18, 2020, is attached hereto as Exhibit 11.

13. A true and correct copy of the Declaration of William S. Cooper, dated March 26, 2020—which includes true and correct copies of, inter alia, Mr. Cooper’s curriculum vitae, and population, geographic, and socioeconomic data relied upon by Mr. Cooper from the 2013-2017 American Community Survey—is attached hereto as Exhibit 12.

14. I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Dated: March 27, 2020



Deuel Ross



PROCLAMATION

TO ALL TO WHOM THESE PRESENTS COME – GREETINGS:

EO 20 - 08

**EXECUTIVE ORDER TO AMEND EXECUTIVE ORDER 20-03 FOR THE PURPOSE
OF ORDERING FUNDS RELEASED TO DEFRAY PROGRAM AND
ADMINISTRATIVE COSTS ASSOCIATED WITH COVID-19**

WHEREAS: An outbreak of coronavirus disease 2019 (COVID-19) has spread throughout China and to 59 other countries and territories, including the United States;

WHEREAS: COVID-19 has been detected within the State of Arkansas and adjoining states, threatening the public safety of the citizens of Arkansas;

WHEREAS: Great hardship has been brought to bear upon the citizens this state as a result of the spread of COVID-19;

WHEREAS: On March 11, 2020, by Executive Order 20-03, an emergency was declared in the state as a result of COVID-19, and that emergency is on-going; and

WHEREAS: State resources are continuously being deployed to render maximum aid and assistance during this emergency;

NOW, THEREFORE, I, Asa Hutchinson, Governor of the State of Arkansas, acting under the authority vested in me by Ark. Code Ann. §§ 12-75-101, *et seq.*, do hereby amend Executive Order 20-03 declaring an emergency in the State of Arkansas, and order the following for the duration of this emergency:

- (1) Authorize funds from the Governor's Disaster Assistance Fund, in the amount of \$30,000,000. Such funds will be used at the discretion of the Director of the Arkansas Division of Emergency Management to defray both program and administrative costs; and
- (2) I am suspending the following provisions of Arkansas Code to aid County Officials and County Boards of Election Commissioners to carry out their duties in respect to the March 31, 2020 elections:
 - a) Provisions under Arkansas Code Annotated § 7-5-101(d)(3)(A) and 7-5-101(e)(2)(C) regarding the moving and consolidation of polling sites to allow counties to consolidate polls to no less than one (1) polling site up to three (3) days before the election so long as adequate notice of the change has been posted at polling sites that would have otherwise been used absent the emergency;
 - b) Provisions under Arkansas Code Annotated § 7-5-402 that require qualified electors be unavoidably absent or unable to attend an election due to illness or physical disability, so that all eligible qualified electors currently entitled to vote in the March 31, 2020 election may request the appropriate absentee ballots from their county of residence.
 - c) Provisions under Arkansas Code Annotated § 7-5-404(a)(3)(A)(ii) to allow county officials to act on an application for an absentee ballot that is received within seven (7) days before the election date and subsequently mail an absentee ballot

to the qualified elector who requested the ballot if the voter is otherwise entitled to vote in the election.

IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the Great Seal of the State of Arkansas to be affixed this 20th day of March, in the year of our Lord 2020.

A handwritten signature in blue ink, appearing to read "Asa Hutchinson", is written over a horizontal line.

Asa Hutchinson, Governor



[Search](#) [Latest](#) [Coronavirus](#) [Elections](#) [Core values](#) [App](#) [Listen](#) [Story ideas](#) [iPad](#) [Weath](#)

ADVERTISEMENT

Two die of coronavirus in Arkansas; virus cases rise to 232 statewide

by [Eric Besson](#), [Francisca Jones](#), [Nyssa Kruse](#) | March 24, 2020 at 7:20 p.m.

0

Follow



Gov. Asa Hutchinson, center, speaks during a news conference on Tuesday where he announced the first deaths from covid-19 in the state of Arkansas.

7:20 p.m. UPDATE:

The number of Arkansans testing positive for the coronavirus increased by two to 232 Tuesday evening, according to a state website. Earlier Tuesday, the site listed 230 cases.

Coronavirus Updates

Stay up to date with the latest news regarding the coronavirus pandemic.

5 p.m. UPDATE:

The number of Arkansans testing positive for the coronavirus had increased to 230 as of Tuesday afternoon, according to a state website. Earlier Tuesday, the site had listed 218 cases.



Yahoo Search
Sponsored



Unexpected Signs of Psoriatic Arthritis

[Read More](#)

3:36 p.m. UPDATE:

The first two people to die from covid-19 in Arkansas were a 59-year-old Sherwood man and a 91-year-old man from Cleburne County. The man from Cleburne County was a member of a church that is reportedly connected to at least 34 virus cases, another church member said.

The man from Sherwood died at 4 a.m. Tuesday at Baptist Health Medical Center in North Little Rock, according to Julie Voegele, Pulaski County's chief deputy coroner.

Voegle declined to release the man's name, saying she was not sure if family had been notified.

The man had a "significant medical history," including respiratory and cardiac problems, Voegele said.

The 91-year-old man died at 8 a.m. Tuesday at Conway Regional Medical Center, a deputy Faulkner County coroner confirmed.

Deputy coroner Robert Edwards could not immediately provide the name of the man, who was a Cleburne County resident.

Gracie Campbell, a member of Greers Ferry First Assembly of God in Greers Ferry, later confirmed that Bill Barton was a member and door greeter at the church.

Jeff Crites of Bishop-Crites Funeral Home in Greenbrier said Tuesday that the home is handling the arrangements.

Arkansas Gov. Asa Hutchinson noted Arkansas' first two deaths from coronavirus at a news conference where he also said the state is not considering a shelter-in-place order at this time.

Hutchinson said he did not want to issue such an order because he believes it would create difficult-to-answer questions of when businesses might reopen or create supply chain issues.

ARTICLE CONTINUES BELOW

More related headlines

3rd patient dies of virus in state; \$116M plan taps Medicaid funds

3rd person to die of virus linked to Greers Ferry church; cases rise to 349 in state

State tightens controls; virus cases hit 308

State sees first covid-19 deaths

MARCH 25 UPDATE: State to ban gatherings over 10 people; virus cases at 301

Governor extends individual tax deadline, says special session needed; virus cases hit 201

ADVERTISEMENT

LIVE: Governor Hutchinson Provides COVID-19 Update to ...



[Video not showing up above? Click here to watch » <https://www.youtube.com/watch?v=odm3YrdB-Yc>]

He also said most orders are too broad and believes the more specific orders he and the Health Department have made so far — closing beauty salons and tattoo parlors, ending dine-in options at restaurants — are better.

Hutchinson said the state received almost 28,000 face masks for healthcare workers overnight from the national stockpile. Another 1 million units of personal protective equipment is scheduled to begin arriving this weekend.

Health Secretary Dr. Nate Smith said people should continue social distancing and advised families to carefully consider plans for funerals and memorials.

He said those gatherings can be a place to transmit the virus to family members, including older people. He advised people to limit gatherings to close family members, to have ceremonies outdoors, to physically distance themselves from one another and to consider delaying large memorial services until after the outbreak.

He said these measures protect not just families but funeral directors as well.

The number of positive cases remained at 218 as of the 1:30 p.m. news conference, Smith said.

Among the sick are 11 children, 134 adults age 19-64 and 73 who are 65 and older.

Smith said 14 patients are hospitalized including six on ventilators. Ten people have recovered from the illness so far, he said.

Hutchinson also pointed to his previous guidance to companies, including allowing employees to work from home when possible.

The news conference came on the heels of an interview in which President Trump seemed to indicate a desire to return to business as normal in the United States by Easter, April 12.

Hutchinson said he had not heard the remarks but believed the president was trying to give people hope.

He said he believes Arkansas is only at the beginning of its outbreak and will see "more disruption" in the coming weeks.

Hutchinson said he's been advised what Arkansas is seeing in terms of the virus right now is "the calm before the storm."

Smith said he believes April 12 will likely be too early to return to business as usual.

Read Wednesday's *Democrat-Gazette* for full details.

EARLIER:

The Arkansas Department of Health reported Tuesday afternoon that 218 people have tested positive for coronavirus in Arkansas.

The number of total cases increased by 12 since Tuesday morning, when the agency reported 206 cases. So far, seven people have recovered from the virus. [One person has died, according to the Faulkner County deputy coroner.](#)

Gov. Asa Hutchinson and state health officials plan to provide an update on the spread of coronavirus in Arkansas at 1:30 p.m. Check back to watch the conference live.

Topics

Arkansas, [Asa Hutchinson](#), [Cleburne county](#), [coronavirus](#), [Sherwood](#), [Nate Smith](#), [Arkansas Department of Health](#), [Faulkner county](#), [Robert Edwards](#), [Pulaski county](#), [Conway Regional Medical Center](#), [Health Department](#), [Baptist Health Medical Center](#), [Gracie Campbell](#), [Bill Barton](#), [Ferry First Assembly](#).

ADVERTISEMENT

Related Articles

3rd patient dies of virus in state; \$116M plan taps Medicaid funds

3rd person to die of virus linked to Greers Ferry church; cases rise to 349 in state

State tightens controls; virus cases hit 308

Sponsor Content



Plastic Surgeon Tells: “Doing This Every Morning Can Snap Back Sagging Skin (No Creams Needed)”

Beverly Hills MD



Before you renew Amazon Prime, read this

Wikibuy

[Pics] Mom has no idea why vacation photo went viral, then she sees the background

When she went to recreate the photo she never knew what she wa...

Obsev

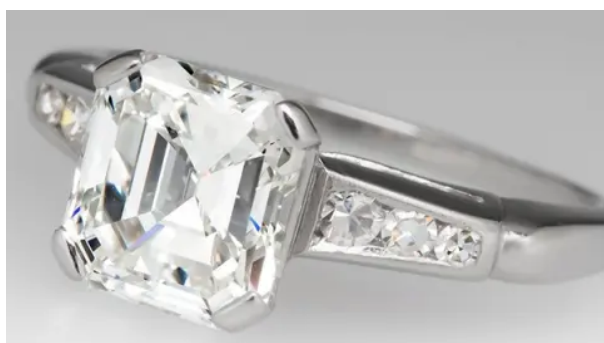
Recommended For You

MARCH 25 UPDATE: State to ban gatherings over 10 people; virus cases at 301

Little Rock to extend nightly curfew, mayor says

State sees first covid-19 deaths

SPONSOR CONTENT



Why a Bigger Diamond Isn't Necessarily Better

By [Gemological Institute of America](#)

ADVERTISEMENT

Recommended For You

Arkadelphia's Eldridge recommended for NLR head coaching spot

RESTAURANT TRANSITIONS: Eateries cook up new ways to run — or just close

What's in store: Groceries installing barriers amid outbreak

State tightens controls; virus cases hit 308

3rd person to die of virus linked to Greers Ferry church;

Arkansas Democrat Gazette

News 

Sports 

Features 

Web Extras 

Promotions 

Other 

Contact 

Digital Replica Info 

[Contact Us](#)

[Terms of Use](#)

[Advertise With Us](#)

Copyright © 2020, Arkansas Democrat-Gazette, Inc.

All rights reserved.

This document may not be reprinted without the express written permission of Arkansas Democrat-Gazette, Inc.

Material from the Associated Press is Copyright © 2020, Associated Press and may not be published, broadcast, rewritten, or redistributed. Associated Press text, photo, graphic, audio and/or video material shall not be published, broadcast, rewritten for broadcast or publication or redistributed directly or indirectly in any medium. Neither these AP materials nor any portion thereof may be stored in a computer except for personal and noncommercial use. The AP will not be held liable for any delays, inaccuracies, errors or omissions therefrom or in the transmission or delivery of all or any part thereof or for any damages arising from any of the foregoing. All rights reserved.

STATE OF ARKANSAS
EXECUTIVE DEPARTMENT
PROCLAMATION

TO ALL TO WHOM THESE PRESENTS COME – GREETINGS:

EO 20-06

EXECUTIVE ORDER TO AMEND EXECUTIVE ORDER 20-03 REGARDING THE PUBLIC HEALTH EMERGENCY CONCERNING COVID-19 FOR THE PURPOSE OF ASSISTING STATE AGENCIES IN RENDERING MAXIMUM ASSISTANCE TO THE CITIZENS OF ARKANSAS.

WHEREAS: An outbreak of coronavirus disease 2019 (COVID-19) has spread throughout China and to 59 other countries and territories, including the United States; and

WHEREAS: COVID-19 has been detected within the State of Arkansas and adjoining states, threatening the public safety of the citizens of Arkansas; and

WHEREAS: Great hardship has been brought to bear upon the citizens of this state as a result of the spread of COVID-19; and

WHEREAS: On March 11, 2020, by Executive Order 20-03, an emergency was declared in the state as a result of COVID-19, and that emergency is on-going; and

WHEREAS: Citizens of the state have been advised to take precautions to prevent the spread of COVID-19, including the advisement to minimize person-to-person contact, avoid large gatherings, and to stay home if they feel ill; and

WHEREAS: Laws of this state and rules and regulations of this state require in-person communication to receive services and conduct business; and

WHEREAS: Many citizens of this state are temporarily without employment due to the closure of businesses to prevent the spread of COVID-19 and need immediate access to unemployment benefits.

NOW, THEREFORE, I, Asa Hutchinson, Governor of the State of Arkansas, acting under the authority vested in me by Ark. Code Ann. §§ 12-75-101, *et seq.*, do hereby amend Executive Order 20-03 declaring an emergency in the State of Arkansas, and order all state agencies to identify provisions of any regulatory statute, agency order or rule that in any way prevents, hinders, or delays the agency's ability to render maximum assistance to the citizens of this state while they are adhering to guidelines to prohibit the spread of disease or seeking assistance from the state to obtain benefits or services related to health, education, employment, or any service rendered by the state in response to or to mitigate the spread of COVID-19. Agencies shall post any identified statutes, orders, and rules to their websites. Once posted by the agency, those identified statutes, orders, and rules are hereby suspended for a period of thirty (30) days from the date of this Order; and

IN TESTIMONY WHEREOF, I have hereunto set my hand and caused the Great Seal of the State of Arkansas to be affixed this 17th day of March, in the year of our Lord 2020.


Asa Hutchinson, Governor


Attest:

John Thurston, Secretary of State



Arkansas Department of Health

4815 West Markham Street • Little Rock, Arkansas 72205-3867 • Telephone (501) 661-2000

Governor Asa Hutchinson

Nathaniel Smith, MD, MPH, Secretary of Health

To: Arkansas Barbers, Body Artists, Cosmetologists, Massage Therapist, and Spas
From: Dr. Nate Smith, Secretary of Health
Date: March 23, 2020
Regarding: **Directive to Barbers, Body Art Establishments, Body Art Schools, Cosmetology Establishments, Massage Therapy Clinics/Spas, and Medical Spas**

The Secretary of Health, in consultation with the Governor, has sole authority over all instances of quarantine, isolation, and restrictions on commerce and travel throughout Arkansas, as necessary and appropriate to control disease in the state of Arkansas as authorized by Ark. Code Ann. §20-7-109—110 and the Arkansas State Board of Health Rules Pertaining to Reportable Disease (2019). Based on available scientific evidence, it is necessary and appropriate to take further action to ensure that COVID-19 remains controlled and that residents and visitors in Arkansas remain safe.

While the CDC public health emergency recommendations do not apply to the day-to-day operation of certain business operations at this time, there are no reasonable assurances of recommended social distancing and safety in Barber Shops, Body Art Establishments, Body Art Schools, Cosmetology Establishments, Massage Therapy Clinics/Spas, and Medical Spas. In order to slow the spread of COVID-19, all Barbers, Body Art establishments, Body Art schools, Cosmetology establishments, Massage Therapy Clinics/Spas, and Medical Spas should close for in-person operations. Maintaining any related schools' distance education/learning is acceptable.

This directive to Barbers, Body Art Establishments, Body Art Schools, Cosmetology Establishments and Massage Therapy Clinics/Spas, and Medical Spas is made in an attempt to reduce introduction of the virus into new communities and to slow the spread of infection in communities already affected by the virus. This directive and mandate is subject to change as the COVID-19 pandemic progresses.

This directive will be in effect as of March 25, 2020 at 12:00 p.m.

Arkansas Expands Restrictions, School Closure Over Virus

Arkansas is keeping its schools closed for another three weeks and banning sit-down service at bars and restaurants over concerns about the coronavirus outbreak.

By Associated Press, Wire Service Content March 19, 2020



In this Wednesday, March 18, 2020 photo, service representative Lisa Norwood, left, wears a mask as she takes a driver's license photo of Jamie Easton, of North Little Rock, at the Central Revenue Office in Little Rock, Ark. (Thomas Metthe/The Arkansas Democrat-Gazette via AP)  THE ASSOCIATED PRESS

BY ANDREW DEMILLO, Associated Press

LITTLE ROCK, Ark. (AP) — Gov. Asa Hutchinson said Thursday that [Arkansas'](#) schools will remain closed for an additional three weeks and he banned sit-down service at all



Hutchinson detailed the new restrictions as health officials said the number of cases of the disease caused by the coronavirus rose overnight from 37 to 62.

"We're really separating what we need to be doing with what is optional to be doing in trying to reduce the risk of community spread and exposure, particularly of our vulnerable population," Hutchinson said.

For most people, the virus causes only mild or moderate symptoms, such as fever and cough. For some, especially older adults and people with preexisting health problems, it can cause more severe illness, including pneumonia.

The vast majority of people recover from the virus. According to the World Health Organization, people with mild cases recover in about two weeks, while others could take three to six weeks to get well.

The state's public schools, which had been set to reopen on March 30 after a two-week closure, will now remain closed through April 17.

Starting Friday, restaurants will be allowed to offer only take-out, curbside and delivery service, he said.

"Please get your food and go home. ... For now, this is our new normal," Little Rock Mayor Frank Scott said earlier Thursday as he announced identical restrictions for his city.

Because of the dining restrictions, the state is temporarily allowing restaurants to sell beer and wine for takeout or delivery with the purchase of food. The emergency rule will also allow curbside service and delivery by liquor stores.



In Little Rock, Scott said the city will allow the restaurant and bar facilities to be used for other purposes such as specialty grocery stores, as long as the maximum occupancy doesn't exceed 10 people.

Gyms in the state were also closed for non-essential services.

The governor also said the state will move to telecommuting, with on-site work limited to employees needed for the proper function of government. He also ordered hospitals, clinics and mental health facilities to screen staff and visitors for temperature and potential symptoms of the virus.

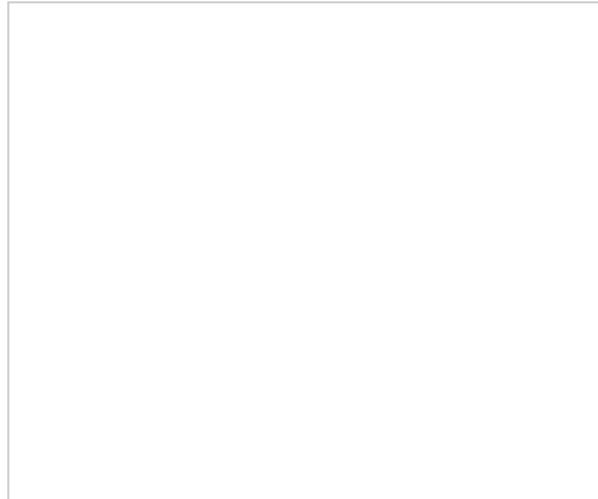
Hutchinson said students will still be taught through alternative instruction methods during the closure. The state Department of Education said it's working with Arkansas PBS to develop lessons and resources for students in kindergarten through 8th grade for districts with limited capacity to plan for and deliver additional lessons, and with Virtual Arkansas and the Arkansas Public Resource Center on options for 9th through 12th grade students.

Education Secretary Johnny Key said officials haven't made a decision about standardized testing because of the closure but will likely have an answer in the next several days. Several states that have closed because of the outbreak have canceled their tests.

Before Thursday, Hutchinson had said he didn't see a need yet for ordering restaurants and bars to close despite other states taking that step. Little Rock on Wednesday began enforcing a curfew from 12 a.m. to 5 a.m. Fayetteville, in northwest Arkansas, had



The Associated Press Health and Science Department receives support from the Howard Hughes Medical Institute's Department of Science Education. The AP is solely responsible for all content.



Follow AP coverage of the virus outbreak at <https://apnews.com/VirusOutbreak> and <https://apnews.com/UnderstandingtheOutbreak>

Copyright 2020 The [Associated Press](#). All rights reserved. This material may not be published, broadcast, rewritten or redistributed.

Tags: Arkansas



Coronavirus Bulletin

Stay informed daily on the latest news and advice on COVID-19 from the editors at U.S. News & World Report.



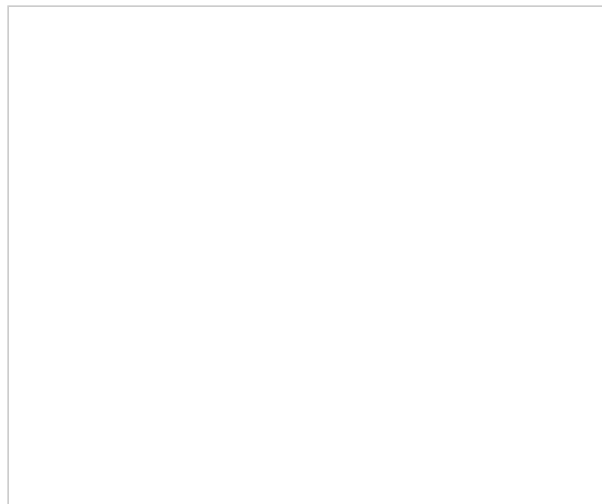
YOU MAY ALSO LIKE

The 10 Best States in the U.S.	
--	--

BRANDFUSE ad content by Nitto Tire Why Ford's Smaller Pickup Has Plenty of Potential: Take a Look Here	
--	--

The 10 Best U.S. States for Education	
--	--

Vermont Governor to Talk of Switch to Remote Learning	
--	--



ACLU Questions Constitutionality of Stopping New York Cars	
---	--

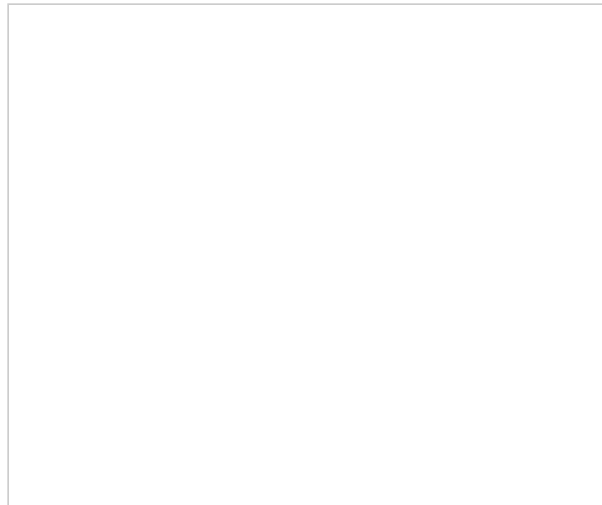


Voting Groups, Unions Sue to Force Election Postponement



Authorities Squash Western New Mexico Prison Riot

Top Dodge County Prosecutor Arrested, Accused of DUI



1 Dead in Early Morning House Fire in Northeast Albuquerque

Juvenile Dies, 2 Injured in West Virginia House Fire

Load More



BEST STATES

Best States is an interactive platform developed by U.S. News for ranking the 50 U.S. states, alongside news analysis and daily reporting. The platform is designed to engage citizens and government leaders in a discussion about what needs improvement across the country.

BEST COUNTRIES

BEST STATES

HEALTHIEST COMMUNITIES

NEWS

CITIES

LEADERS

THE REPORT

PHOTOS

AMERICA 2020

EVENTS



[About](#) [Our Mission](#) [Contact](#) [Press](#) [Advertise](#) [Newsletters](#)

[Jobs](#) [Site Map](#) [Store](#)



Copyright 2020 © U.S. News & World Report L.P.

[Terms & Conditions](#)/[Privacy Policy](#)/[California Privacy Notice](#)/[California Do Not Sell My Personal Information Request](#)

×

In service to our community, the Arkansas Democrat-Gazette is making its online coronavirus coverage accessible for all readers.



[Search](#) [Latest](#) [Coronavirus](#) [Elections](#) [Core values](#) [App](#) [Listen](#) [Story ideas](#) [iPad](#) [Weath](#)

ADVERTISEMENT

Election officials in Arkansas proceed carefully

by [Bill Bowden](#), [Dale Ellis](#) | March 22, 2020 at 9:12 a.m.

2

Follow



In service to our community, the Arkansas Democrat-Gazette is making its online coronavirus coverage accessible for all readers.

For our community, now there's unlimited access for all covid-19 news online from the Arkansas Democrat-Gazette.

With covid-19 creeping across Arkansas, voters will begin going to the polls Tuesday to cast early votes in the state's primary runoffs.

The situation is unprecedented. The Arkansas Constitution provides no mechanism for postponing the election, which is taking place during a pandemic that has infected more than 266,000 people worldwide, including 15,000 in the United States and 118 in Arkansas.

Coronavirus Updates

Stay up to date with the latest news regarding the coronavirus pandemic.

In Pine Bluff, where Arkansas' first case of covid-19 was confirmed, poll workers are skittish, and one quit.

Across Arkansas, hand sanitizer and alcohol wipes will be deployed at polling places, and electronic voting machines, countertops, tables and anything else people touch will be cleaned regularly.

In service to our community, the Arkansas Democrat-Gazette is making its online coronavirus coverage accessible for all readers.



Unexpected Signs of Psoriatic Arthritis

[Read More](#)

[CORONAVIRUS: [Click here for our complete coverage » arkansasonline.com/coronavirus](https://arkansasonline.com/coronavirus)]

One county opted for paper ballots. Another is handing out pencils so voters can use the erasers on the touch screens of voting machines instead of their fingers.

Another county is having drive-thru voting. Some courthouses are closed to the public but will let people in one at a time to vote.

Voting will continue in the 12 Arkansas counties through Election Day, which is March 31.

At the direction of the state Board of Election Commissioners, officials in those counties are working to limit the amount of contact between voters and poll workers out of fear of the coronavirus.

Holding runoffs are Arkansas, Benton, Conway, Craighead, Garland, Grant, Greene, Hot Spring, Jefferson, Lonoke, Saline and White counties.

Officials in those counties have worked to establish sanitation procedures, cut the number of polling sites, schedule poll workers — most of whom are considered at high risk to the virus because of their age — and promote absentee balloting in an effort to keep as many voters as possible away from the polls while simultaneously working to safeguard their right to cast a ballot.

While officials hope more voters than usual will opt to vote by absentee ballot, they are preparing for an unknown number to vote in person.

In service to our community, the Arkansas Democrat-Gazette is making its online coronavirus coverage accessible for all readers.

JEFFERSON COUNTY

Jefferson County remains one of the hardest-hit counties with more than 10 confirmed cases of covid-19.

ARTICLE CONTINUES BELOW

More related headlines

March 31 runoff to go on despite the health scare

Think safety for runoffs, counties told; officials prep for elections, but some calling for delay

3 states vote, but coronavirus disruptions could last weeks

Arkansas Election Board provides guidance for runoff elections amid virus

ADVERTISEMENT

There are two races on the ballot — one for Pine Bluff City Council and one for Jefferson County justice of the peace.

“We’ve lowered the number of polling sites to lessen the number of poll workers and the exposure factor,” Election Administrator Sven Hippi said Thursday. “We’ve come up with a health/safety plan to require gloves and alcohol wipes at each polling site, and as of now, everything is programmed and ready to walk out the door for the election.”

Hipp said that after the first covid-19 case was discovered in Pine Bluff, he began hearing from concerned poll workers as well as officials in charge of the locations the county uses as polling sites, many of whom were unwilling to risk the possibility of exposure. As the threat level continues to rise in the state, concern is also rising, he said.

“I’ve had three [poll workers] call today and express concern after they raised the number [of covid-19 cases] to 62,” Hipp said Thursday. “One poll worker actually quit, and two others wanted to know if we

In service to our community, the Arkansas Democrat-Gazette is making its online coronavirus coverage accessible for all readers.

BENTON COUNTY

In Benton County, voters will be handed pencils, but not to write on paper ballots. They'll be instructed to use the eraser end on the touch screen of electronic voting machines.

The pencils will be sanitized between voters, said Russell Anzalone, chairman of the Benton County Election Commission.

Anzalone said that with three early voting locations and six polling places open on Election Day, he doesn't foresee overcrowding being a problem.

"It's a runoff election," he said. "We are really not inundated with voters for runoff elections."

Samantha Hufford, deputy Benton County clerk, said 22,000 notices were mailed Tuesday to let people know they could vote by absentee ballot, and as of Thursday, the office had processed 118 applications. Many more are expected, she said.

"We are trying to get people to vote absentee just to cut down on the traffic," Hufford said.

HOT SPRING COUNTY

In Hot Spring County, among other precautions, paper ballots will be used in the Glen Rose School District election so voters don't have to touch the screens of voting machines, said Election Coordinator Liz Pfeiffer. If handicapped voters need a machine to vote, they will have access to one, she said.

She said the number of people allowed into the voting center in Malvern would be limited to 10. That probably will include three staff members and two poll workers at any given time. Pfeiffer said only the younger, healthy poll workers will be working this election.

And she said that for this election, the only polling place will be at the voting center in Malvern.

"We felt like we needed to be able to contain and monitor the situation," she said.

SALINE COUNTY

In neighboring Saline County, which also has voters participating in the Glen Rose School District runoff, Election Coordinator Allison Cain said voters will cast ballots at a single location both for early voting and on March 31 — at the Benton Vote Center across from the Saline County Courthouse in Benton.

Cain said she has had no trouble securing poll workers to staff the voting center.

In service to our community, the Arkansas Democrat-Gazette is making its online coronavirus coverage accessible for all readers.

so we haven't had any issues at all."

GARLAND COUNTY

Sarah Smith, the Garland County clerk, said Wednesday that she had sent out 70 absentee ballots for the Lakeside School Board election and had requests for 25 more.

"We've definitely had an increase in the requests," she said. "We have asked people to request absentee ballots if they could based on the recommendation of the state Board of Elections."

WHITE COUNTY

In White County, which has a runoff for Big Creek Township constable, officials plan to utilize three polling sites.

"We normally have five locations for that township, but due to all of this we have consolidated," said Election Coordinator Tara McKnight. "All of our poll workers are older, so we're trying to limit their risk as much as possible."

McKnight said though some had expressed concerns, she had no difficulty lining up poll workers, and as recently as a week ago all were still committed to work.

"When we consolidated, I talked to them last week to be sure everyone was still OK," she said. "They were just like, 'Well, we're fine.' Everyone is still on board."

LONOKE COUNTY

For voters who opt to show up for early voting in person in Lonoke County, the process will be conducted in a manner guaranteed to keep voters more than 6 feet apart, said Election Coordinator Kirsten Shipp.

"We're going to be doing early voting, drive-thru, at the courthouse," Shipp said. "We care most about our voters and we don't want to deny them the right to vote, so we're doing everything we can to safeguard their right to vote and their safety while doing so."

On Election Day, voters will vote at the South Bend Fire Department in Jacksonville.

GRANT COUNTY

Voters in Grant County will have their temperatures taken outside the courthouse, said Election Coordinator Debbie More. Those who have a normal temperature will cast their ballot on a touchscreen machine, while those who have a fever will vote by paper. A justice of the peace seat is on the ballot.

In service to our community, the Arkansas Democrat-Gazette is making its online coronavirus coverage accessible for all readers.

ARKANSAS COUNTY

In Arkansas County, in the DeWitt School Board Zone 7 runoff, County Clerk Melissa Wood said that during early voting voters will be required to call a number posted on the door, which will be locked, and they will be allowed in one at a time to cast their vote on a paper ballot. She said voters will not be screened before being allowed in.

“We can’t deny anyone their right to vote, whether they have a fever, a cough or whatever,” Wood said. “What we’ll do is — wearing gloves, masks and all of that — we’ll let them in one at a time to vote, and then we’ll sanitize the area behind each voter. Then we’ll allow the next person to come inside the building.”

GREENE COUNTY

Kristi Rawls, the election coordinator in Greene County, said there are two constable races on the ballot.

Roscoe Wood, a candidate in one of those races, died Feb. 29 during early voting. He got the same number of votes as his opponent, Claude Graves, in the March 3 election for constable for Crowley’s Ridge Township, so the two are in a runoff.

“It’s actually pretty heated,” said Rawls. “There’s just been a lot of social media talk.”

CRAIGHEAD COUNTY

Craighead County is having a Republican primary runoff for District 53 state representative.

Jennifer Clack, the Craighead County election coordinator, said the county will have forehead thermometers available for election workers to make sure they don’t have a fever.

Clack said she has a total of 23 election workers scheduled to work the two polling places during early voting — the courthouse in Jonesboro and the courthouse annex in Lake City — and seven polling places on Election Day.

CONWAY COUNTY

A Democratic primary runoff is being held for an at-large Morrilton City Council seat, said Debbie Hartman, the Conway County clerk.

Hartman said the courthouse in Morrilton has been closed to the public, so early voting will be held at an annex across the alley from the courthouse.

In service to our community, the Arkansas Democrat-Gazette is making its online coronavirus coverage accessible for all readers.

On Election Day, voting will be held at the Morrison Christian Center.

“We found some young poll workers who are going to be running it that day,” said Hartman. “We’re going to do everything we can to protect the public and ourselves.”

Topics

[Arkansas](#), [Jefferson county](#), [Benton county](#), [Arkansas county](#), [Lonoke county](#), [Saline county](#), [Craighead county](#), [Board of Election Commissioners](#), [Hot Spring county](#), [Greene county](#), [Grant county](#), [White county](#), [Lake city](#), [Garland county](#), [Big creek](#), [Sarah Smith](#), [Board of Elections](#), [Conway county](#).

ADVERTISEMENT

Related Articles

March 31 runoff to go on despite the health scare

Think safety for runoffs, counties told; officials prep for elections, but some calling for delay

3 states vote, but coronavirus disruptions could last weeks

Sponsor Content



Plastic Surgeon Tells: “Doing This Every Morning Can Snap Back Sagging Skin (No Creams Needed)”

Beverly Hills MD



Before you renew Amazon Prime, read this

Wikibuy



New York: Say Bye To Expensive Solar Panels If You Own A Home in New York

top.solar



PRESS RELEASE

FOR IMMEDIATE RELEASE

Released by: Jefferson County Clerk Shawndra Taggart (870) 541-5322

Subject: Jefferson County Clerk Encourages Voting By Absentee Ballot for the March 31 Runoff Election

As a preventative measure to avoid COVID-19 exposure, the Centers for Disease Control and Prevention, Arkansas Department of Health and State Board of Election Commissioners recommend voting by absentee ballot in the March 31 Democratic general primary election (runoff) for JP District 13 and Pine Bluff Ward 2, position 1 city council.

Steps for Absentee Voting:

- Request an absentee ballot application from the Clerk's office or download and print a ballot from jeffersoncountyar.gov. Go to officials/County Clerk website/over registration information or https://www.sos.arkansas.gov/uploads/elections/Absentee Ballot Application.pdf
- Although the courthouse is closed to the public, the County Clerk's Office will be open during regular business hours Wednesday 18th through Tuesday 24th to provide and accept absentee ballot applications. Call (870) 541-5322 if you cannot get in to the courthouse.
- Complete and return the ballot application to the County Clerk's Office in person, by fax to 870-541-5324, or by email to staggart.jcclerk@yahoo.com no later than March 24; or by mail to P.O. Box 6317, Pine Bluff AR 71611-6317 postmarked no later than March 24, 2020.
- Upon receipt of your absentee ballot and voter statement, ensure you accurately complete the voter statement. In the event you cannot provide a copy of acceptable photo ID, ensure you sign the highlighted OPTIONAL VERIFICATION OF IDENTITY statement at the bottom.

The voter shall return their voted absentee ballot in person no later than 5 pm on Monday, March 30. If a voted ballot is returned by mail, designated bearer, authorized agent or nursing home administrator, it must be received in the County Clerk's Office by 5 pm on March 31.

Early voting will be conducted at the courthouse beginning Tuesday, March 24th through Monday, March 30th from 8:30 am to 5 pm with no voting on Saturday or Sunday.

The Jefferson County Clerk's Office has implemented health screen strategies for the safety of Jefferson County voters. Notices will be posted from the entrance throughout the designated areas leading to the voting machines. Each voter is required to remain at least six (6) feet from the voter in front of them. Bringing children is discouraged. Voting machine screens will be disinfected after each voter casts their vote.



Overview Table 2: By-Mail and In-Person Early Voting

State	Total Voter Turnout	Total By-Mail Ballots Transmitted	By-Mail Ballots Returned by Voters								In-Person Early Voters	
			Total	Pct. of Transmitted	Counted		Rejected		Other		Total	Pct. of Total Ballots Cast
					Total	Pct. of Returned	Total	Pct. of Returned	Total	Pct. of Returned		
Alabama [1]	1,723,694	63,379	57,832	91.25	54,833	94.81	1368	2.37	1631	2.82	-	-
Alaska	287,485	29,257	24,425	83.48	23,667	96.90	758	3.10	0	0.00	56,434	19.63
American Samoa	8,462	51	36	70.59	0	0.00	0	0.00	36	100.00	893	10.55
Arizona	2,409,906	2,672,384	1,899,240	71.07	1,874,577	98.70	8,567	0.45	16,096	0.85	44,417	1.84
Arkansas	790,656	17,120	15,208	88.83	11,611	76.35	1,150	7.56	2,447	16.09	413,254	52.27
California	13,828,680	13,687,191	8,286,228	60.54	8,289,322	100.04	161,660	1.95	-164,754	-1.99	61,901	0.45
Colorado	2,586,432	3,467,664	2,449,409	70.64	2,430,239	99.22	19,170	0.78	0	0.00	89,355	3.45
Connecticut [1]	1,421,650	96,559	91,602	94.87	89,877	98.12	1,725	1.88	0	0.00	-	-
Delaware	366,550	17,392	14,142	81.31	13,436	95.01	706	4.99	0	0.00	5,525	1.51
District of Columbia	231,700	12,400	9,351	75.41	9,019	96.45	332	3.55	0	0.00	52,512	22.66
Florida	8,355,817	3,499,591	2,604,544	74.42	2,585,374	99.26	30,540	1.17	-11,370	-0.44	2,681,708	32.09
Georgia	3,951,876	281,490	242,661	86.21	218,858	90.19	7,512	3.10	16,291	6.71	1,893,368	47.91
Guam	37,386	624	367	58.81	298	81.20	69	18.80	0	0.00	1,042	2.79
Hawaii	398,657	286,317	224,492	78.41	12,616	5.62	1,638	0.73	210,238	93.65	28,300	7.10
Idaho	612,582	81,172	76,197	93.87	72,872	95.64	1,188	1.56	2,137	2.80	166,195	27.13
Illinois	4,751,180	496,345	417,092	84.03	429,874	103.06	9,056	2.17	-21,838	-5.24	1,078,372	22.70
Indiana	2,933,234	766,722	762,511	99.45	750,339	98.40	3,413	0.45	8,759	1.15	616,016	21.00
Iowa [2]	1,334,279	358,659	325,098	90.64	310,563	95.53	5,098	1.57	9,437	2.90	-	-
Kansas	1,070,221	191,602	172,743	90.16	170,641	98.78	1,879	1.09	223	0.13	250,114	23.37
Kentucky	1,619,587	29,244	25,837	88.35	23,971	92.78	1,756	6.80	110	0.43	64,407	3.98
Louisiana	1,519,552	65,442	43,959	67.17	41,363	94.09	2,596	5.91	0	0.00	271,191	17.85
Maine [2]	646,083	193,558	185,763	95.97	183,644	98.86	2,119	1.14	0	0.00	-	-
Maryland	2,335,128	146,208	113,702	77.77	111,696	98.24	1,997	1.76	9	0.01	663,188	28.40
Massachusetts	2,753,623	105,454	89,437	84.81	84,280	94.23	5,157	5.77	0	0.00	580,091	21.07
Michigan	4,341,340	1,123,415	1,061,835	94.52	1,055,822	99.43	6,013	0.57	0	0.00	98,136	2.26
Minnesota	2,618,245	722,326	640,707	88.70	632,868	98.78	7,479	1.17	360	0.06	340,004	12.99
Mississippi	961,025	69,904	64,060	91.64	17,979	28.07	482	0.75	45,599	71.18	50,727	5.28

Overview Table 2: Absentee Voting									
	Total Voter Turnout	Total Ballots Transmitted	Total Ballots Returned	Counted		Rejected		Other	
				Total	Pct. Returned	Total	Pct. Transmitted	Total	Pct.
Alabama	2,137,452	98,474	88,601	87,553	98.82	0	0	1,048	1.18
Alaska	323,288	31,817	27,626	26,750	96.83	876	2.75	0	0.00
Arizona	2,722,660	2,478,063	2,017,722	1,991,683	98.71	10,769	0.43	15,270	0.76
Arkansas	1,048,513	29,902	27,525	26,655	96.84	1,614	5.4	-744	-2.70
California	14,610,494	12,018,267	8,511,992	8,453,683	99.31	58,309	0.49	0	0.00
Colorado	2,884,199	3,411,107	2,654,993	2,631,744	99.12	23,249	0.68	0	0.00
Connecticut	1,675,955	129,480	132,012	129,480	98.08	2,532	1.96	0	0.00
Delaware	448,217	15,924	14,025	13,809	98.46	216	1.36	0	0.00
District of Columbia	311,841	21,362	16,625	16,592	99.8	33	0.15	0	0.00
Florida	9,613,669	3,421,930	2,679,049	2,657,064	99.18	21,973	0.64	12	0.00
Georgia	4,147,161	236,925	213,033	199,356	93.58	13,677	5.77	0	0.00
Guam	35,854	1,634	1,527	1,508	98.76	19	1.16	0	0.00
Hawaii	437,697	218,487	190,553	189,225	99.3	1,244	0.57	84	0.04
Idaho	710,495	207,409	201,256	200,380	99.56	876	0.42	0	0.00
Illinois	5,562,009	428,748	377,551	371,557	98.41	5,994	1.4	0	0.00
Indiana	2,831,540	946,408	943,924	923,455	97.83	2,095	0.22	18,374	1.95
Iowa	1,581,371	671,415	650,551	646,313	99.35	4,238	0.63	0	0.00
Kansas	1,223,491	196,910	179,557	177,701	98.97	4,361	2.21	-2,505	-1.40
Kentucky	1,949,254	42,519	38,112	35,967	94.37	2,145	5.04	0	0.00
Louisiana	2,049,802	76,120	59,747	57,476	96.2	2,271	2.98	0	0.00
Maine	771,892	260,033	254,153	251,701	99.04	2,452	0.94	0	0.00
Maryland	2,807,326	206,063	160,508	158,120	98.51	2,388	1.16	0	0.00
Massachusetts	3,378,801	174,655	155,894	150,742	96.7	5,152	2.95	0	0.00



New York Office
40 Rector Street, 5th Floor
New York, NY 10006-1738
T. (212) 965 2200 F. (212) 226 7592
www.naacpldf.org



Washington, D.C. Office
700 14th Street, NW, Suite 600
Washington, D.C. 20005
T. (202) 682 1300 F. (202) 682 1312

March 24, 2020

Via Email

Hon. John Thurston
Arkansas Secretary of State
Executive Office State Capitol, Suite 256
500 Woodlane Avenue
Little Rock, AR 72201
501-682-1010

Re: Ensuring Ballot Access for Arkansas Voters during the COVID-19 Pandemic

Dear Secretary Thurston:

The NAACP Legal Defense and Educational Fund, Inc., the Christian Ministerial Alliance, and the Arkansas Community Institute write to ask that you issue guidance and administrative rules to permit every eligible voter in Arkansas to safely vote in the March 31, 2020 runoff election during this unprecedented national and statewide health crisis. We also write to raise concerns about your compliance with the National Voter Registration Act.

As you know, the COVID-19 (coronavirus) pandemic presents extraordinary public health, safety, and logistical concerns for every Arkansas voter. On March 10, the President responded to the rapid spread of COVID-19 by declaring a national emergency.¹ On March 11, Governor Hutchinson declared a state of emergency for Arkansas.² These declarations are based on the well-founded concern that COVID-19 could lead to the death or serious illness of millions and overwhelm our healthcare system. To date, there are 211 confirmed COVID-19 cases in Arkansas.³ For each confirmed case, however, there could be up to 10 unconfirmed ones.⁴ To slow the outbreak, the State has ordered school closures, advised people to work from home, to minimize personal contact, to avoid large gatherings, and to stay home if they are ill, and the State has urged everyone to practice social distancing.⁵

Because conducting elections and other government functions in this situation presents exceptional challenges, the Governor has directed every state agency to identify and suspend

¹ Brooke Singman, "Trump Declares National Emergency over Coronavirus, Enlists Private Sector," Fox News (Mar. 14, 2020), <https://www.foxnews.com/politics/trump-declares-national-emergency-coronavirus>.

² Proclamation by the Governor of the State of Arkansas, Executive Order No. 20-03, Mar. 11, 2020, available at https://governor.arkansas.gov/images/uploads/executiveOrders/EO_20-03.__1.pdf.

³ "Officials say 7 people have recovered from coronavirus in Arkansas," THV 11 Digital, Mar. 23, 2020, <https://www.thv11.com/article/news/health/coronavirus/coronavirus-in-arkansas-covid-19-updates/91-386ccf84-2651-481e-b77f-e07e703fad65>.

⁴ Ruiyun Li, et al, *Substantial undocumented infection facilitates the rapid dissemination of novel coronavirus*, Science Magazine (Mar. 16, 2020), <https://science.sciencemag.org/content/early/2020/03/13/science.abb3221>.

⁵ Proclamation by the Governor of the State of Arkansas, Executive Order No. 20-06, Mar. 17, 2020, available at https://governor.arkansas.gov/images/uploads/executiveOrders/EO_20-06.__.pdf.

March 24, 2020

Page 2 of 4

any “regulatory statute, agency order or rule that in any way prevents, hinders, or delays the agency's ability to render maximum assistance to the citizens of this state while they are adhering to the guidelines to prohibit the spread of disease”⁶

To that end, we appreciate that you have recently issued guidance that explains that “[a]ll Arkansans who are eligible to vote in a runoff election are eligible to cast an absentee ballot under Arkansas’s existing absentee voting law.”⁷ Unfortunately, this guidance does not go far enough to protect voters. For example, under the guidance, a voter must apply for an absentee ballot via mail, fax, or email by today (March 24), but a voter may request an absentee ballot in-person through March 30. Further, the absentee ballot itself must be received by the county clerk by 7:30pm on Election Day (March 31) and there are needless limitations placed on who can collect absentee ballot applications.

Accordingly, we respectfully request that you take the following additional steps:

- Clarify that voters are exempt from the photo ID requirements related to absentee voting;
- To assist voters in complying with social distancing guidelines and burdened by county courthouse and polling place closures, extend the absentee ballot request deadline for mail, fax, or email applications to at least March 30 (i.e., the deadline for in-person absentee ballot requests);
- Accept absentee ballots postmarked by Election Day (March 31) and received within 10 days of Election Day;
- Allow any voter or a designee to drop off their absentee ballot at any polling place;
- Allow any person designated by the voter (including staff of nursing homes and senior centers if the voter resides in these facilities) to pick up the voter’s absentee ballot and drop that absentee ballot off by the close of polls on Election Day;
- Allow curbside voting to any eligible voter that is concerned about coming inside a polling location; and
- Undertake an aggressive voter education plan to ensure that voters are aware of and know how to exercise these options and to counter (intentional or unintentional) disinformation with facts.

⁶ *Id.*

⁷ Press Release, “Important Election Update: Early Voting for General Primary Runoff Election Begins Tuesday, March 24th,” Arkansas Secretary of State, March 18, 2020, available at <https://content.govdelivery.com/accounts/ARSOS/bulletins/281e8cf>.

March 24, 2020
Page 3 of 4

The above measures, in conjunction with the recommendations made by others,⁸ will benefit all eligible voters, but are particularly important for older voters, low-income people, voters with disabilities, and people of color who are less likely to have access to the healthcare, social networks, and transportation necessary to feel safe voting in-person. In fact, to protect the fundamental right to vote in times of crisis, federal courts have ordered election officials to extend voting deadlines or make other accommodations to address states of emergency.⁹

Moreover, because polling places are being relocated to protect the public health and vulnerable populations, like elderly people and people with disabilities, affected voters must be promptly notified of any changes.¹⁰ Election officials must ensure that no polling site relocation violates the Voting Rights Act, that any new poll sites are compliant with the Americans with Disabilities Act, and that the new sites are consistent with all other federal nondiscrimination and election laws. Also, to prepare for the possibility that COVID-19 may lead to the unavailability of large numbers of poll workers,¹¹ your office should immediately begin working with local officials on a special effort to recruit and train more poll workers.

Finally, we write to notify you that the State of Arkansas is not in compliance with Sections 5 and 7 of the National Voter Registration Act of 1993 (“NVRA”), 52 U.S.C. § 20504 et seq. Arkansas is systematically failing to ensure that a driver’s license or identification card application, renewal, or change of address transaction serves as a voter registration application or change of address in accordance with Section 5. Arkansas is also not in compliance with Section 7 of the NVRA. While Arkansas permits individuals to apply for public benefits online at <https://access.arkansas.gov/Welcome.aspx>, that website is not set up to accept or transmit voter registration applications or to assist voters with the registration process. Rather, voters are directed to print and mail-in their registration forms. This letter serves as notice per 52 U.S.C. § 20510(b) of violations by Arkansas of the NVRA.

Given the urgency of the COVID-19 concerns, we request that you respond by **noon tomorrow (Wednesday March 25, 2020)** to Deuel Ross (dross@naacpldf.org) and Natasha Merle (nmerle@naacpldf.org). Thank you.

⁸ See, e.g., Letter from the Leadership Conference on Civil and Human Rights to State Election Officials, etc., Mar. 17, 2020, available at <http://civilrightsdocs.info/pdf/policy/letters/2020/COVID-19-Coalition-Letter-updated-3.17.20.pdf>; Brennan Center for Justice, Memorandum re: How to Protect the 2020 Vote from the Coronavirus, Mar. 16, 2020, [https://www.brennancenter.org/sites/default/files/2020-03/Coronavirus Response Memo.pdf](https://www.brennancenter.org/sites/default/files/2020-03/Coronavirus%20Response%20Memo.pdf).

⁹ *D.N.C. v. Bostelmann*, No. 20-cv-249, 2020 WL 1320819 (W.D. Wis. Mar. 20, 2020); *Florida Democratic Party v. Scott*, No. 4:16-cv-626, 2016 WL 6080225 (N.D. Fla. Oct. 12, 2016).

¹⁰ See Bill Bowden, *Election officials in Arkansas proceed carefully*, Arkansas Democrat Gazette, Mar. 22, 2020, available at <https://www.arkansasonline.com/news/2020/mar/22/election-officials-proceed-carefully/>

¹¹ Nationally, two-thirds of poll workers are age 61 or older. Election Administration Commission, Election Administration and Voting Survey: 2018 Comprehensive Report, at 9, https://www.eac.gov/sites/default/files/eac_assets/1/6/2018_EAVS_Report.pdf.

March 24, 2020

Page 2 of 4

Sincerely,

Deuel Ross

Natasha Merle

NAACP Legal Defense

& Educational Fund, Inc.

(212) 965-7712

Bishop Vernon Kennebrew,

President

Christian Ministerial Alliance

Neil Sealy

Executive Director

Arkansas Community Institute

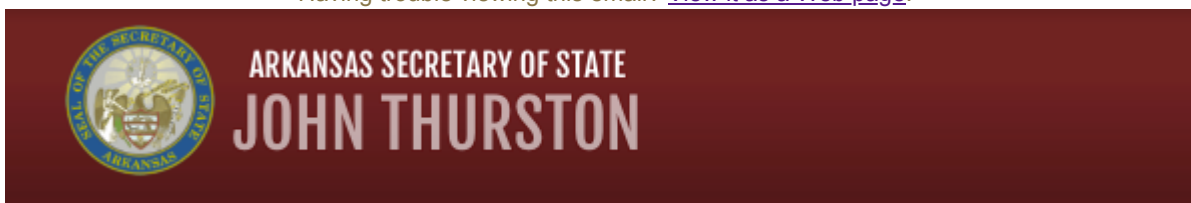
Receive Updates

[Arkansas Secretary of State](#)

Early Voting for General Primary Runoff Election Begins Tuesday, March 24th

Arkansas Secretary of State sent this bulletin at 03/18/2020 02:45 PM CDT

Having trouble viewing this email? [View it as a Web page.](#)



March 18, 2020

FOR IMMEDIATE RELEASE

MEDIA CONTACT: Chris Powell | chris.powell@sos.arkansas.gov | (501) 529-5441

Important Election Update:

Early Voting for General Primary Runoff Election Begins Tuesday, March 24th

(LITTLE ROCK, ARK.) – Arkansas Secretary of State John Thurston wants to remind voters that Early Voting for the Tuesday, March 31st General Primary Runoff Election begins next Tuesday, March 24th.

Early voting will be available during your county clerk's normal business hours, March 24-March 30. Polls will be closed Saturday, March 28th and Sunday, March 29th.

The Arkansas State Board of Election Commissioners has provided guidance to local election officials in Arkansas to explore all available options to make the March 31st General Primary Runoff Election as safe and accessible as possible. Due to the ongoing precautions being taken in response to the COVID-19 pandemic, the Board recommended notifying eligible voters of the option to vote by absentee ballot if they wish.

All Arkansans who are eligible to vote in a runoff election are eligible to cast an absentee ballot under Arkansas's existing absentee voting law. To receive an absentee ballot, the eligible voter must submit an application to his or her local county clerk. Applications sent via mail, fax, or email must be received by the County Clerk no later than March 24th. If you are unable to mail, fax, or email your absentee ballot application by March 24th, then you may request one in person or through a designated bearer from your county clerk so long as the request is made by close of business hours on March 30th. Please note that a designated bearer may only request two absentee ballots per election. Absentee ballots received by the County Clerk by 7:30 pm on March 31st will be counted. You may download an absentee ballot application from the Secretary of State website

at: https://www.sos.arkansas.gov/uploads/elections/Absentee_Ballot_Application.pdf.

Per recommendations from the Centers for Disease Control and the Arkansas Department of Health, voters should continue to observe appropriate social distancing measures when going to vote, and maintain a six-foot distance from others, if possible. County officials and workers are receiving guidance on additional measures to ensure the safety of everyone.

To check your voter registration information and get information on your local polling location, contact your county clerk.

###

Having trouble viewing this email? [View it as a Web page.](#)

Stay Connected with Arkansas Secretary of State:



SUBSCRIBER SERVICES:

[Manage Subscriptions](#) | [Unsubscribe All](#) | [Help](#)

Powered by



[Privacy Policy](#) | [Cookie Statement](#) | [Help](#)

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS

DEBRA MAYS, et al.,

Plaintiffs,

v.

JOHN THURSTON, et al.,

Defendants.

DECLARATION OF WILLIAM S. COOPER

WILLIAM S. COOPER, acting in accordance with 28 U.S.C. § 1746, Federal Rule of Civil Procedure 26(a) (2) (B), and Federal Rules of Evidence 702 and 703, does hereby declare and say:

I. INTRODUCTION

1. My name is William S. Cooper. I have a B.A. in Economics from Davidson College. As a private consultant, I currently serve as a demographic and redistricting expert for the Plaintiffs. I am compensated at a rate of \$150 per hour.

2. I have testified at trial as an expert witness on redistricting and demographics in federal courts in about 40 voting rights cases since the late 1980s. Five of these lawsuits resulted in changes to state legislative boundaries. Approximately 25 of the cases led to changes in local election district plans. My testimony in these lawsuits almost always included a review of demographics and socioeconomic characteristics for the jurisdictions at issue.

3. For additional historical information on my testimony as an expert witness, see **Exhibit A** attached to this declaration.

4. In this declaration, I present a demographic and socioeconomic profile of Arkansas and the counties at issue in this lawsuit. All of this information is based on data published by the U.S. Census Bureau.

II. DEMOGRAPHIC PROFILE OF ARKANSAS

5. As shown in **Figure 1**, according to the 2010 Census, Arkansas has a total population of 2,915,918. Non-Hispanic Whites (“NH Whites”) are a majority of the population (74.54%). African Americans –16.07% Any Part Black (“AP Black”) – comprise the largest minority population, followed by Latinos (6.38%), who may be of any race.

Figure 1

Arkansas – 2010 Census and 2018 Census Bureau Estimates Population by Race and Ethnicity

	2010 Number	Percent	2018 Number	Percent
Total Population	2,915,918	100.00%	3,013,825	100.00%
NH White*	2,173,469	74.54%	2,176,611	72.22%
Total Minority Pop.	742,449	25.46%	837,214	27.78%
Latino	186,050	6.38%	233,187	7.74%
NH Black*	447,102	15.33%	464,640	15.42%
Single-race Black (Including Hispanics)	449,895	15.43%	472,287	15.67%
Any Part Black (Including Hispanics)	468,710	16.07%	499,364	16.57%

* Single-race

6. The most recent estimates available from the Census Bureau, also shown in **Figure 1**, indicate relative stability since 2010 in the statewide population in

percentage and absolute terms. As of July 1, 2018, the Census Bureau estimates a statewide population of 3,013,825, of whom 72.22% are NH White, 16.57% AP Black, and 7.74% Latino.

7. **Figure 2** shows 2010 Census population and AP Black population estimates for the dozen counties at issue in this case, alongside the 2018 Census Bureau estimates.

Figure 2

**12 Counties – 2010 Census and 2018 Census Bureau Estimates
Population by Race and Ethnicity**

County	2010 Pop.	2010 AP Black	2018 Pop.	2018 AP Black	Pop Change	AP Black Change	2010 %AP Black	2018 %AP Black
ARKANSAS	19,019	4,798	17,769	4,619	-1,250	-179	25.23%	25.99%
BENTON	221,339	3,603	272,608	7,221	51,269	3,618	1.63%	2.65%
CONWAY	21,273	2,561	20,891	2,612	-382	51	12.04%	12.50%
CRAIGHEAD	96,443	13,458	108,558	18,735	12,115	5,277	13.95%	17.26%
GARLAND	96,024	8,531	99,154	9,862	3,130	1,331	8.88%	9.95%
GRANT	17,853	432	18,188	601	335	169	2.42%	3.30%
GREENE	42,090	392	45,325	1,145	3,235	753	0.93%	2.53%
HOT SPRING	32,923	3,792	33,701	4,134	778	342	11.52%	12.27%
JEFFERSON	77,435	43,194	68,114	39,447	-9,321	-3,747	55.78%	57.91%
LONOKE	68,356	4,443	73,657	5,307	5,301	864	6.50%	7.21%
SALINE	107,118	5,472	121,421	10,526	14,303	5,054	5.11%	8.67%
WHITE	77,076	3,658	78,727	4,418	1,651	760	4.75%	5.61%
12-County Total	876,949	94,334	958,113	108,627	81,164	14,293	10.76%	11.34%

8. **Figure 3** (on the next page) displays the 2010 voting age population (“VAP”) in Arkansas by race and ethnicity, alongside Census Bureau estimates for VAP as of July 1, 2018. The rightmost column reports CVAP percentages, according to the Special Tabulation of the 2014-2018 5-year American Community Survey (“ACS”), released by the Census Bureau on January 31, 2020.

Figure 3**Arkansas – 2010 Voting Age and CVAP by Race and Ethnicity**

	2010 VAP	2010 VAP Percent	2018 VAP	2018 VAP Percent	% 2014- 2018 CVAP
Total	2,204,443	100.00%	2,389,973	100.00%	
NH White 18+	1,708,907	77.52%	1,733,825	72.55%	78.3%
Total Minority 18+	495,536	22.48%	656,148	27.45%	21.7%
Latino 18+	111,094	5.04%	145,153	6.07%	3.4%
NH Black 18+	313,887	14.24%	339,486	14.20%	15.1%
Single-race Black (Including Hispanics) 18+	315,462	14.31%	344,104	14.40%	
Any Part Black (Including Hispanics) 18+	321,201	14.57%	353,422	14.79%	

9. For the counties at issue, **Figure 4** presents 2010 VAP according to the 2010 Census and 2014-2018 CVAP (2016 survey midpoint). Note that unlike the 2018 VAP estimates for the state shown in **Figure 3**, post-2010 VAP estimates as reported by the Census Bureau’s Population Estimates Program are not available at the county level.

Figure 4**12 Counties – 2010 VAP and 2014-2018 CVAP Estimates
Population by Race and Ethnicity**

County	2010 VAP	% NH Black VAP	%_Latino VAP	%NH White VAP	2014- 2018 CVAP	% NH BCVAP	% LCVAP	% NH WCVAP
ARKANSAS	14,594	22.41%	2.45%	73.62%	13,855	24.83%	1.55%	73.08%
BENTON	159,491	1.11%	12.56%	80.33%	170,775	1.63%	8.07%	85.02%
CONWAY	16,128	10.89%	2.77%	84.03%	15,815	12.01%	1.20%	84.45%
CRAIGHEAD	72,302	10.98%	3.50%	83.07%	76,270	12.55%	1.86%	83.63%
GARLAND	75,931	7.10%	3.79%	86.53%	76,295	7.86%	2.52%	86.90%
GRANT	13,538	2.22%	1.69%	94.74%	13,830	2.57%	1.59%	94.14%
GREENE	31,500	0.49%	1.57%	96.29%	33,405	1.18%	1.74%	95.36%
HOT SPRING	25,237	10.29%	2.15%	85.74%	26,220	11.96%	2.04%	84.94%
JEFFERSON	59,007	51.95%	1.34%	44.83%	54,000	54.46%	1.32%	42.59%
LONOKE	49,525	5.78%	2.59%	89.34%	52,605	5.95%	2.95%	88.62%
SCOTT	8,350	0.30%	5.05%	88.42%	88,240	6.45%	2.10%	89.17%
WHITE	58,643	3.65%	2.91%	91.26%	58,720	3.79%	2.17%	91.94%

III. SOCIOECONOMIC PROFILE OF ARKANSAS

10. Non-Hispanic Whites in Arkansas significantly outpace African Americans across a broad range of socioeconomic measures, as reported in the 5-year 2013-2017 ACS.¹ This disparity is summarized below and depicted with further detail in charts found in **Exhibit B**.

(a) Income

- African Americans in Arkansas experience a poverty rate (31.9%) that is more than twice that of Whites (14.1%). (**Exhibit B, pp. 28-29**)
- The child poverty rate for African Americans is 44.8%, compared to 18.1% of White children. (**Exhibit B, pp. 22-29**)
- Black median household income is \$29,299 – just 60.8% of the White median household income of \$48,154. (**Exhibit B, pp. 32-33**)
- Per capita income disparities in Arkansas track the disparities seen in median household income. Black per capita income is \$16,303, compared to White per capita income of \$27,425. (**Exhibit B, pp. 40-41**)
- Over a quarter (28.4%) of Black households rely on food stamps, compared to 10.5% of White households. (**Exhibit B, pp. 49-50**)

(b) Education

- Of persons 25 years of age and over, 17.9% of African Americans have not finished high school, compared to 11.7% of their White counterparts. (**Exhibit B, pp 21-22**)

¹ In this section, “White” refers to NH White. Black or African American refers to single-race Black, including Hispanic Blacks. There is not a breakout for the Any Part Black category for socioeconomic statistics reported in the 5-year 2013-2017 ACS.

- At the other end of the educational scale, for ages 25 and over, 14.8% of African Americans have a bachelor's degree or higher, compared to 23.8% of Whites. (**Exhibit B, pp. 21-22**)

(c) Employment

- The Black unemployment rate (for the population over 16, expressed as a percent of the civilian labor force) is 12.0% – more than twice the 5.6% White unemployment rate. (**Exhibit B, pp. 51-54**)
- Of employed African Americans, 24.8% are in management or professional occupations, compared to 35.9% of Whites. (**Exhibit B, pp. 55-56**)

(d) Housing

- In Arkansas, less than half of Black householders (43.2%) are homeowners, while over two-thirds of White households (71.5%) are owner-occupied. (**Exhibit B, pp. 57-58**)

(e) Health

- The African American population has a higher percentage of persons with a disability than Whites – 18.4% of the 18-64 Black population has a disability, compared to 15.3% of Whites; 48.6% of the 65 and over Black population is disabled, compared to 41.4% of Whites. (**Exhibit B, pp. 61-62**)
- About 16.5% of the 18-64 Black population is not covered by health insurance, compared to 13.3% of Whites. (**Exhibit B, pp. 63-64**)

11. County-level socioeconomic disparities by race mirror the statewide disparities. Corresponding 2013-2017 ACS charts for Jefferson County – the county with the largest Black population of the 12 counties at issue – are shown in **Exhibit C**. Charts for the remaining 11 counties are available for download in a zip file at

this link:

http://www.fairdata2000.com/Arkansas_12_counties/

12. The charts in **Exhibit D** summarize statewide statistics from the 1-year 2018 ACS, released by the Census Bureau in November 2019. Breakouts for the Latino population are included in these charts.²

13. Some statistics that are not reported in the 5-year ACS are found in the 1-year ACS. For example, 15.6% of Black households do not have an available vehicle, compared to 4.9% of White households. (**Exhibit D, p.23**)

###

I reserve the right to continue to supplement my reports in light of additional facts, testimony and/or materials that may come to light.

Executed on: March 26, 2020


WILLIAM S. COOPER

² In these charts Black or African American refers to single-race NH Black (excluding Hispanic Blacks who are reported as a component of the Latino population). The 1-year 2018 ACS survey is based on a smaller sample size and is not available for many counties in Arkansas.

March 15, 2020

William S. Cooper
P.O. Box 16066
Bristol, VA 24209
276-669-8567
bcooper@msn.com

Summary of Redistricting Work

I have a B.A. in Economics from Davidson College in Davidson, North Carolina.

Since 1986, I have prepared proposed redistricting maps of approximately 750 jurisdictions for Section 2 litigation, Section 5 comment letters, and for use in other efforts to promote compliance with the Voting Rights Act of 1965. I have analyzed and prepared election plans in over 100 of these jurisdictions for two or more of the decennial censuses – either as part of concurrent legislative reapportionments or, retrospectively, in relation to litigation involving many of the cases listed below.

From 1986 to 2019, I have prepared election plans for Section 2 litigation in Alabama, Connecticut, Florida, Georgia, Louisiana, Maryland, Mississippi, Missouri, Montana, Nebraska, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, South Dakota, Tennessee, Texas, Utah, Virginia, Washington, and Wyoming.

Post-2010 Redistricting Experience

Since the release of the 2010 Census in February 2011, I have developed statewide legislative plans on behalf of clients in eight states (Alabama, Connecticut, Florida, Georgia, Kentucky, South Carolina, Texas, and Virginia), as well as over 150 local redistricting plans in approximately 30 states – primarily for groups working to protect minority voting rights. In addition, I have prepared congressional plans for clients in eight states (Alabama, Florida, Georgia, Louisiana, Maryland, Ohio, Pennsylvania, South Carolina, and Virginia).

In March 2011, I was retained by the Sussex County, Virginia Board of

March 15, 2020

Supervisors and the Bolivar County, Mississippi Board of Supervisors to draft new district plans based on the 2010 Census. In the summer of 2011, both counties received Section 5 preclearance from the U.S. Department of Justice (DOJ).

Also in 2011, I was retained by way of a subcontract with Olmedillo X5 LLC to assist with redistricting for the Miami-Dade County, Florida Board of Commissioners and the Miami-Dade, Florida School Board. Final plans were adopted in late 2011 following public hearings.

In the fall of 2011, I was retained by the City of Grenada, Mississippi to provide redistricting services. The ward plan I developed received DOJ preclearance in March 2012.

In 2012 and 2013, I served as a redistricting consultant to the Tunica County, Mississippi Board of Supervisors and the Claiborne County, Mississippi Board of Supervisors.

In *Montes v. City of Yakima* (E.D. Wash. Feb. 17, 2015) the court adopted, as a remedy for the Voting Rights Act Section 2 violation, a seven single-member district plan that I developed for the Latino plaintiffs. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In *Pope v. Albany County* (N.D.N.Y. Mar. 24, 2015), the court approved, as a remedy for a Section 2 violation, a plan drawn by the defendants, creating a new Black-majority district. I served as the expert for the Plaintiffs in the liability and remedy phases of the case.

In 2016, two redistricting plans that I developed on behalf of the plaintiffs for consent decrees in Section 2 lawsuits in Georgia were adopted (*NAACP v. Fayette County, Georgia* and *NAACP v. Emanuel County, Georgia*).

March 15, 2020

In 2016, two federal courts granted summary judgment to the plaintiffs based in part on my *Gingles 1* testimony: *Navajo Nation v. San Juan County, Utah* (C.D. Utah 2016) and *NAACP v. Ferguson-Florissant School District, Missouri* (E. D. Mo. August 22, 2016).

Also in 2016, based in part on my analysis, the City of Pasco, Washington admitted to a Section 2 violation. As a result, in *Glatt v. City of Pasco* (E.D. Wash. Jan. 27, 2017), the court ordered a plan that created three Latino majority single-member districts in a 6 district, 1 at-large plan.

In 2017, a federal court ruled in favor of the plaintiffs in a Section 2 case regarding the 32nd Judicial District in Louisiana, based in part on my *Gingles 1* testimony in *Terrebonne Parish Branch NAACP et al. v. Jindal et al* (M.D La. August 17, 2017).

In August 2018, the Wenatchee City Council adopted a hybrid election plan that I developed – five single-member districts with two members at-large. The Wenatchee election plan is the first plan adopted under the Washington Voting Rights Acts of 2018.

In February 2019, a federal court ruled in favor of the plaintiffs in a Section 2 case regarding Senate District 22 in Mississippi, based in part on my *Gingles 1* testimony in *Thomas v. Bryant* (S.D. Ms. Feb 16, 2019).

In August 2019, the Grand County (Utah) Change of Form of Government Study Committee voted to place a county commission redistricting plan I developed on the ballot for voter approval in November 2020.

I currently serve as a redistricting consultant and expert to the City of Decatur, Alabama (*Voketz v. City of Decatur*).

I am currently a redistricting consultant and expert for the plaintiffs in nine voting cases – *Terrebonne Parish Branch NAACP. v. Jindal*; *Dwight v. Kemp*; *NAACP v. East Ramapo Central School District*; *Thomas v. Bryant*; *Jayla Allen. v. Waller County, Texas*;

March 15, 2020

Chestnut v. Merrill; Alabama State Conference of the NAACP v. State of Alabama; Johnson v. Ardoin; and NAACP v. Merrill.

Since 2011 (mostly in the first half of the decade), I have served as a redistricting and demographic consultant to the Massachusetts-based Prison Policy Initiative for a nationwide project to end prison-based gerrymandering. I have analyzed proposed and adopted election plans in about 25 states as part of my work.

Post-2010 Demographics Experience

My trial testimony in Section 2 lawsuits usually includes presentations of U.S. Census data with charts, tables, and/or maps to demonstrate socioeconomic disparities between non-Hispanic Whites and racial or ethnic minorities.

I have also served as an expert witness on demographics in non-voting trials. For example, in an April 2017 opinion in *Stout v. Jefferson County Board of Education* (Case no.2:65-cv-00396-MHH), a school desegregation case involving the City of Gardendale, Ala., the court made extensive reference to my testimony.

I provide technical demographic and mapping assistance to the Food Research and Action Center (FRAC) in Washington D.C and their constituent organizations around the country. Most of my work with FRAC involves the Summer Food Program and Child and Adult Care Food Program. Both programs provide nutritional assistance to school-age children who are eligible for free and reduced price meals. As part of this project, I developed an online interactive map to determine site eligibility for the two programs that has been in continuous use by community organizations and school districts around the country since 2003. The map is updated annually with new data from a Special Tabulation of the American Community Survey prepared by the U.S. Census Bureau for the Food and Nutrition Service of the U.S. Department of Agriculture.

March 15, 2020

Historical Redistricting Experience

In the 1980s and 1990s, I developed voting plans in about 400 state and local jurisdictions – primarily in the South and Rocky Mountain West. During the 2000s, I prepared draft election plans involving about 300 state and local jurisdictions in 25 states. Most of these plans were prepared at the request of local citizens’ groups, national organizations such as the NAACP, tribal governments, and for Section 2 or Section 5 litigation.

Election plans I developed for governments in two counties – Sussex County, Virginia and Webster County, Mississippi – were adopted and precleared in 2002 by the U.S. Department of Justice. A ward plan I prepared for the City of Grenada, Mississippi was precleared in August 2005. A county supervisors’ plan I produced for Bolivar County, Mississippi was precleared in January 2006.

In August 2005, a federal court ordered the State of South Dakota to remedy a Section 2 voting rights violation and adopt a state legislative plan I developed (*Bone Shirt v. Hazeltine*).

A county council plan I developed for Native American plaintiffs in a Section 2 lawsuit (*Blackmoon v. Charles Mix County*) was adopted by Charles Mix County, South Dakota in November 2005. A plan I drafted for Latino plaintiffs in Bethlehem, Pennsylvania (*Pennsylvania Statewide Latino Coalition v. Bethlehem Area School District*) was adopted in March 2009. Plans I developed for minority plaintiffs in Columbus County, North Carolina and Montezuma- Cortez School District in Colorado were adopted in 2009.

Since 1986, I have testified at trial as an expert witness on redistricting and demographics in federal courts in the following voting rights cases (approximate most recent testimony dates are in parentheses). I also filed declarations and was deposed in

March 15, 2020

most of these cases.

Alabama

Alabama Legislative Black Caucus et al. v. Alabama et al. (2013)

Alabama State Conference of the NAACP v. Alabama (2018)

Chestnut v. Merrill (2019)

Colorado

Cuthair v. Montezuma-Cortez School Board (1997)

Georgia

Cofield v. City of LaGrange (1996)

Love v. Deal (1995)

Askew v. City of Rome (1995)

Woodard v. Lumber City (1989)

Louisiana

Knight v. McKeithen (1994)

Reno v. Bossier Parish (1995)

Wilson v. Town of St. Francisville (1996)

Terrebonne Parish NAACP v. Jindal, et al. (2017)

Maryland

Cane v. Worcester County (1994)

Mississippi

Addy v. Newton County (1995)

Boddie v. Cleveland (2003)

Boddie v. Cleveland School District (2010)

Ewing v. Monroe County (1995)

Fairley v. Hattiesburg (2014)

Fairley v. Hattiesburg (2008)

Jamison v. City of Tupelo (2006)

Gunn v. Chickasaw County (1995)

NAACP v. Fordice (1999)

Nichols v. Okolona (1995)

Smith v. Clark (2002)

Thomas v. Bryant (2019)

Montana

Old Person v. Cooney (1998)

Old Person v. Brown (on remand) (2001)

Missouri

Missouri NAACP v. Ferguson-Florissant School District (2016)

Nebraska

Stabler v. Thurston County (1995)

March 15, 2020

New York

Arbor Hills Concerned Citizens v. Albany County (2003)

Pope v. County of Albany (2015)

NAACP v. East Ramapo Central School District (2020)

Ohio

Ohio A. Philip Randolph Institute, et al. v. Ryan (2019)

South Carolina

Smith v. Beasley (1996)

South Dakota

Bone Shirt v. Hazeltine (2004)

Cottier v. City of Martin (2004)

Tennessee

Cousins v. McWherter (1994)

Rural West Tennessee African American Affairs Council v. McWherter (1993)

Virginia

Henderson v. Richmond County (1988)

McDaniel v. Mehfoud (1988)

White v. Daniel (1989)

Smith v. Brunswick County (1991)

Wyoming

Large v. Fremont County (2007)

In addition, I have filed expert declarations or been deposed in the following cases that did not require trial testimony. The dates listed indicate the deposition date or date of last declaration or supplemental declaration:

Alabama

Voketz v. City of Decatur (2018)

Alabama State NAACP v. City of Pleasant Grove (2019)

Jpmes v. Jefferson County Board of Education (2019)

Connecticut

NAACP v. Merrill (2020)

March 15, 2020

Florida

Calvin v. Jefferson County (2016)
Thompson v. Glades County (2001)
Johnson v. DeSoto County (1999)
Burton v. City of Belle Glade (1997)

Georgia

Dwight v. Kemp (2018)
Georgia NAACP et al. v. Gwinnett County, GA (2018)
Georgia State Conference NAACP et al v. Georgia (2018)
Georgia State Conference NAACP, et al. v. Fayette County (2015)
Knighon v. Dougherty County (2002)
Johnson v. Miller (1998)
Jones v. Cook County (1993)

Kentucky

Herbert v. Kentucky State Board of Elections (2013)

Louisiana

Johnson v. Ardoin (2019)
NAACP v. St. Landry Parish Council (2005)
Rodney v. McKeithen (1993)
Prejean v. Foster (1998)

Maryland

Fletcher v. Lamone (2011)
Benisek v. Lamone (2017)

Mississippi

Partee v. Coahoma County (2015)
Figgs v. Quitman County (2015)
West v. Natchez (2015)
Williams v. Bolivar County (2005)
Clark v. Calhoun County (on remand)(1993)
Houston v. Lafayette County (2002)
Wilson v. Clarksdale (1992)
Stanfield v. Lee County(1991)
Teague v. Attala County (on remand)(1993)

Montana

Alden v. Rosebud County (2000)

North Carolina

Lewis v. Alamance County (1991)
Gause v. Brunswick County (1992)
Webster v. Person County (1992)

March 15, 2020

Rhode Island

Davidson v. City of Cranston (2015)

South Carolina

Vander Linden v. Campbell (1996)

South Dakota

Emery v. Hunt (1999)

Kirkie v. Buffalo County (2004)

Tennessee

NAACP v. Frost, et al. (2003)

Texas

Jayla Allen et al. v. Waller County (2019)

Utah

Navajo Nation v. San Juan County (2018)

Virginia

Moon v. Beyer (1990)

Washington

Montes v. City of Yakima (2014)

Glatt v. City of Pasco (2016)

###

Selected Socio-Economic Data

Arkansas

African American and White, Not Hispanic

Data Set: 2013-2017 American Community Survey 5-Year Estimates

C02003.DETAILED RACE - Universe: TOTAL POPULATION

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas		
	Population	Margin of Error (+/-)	% of Total
Total:	2,977,944	*****	100.0%
Population of one race:	2,906,122	2,359	97.6%
White	2,302,141	3,304	77.3%
Black or African American	459,969	1,706	15.4%
American Indian and Alaska Native	19,476	1,088	0.7%
Asian alone	42,368	858	1.4%
Native Hawaiian and Other Pacific Islander	7,062	624	0.2%
Some other race	75,106	3,110	2.5%
Population of two or more races:	71,822	2,359	2.4%
Two races including Some other race	6,651	1,106	0.2%
Two races excluding Some other race, and three or more races	65,171	1,923	2.2%
Population of two races:	68,670	2,200	2.3%
White; Black or African American	20,253	1,329	0.7%
White; American Indian and Alaska Native	28,809	959	1.0%
White; Asian	7,904	810	0.3%
Black or African American; American Indian and Alaska Native	2,616	664	0.1%
All other two race combinations	9,088	1,262	0.3%
Population of three races	2,871	540	0.1%
Population of four or more races	281	144	0.0%

Note: Hispanics may be of any race. See Table B03002 and chart.

Source: U.S. Census Bureau, 2013-2017 American Community Survey

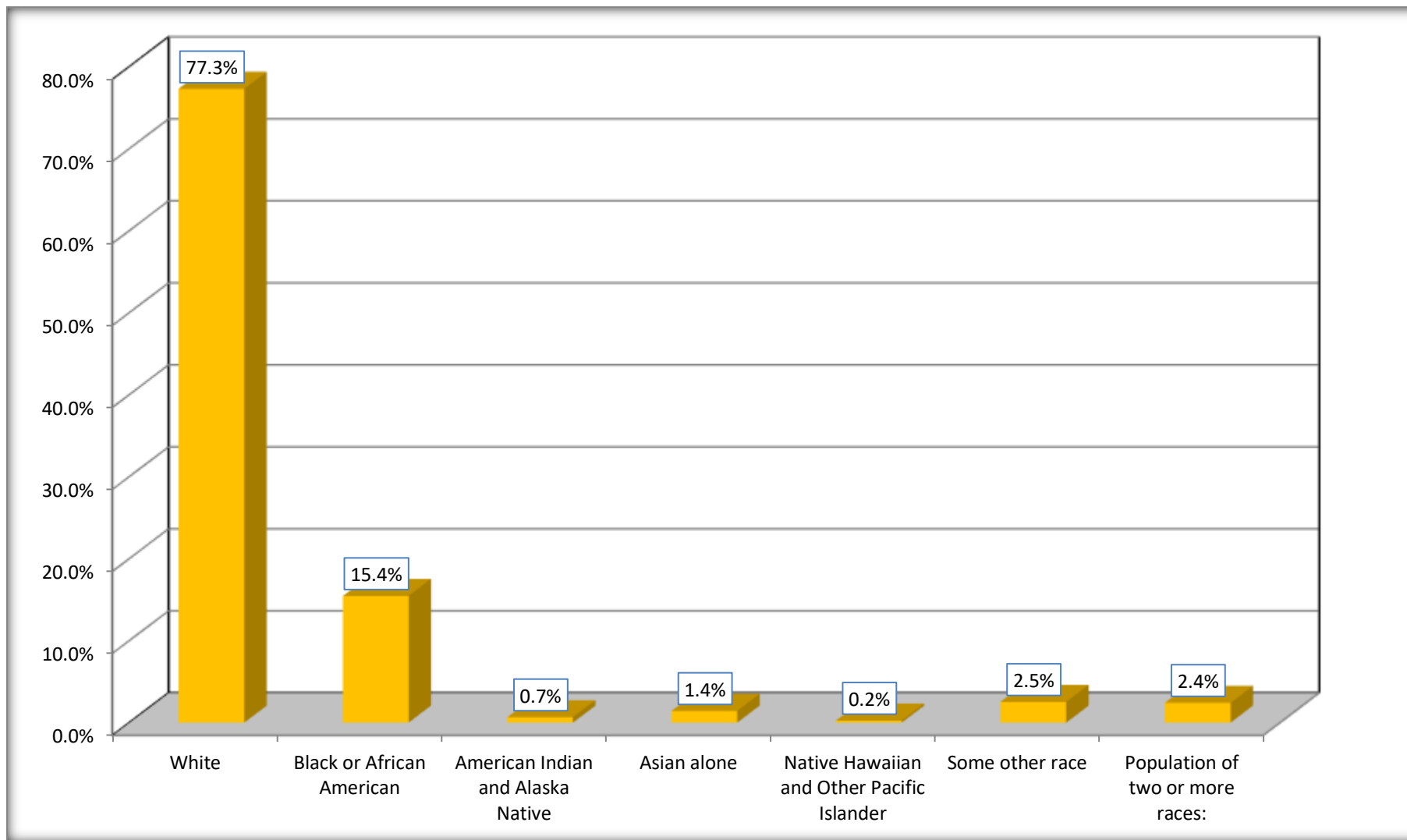
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Population by Race

Arkansas



Source: C02003.DETAILED RACE - Universe: TOTAL POPULATION
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas		
	Population	Margin of Error (+/-)	% of Total
Total:	2,977,944	*****	100.0%
Not Hispanic or Latino:	2,764,698	272	92.8%
White alone	2,174,326	629	73.0%
Black or African American alone	457,251	1,636	15.4%
American Indian and Alaska Native alone	17,002	951	0.6%
Asian alone	41,896	868	1.4%
Native Hawaiian and Other Pacific Islander alone	6,979	601	0.2%
Some other race alone	4,283	919	0.1%
Two or more races:	62,961	1,835	2.1%
Two races including Some other race	1,374	382	0.0%
Two races excluding Some other race, and three or more races	61,587	1,790	2.1%
Hispanic or Latino	213,246	272	7.2%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

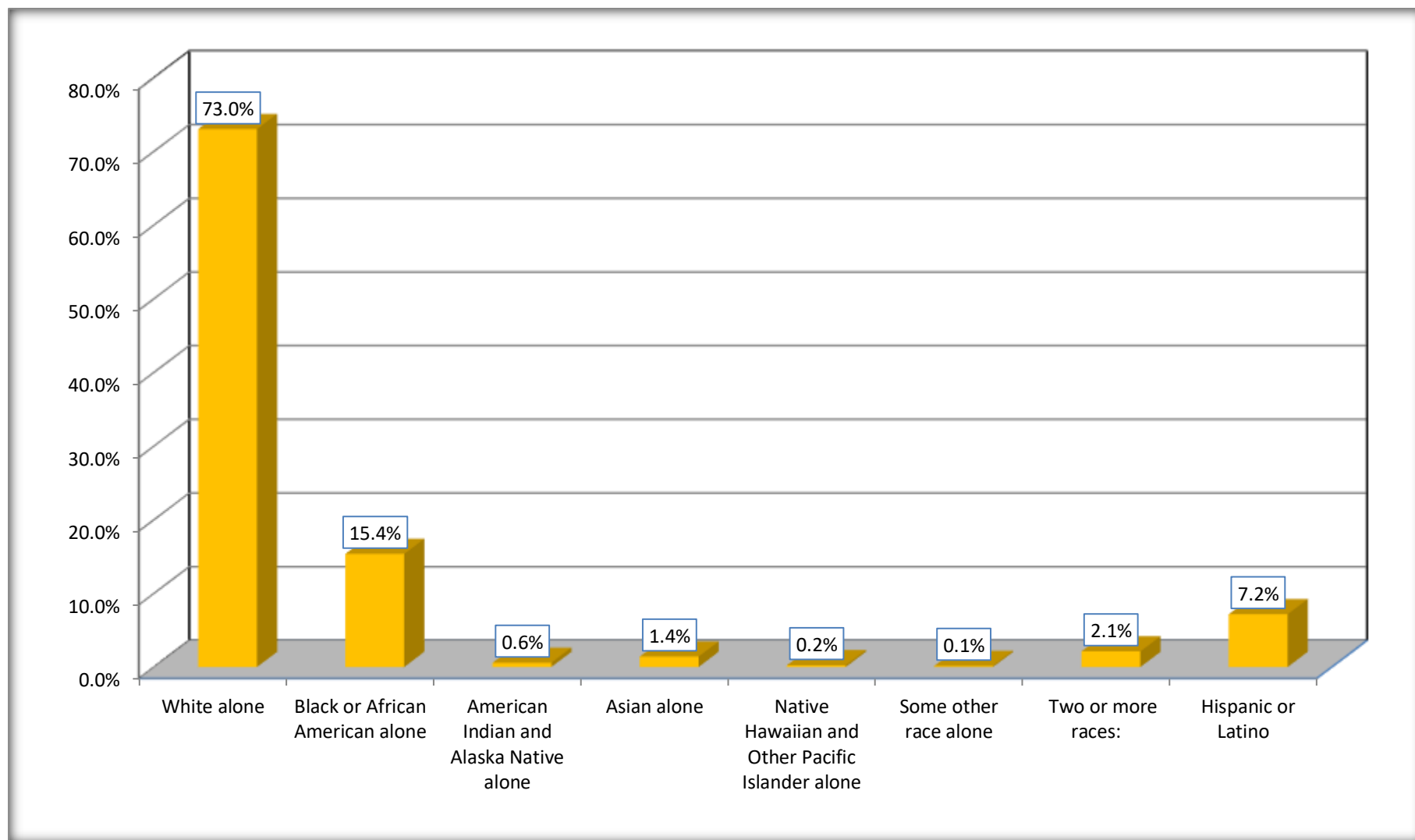
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Non-Hispanic by Race and Hispanic Population

Arkansas



Source: B03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B03002. HISPANIC OR LATINO ORIGIN BY RACE

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas		
	Population	Margin of Error (+/-)	% of Total
Hispanic or Latino:	213,246	272	100.0%
White alone	127,815	3,339	59.9%
Black or African American alone	2,718	527	1.3%
American Indian and Alaska Native alone	2,474	566	1.2%
Asian alone	472	162	0.2%
Native Hawaiian and Other Pacific Islander alone	83	93	0.0%
Some other race alone	70,823	3,046	33.2%
Two or more races:	8,861	1,215	4.2%
Two races including Some other race	5,277	963	2.5%
Two races excluding Some other race, and three or more races	3,584	625	1.7%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

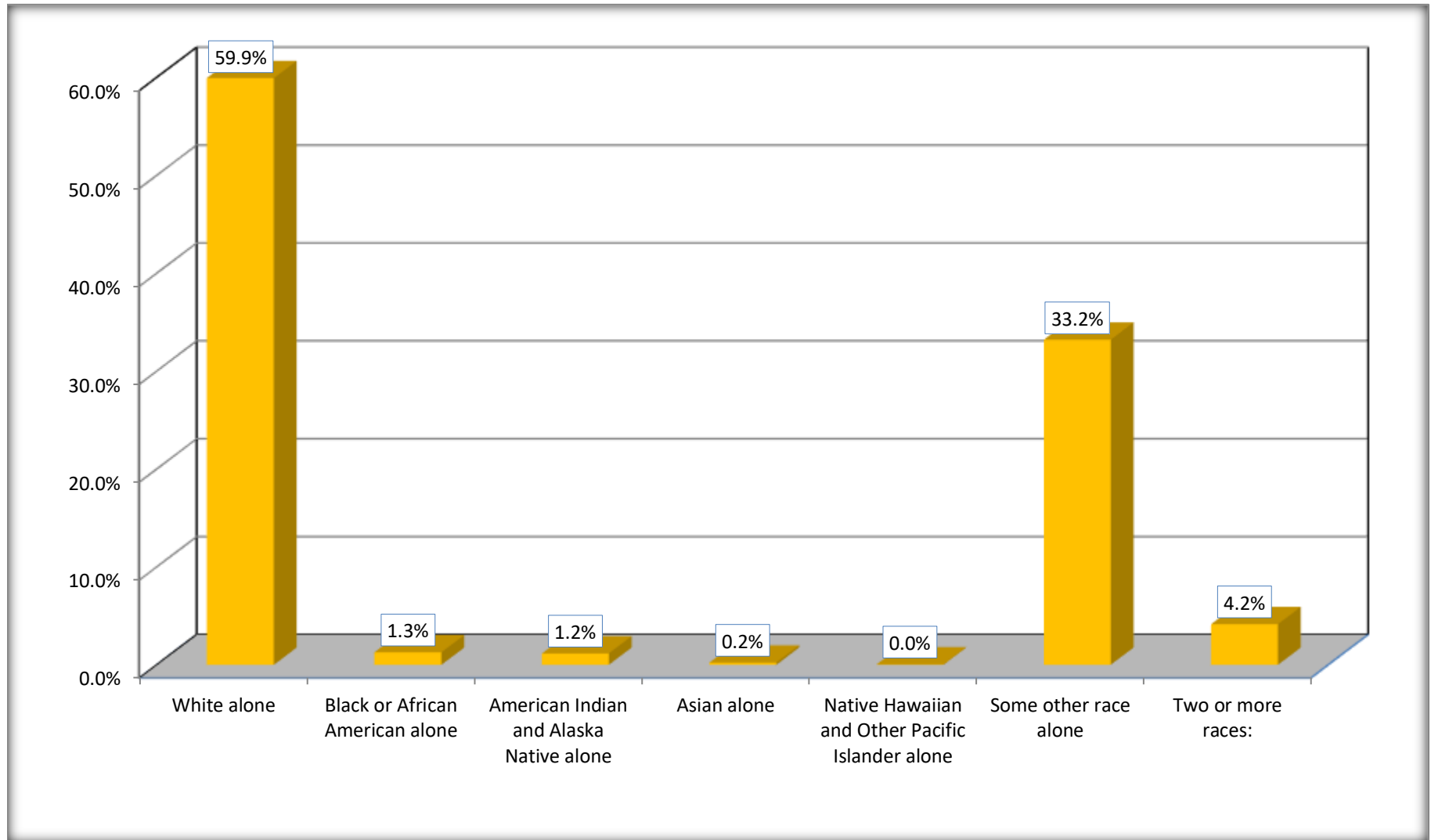
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Hispanic or Latino Origin by Race

Arkansas



Source: B03002. HISPANIC OR LATINO ORIGIN BY RACE
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B01001. SEX BY AGE

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	459,969	1,706	100.0%	2,174,326	629	100.0%
Under 18 years	127,591	NC	27.7%	450,312	NC	20.7%
18 to 64 years	286,695	NC	62.3%	1,310,909	NC	60.3%
65 years and over	45,683	NC	9.9%	413,105	NC	19.0%
Male:	219,775	988	47.8%	1,068,133	4,980	49.1%
Under 18 years	65,227	NC	14.2%	231,491	NC	10.6%
18 to 64 years	135,648	NC	29.5%	652,251	NC	30.0%
65 years and over	18,900	NC	4.1%	184,391	NC	8.5%
Female:	240,194	1,132	52.2%	1,106,193	5,836	50.9%
Under 18 years	62,364	NC	13.6%	218,821	NC	10.1%
18 to 64 years	151,047	NC	32.8%	658,658	NC	30.3%
65 years and over	26,783	NC	5.8%	228,714	NC	10.5%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

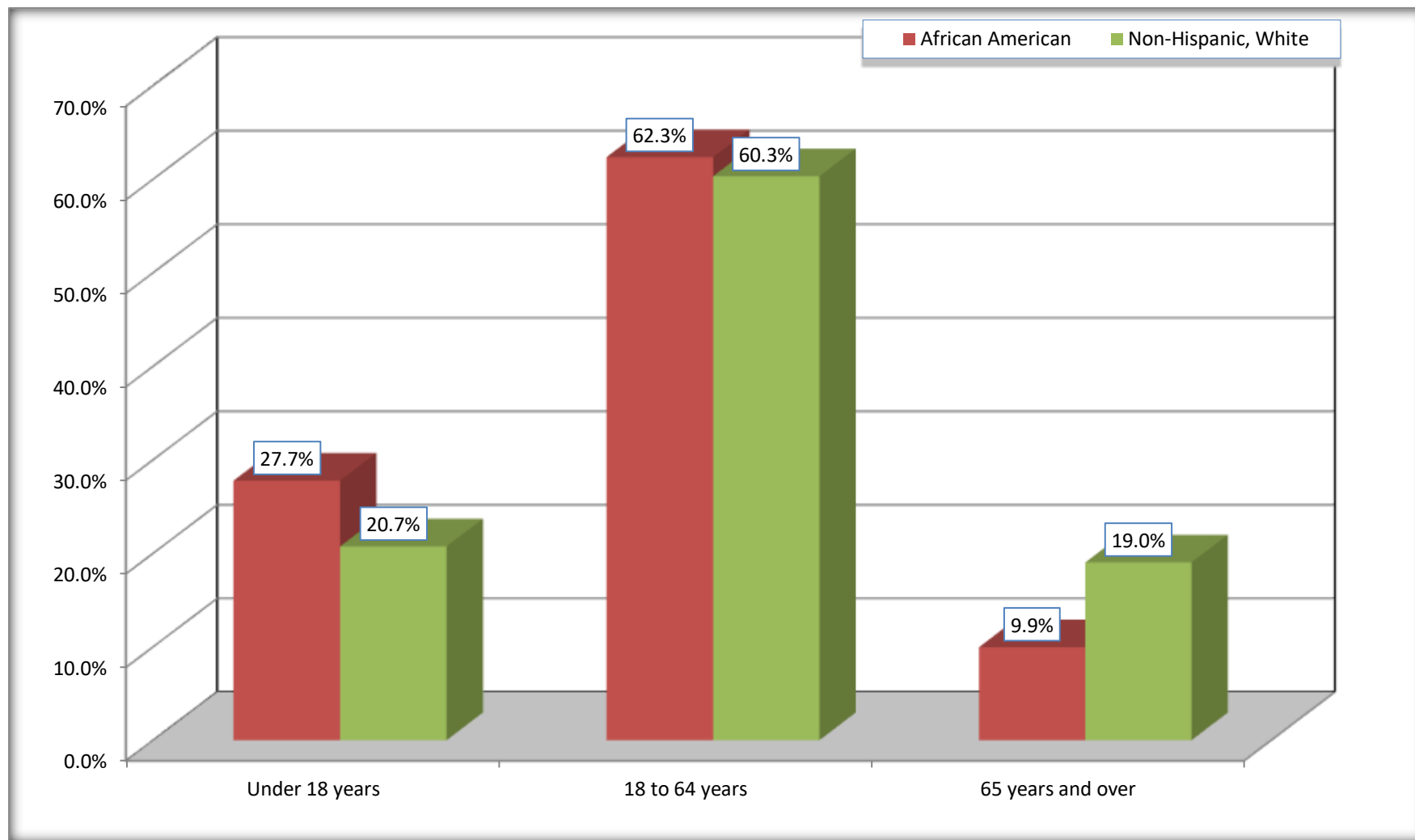
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Population by Age

Arkansas



Source: B01001. SEX BY AGE

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B05003. SEX BY AGE BY CITIZENSHIP STATUS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total by Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total by Age
Total:	459,969	1,706	100.0%	2,174,326	629	100.0%
Under 18 years:	127,591	NC	100.0%	450,312	NC	100.0%
Native	127,332	NC	99.8%	449,481	NC	99.8%
Foreign born:	259	NC	0.2%	831	NC	0.2%
Naturalized U.S. citizen	112	NC	0.1%	301	NC	0.1%
Not a U.S. citizen	147	NC	0.1%	530	NC	0.1%
18 years and over:	332,378	NC	100.0%	1,724,014	NC	100.0%
Native	329,216	NC	99.0%	1,707,573	NC	99.0%
Foreign born:	3,162	NC	1.0%	16,441	NC	1.0%
Naturalized U.S. citizen	1,165	NC	0.4%	8,527	NC	0.5%
Not a U.S. citizen	1,997	NC	0.6%	7,914	NC	0.5%
Male:	219,775	988	47.8%	1,068,133	373	49.1%
Under 18 years:	65,227	788	100.0%	231,491	265	100.0%
Native	65,087	789	99.8%	231,011	333	99.8%
Foreign born:	140	78	0.2%	480	190	0.2%
Naturalized U.S. citizen	80	68	0.1%	122	82	0.1%
Not a U.S. citizen	60	40	0.1%	358	199	0.2%
18 years and over:	154,548	604	100.0%	836,642	222	100.0%
Native	152,863	682	98.9%	829,121	677	99.1%
Foreign born:	1,685	346	1.1%	7,521	648	0.9%
Naturalized U.S. citizen	632	200	0.4%	3,618	382	0.4%
Not a U.S. citizen	1,053	321	0.7%	3,903	588	0.5%

	Arkansas					
	African American	Margin of Error (+/-)	% of AA by Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW by Age
Female:	240,194	1,132	52.2%	1,106,193	471	50.9%
Under 18 years:	62,364	826	100.0%	218,821	326	100.0%
Native	62,245	837	99.8%	218,470	343	99.8%
Foreign born:	119	84	0.2%	351	116	0.2%
Naturalized U.S. citizen	32	36	0.1%	179	93	0.1%
Not a U.S. citizen	87	70	0.1%	172	95	0.1%
18 years and over:	177,830	753	100.0%	887,372	230	100.0%
Native	176,353	824	99.2%	878,452	631	99.0%
Foreign born:	1,477	313	0.8%	8,920	616	1.0%
Naturalized U.S. citizen	533	188	0.3%	4,909	446	0.6%
Not a U.S. citizen	944	242	0.5%	4,011	481	0.5%

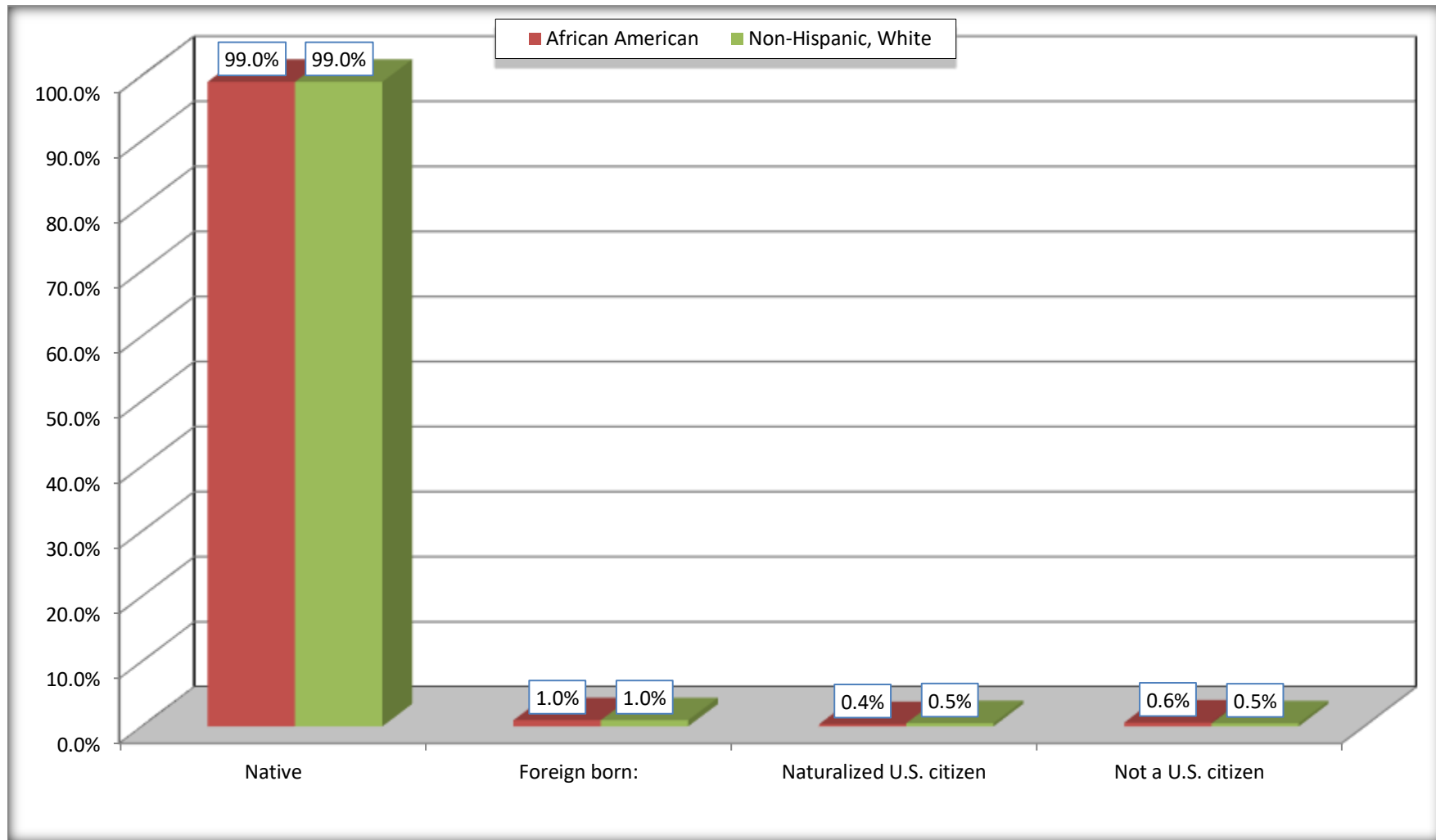
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Citizenship Status of Voting Age Population (18 and Over)

Arkansas



Source: B05003. SEX BY AGE BY CITIZENSHIP STATUS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

Case 4:20-cv-00341-LM Document 3-1 Filed 03/27/20 Page 13 of 64

B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe:
POPULATION 1 YEAR AND OVER
 Data Set: 2013-2017 American Community Survey 5-Year Estimates

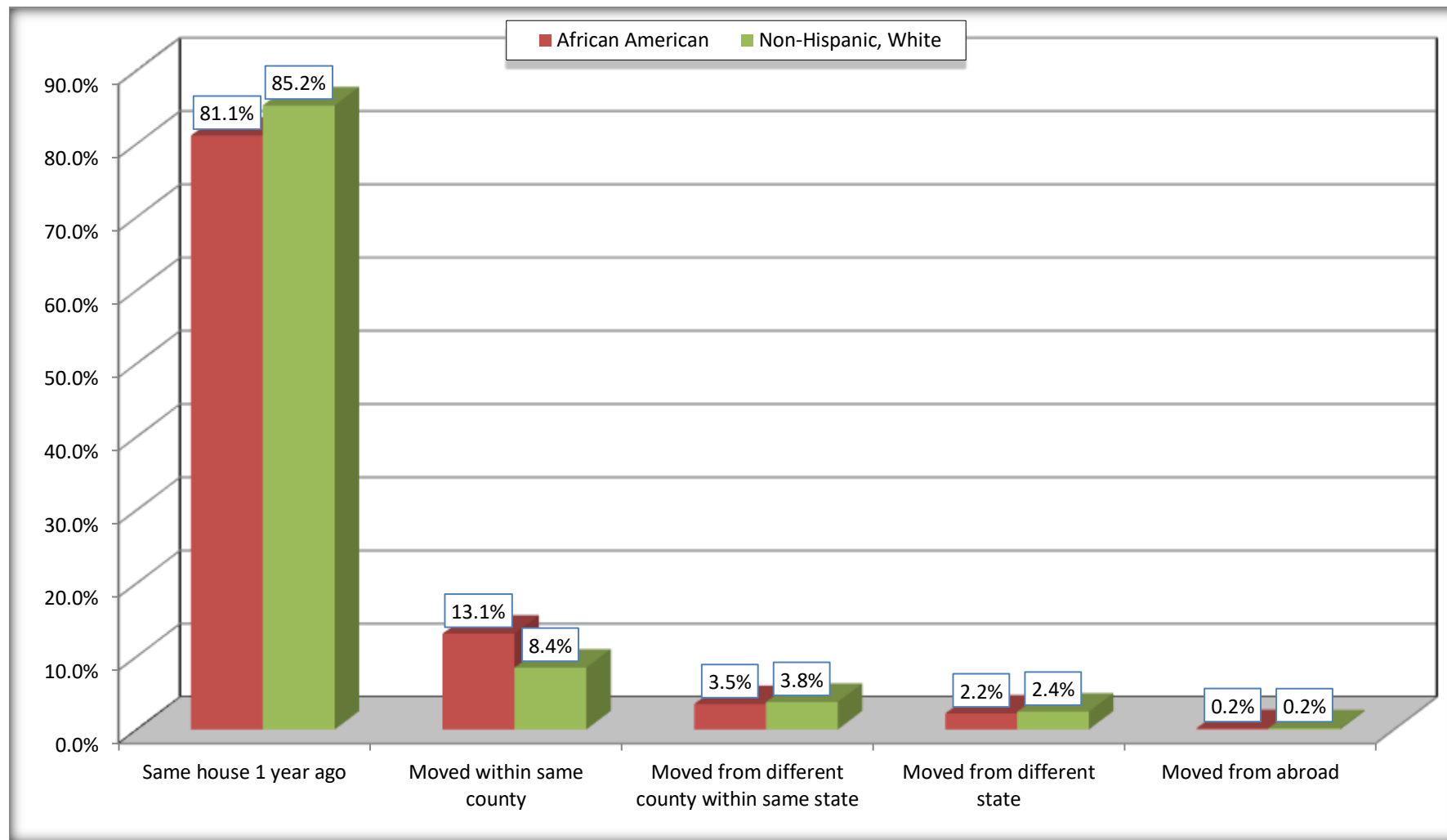
	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	453,377	1,816	100.0%	2,151,898	1,165	100.0%
Same house 1 year ago	367,617	4,321	81.1%	1,833,469	5,538	85.2%
Moved within same county	59,288	3,612	13.1%	181,529	4,570	8.4%
Moved from different county within same state	15,682	1,244	3.5%	80,908	2,726	3.8%
Moved from different state	9,967	1,079	2.2%	52,423	2,364	2.4%
Moved from abroad	823	221	0.2%	3,569	570	0.2%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.
<http://www.census.gov/acs/www/UseData/index.htm>

Geographical Mobility in the Past Year (Population 1 Year and Over)

Arkansas



Source: B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe: POPULATION 1 YEAR AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	172144	2197	100.0%	948326	3727	100.0%
Car, truck, or van - drove alone	140511	2335	81.6%	801186	3965	84.5%
Car, truck, or van - carpooled	19760	1118	11.5%	86452	2455	9.1%
Public transportation (excluding taxicab)	1779	300	1.0%	2212	402	0.2%
Walked	3799	497	2.2%	14144	753	1.5%
Taxicab, motorcycle, bicycle, or other means	3260	504	1.9%	10071	812	1.1%
Worked at home	3035	443	1.8%	34261	1317	3.6%

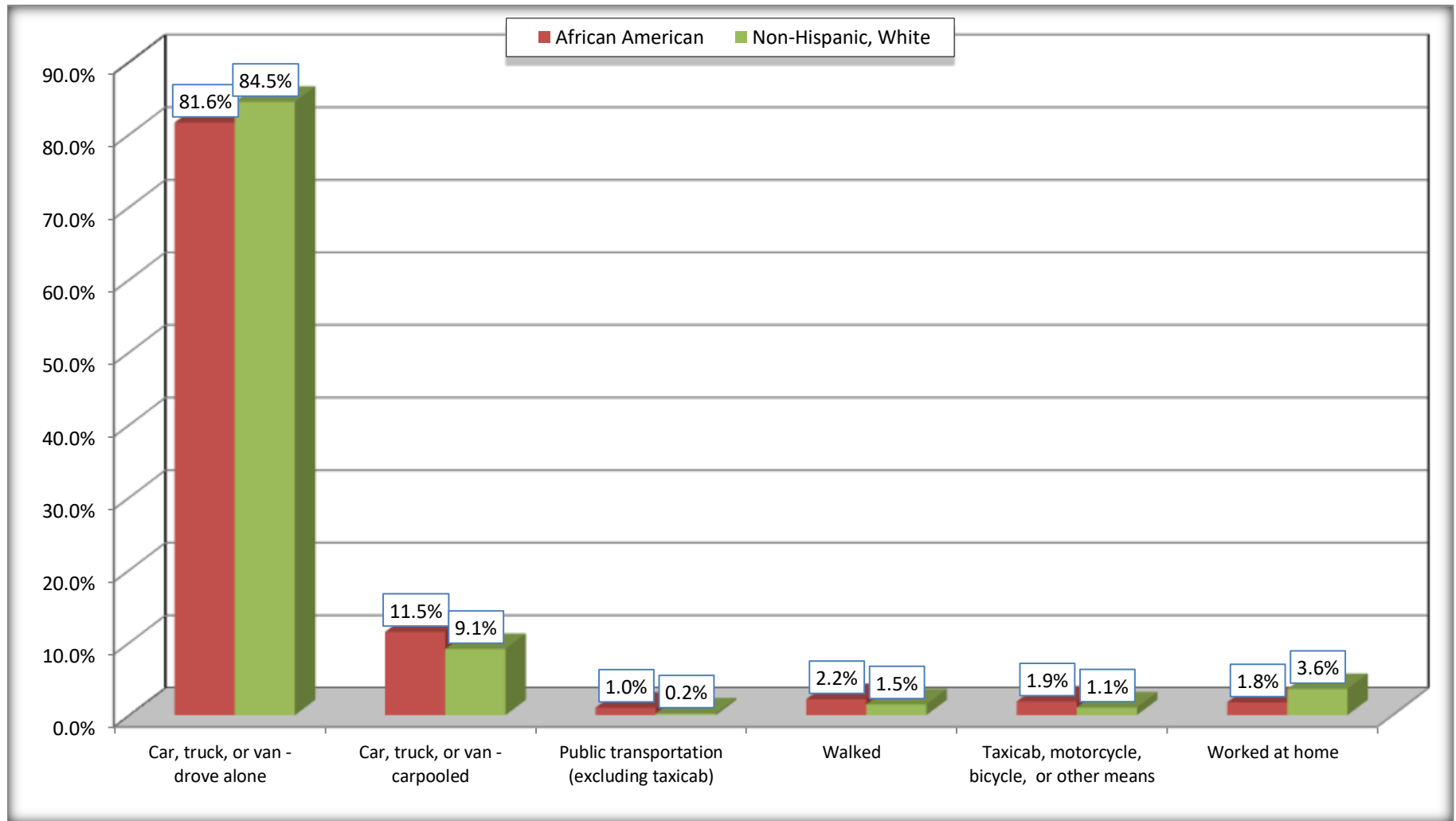
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Means of Transportation to Work (Workers 16 Years and Over)

Arkansas



Source: B08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B11002. HOUSEHOLD TYPE BY RELATIVES AND NONRELATIVES FOR POPULATION IN HOUSEHOLDS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	433735	2570	100.0%	2162144	4155	100.0%
In family households	351864	3316	81.1%	1802162	5952	83.4%
In nonfamily households	81871	2349	18.9%	359982	4438	16.6%

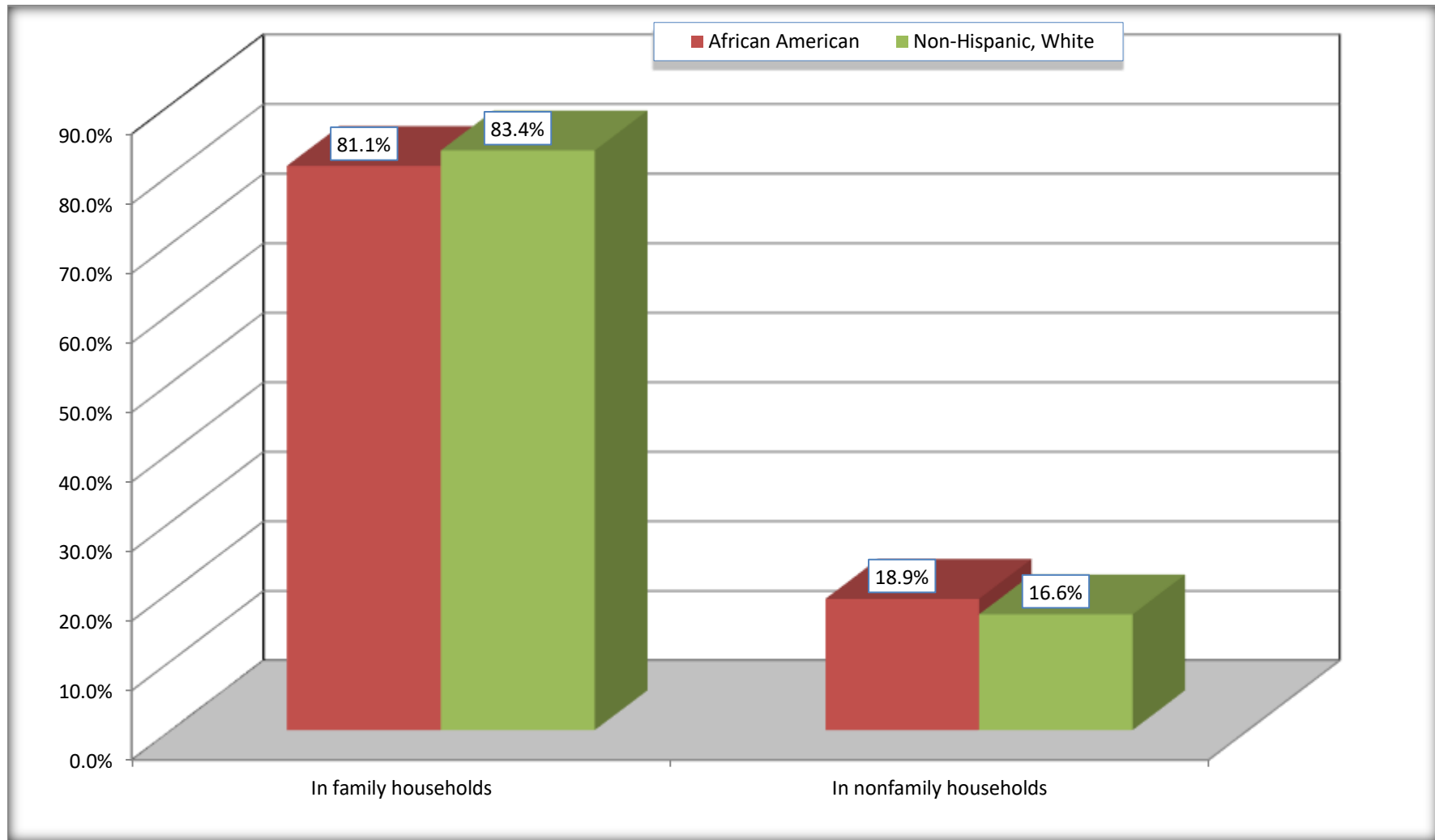
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Household Type for Population in Households

Arkansas



Source: B11002. HOUSEHOLD TYPE BY RELATIVES AND NONRELATIVES FOR POPULATION IN HOUSEHOLDS
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B12002. MARITAL STATUS FOR THE POPULATION 15 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	353,877	1,168	100.0%	1,803,199	382	100.0%
Never married	166,084	NC	46.9%	409,348	NC	22.7%
Now married (except separated)	102,640	NC	29.0%	978,980	NC	54.3%
Separated	16,439	NC	4.6%	34,531	NC	1.9%
Widowed	22,069	NC	6.2%	135,691	NC	7.5%
Divorced	46,645	NC	13.2%	244,649	NC	13.6%
Male:	165,863	707	46.9%	877,318	266	48.7%
Never married	82,764	1,489	23.4%	228,966	2,426	12.7%
Now married (except separated)	52,950	1,441	15.0%	492,052	4,059	27.3%
Separated	5,966	514	1.7%	14,917	1,085	0.8%
Widowed	4,543	409	1.3%	28,997	969	1.6%
Divorced	19,640	1,001	5.5%	112,386	2,728	6.2%
Female:	188,014	887	53.1%	925,881	293	51.3%
Never married	83,320	1,343	23.5%	180,382	2,332	10.0%
Now married (except separated)	49,690	1,377	14.0%	486,928	3,670	27.0%
Separated	10,473	784	3.0%	19,614	1,001	1.1%
Widowed	17,526	614	5.0%	106,694	1,938	5.9%
Divorced	27,005	1,075	7.6%	132,263	2,533	7.3%

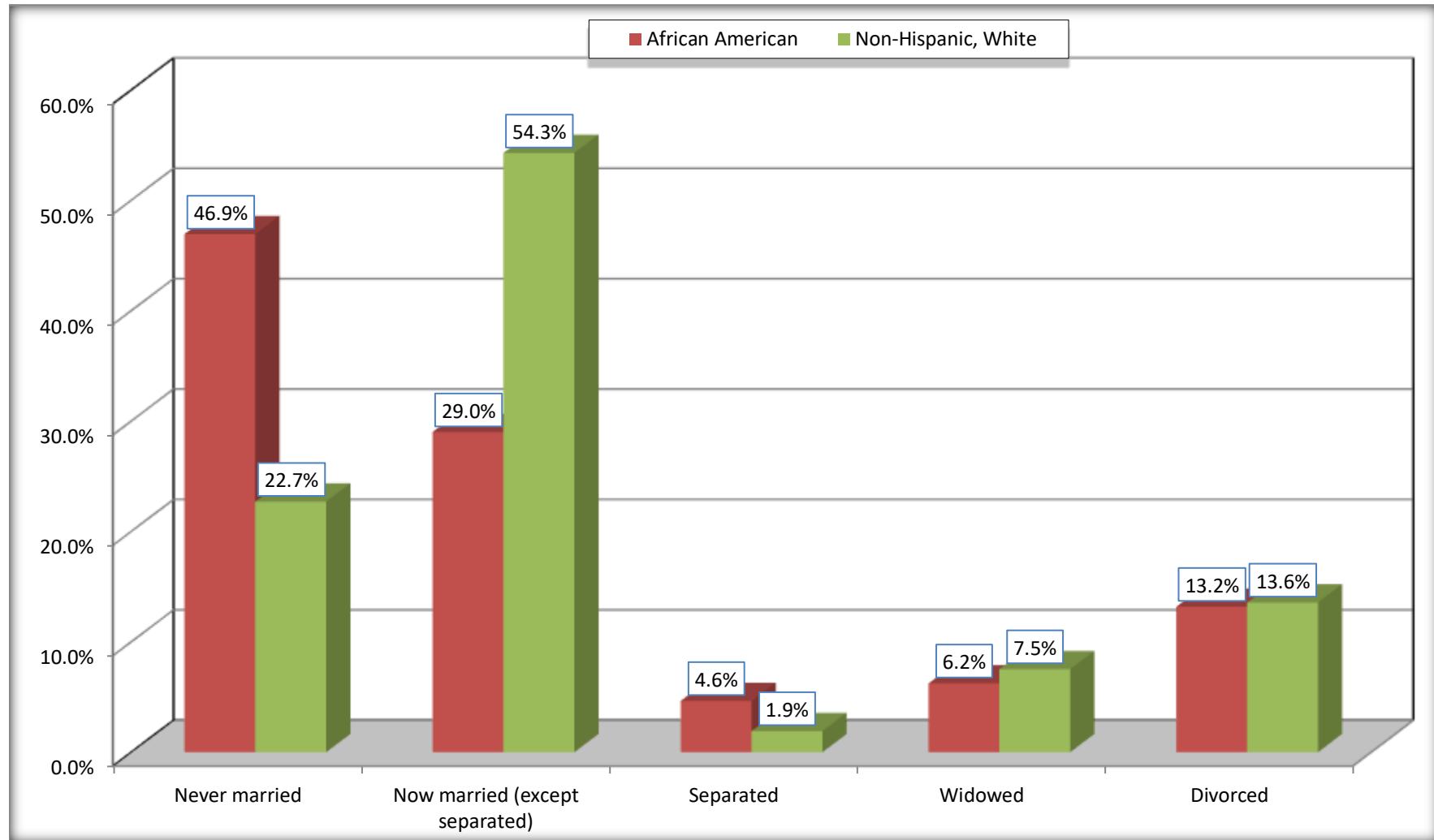
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Marital Status for the Population 15 Years and Over

Arkansas



Source: B12002. MARITAL STATUS FOR THE POPULATION 15 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	277,145	889	100.0%	1,533,104	430	100.0%
Less than high school diploma	49,613	NC	17.9%	178,707	NC	11.7%
High school graduate, GED, or alternative	100,264	NC	36.2%	532,933	NC	34.8%
Some college or associate's degree	86,358	NC	31.2%	457,023	NC	29.8%
Bachelor's degree or higher	40,910	NC	14.8%	364,441	NC	23.8%
Male:	126,567	627	45.7%	739,298	258	48.2%
Less than high school diploma	23,880	935	8.6%	92,042	1,996	6.0%
High school graduate, GED, or alternative	53,611	1,374	19.3%	266,875	3,399	17.4%
Some college or associate's degree	34,202	1,275	12.3%	207,773	2,877	13.6%
Bachelor's degree or higher	14,874	890	5.4%	172,608	2,853	11.3%
Female:	150,578	611	54.3%	793,806	248	51.8%
Less than high school diploma	25,733	1,121	9.3%	86,665	1,591	5.7%
High school graduate, GED, or alternative	46,653	1,526	16.8%	266,058	2,673	17.4%
Some college or associate's degree	52,156	1,445	18.8%	249,250	2,623	16.3%
Bachelor's degree or higher	26,036	1,176	9.4%	191,833	2,403	12.5%

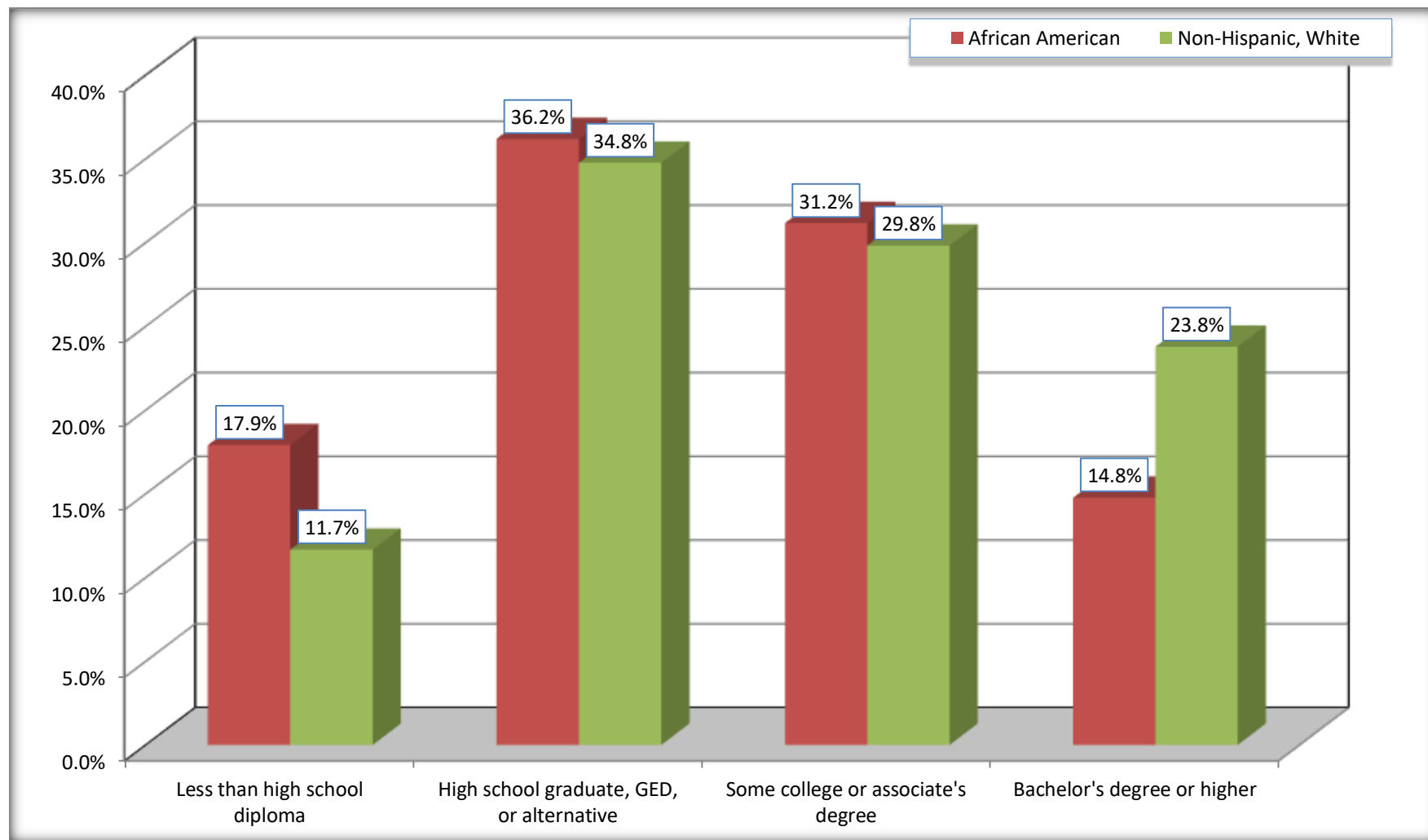
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Educational Attainment for the Population 25 Years and Older

Arkansas



Source: C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

Case 4:20-cv-00341-JM Document 3-15 Filed 03/27/20 Page 23 of 64

B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	425,645	1,416	100.0%	2,055,695	471	100.0%
Speak only English	420,079	NC	98.7%	2,026,567	NC	98.6%
Speak another language	5,566	NC	1.3%	29,128	NC	1.4%
Speak English "very well"	4,416	NC	1.0%	22,786	NC	1.1%
Speak English "less than very well"	1,150	NC	0.3%	6,342	NC	0.3%
Native:	422,277	1,515	99.2%	2,038,590	1,126	99.2%
Speak only English	418,572	1,600	98.3%	2,017,513	1,847	98.1%
Speak another language	3,705	543	0.9%	21,077	1,286	1.0%
Speak English "very well"	3,036	503	0.7%	17,985	1,167	0.9%
Speak English "less than very well"	669	167	0.2%	3,092	472	0.2%
Foreign born:	3,368	485	0.8%	17,105	1,074	0.8%
Speak only English	1,507	320	0.4%	9,054	649	0.4%
Speak another language	1,861	405	0.4%	8,051	942	0.4%
Speak English "very well"	1,380	366	0.3%	4,801	698	0.2%
Speak English "less than very well"	481	204	0.1%	3,250	634	0.2%

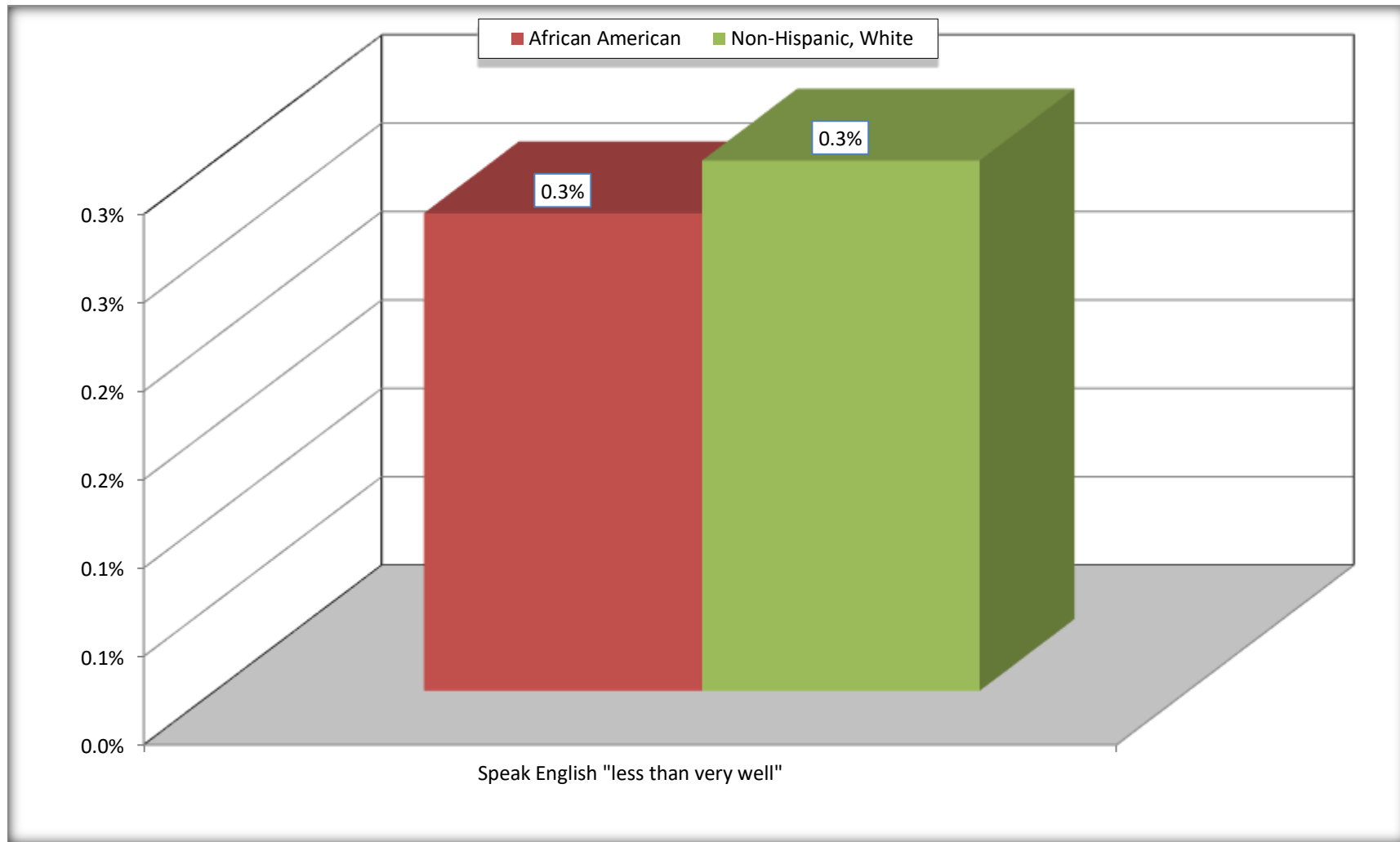
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Speak English "Less than Very Well" (Population 5 Years and Over)

Arkansas



Source: B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	102,634	1,433	100.0%	586,769	3,559	100.0%
Income in the past 12 months below poverty level:	27,738	1,214	27.0%	56,968	1,833	9.7%
Married-couple family:	4,993	483	4.9%	24,308	1,215	4.1%
With related children under 18 years	2,849	416	2.8%	13,501	852	2.3%
Other family:	22,745	1,209	22.2%	32,660	1,140	5.6%
Male householder, no wife present	2,785	389	2.7%	6,216	574	1.1%
With related children under 18 years	2,053	342	2.0%	4,427	463	0.8%
Female householder, no husband present	19,960	1,087	19.4%	26,444	930	4.5%
With related children under 18 years	17,516	1,064	17.1%	22,093	876	3.8%
Income in the past 12 months at or above poverty level:	74,896	1,528	73.0%	529,801	3,817	90.3%
Married-couple family:	39,761	1,377	38.7%	440,472	4,198	75.1%
With related children under 18 years	16,543	984	16.1%	162,238	2,943	27.6%
Other family:	35,135	1,079	34.2%	89,329	2,261	15.2%
Male householder, no wife present	6,290	578	6.1%	28,678	1,211	4.9%
With related children under 18 years	3,184	437	3.1%	15,398	828	2.6%
Female householder, no husband present	28,845	991	28.1%	60,651	1,739	10.3%
With related children under 18 years	18,097	961	17.6%	31,332	1,230	5.3%

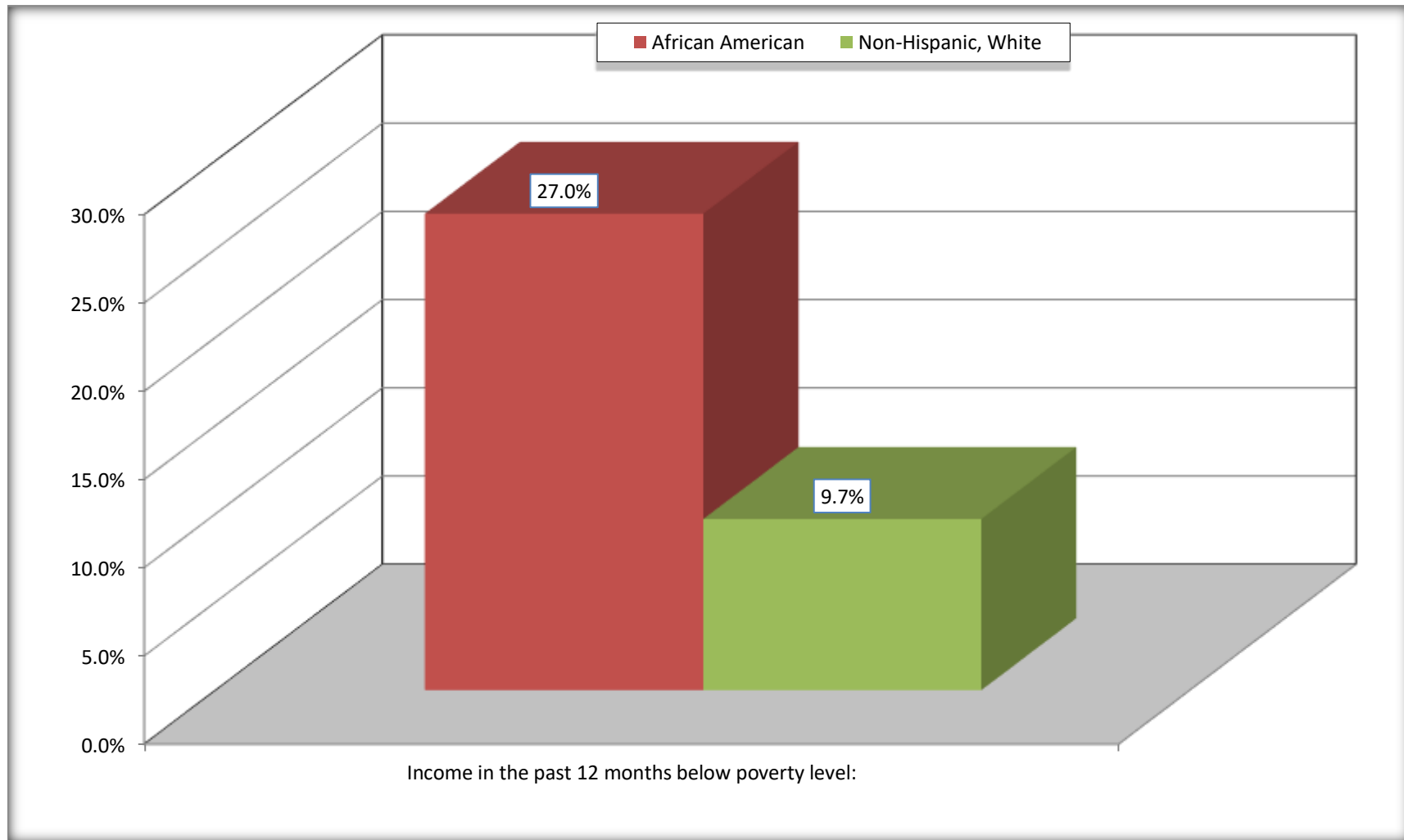
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Family Households Below Poverty in the Past 12 Months

Arkansas

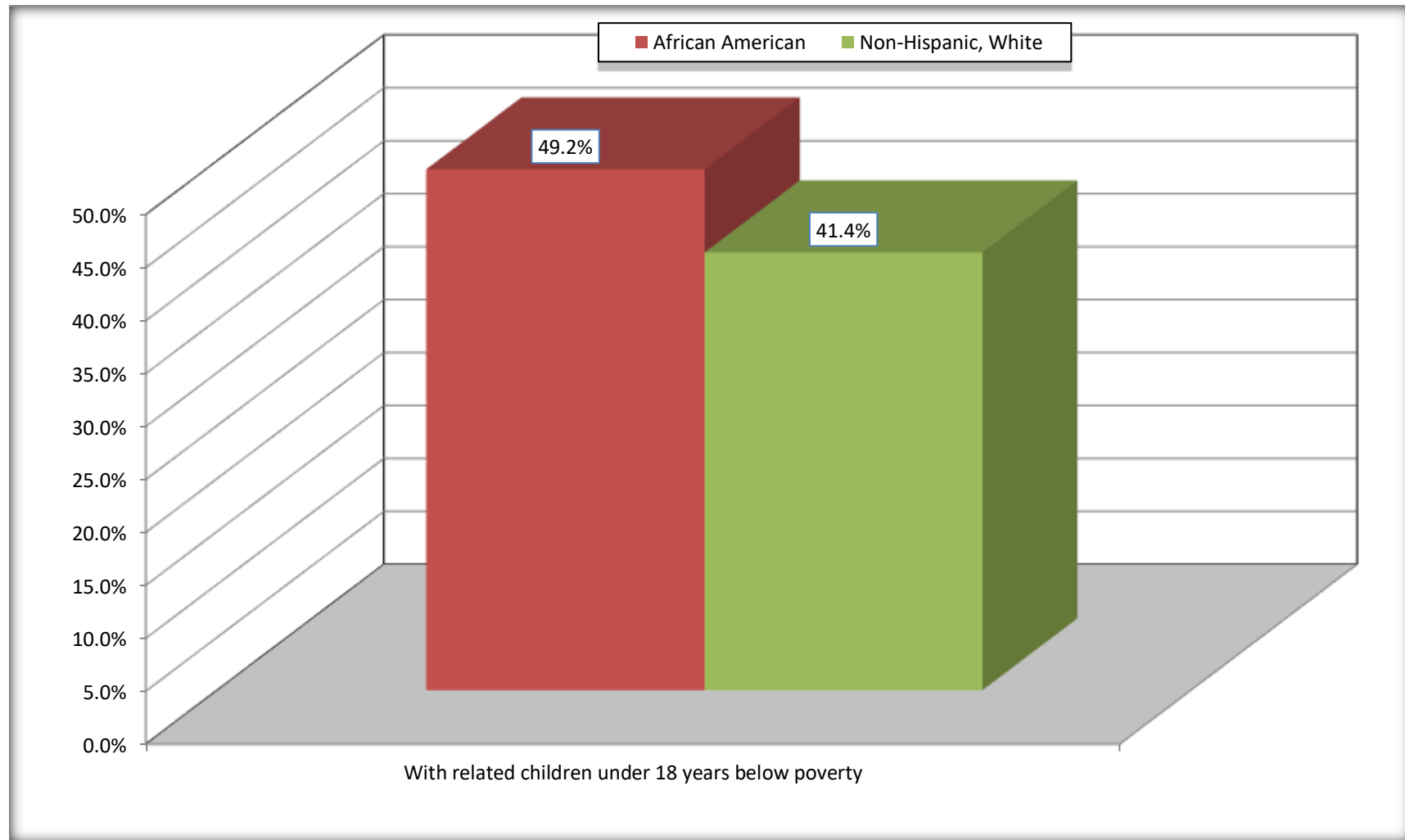


Source: B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

Female-headed Households with Related Children Below Poverty in the Past 12 Months

Arkansas



Source: B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA By Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW By Age
Total:	437,236	1,830	100.0%	2,115,730	1,289	100.0%
Income in the past 12 months below poverty level:	139,406	4,453	31.9%	297,355	6,289	14.1%
Under 18 years	55,866	NC	44.8%	80,100	NC	18.1%
18 to 59 years	68,473	766	27.9%	166,061	1,527	14.7%
60 years and over	15,067	NC	22.3%	51,194	NC	9.4%
Income in the past 12 months at or above poverty level:	297,830	4,723	68.1%	1,818,375	6,092	85.9%
Under 18 years	68,881	NC	55.2%	361,797	NC	81.9%
18 to 59 years	176,543	1,054	72.1%	964,389	2,047	85.3%
60 years and over	52,406	NC	77.7%	492,189	NC	90.6%

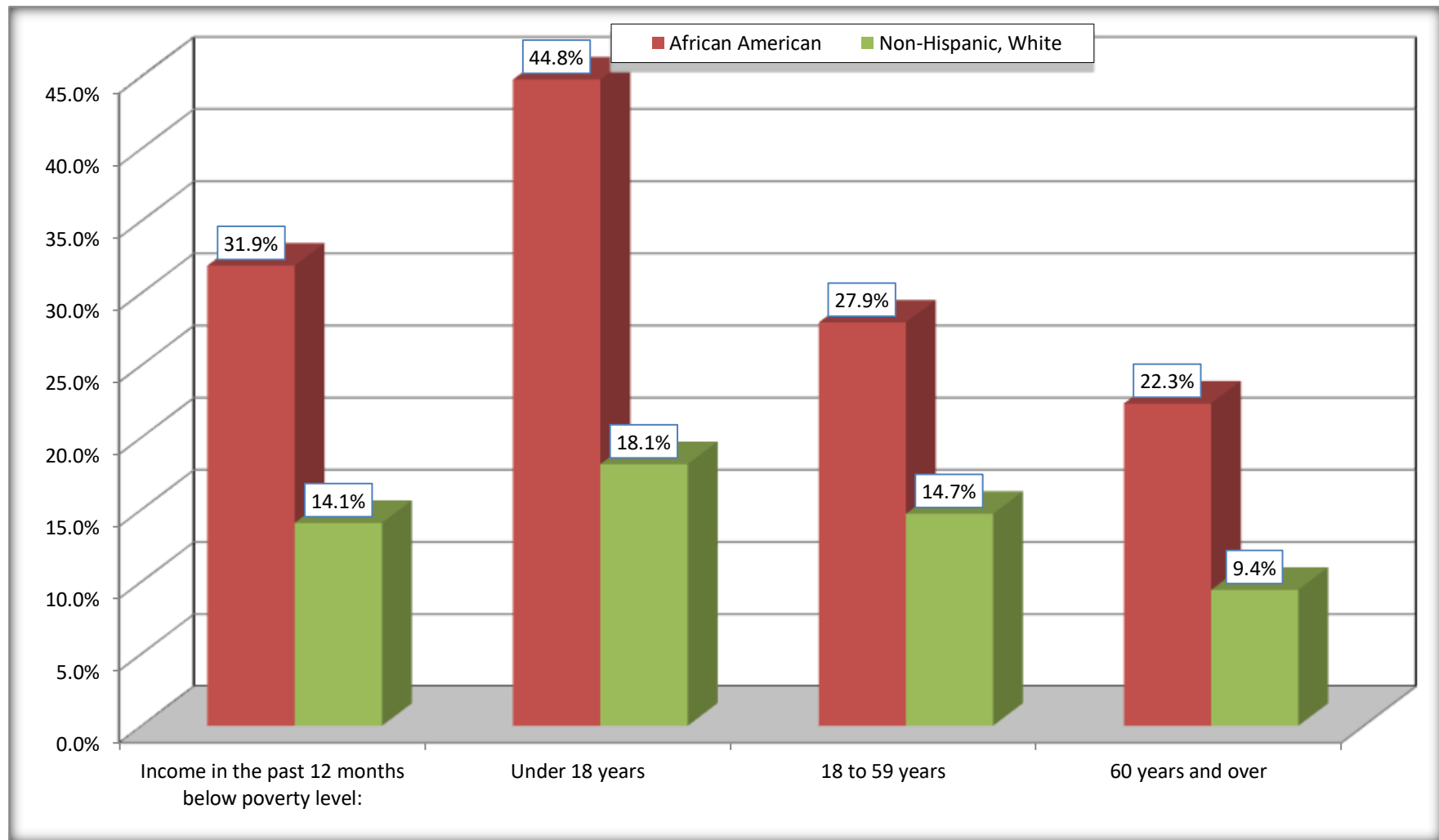
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Population Below Poverty in the Past 12 Months

Arkansas



Source: B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19001. HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

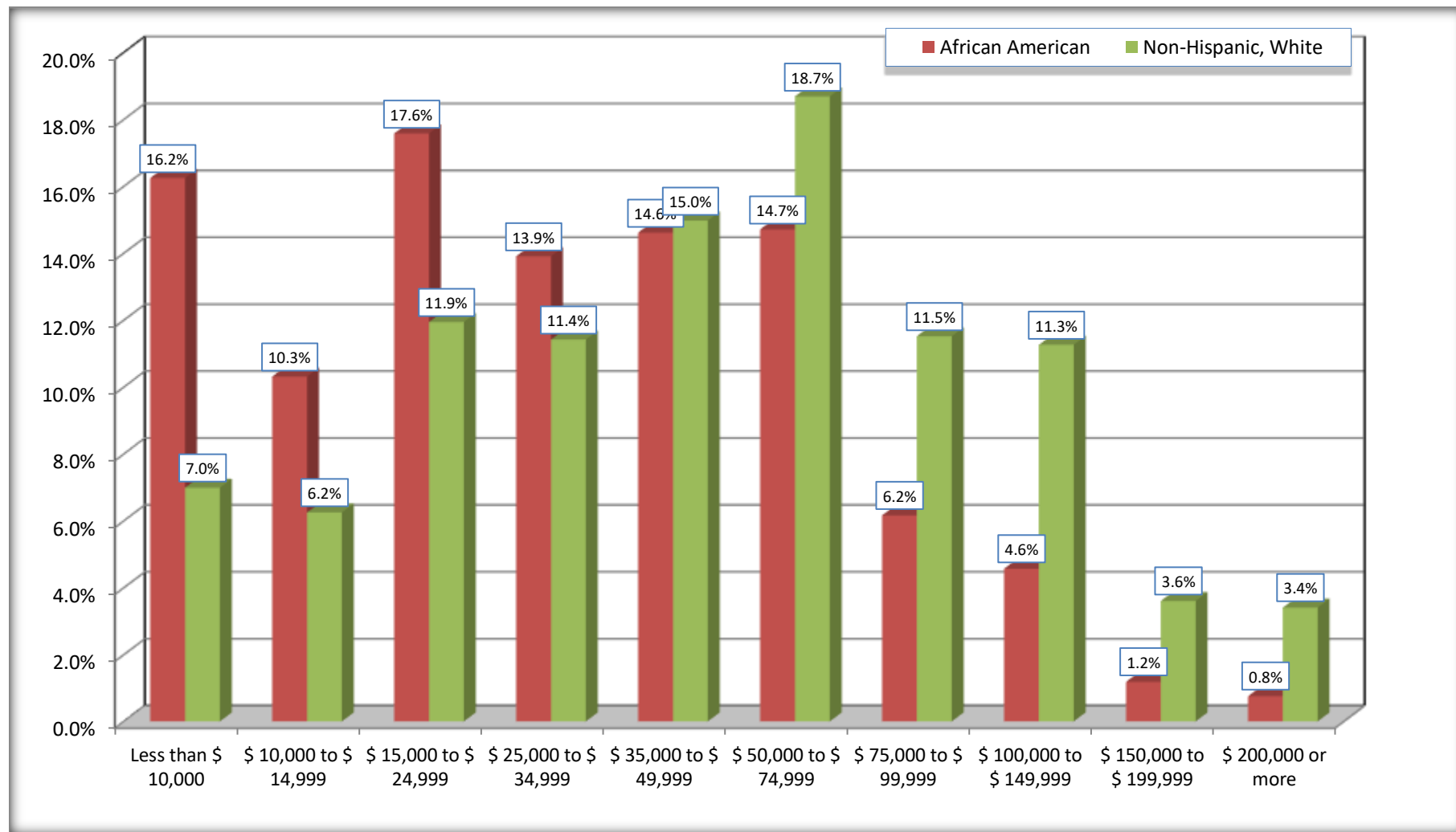
Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	172,490	1,507	100.0%	879,735	3,594	100.0%
Less than \$ 10,000	28,021	1,242	16.2%	61,431	2,151	7.0%
\$ 10,000 to \$ 14,999	17,775	937	10.3%	54,932	1,729	6.2%
\$ 15,000 to \$ 24,999	30,316	NC	17.6%	105,022	NC	11.9%
\$ 25,000 to \$ 34,999	23,983	NC	13.9%	100,399	NC	11.4%
\$ 35,000 to \$ 49,999	25,199	NC	14.6%	131,692	NC	15.0%
\$ 50,000 to \$ 74,999	25,367	NC	14.7%	164,369	NC	18.7%
\$ 75,000 to \$ 99,999	10,625	709	6.2%	101,288	2,250	11.5%
\$ 100,000 to \$ 149,999	7,870	NC	4.6%	99,031	NC	11.3%
\$ 150,000 to \$ 199,999	2,036	311	1.2%	31,665	1,133	3.6%
\$ 200,000 or more	1,298	294	0.8%	29,906	1,146	3.4%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Household Income in the Past 12 Months**Arkansas**

Source: B19001. HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median household income in the past 12 months (in 2017 inflation-adjusted dollars)	\$ 29,299	\$ 734	\$ 48,154	\$ 455

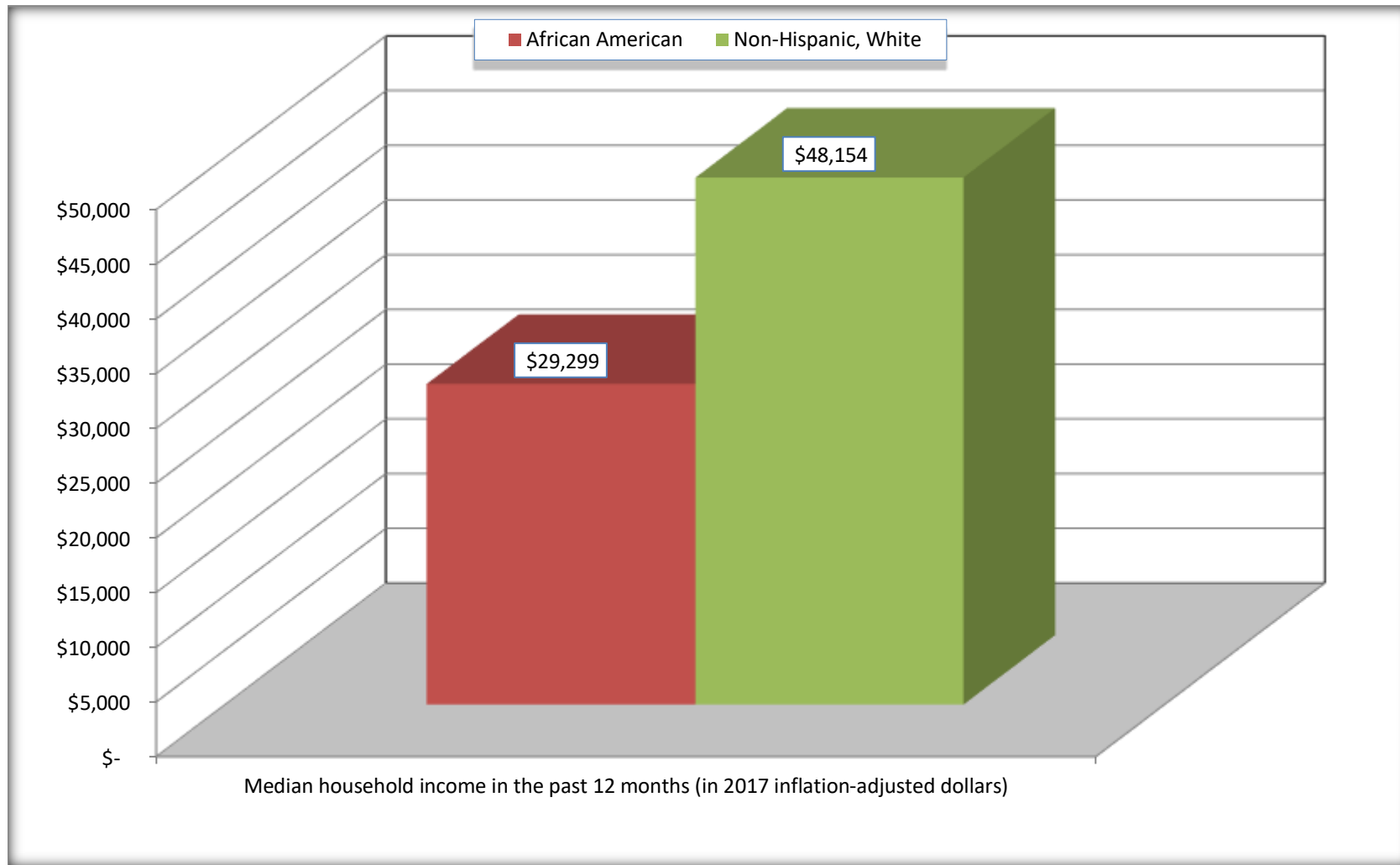
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median Household Income in the Past 12 Months

Arkansas



Source: B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19101. FAMILY INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

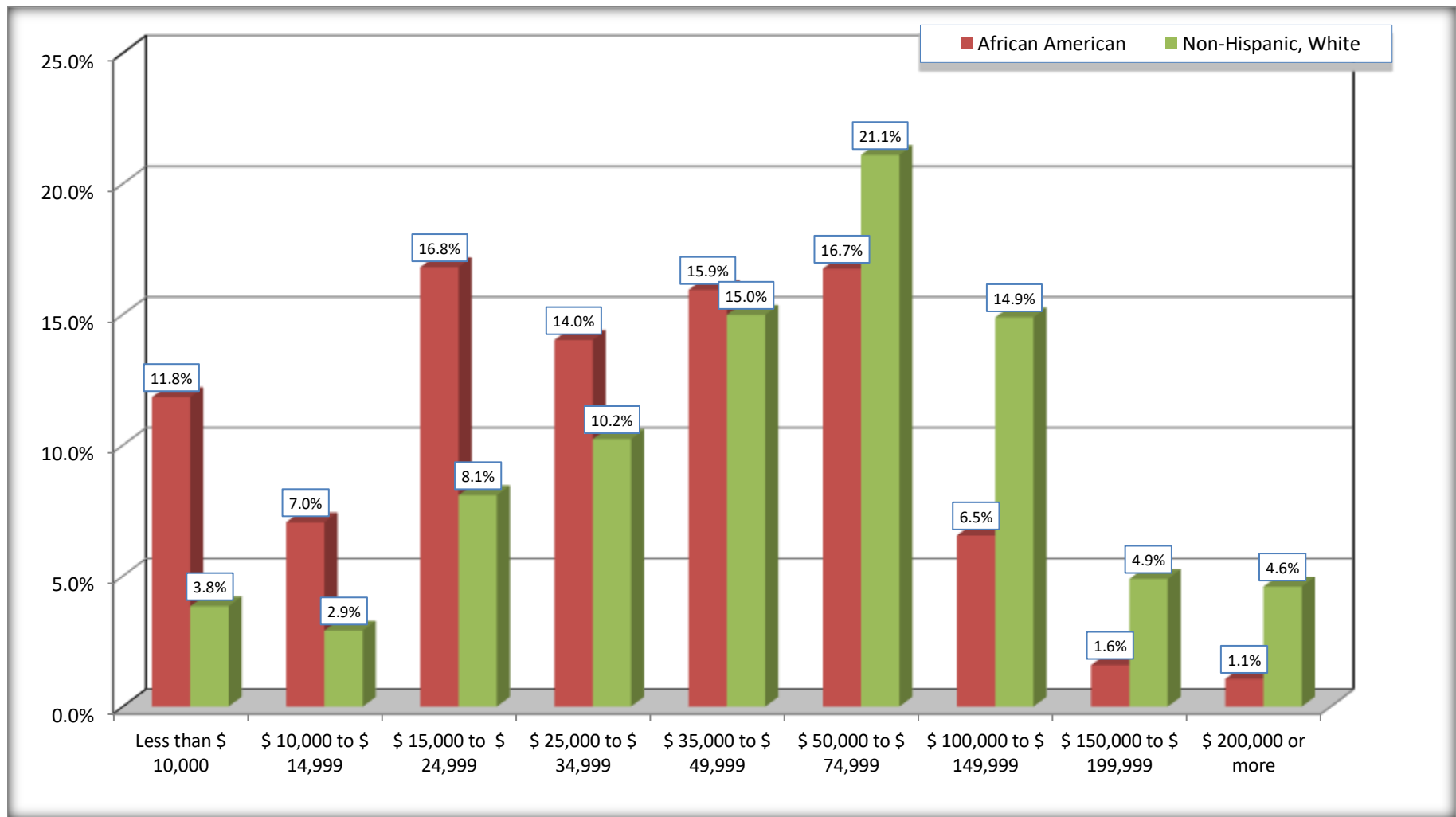
Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	102,634	1,433	100.0%	586,769	3,559	100.0%
Less than \$ 10,000	12,145	830	11.8%	22,507	1,099	3.8%
\$ 10,000 to \$ 14,999	7,232	618	7.0%	17,040	1,110	2.9%
\$ 15,000 to \$ 24,999	17,246	NC	16.8%	47,415	NC	8.1%
\$ 25,000 to \$ 34,999	14,381	NC	14.0%	59,990	NC	10.2%
\$ 35,000 to \$ 49,999	16,351	NC	15.9%	87,907	NC	15.0%
\$ 50,000 to \$ 74,999	17,186	NC	16.7%	123,771	NC	21.1%
\$ 100,000 to \$ 149,999	6,715	NC	6.5%	87,353	NC	14.9%
\$ 150,000 to \$ 199,999	1,628	288	1.6%	28,618	1,039	4.9%
\$ 200,000 or more	1,083	273	1.1%	26,906	1,078	4.6%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Family Income in the Past 12 Months**Arkansas**

Source: B19101. FAMILY INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19113. MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median family income in the past 12 months (in 2017 inflation-adjusted dollars)	\$ 35,221	\$ 1,004	\$ 60,740	\$ 517

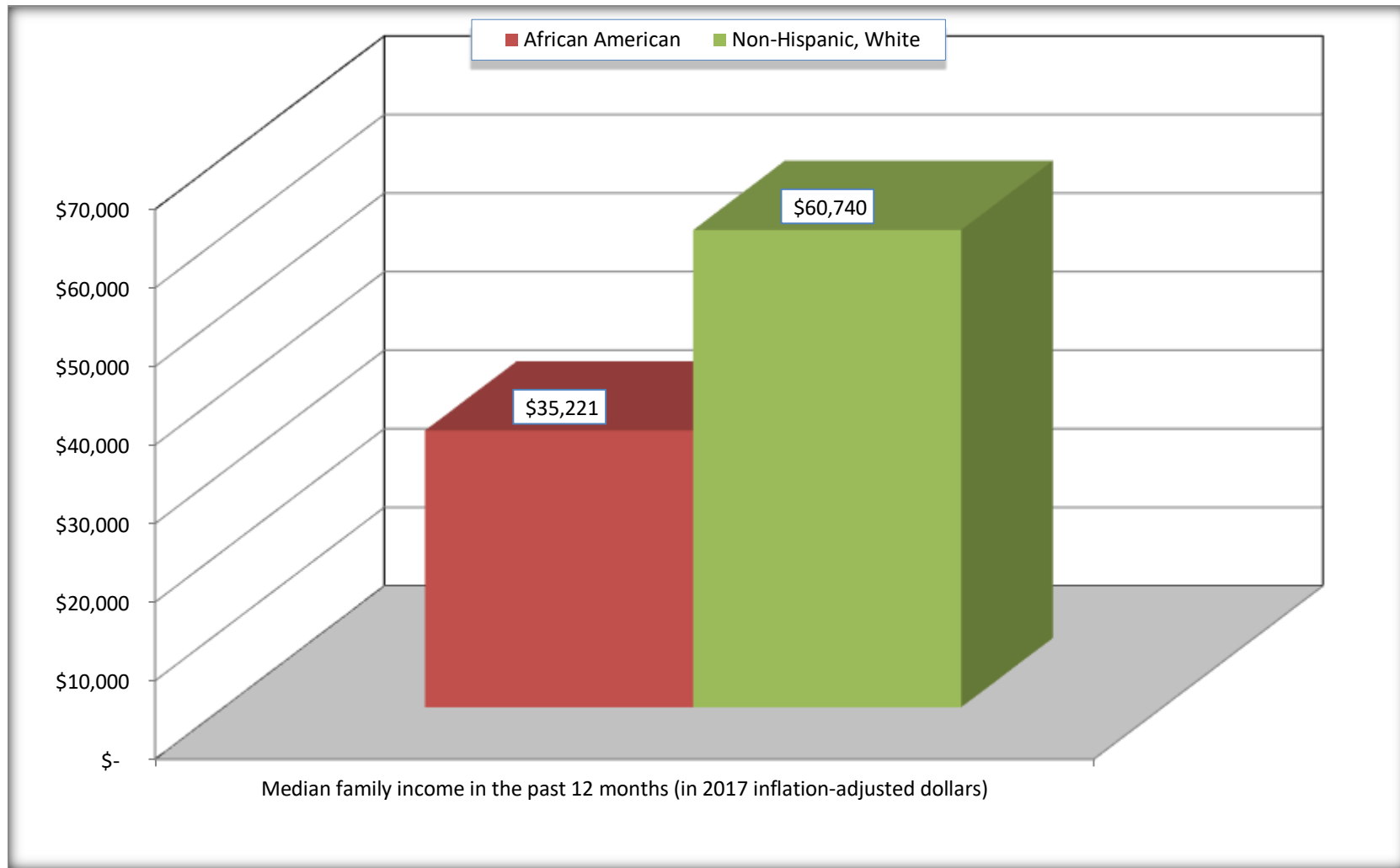
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median Family Income in the Past 12 Months

Arkansas



Source: B19113. MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median nonfamily household income in the past 12 months (in 2017 inflation-adjusted dollars)	\$ 19,871	\$ 622	\$ 26,263	\$ 405

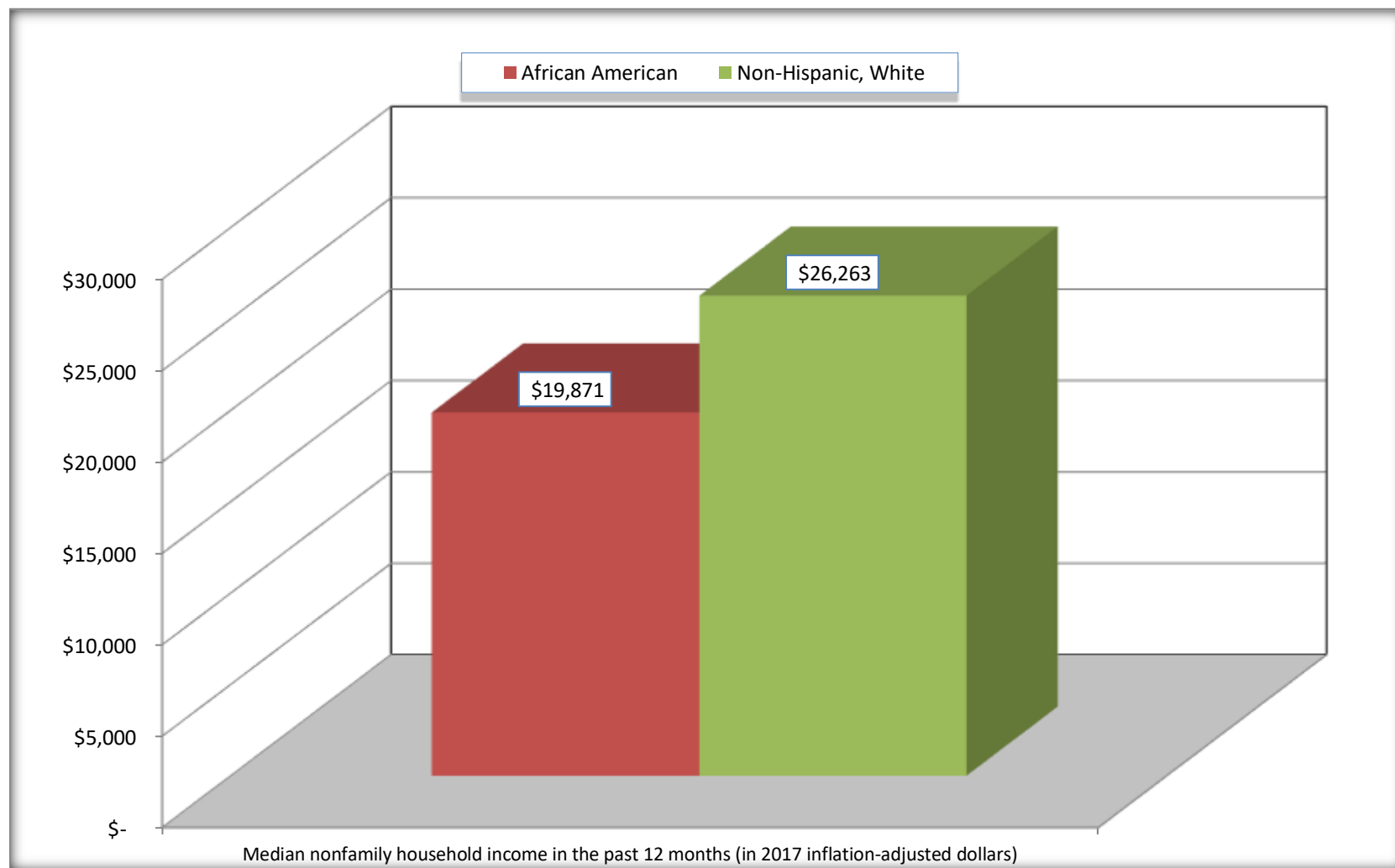
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median Non-Family Income in the Past 12 Months

Arkansas



Source: B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Per capita income in the past 12 months (in 2017 inflation-adjusted dollars)	\$ 16,303	\$ 311	\$ 27,425	\$ 216

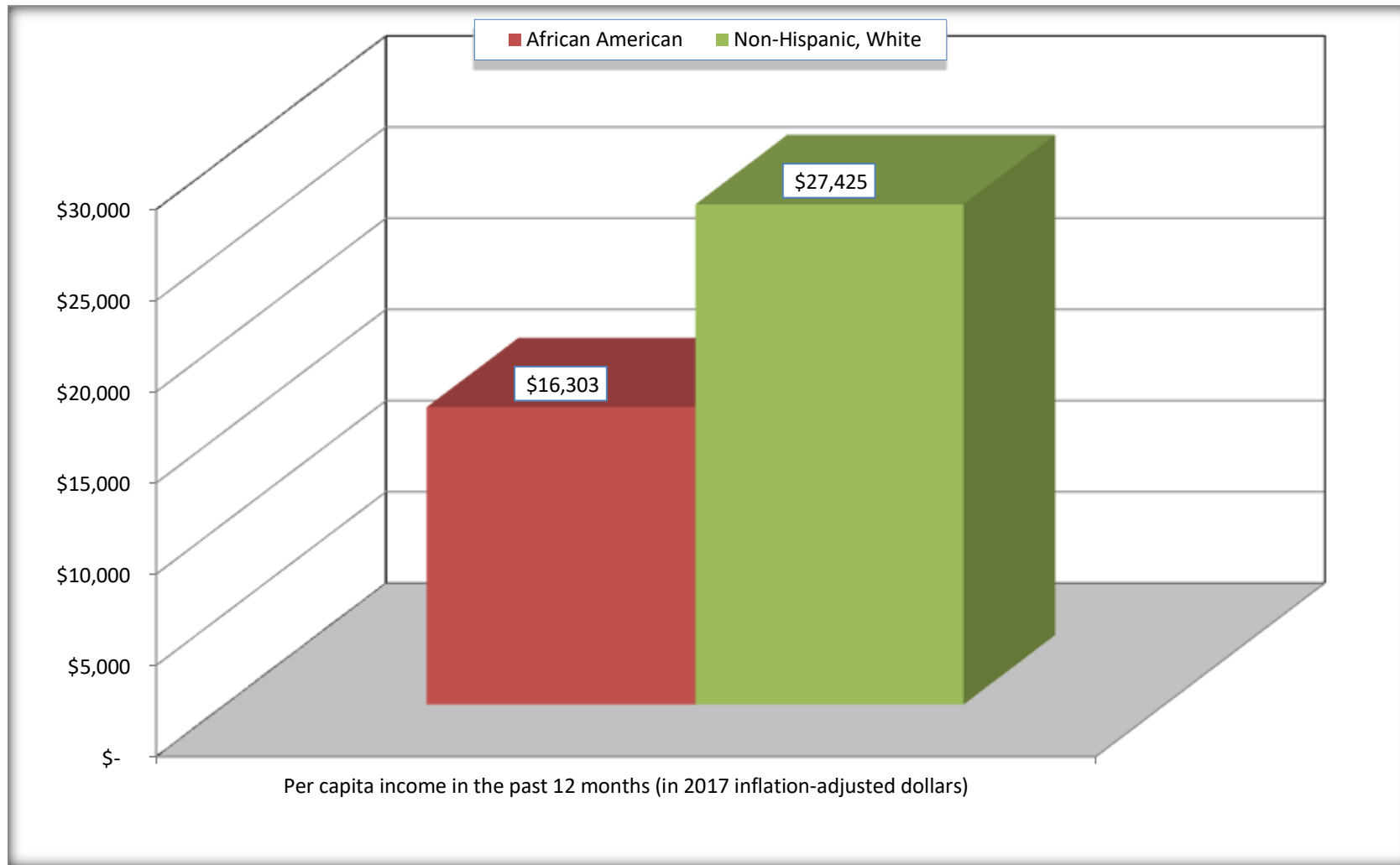
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Per capita Income in the Past 12 Months

Arkansas



Source: B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median earnings in the past 12 months (in 2017 inflation-adjusted dollars) --				
Total:	\$ 22,335	\$ 362	\$ 30,577	\$ 184
Male --				
Total	\$ 24,612	\$ 839	\$ 36,034	\$ 257
Worked full-time, year-round in the past 12 months	\$ 32,427	\$ 724	\$ 45,567	\$ 386
Other	\$ 8,580	\$ 953	\$ 11,043	\$ 260
Female --				
Total	\$ 21,138	\$ 451	\$ 25,158	\$ 245
Worked full-time, year-round in the past 12 months	\$ 28,953	\$ 866	\$ 35,434	\$ 312
Other	\$ 8,656	\$ 364	\$ 9,892	\$ 207

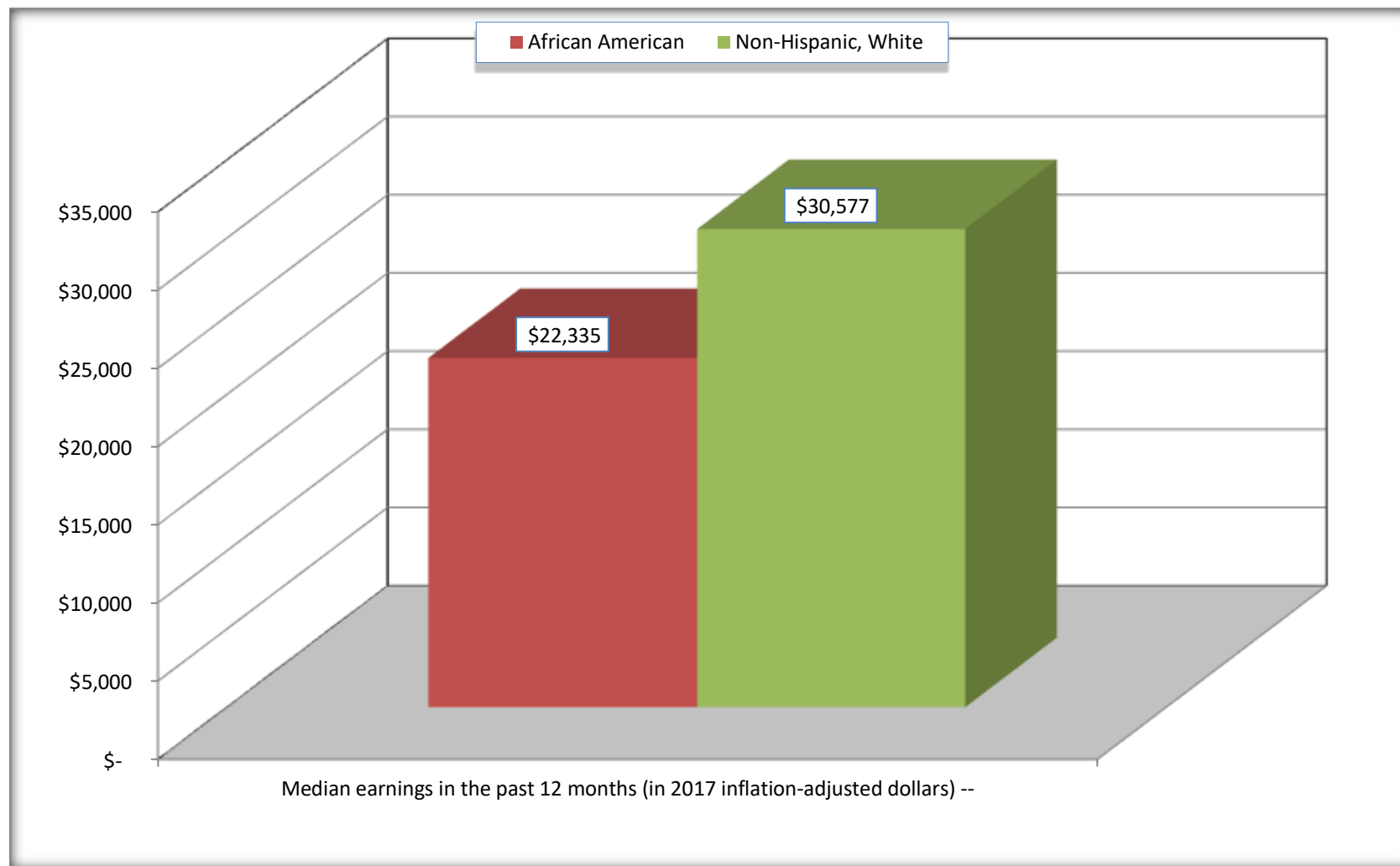
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median earnings in the Past 12 Months (16 Years and Over with Earnings)

Arkansas



Source: B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	331,793	989	100.0%	1,720,895	564	100.0%
Veteran	22,826	NC	6.9%	174,368	NC	10.1%
Nonveteran	308,967	NC	93.1%	1,546,527	NC	89.9%
Male:	154,232	609	46.5%	833,909	433	48.5%
18 to 64 years:	135,332	589	40.8%	649,518	431	37.7%
Veteran	13,893	816	4.2%	75,214	1,848	4.4%
Nonveteran	121,439	973	36.6%	574,304	1,864	33.4%
65 years and over:	18,900	199	5.7%	184,391	74	10.7%
Veteran	6010	396	1.8%	87615	1194	5.1%
Nonveteran	12,890	409	3.9%	96,776	1,202	5.6%
Female:	177,561	757	53.5%	886,986	263	51.5%
18 to 64 years:	150,778	717	45.4%	658,272	257	38.3%
Veteran	2,754	415	0.8%	9,053	693	0.5%
Nonveteran	148,024	847	44.6%	649,219	710	37.7%
65 years and over:	26,783	223	8.1%	228,714	72	13.3%
Veteran	169	77	0.1%	2,486	305	0.1%
Nonveteran	26,614	233	8.0%	226,228	325	13.1%

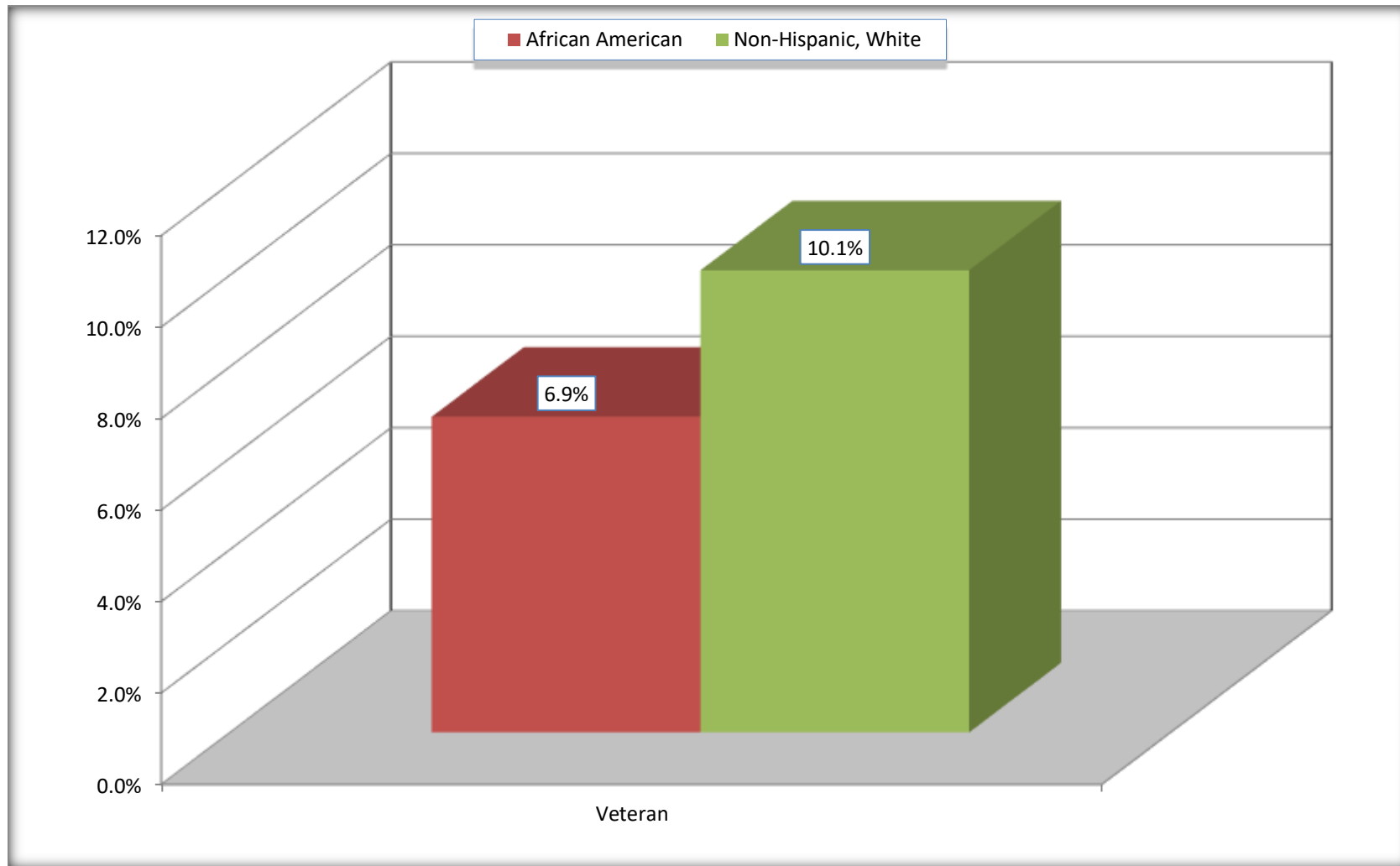
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Veterans in the Civilian Population 18 Years and Over

Arkansas



Source: C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B20005. SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS BY EARNINGS IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS) FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	346,651	1,136	100.0%	1,776,600	1,188	100.0%
Worked full-time, year-round in the past 12 months:	125,903	NC	36.3%	705,609	NC	39.7%
No earnings	0	NC	0.0%	115	NC	0.0%
With earnings:	125,903	NC	36.3%	705,494	NC	39.7%
\$ 1 to \$ 9,999 or less	3,898	NC	1.1%	12,248	NC	0.7%
\$ 10,000 to \$ 19,999	23,937	NC	6.9%	73,381	NC	4.1%
\$ 20,000 to \$ 29,999	31,501	NC	9.1%	132,935	NC	7.5%
\$ 30,000 to \$ 49,999	41,125	NC	11.9%	221,405	NC	12.5%
\$ 50,000 to \$ 74,999	18,162	NC	5.2%	148,019	NC	8.3%
\$ 75,000 or more	7,280	NC	2.1%	117,506	NC	6.6%
Other:	220,748	NC	63.7%	1,070,991	NC	60.3%
No earnings	147,701	NC	42.6%	706,806	NC	39.8%
With earnings: less than full time, year-round	73,047	NC	21.1%	364,185	NC	20.5%
Male:	162,031	756	46.7%	863,595	800	48.6%
Worked full-time, year-round in the past 12 months:	58,809	1,597	17.0%	403,863	2,676	22.7%
No earnings	0	27	0.0%	59	60	0.0%
With earnings:	58,809	1,597	17.0%	403,804	2,666	22.7%
\$ 1 to \$ 9,999 or less	1,764	NC	0.5%	6,081	NC	0.3%
\$ 10,000 to \$ 19,999	9,255	NC	2.7%	30,023	NC	1.7%
\$ 20,000 to \$ 29,999	13,465	NC	3.9%	65,336	NC	3.7%
\$ 30,000 to \$ 49,999	20,479	NC	5.9%	120,445	NC	6.8%
\$ 50,000 to \$ 74,999	9,416	NC	2.7%	93,614	NC	5.3%
\$ 75,000 or more	4,430	NC	1.3%	88,305	NC	5.0%

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Other:	103,222	1,705	29.8%	459,732	2,767	25.9%
No earnings	70,987	1,652	20.5%	295,575	2,614	16.6%
With earnings:	32,235	1,235	9.3%	164,157	2,707	9.2%
Female:	184,620	889	53.3%	913,005	797	51.4%
Worked full-time, year-round in the past 12 months:	67,094	1,504	19.4%	301,746	2,456	17.0%
No earnings	0	27	0.0%	56	40	0.0%
With earnings:	67,094	1,504	19.4%	301,690	2,454	17.0%
\$ 1 to \$ 9,999 or loss	2,134	NC	0.6%	6,167	NC	0.3%
\$ 10,000 to \$ 19,999	14,682	NC	4.2%	43,358	NC	2.4%
\$ 20,000 to \$ 29,999	18,036	NC	5.2%	67,599	NC	3.8%
\$ 30,000 to \$ 49,999	20,646	NC	6.0%	100,960	NC	5.7%
\$ 50,000 to \$ 74,999	8,746	NC	2.5%	54,405	NC	3.1%
\$ 75,000 or more	2,850	NC	0.8%	29,201	NC	1.6%
Other:	117,526	1,535	33.9%	611,259	2,791	34.4%
No earnings	76,714	1,746	22.1%	411,231	3,017	23.1%
With earnings:	40,812	1,332	11.8%	200,028	2,860	11.3%

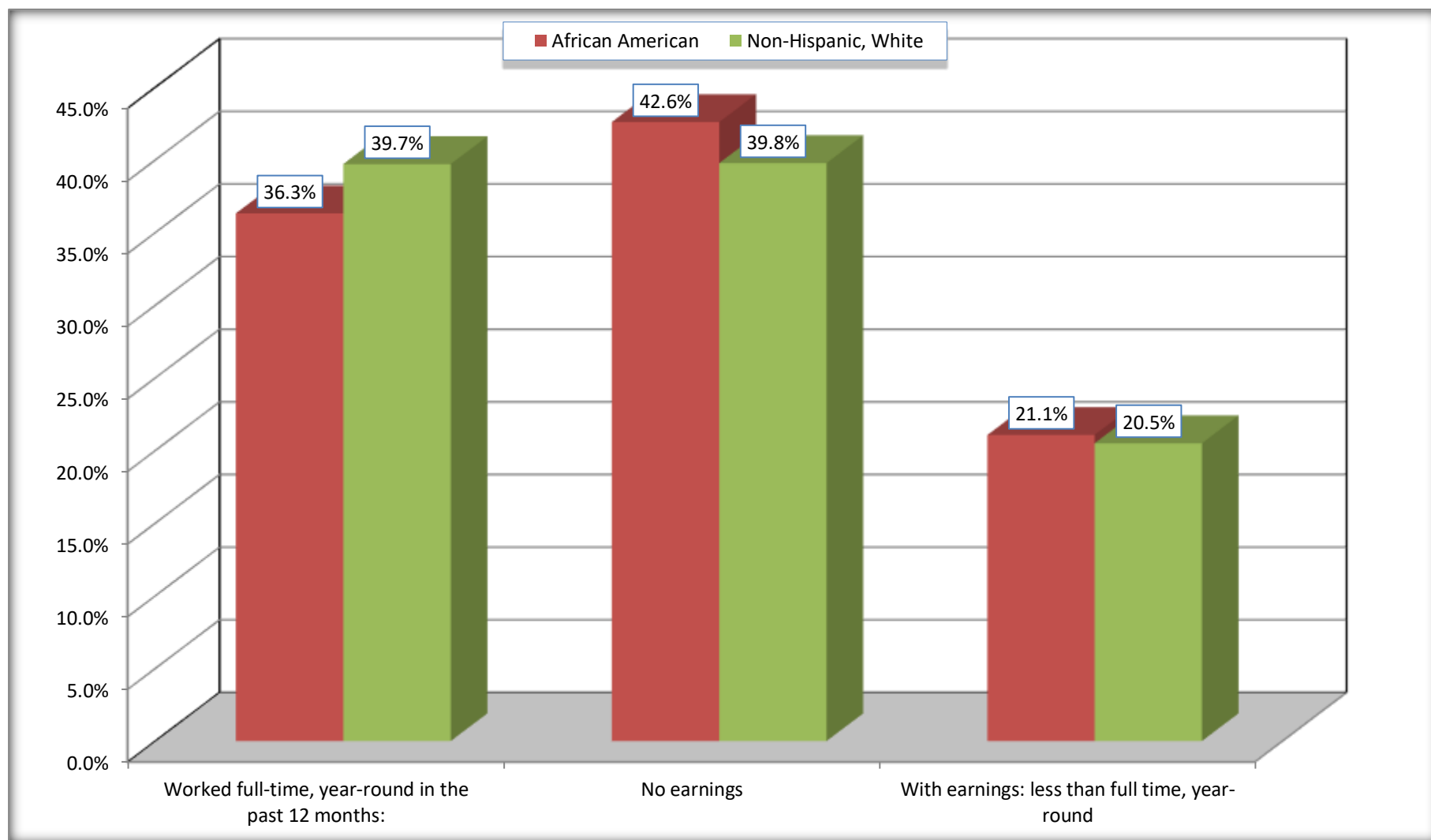
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Employment and Earnings in in the Past 12 Months (16 Years and Over)

Arkansas



Source: B20005. SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS BY EARNINGS IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS) FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	172,490	1,507	100.0%	879,735	3,594	100.0%
HH received Food Stamps/SNAP in the past 12 months	48,970	1,368	28.4%	92,137	2,014	10.5%
HH did not receive Food Stamps/SNAP in the past 12 months	123,520	1,602	71.6%	787,598	3,954	89.5%

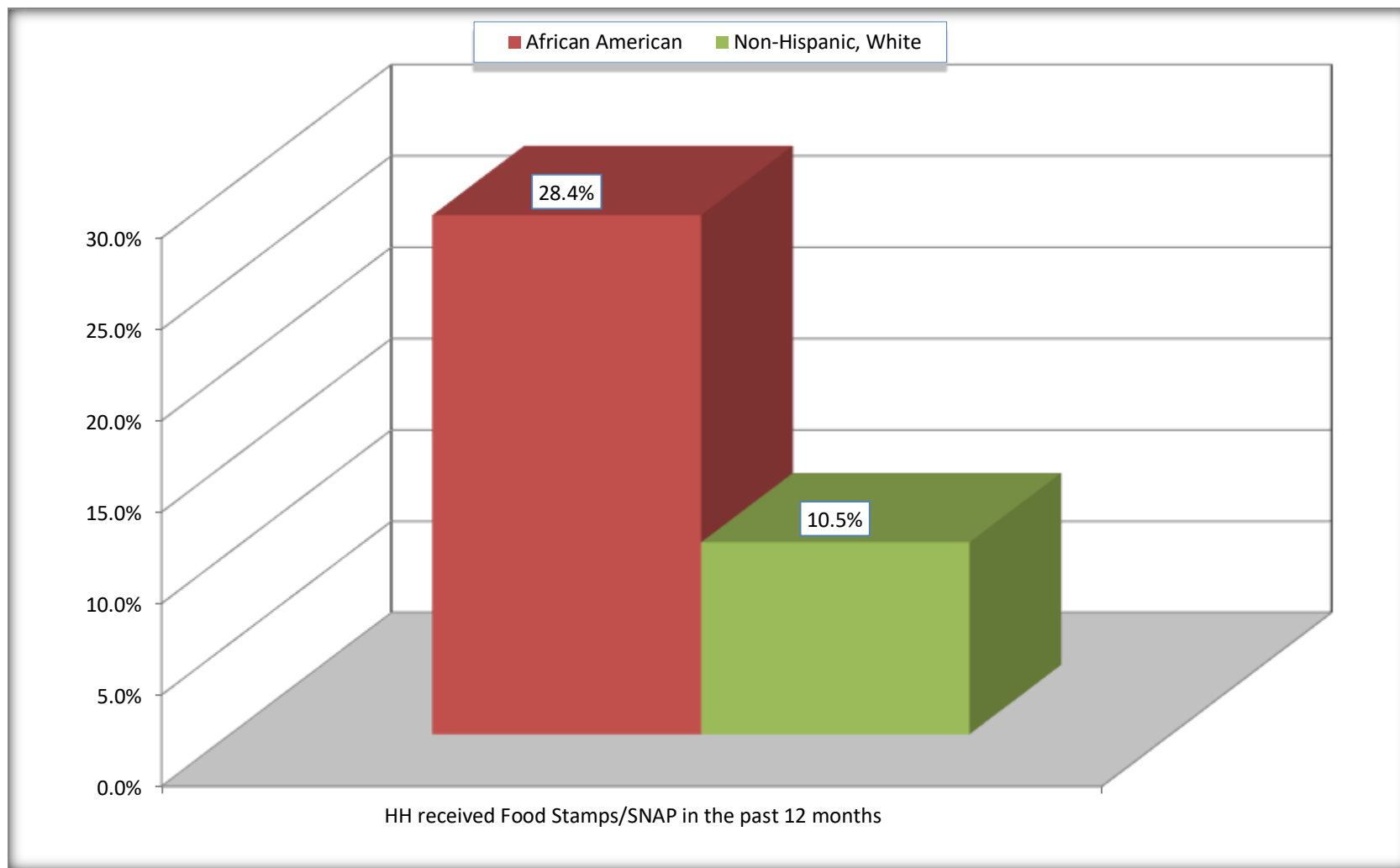
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Receipt of Food Stamps/SNAP in the Past 12 Months by Household

Arkansas



Source: B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	346,651	1,136	100.0%	1,776,600	1,188	100.0%
In labor force:	198,764	NC	57.3%	1,018,221	NC	57.3%
In Armed Forces	585	NC	0.2%	3,119	NC	0.2%
Civilian:	191,996	NC	55.4%	950,873	NC	53.5%
Employed	175,143	NC	50.5%	961,387	NC	54.1%
Unemployed	23,036	NC	6.6%	53,715	NC	3.0%
Not in labor force	147,887	NC	42.7%	758,379	NC	42.7%
Male:	162,031	756	46.7%	863,595	800	48.6%
16 to 64 years:	143,131	749	41.3%	679,204	792	38.2%
In labor force:	87,868	1,455	25.3%	509,412	2,210	28.7%
In Armed Forces	316	157	0.1%	2,733	359	0.2%
Civilian:	87,552	1,456	25.3%	506,679	2,176	28.5%
Employed	75,782	1,411	21.9%	477,242	2,271	26.9%
Unemployed	11,770	871	3.4%	29,437	1,118	1.7%
Not in labor force	55,263	1,484	15.9%	169,792	2,284	9.6%
65 years and over:	18,900	199	5.5%	184,391	74	10.4%
In labor force:	3,065	284	0.9%	35,959	1,164	2.0%
Employed	2,781	269	0.8%	34,830	1,134	2.0%
Unemployed	284	104	0.1%	1,129	191	0.1%
Not in labor force	15,835	335	4.6%	148,432	1,161	8.4%

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Female:	184,620	889	53.3%	913,005	797	51.4%
16 to 64 years:	157,837	851	45.5%	684,291	791	38.5%
In labor force:	104,713	1,573	30.2%	444,580	2,523	25.0%
In Armed Forces	269	178	0.1%	386	129	0.0%
Civilian:	104,444	1,565	30.1%	444,194	2,509	25.0%
Employed	93,551	1,629	27.0%	421,651	2,527	23.7%
Unemployed	10,893	923	3.1%	22,543	1,158	1.3%
Not in labor force	53,124	1,608	15.3%	239,711	2,708	13.5%
65 years and over:	26,783	223	7.7%	228,714	72	12.9%
In labor force:	3,118	304	0.9%	28,270	888	1.6%
Employed	3,029	305	0.9%	27,664	897	1.6%
Unemployed	89	52	0.0%	606	153	0.0%
Not in labor force	23,665	401	6.8%	200,444	893	11.3%

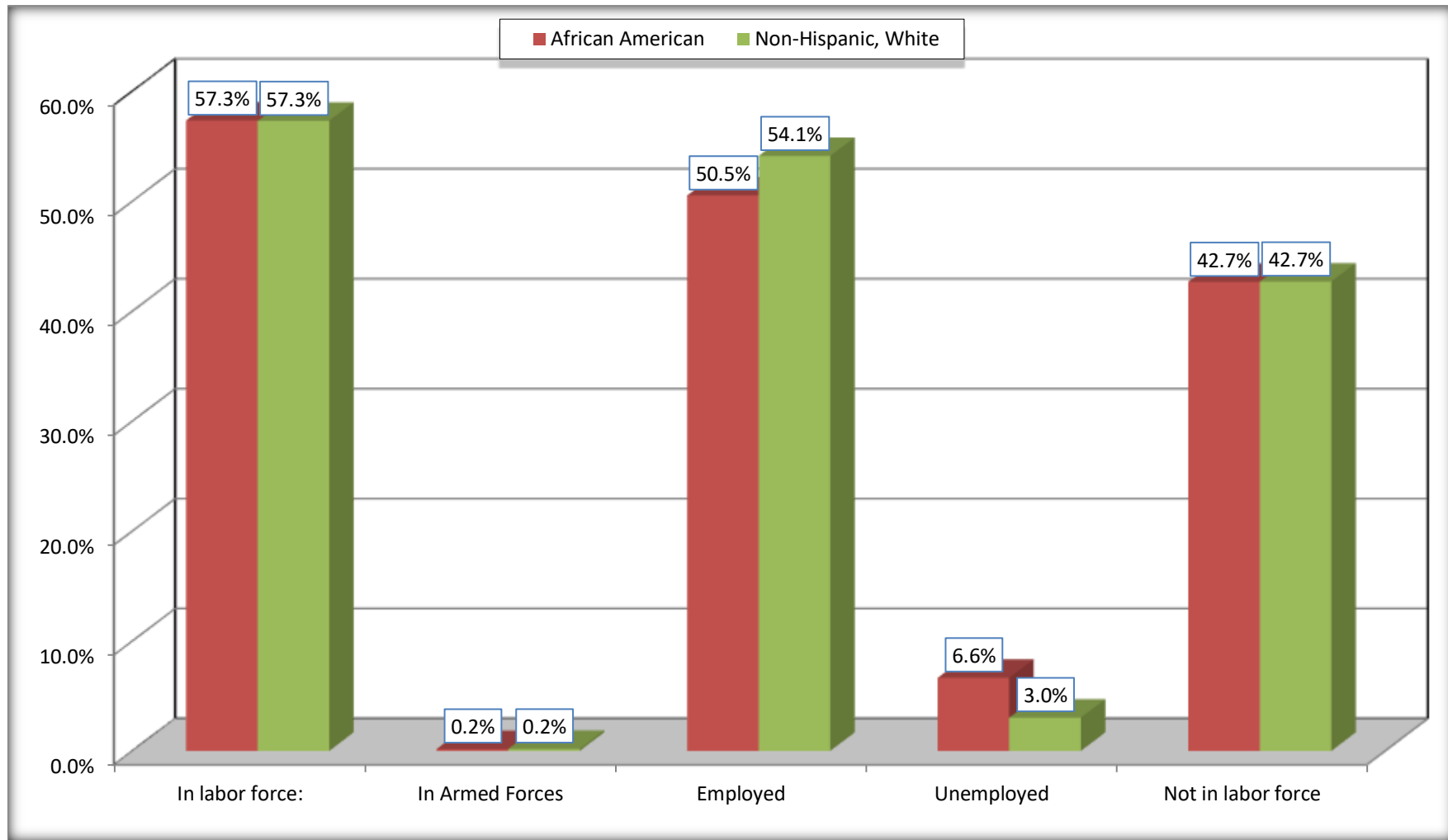
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Employment Status for the Population 16 years and over

Arkansas

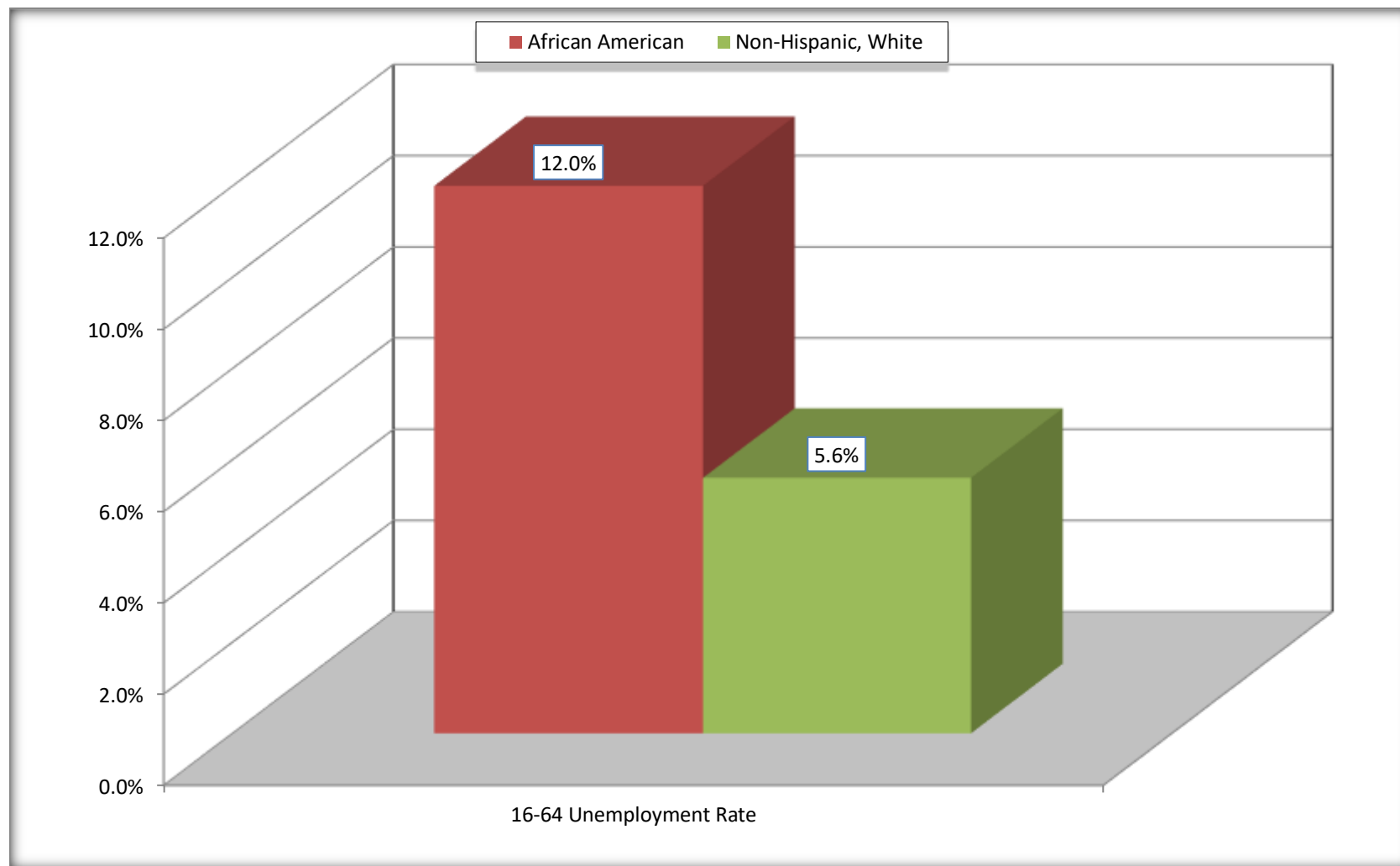


Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

**Unemployment of Working Age Population (Ages 16 to 64)
(As a Percent of 16-64 Civilian Labor Force)**

Arkansas



Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	175,143	2,205	100.0%	961,387	3,528	100.0%
Management, professional, and related occupations	43,503	NC	24.8%	345,297	NC	35.9%
Service occupations	44,675	NC	25.5%	143,307	NC	14.9%
Sales and office occupations	38,649	NC	22.1%	236,173	NC	24.6%
Natural resources, construction, and maintenance occupations:	9,267	NC	5.3%	103,078	NC	10.7%
Production, transportation, and material moving occupations	39,049	NC	22.3%	133,532	NC	13.9%
Male:	78,563	1,454	44.9%	512,072	2,425	53.3%
Management, business, science, and arts occupations:	12,759	824	7.3%	155,889	2,380	16.2%
Service occupations	16,540	1,088	9.4%	61,282	1,949	6.4%
Sales and office occupations	12,469	968	7.1%	87,140	2,153	9.1%
Natural resources, construction, and maintenance occupations:	8,488	713	4.8%	99,187	2,343	10.3%
Production, transportation, and material moving occupations	28,307	1,156	16.2%	108,574	2,502	11.3%
Female:	96,580	1,619	55.1%	449,315	2,563	46.7%
Management, professional, and related occupations	30,744	1,194	17.6%	189,408	2,469	19.7%
Service occupations	28,135	1,134	16.1%	82,025	2,122	8.5%
Sales and office occupations	26,180	1,154	14.9%	149,033	2,553	15.5%
Natural resources, construction, and maintenance occupations:	779	216	0.4%	3,891	463	0.4%
Production, transportation, and material moving occupations	10,742	790	6.1%	24,958	1,066	2.6%

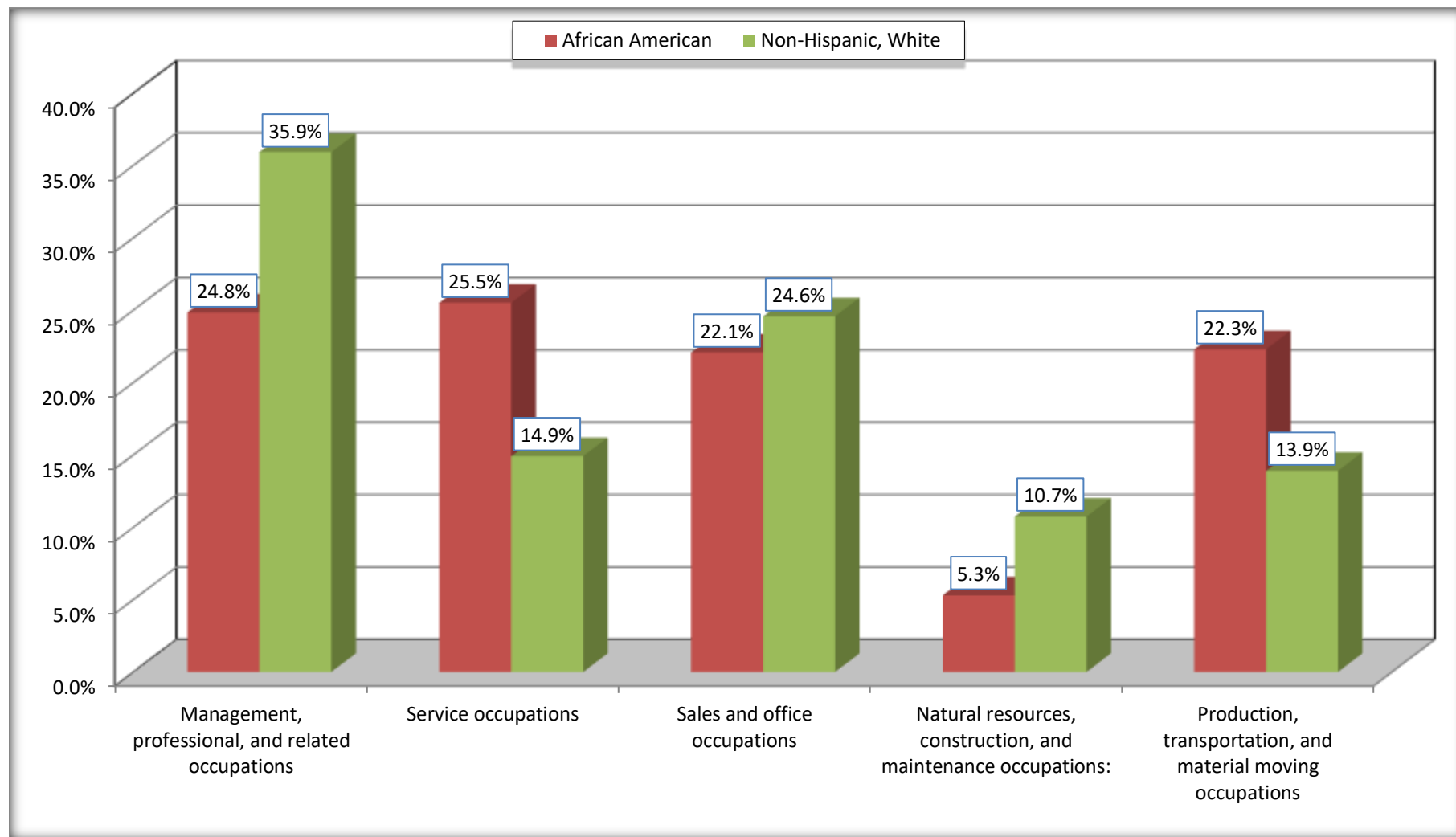
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Occupation for the Civilian Employed 16 Years and Over Population

Arkansas



Source: C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER
 Data Set: 2013-2017 American Community Survey 5-Year Estimates

B25003. TENURE - Universe: OCCUPIED HOUSING UNITS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	172,490	1,507	100.0%	879,735	3,594	100.0%
Owner occupied	74,500	1,461	43.2%	629,422	4,273	71.5%
Renter occupied	97,990	1,849	56.8%	250,313	2,738	28.5%

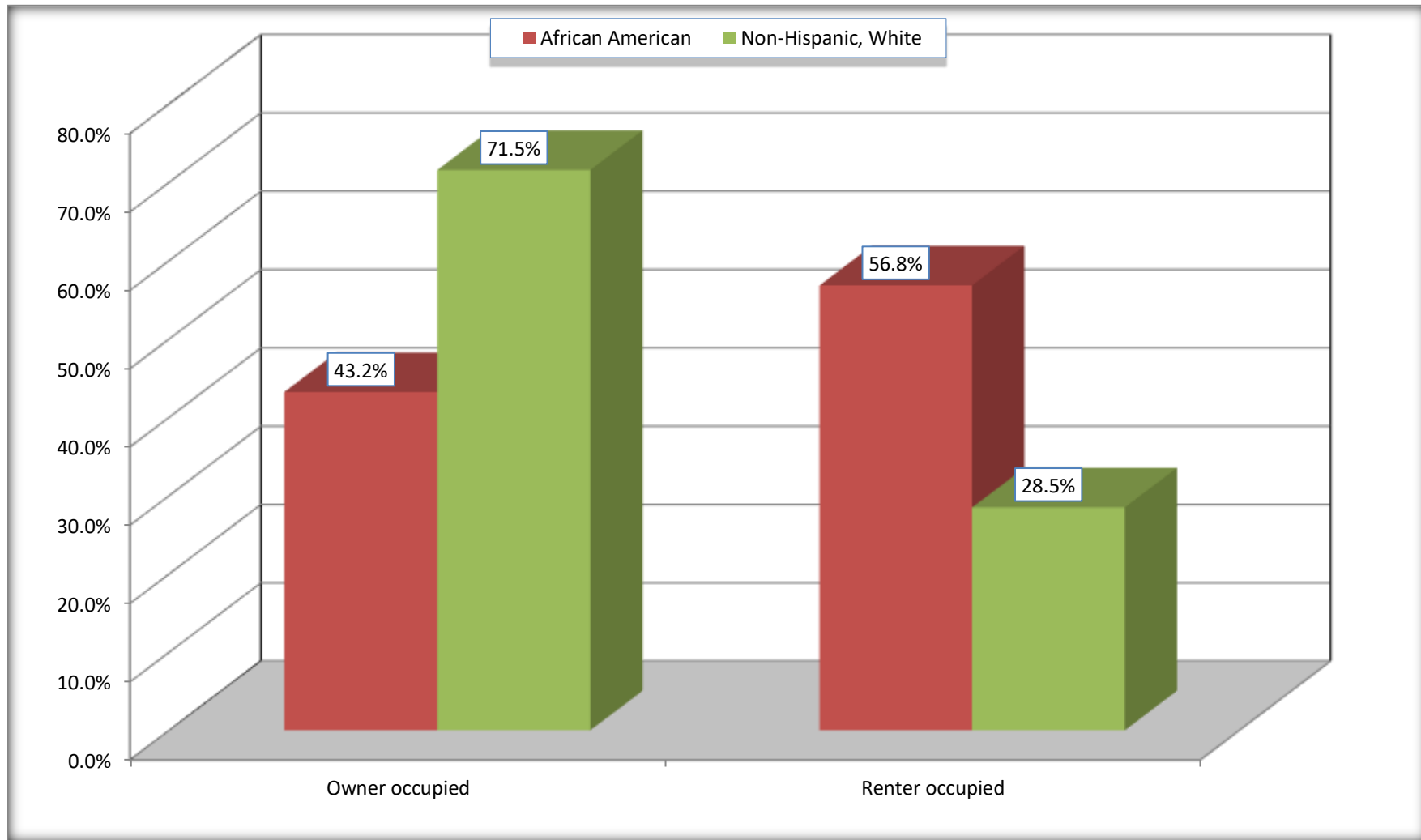
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.h>

Home Owners and Renters by Household

Arkansas



Source: B25003. TENURE - Universe: OCCUPIED HOUSING UNITS
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	172,490	1,507	100.0%	879,735	3,594	100.0%
1.00 or less occupants per room	166,115	1,735	96.3%	864,158	3,686	98.2%
1.01 or more occupants per room	6,375	628	3.7%	15,577	766	1.8%

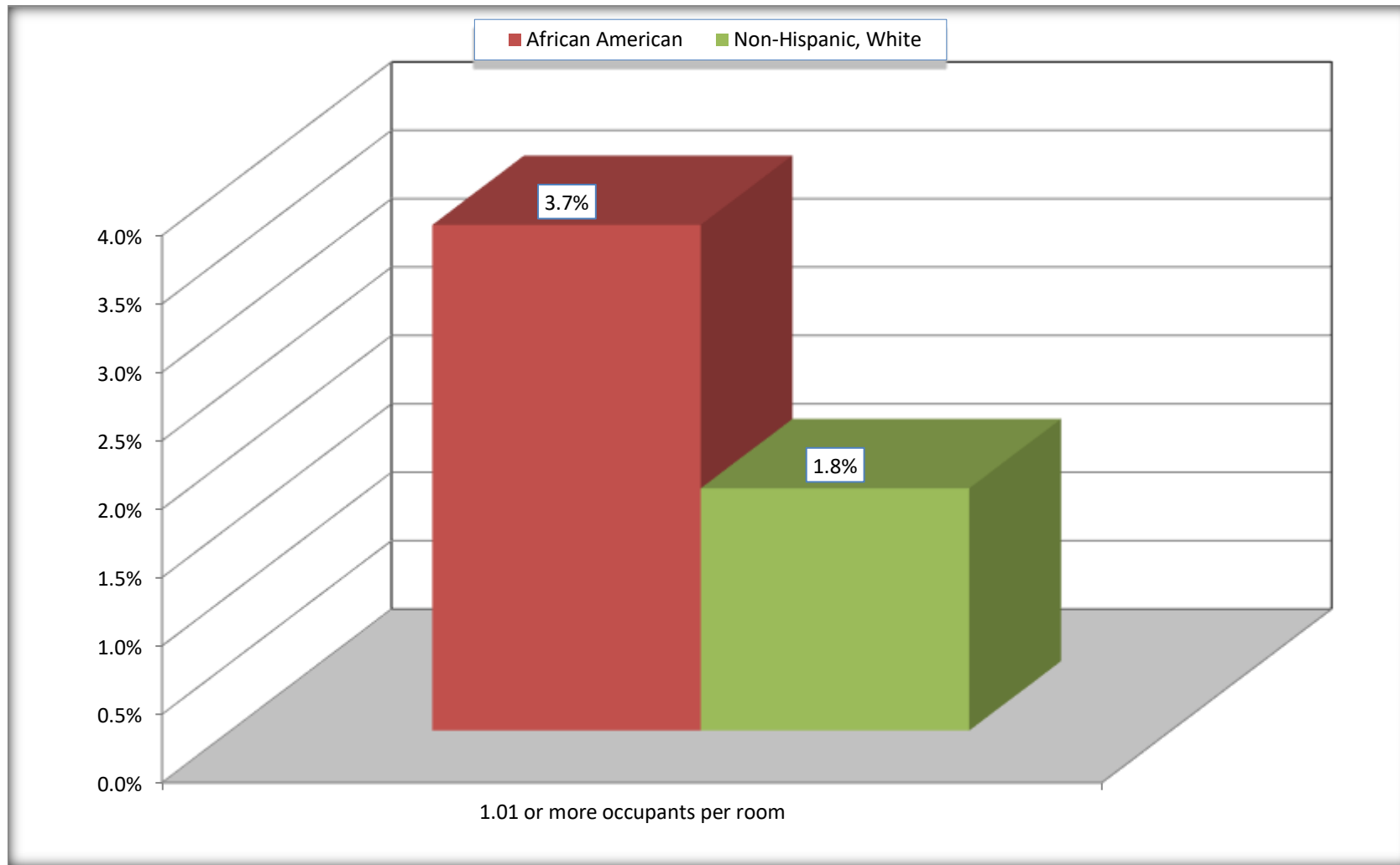
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.ht>

More than One Person per Room (Crowding) by Household

Arkansas



Source: B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS
Data Set: 2013-2017 American Community Survey 5-Year Estimates

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	445,351	1,736	100.0%	2,138,713	903	100.0%
Under 18 years:	126,845	1,245	28.5%	449,103	1,325	21.0%
With a disability	9,585	992	2.2%	25,273	1,156	1.2%
No disability	117,260	1,694	26.3%	423,830	1,245	19.8%
18 to 64 years:	275,021	970	61.8%	1,290,161	690	60.3%
With a disability	50,740	1,912	11.4%	197,257	2,963	9.2%
No disability	224,281	2,013	50.4%	1,092,904	2,857	51.1%
65 years and over:	43,485	413	9.8%	399,449	482	18.7%
With a disability	21,128	711	4.7%	165,496	2,143	7.7%
No disability	22,357	637	5.0%	233,953	2,150	10.9%

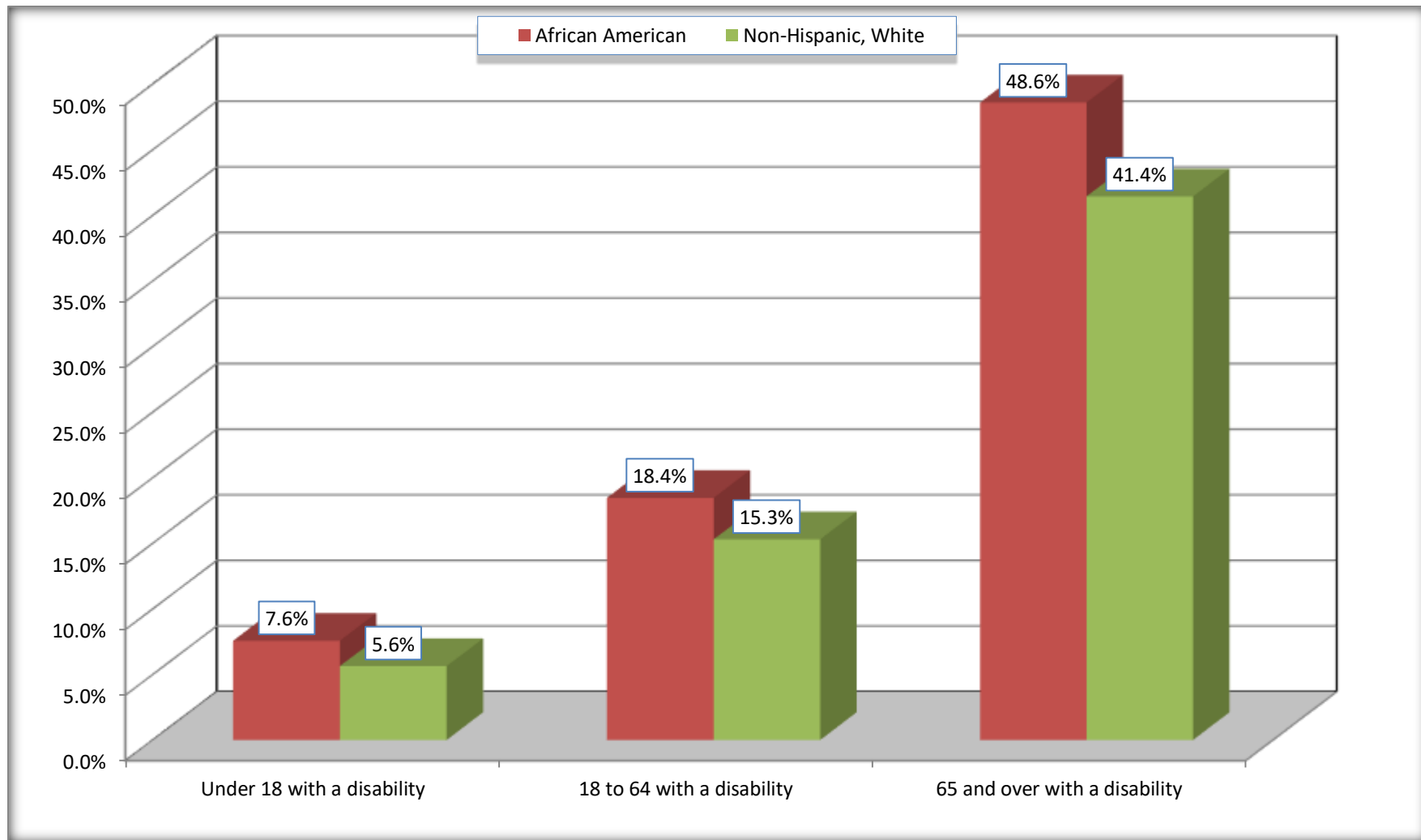
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Disability by Age

Arkansas



Source: B18101. AGE BY DISABILITY STATUS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

C27001B. HEALTH INSURANCE COVERAGE STATUS BY AGE
Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	445,351	1,736	100.0%	2,138,713	903	100.0%
Under 18 years:	135,916	1,480	30.5%	474,933	982	22.2%
With health insurance coverage	130,470	1,530	29.3%	455,561	1,640	21.3%
No health insurance coverage	5,446	893	1.2%	19,372	1,274	0.9%
18 to 64 years:	265,950	1,093	59.7%	1,264,331	1,168	59.1%
With health insurance coverage	222,200	1,920	49.9%	1,096,133	4,206	51.3%
No health insurance coverage	43,750	1,661	9.8%	168,198	4,098	7.9%
65 years and over:	43,485	413	9.8%	399,449	482	18.7%
With health insurance coverage	43,275	415	9.7%	398,697	523	18.6%
No health insurance coverage	210	79	0.0%	752	213	0.0%

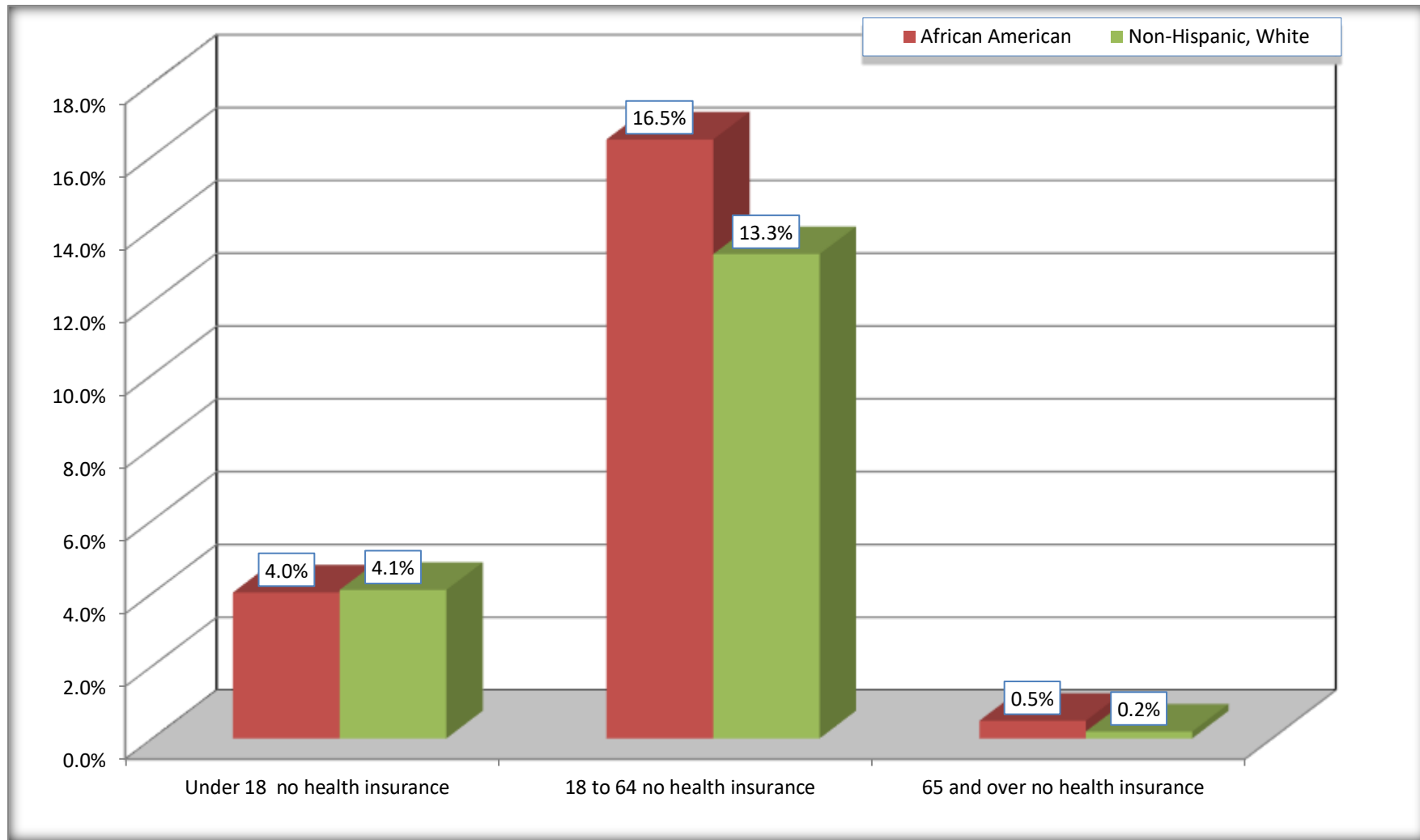
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Lack of Health Insurance Coverage by Age

Arkansas



Source: C27001B. HEALTH INSURANCE COVERAGE STATUS BY AGE
Data Set: 2013-2017 American Community Survey 5-Year Estimates

Selected Socio-Economic Data

Jefferson County, Arkansas

African American and White, Not Hispanic

Data Set: 2013-2017 American Community Survey 5-Year Estimates

C02003.DETAILED RACE - Universe: TOTAL POPULATION

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas		
	Population	Margin of Error (+/-)	% of Total
Total:	71,373	*****	100.0%
Population of one race:	70,559	218	98.9%
White	28,952	218	40.6%
Black or African American	40,220	164	56.4%
American Indian and Alaska Native	169	94	0.2%
Asian alone	539	124	0.8%
Native Hawaiian and Other Pacific Islander	0	27	0.0%
Some other race	679	227	1.0%
Population of two or more races:	814	218	1.1%
Two races including Some other race	27	29	0.0%
Two races excluding Some other race, and three or more races	787	220	1.1%
Population of two races:	768	211	1.1%
White; Black or African American	260	153	0.4%
White; American Indian and Alaska Native	296	94	0.4%
White; Asian	159	124	0.2%
Black or African American; American Indian and Alaska Native	17	23	0.0%
All other two race combinations	36	34	0.1%
Population of three races	46	53	0.1%
Population of four or more races	0	27	0.0%

Note: Hispanics may be of any race. See Table B03002 and chart.

Source: U.S. Census Bureau, 2013-2017 American Community Survey

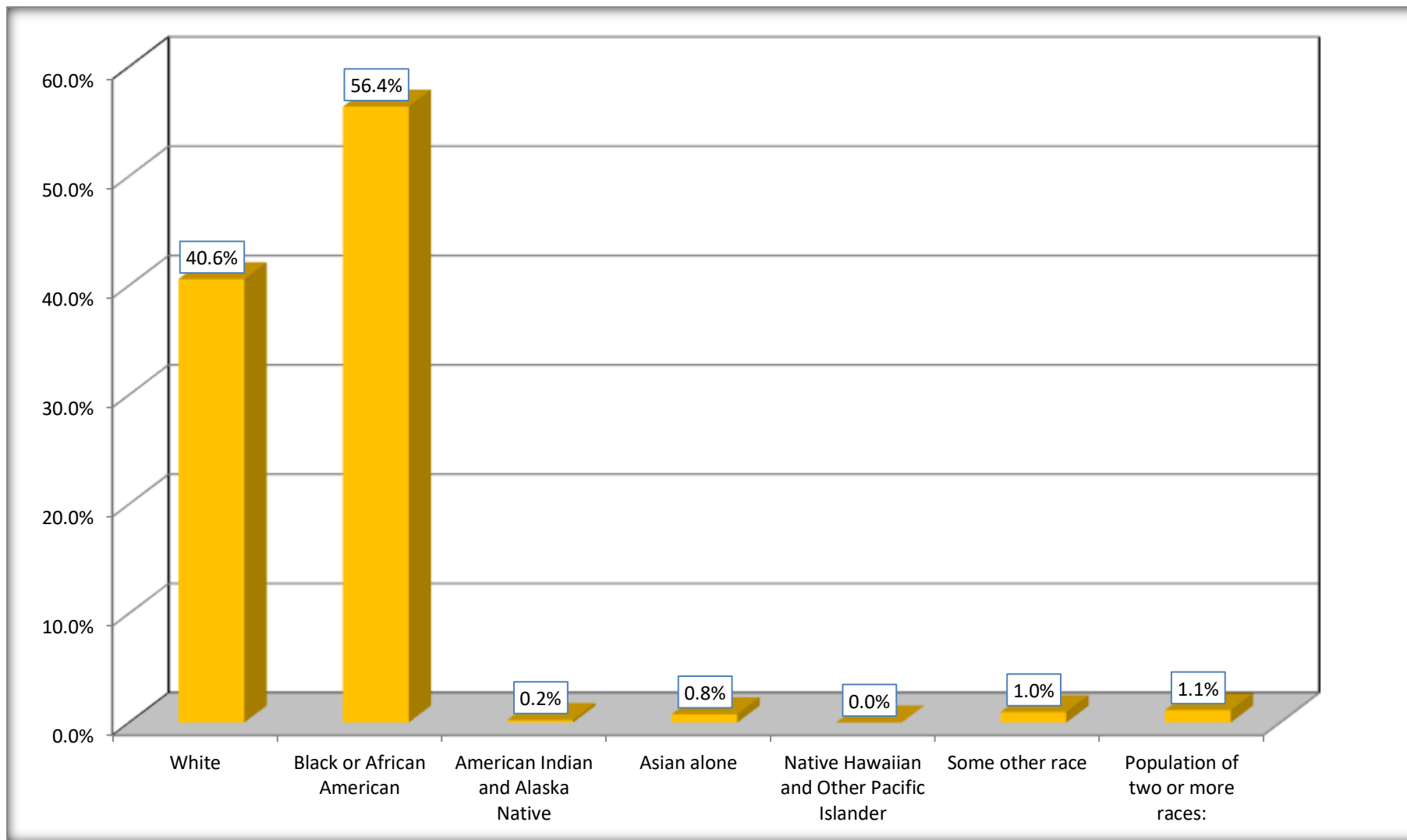
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Population by Race

Jefferson County, Arkansas



Source: C02003.DETAILED RACE - Universe: TOTAL POPULATION

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas		
	Population	Margin of Error (+/-)	% of Total
Total:	71,373	*****	100.0%
Not Hispanic or Latino:	69,963	*****	98.0%
White alone	28,256	32	39.6%
Black or African American alone	40,183	161	56.3%
American Indian and Alaska Native alone	169	94	0.2%
Asian alone	539	124	0.8%
Native Hawaiian and Other Pacific Islander alone	0	27	0.0%
Some other race alone	75	63	0.1%
Two or more races:	741	208	1.0%
Two races including Some other race	0	27	0.0%
Two races excluding Some other race, and three or more races	741	208	1.0%
Hispanic or Latino	1,410	*****	2.0%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

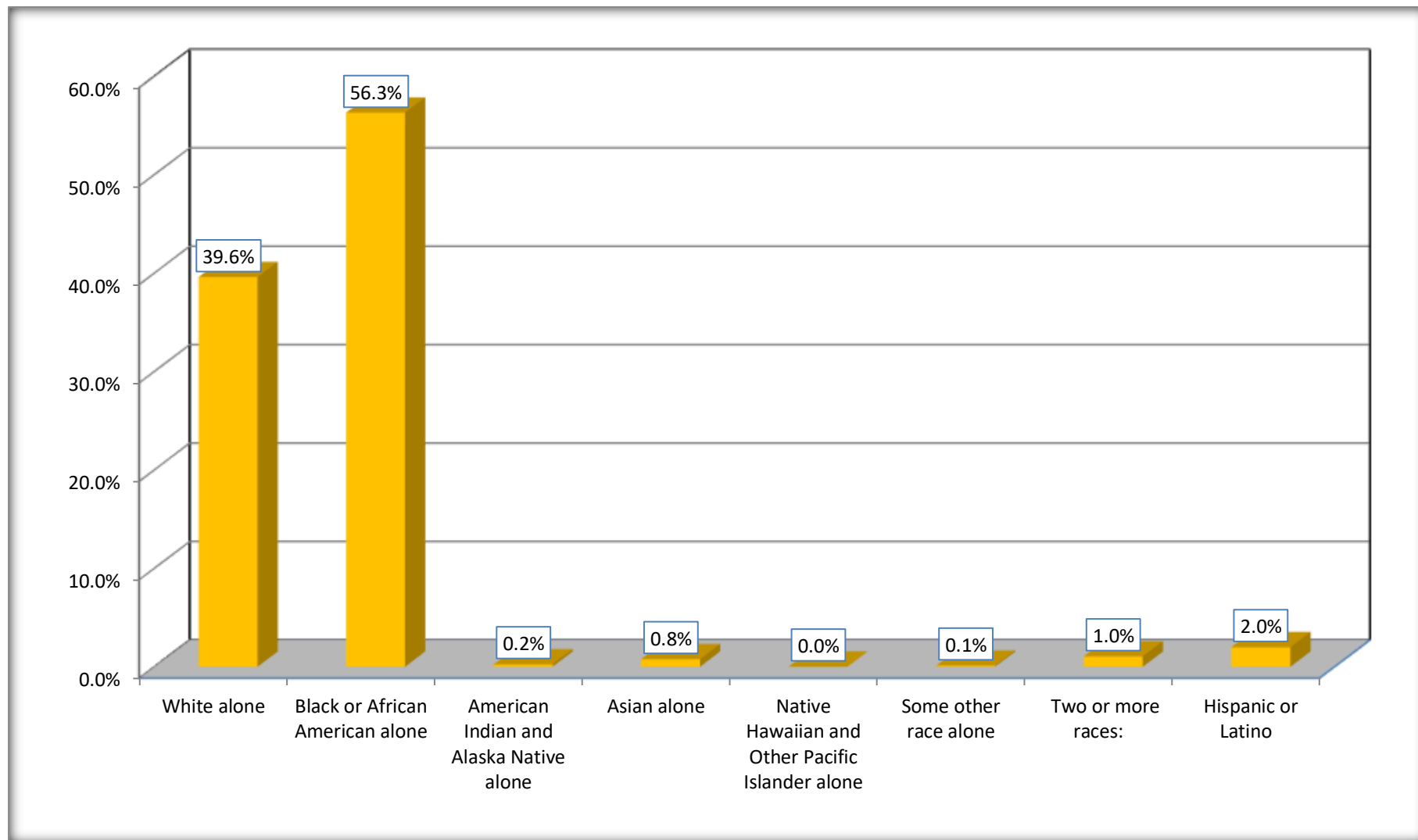
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Non-Hispanic by Race and Hispanic Population

Jefferson County, Arkansas



Source: B03002. HISPANIC OR LATINO ORIGIN BY RACE - Universe: TOTAL POPULATION

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B03002. HISPANIC OR LATINO ORIGIN BY RACE

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas		
	Population	Margin of Error (+/-)	% of Total
Hispanic or Latino:	1,410	0	100.0%
White alone	696	215	49.4%
Black or African American alone	37	26	2.6%
American Indian and Alaska Native alone	0	27	0.0%
Asian alone	0	27	0.0%
Native Hawaiian and Other Pacific Islander alone	0	27	0.0%
Some other race alone	604	214	42.8%
Two or more races:	73	63	5.2%
Two races including Some other race	27	29	1.9%
Two races excluding Some other race, and three or more races	46	52	3.3%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

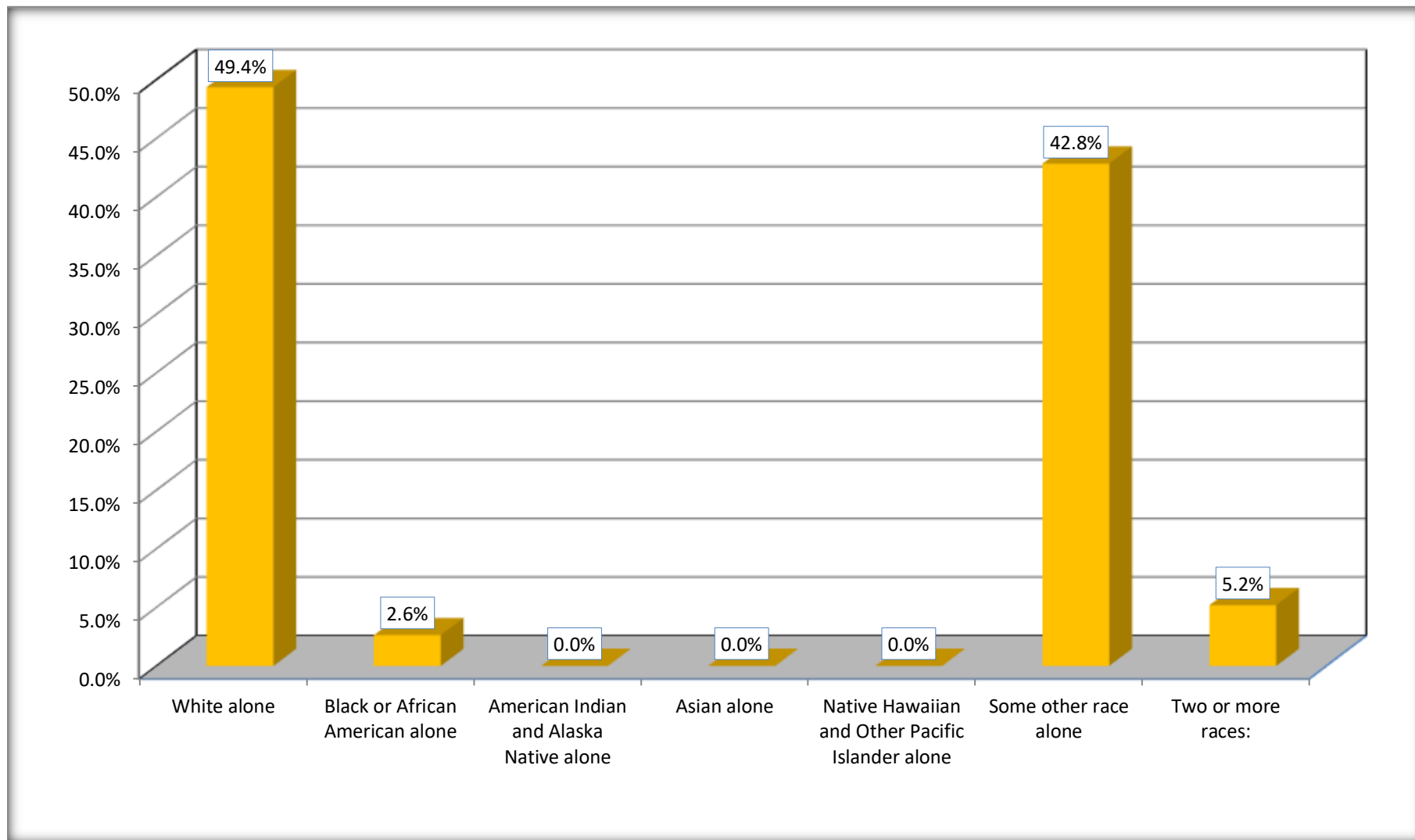
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Hispanic or Latino Origin by Race

Jefferson County, Arkansas



Source: B03002. HISPANIC OR LATINO ORIGIN BY RACE
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B01001. SEX BY AGE

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	40,220	164	100.0%	28,256	32	100.0%
Under 18 years	10,653	NC	26.5%	4,756	NC	16.8%
18 to 64 years	25,081	NC	62.4%	17,059	NC	60.4%
65 years and over	4,486	NC	11.2%	6,441	NC	22.8%
Male:	19,343	112	48.1%	14,328	4,980	50.7%
Under 18 years	5,543	NC	13.8%	2,434	NC	8.6%
18 to 64 years	11,935	NC	29.7%	8,997	NC	31.8%
65 years and over	1,865	NC	4.6%	2,897	NC	10.3%
Female:	20,877	92	51.9%	13,928	5,836	49.3%
Under 18 years	5,110	NC	12.7%	2,322	NC	8.2%
18 to 64 years	13,146	NC	32.7%	8,062	NC	28.5%
65 years and over	2,621	NC	6.5%	3,544	NC	12.5%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

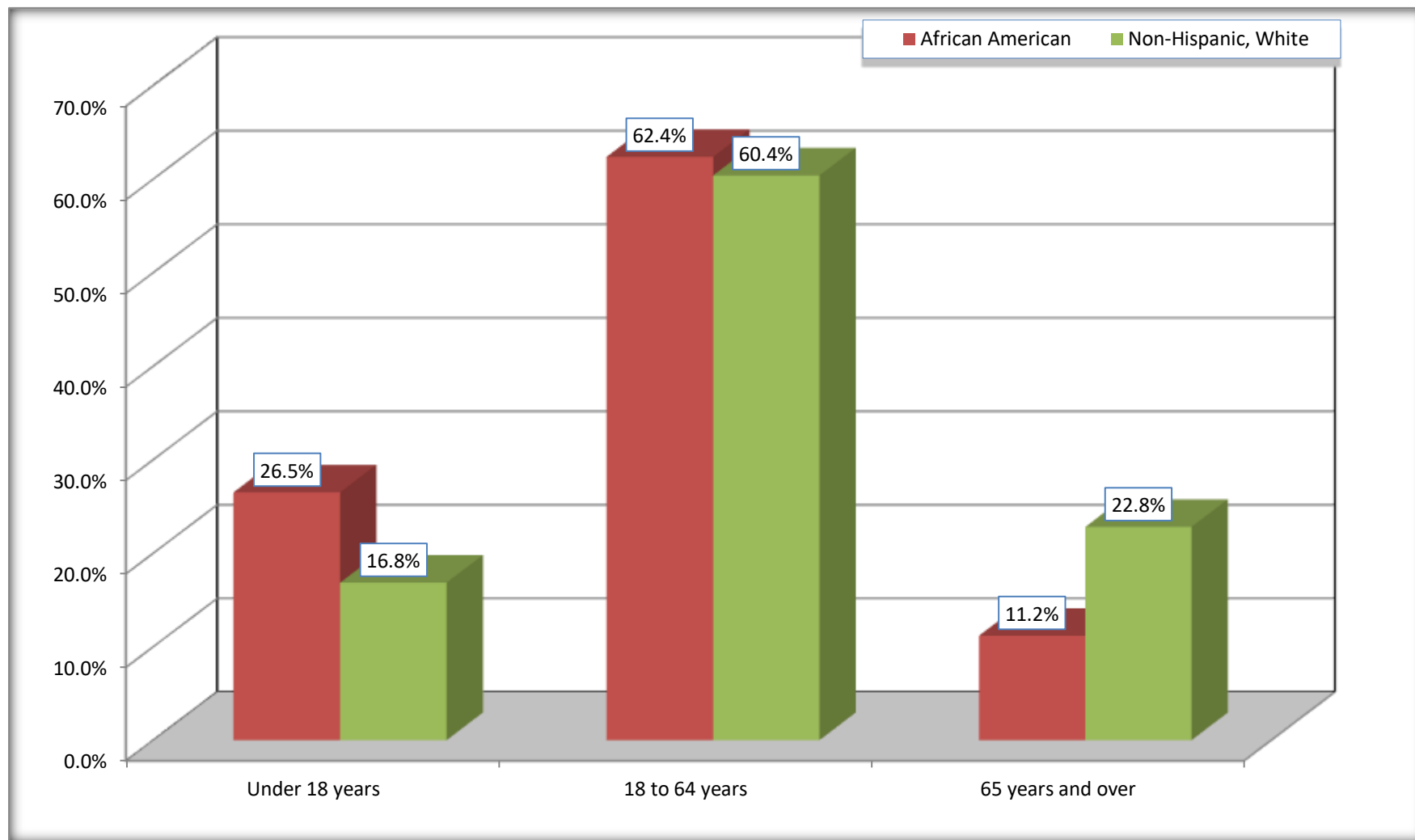
Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Population by Age

Jefferson County, Arkansas



Source: B01001. SEX BY AGE

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B05003. SEX BY AGE BY CITIZENSHIP STATUS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total by Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total by Age
Total:	40,220	164	100.0%	28,256	32	100.0%
Under 18 years:	10,653	NC	100.0%	4,756	NC	100.0%
Native	10,653	NC	100.0%	4,756	NC	100.0%
Foreign born:	0	NC	0.0%	0	NC	0.0%
Naturalized U.S. citizen	0	NC	0.0%	0	NC	0.0%
Not a U.S. citizen	0	NC	0.0%	0	NC	0.0%
18 years and over:	29,567	NC	100.0%	23,500	NC	100.0%
Native	29,338	NC	99.2%	23,383	NC	99.5%
Foreign born:	229	NC	0.8%	117	NC	0.5%
Naturalized U.S. citizen	60	NC	0.2%	101	NC	0.4%
Not a U.S. citizen	169	NC	0.6%	16	NC	0.1%
Male:	19,343	112	48.1%	14,328	6	50.7%
Under 18 years:	5543	57	100.0%	2434	27	100.0%
Native	5,543	57	100.0%	2,434	27	100.0%
Foreign born:	0	27	0.0%	0	27	0.0%
Naturalized U.S. citizen	0	27	0.0%	0	27	0.0%
Not a U.S. citizen	0	27	0.0%	0	27	0.0%
18 years and over:	13,800	74	100.0%	11,894	6	100.0%
Native	13,719	111	99.4%	11,831	49	99.5%
Foreign born:	81	73	0.6%	63	49	0.5%
Naturalized U.S. citizen	29	26	0.2%	47	43	0.4%
Not a U.S. citizen	52	69	0.4%	16	17	0.1%

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA by Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW by Age
Female:	20,877	92	51.9%	13,928	31	49.3%
Under 18 years:	5,110	51	100.0%	2,322	21	100.0%
Native	5,110	51	100.0%	2,322	21	100.0%
Foreign born:	0	27	0.0%	0	27	0.0%
Naturalized U.S. citizen	0	27	0.0%	0	27	0.0%
Not a U.S. citizen	0	27	0.0%	0	27	0.0%
18 years and over:	15,767	58	100.0%	11,606	22	100.0%
Native	15,619	119	99.1%	11,552	43	99.5%
Foreign born:	148	103	0.9%	54	37	0.5%
Naturalized U.S. citizen	31	34	0.2%	54	37	0.5%
Not a U.S. citizen	117	90	0.7%	0	27	0.0%

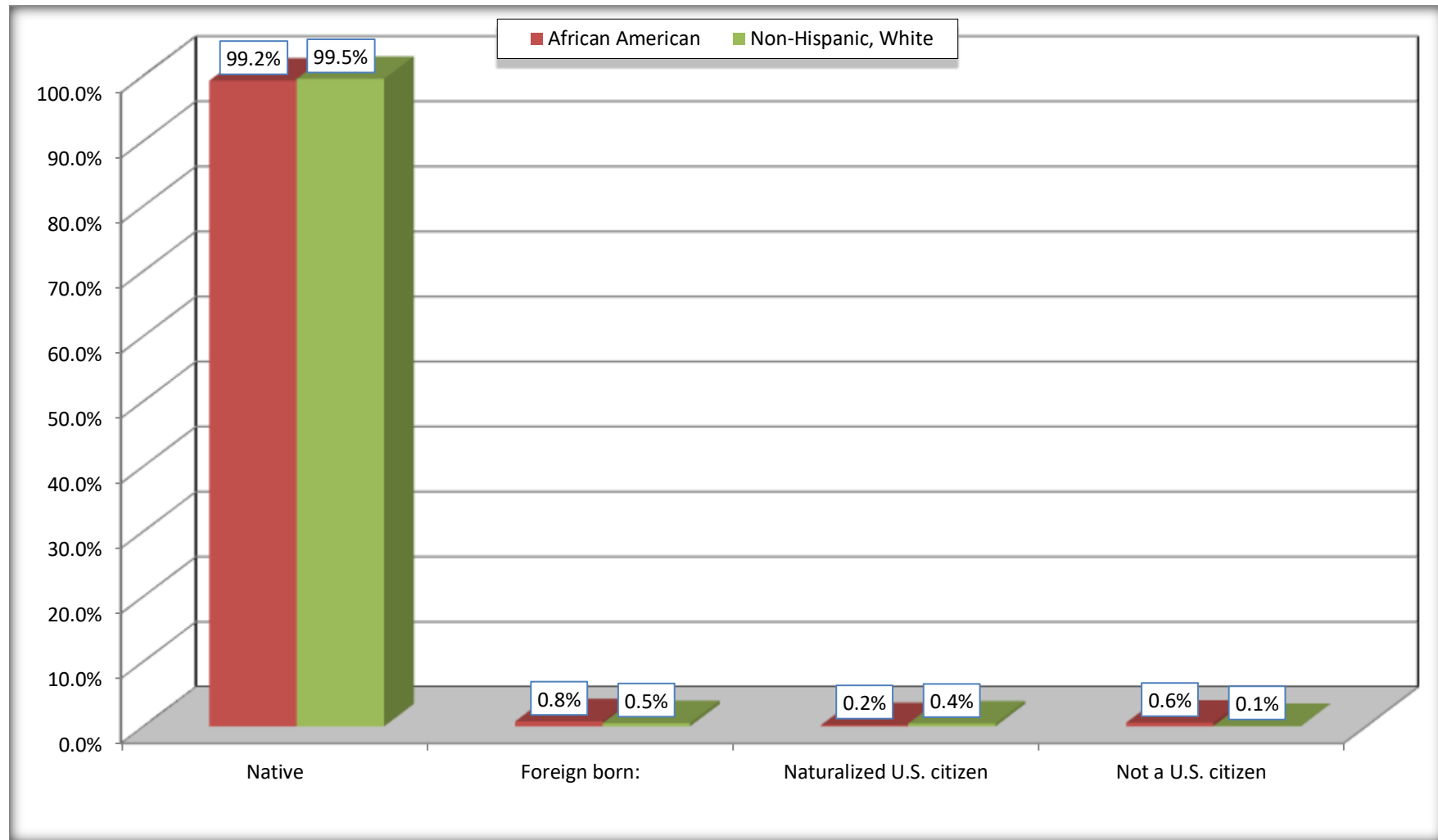
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Citizenship Status of Voting Age Population (18 and Over)

Jefferson County, Arkansas



Source: B05003. SEX BY AGE BY CITIZENSHIP STATUS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

Case 4:20-cv-00341-M Document 3-16 Filed 03/27/20 Page 13 of 64

B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe:
POPULATION 1 YEAR AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	39,780	212	100.0%	28,195	60	100.0%
Same house 1 year ago	34,779	759	87.4%	24,981	484	88.6%
Moved within same county	3,371	666	8.5%	1,380	304	4.9%
Moved from different county within same state	1,092	309	2.7%	1,392	396	4.9%
Moved from different state	447	209	1.1%	431	257	1.5%
Moved from abroad	91	55	0.2%	11	13	0.0%

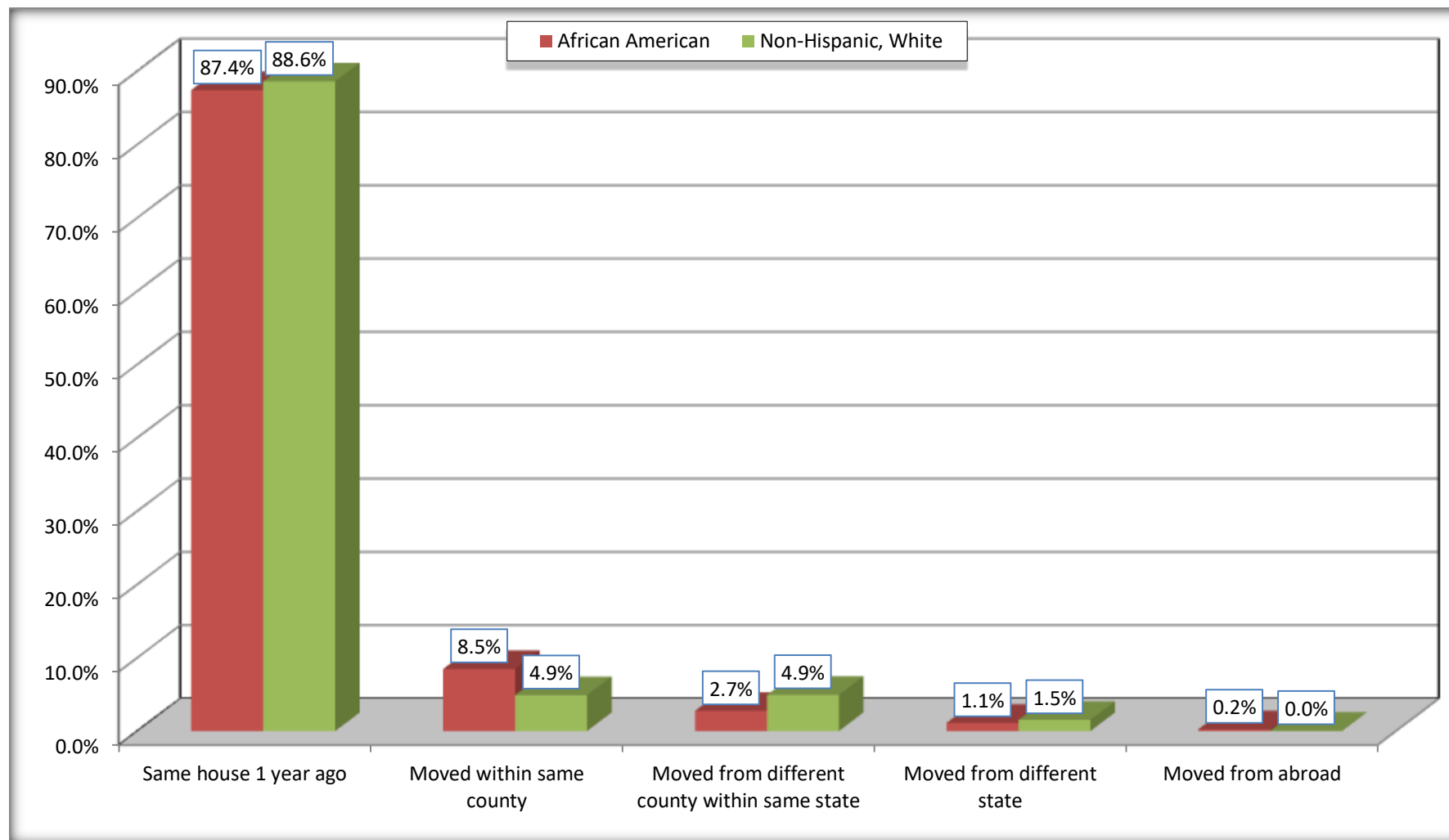
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Geographical Mobility in the Past Year (Population 1 Year and Over)

Jefferson County, Arkansas



Source: B07004. GEOGRAPHICAL MOBILITY IN THE PAST YEAR BY RACE FOR CURRENT RESIDENCE IN THE UNITED STATES - Universe: POPULATION 1 YEAR AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	14027	553	100.0%	11091	535	100.0%
Car, truck, or van - drove alone	12330	621	87.9%	9718	520	87.6%
Car, truck, or van - carpooled	782	177	5.6%	811	190	7.3%
Public transportation (excluding taxicab)	39	28	0.3%	19	22	0.2%
Walked	193	125	1.4%	89	61	0.8%
Taxicab, motorcycle, bicycle, or other means	381	146	2.7%	228	123	2.1%
Worked at home	302	125	2.2%	226	89	2.0%

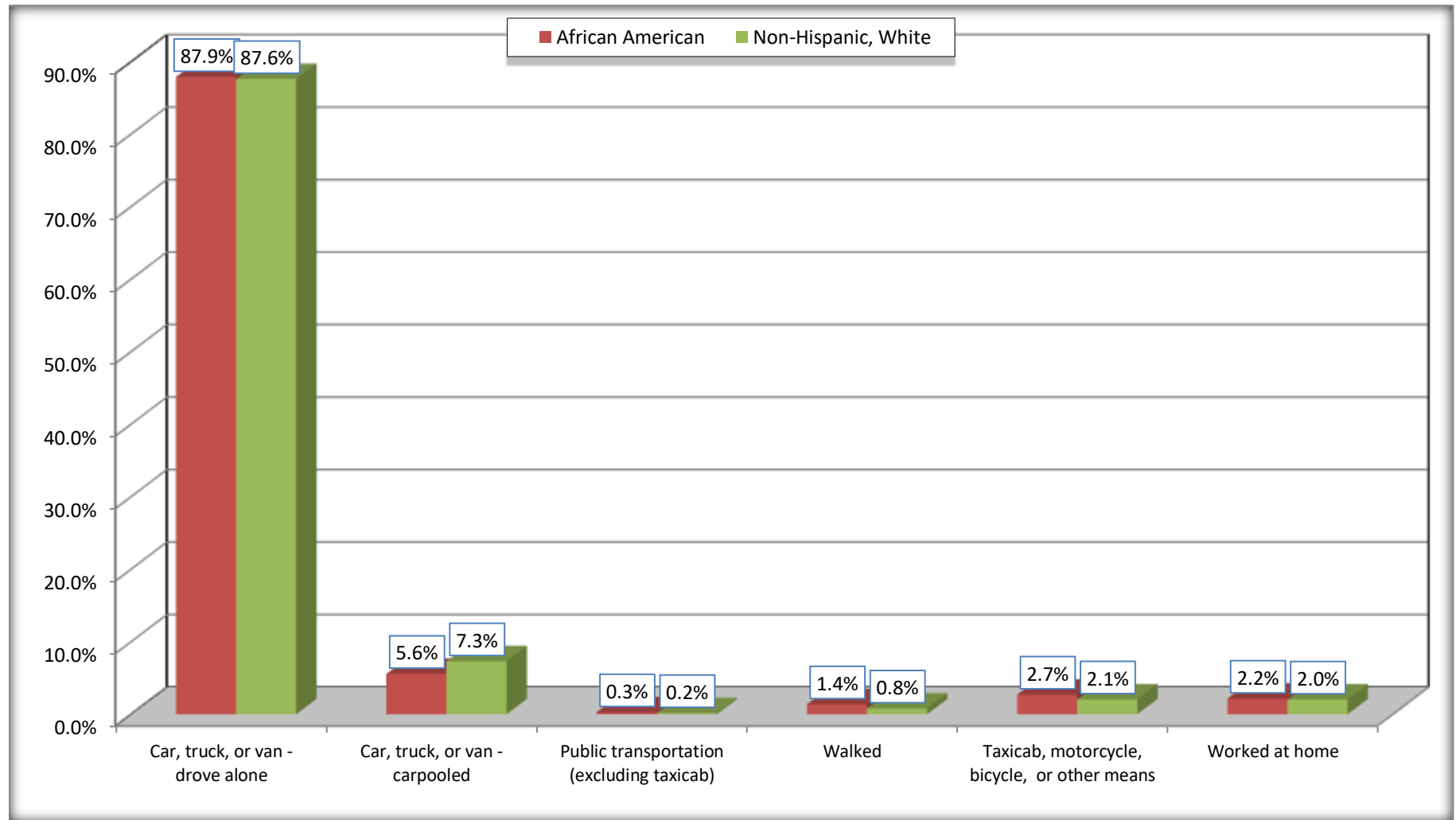
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Means of Transportation to Work (Workers 16 Years and Over)

Jefferson County, Arkansas



Source: B08105. MEANS OF TRANSPORTATION TO WORK - Universe: WORKERS 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B11002. HOUSEHOLD TYPE BY RELATIVES AND NONRELATIVES FOR POPULATION IN HOUSEHOLDS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	36803	442	100.0%	26182	599	100.0%
In family households	29696	753	80.7%	21617	708	82.6%
In nonfamily households	7107	707	19.3%	4565	483	17.4%

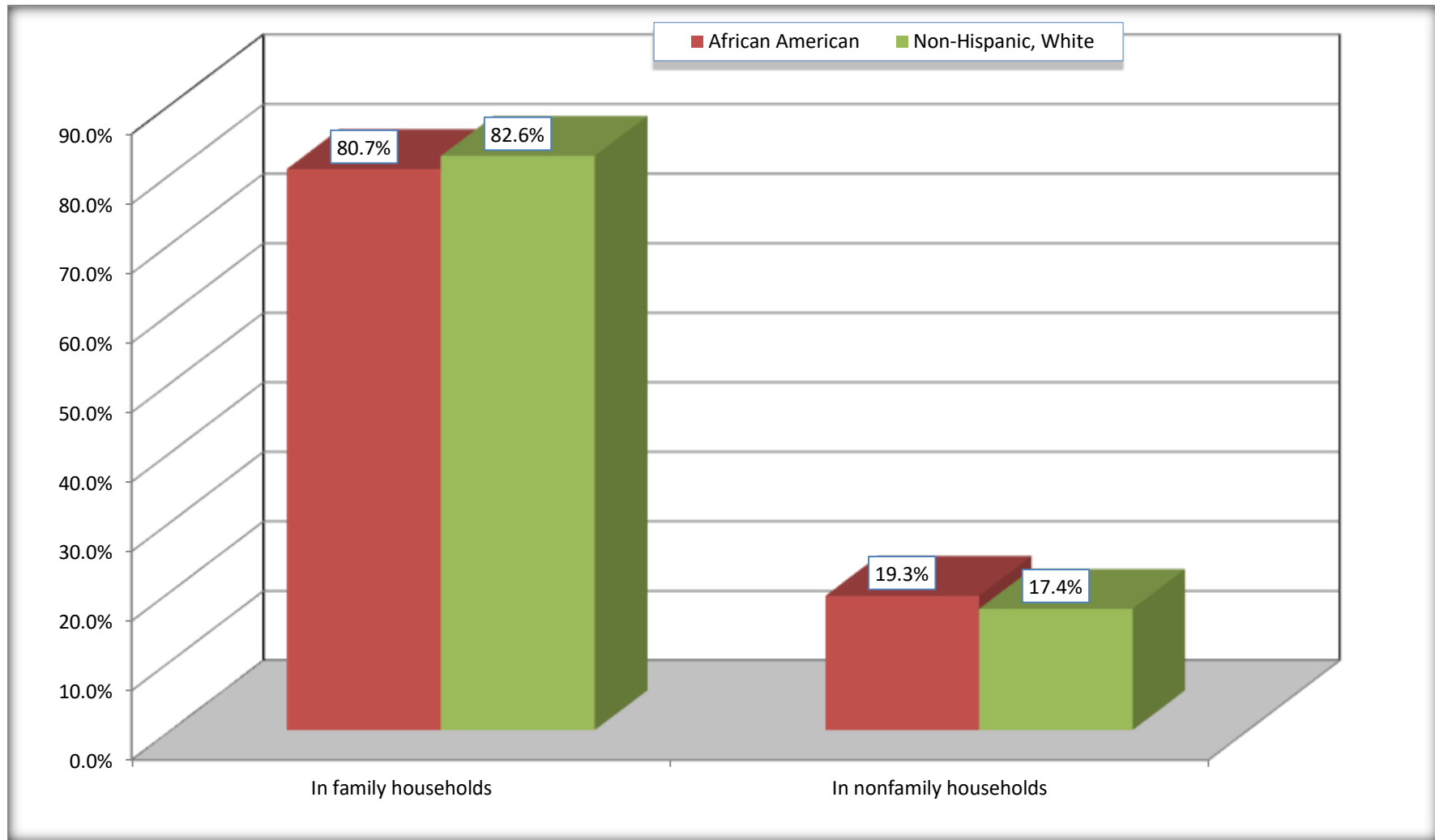
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Household Type for Population in Households

Jefferson County, Arkansas



Source: B11002. HOUSEHOLD TYPE BY RELATIVES AND NONRELATIVES FOR POPULATION IN HOUSEHOLDS
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B12002. MARITAL STATUS FOR THE POPULATION 15 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	31,438	120	100.0%	24,421	23	100.0%
Never married	14,760	NC	46.9%	5,338	NC	21.9%
Now married (except separated)	9,692	NC	30.8%	12,777	NC	52.3%
Separated	1,342	NC	4.3%	682	NC	2.8%
Widowed	2,005	NC	6.4%	2,199	NC	9.0%
Divorced	3,639	NC	11.6%	3,425	NC	14.0%
Male:	14,783	74	47.0%	12,374	6	50.7%
Never married	7,732	348	24.6%	3,342	307	13.7%
Now married (except separated)	4,904	361	15.6%	6,337	319	25.9%
Separated	561	130	1.8%	396	127	1.6%
Widowed	354	107	1.1%	423	113	1.7%
Divorced	1,232	177	3.9%	1,876	285	7.7%
Female:	16,655	80	53.0%	12,047	22	49.3%
Never married	7,028	321	22.4%	1,996	208	8.2%
Now married (except separated)	4,788	343	15.2%	6,440	332	26.4%
Separated	781	163	2.5%	286	128	1.2%
Widowed	1,651	178	5.3%	1,776	205	7.3%
Divorced	2,407	269	7.7%	1,549	258	6.3%

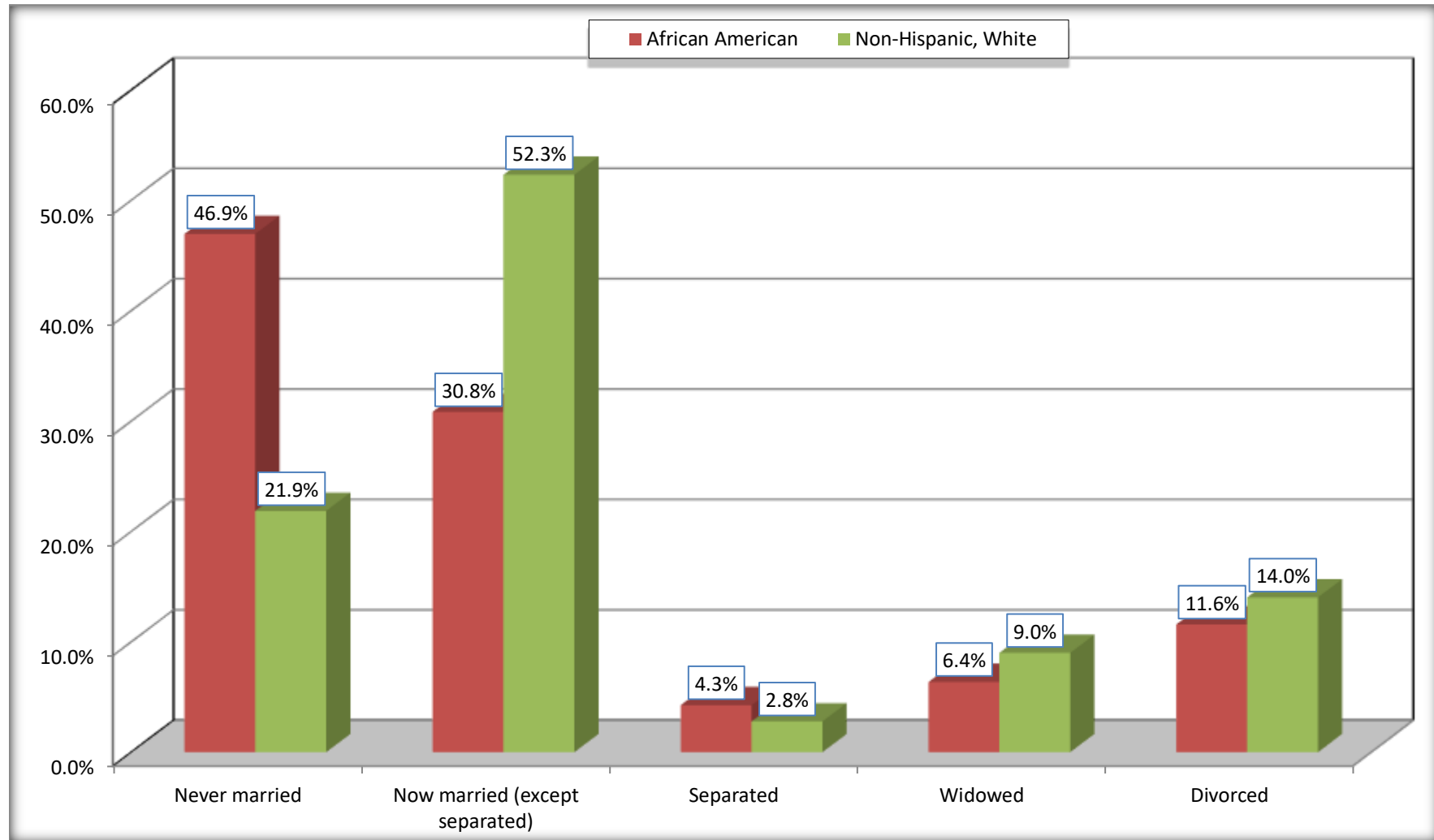
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Marital Status for the Population 15 Years and Over

Jefferson County, Arkansas



Source: B12002. MARITAL STATUS FOR THE POPULATION 15 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	24,405	97	100.0%	21,544	22	100.0%
Less than high school diploma	4,198	NC	17.2%	2,512	NC	11.7%
High school graduate, GED, or alternative	8,599	NC	35.2%	9,092	NC	42.2%
Some college or associate's degree	7,528	NC	30.8%	6,321	NC	29.3%
Bachelor's degree or higher	4,080	NC	16.7%	3,619	NC	16.8%
Male:	11,238	72	46.0%	10,865	27	50.4%
Less than high school diploma	2,271	331	9.3%	1,390	232	6.5%
High school graduate, GED, or alternative	4,940	384	20.2%	4,927	369	22.9%
Some college or associate's degree	2,835	343	11.6%	2,882	237	13.4%
Bachelor's degree or higher	1,192	199	4.9%	1,666	209	7.7%
Female:	13,167	50	54.0%	10,679	22	49.6%
Less than high school diploma	1,927	249	7.9%	1,122	209	5.2%
High school graduate, GED, or alternative	3,659	317	15.0%	4,165	370	19.3%
Some college or associate's degree	4,693	352	19.2%	3,439	369	16.0%
Bachelor's degree or higher	2,888	313	11.8%	1,953	269	9.1%

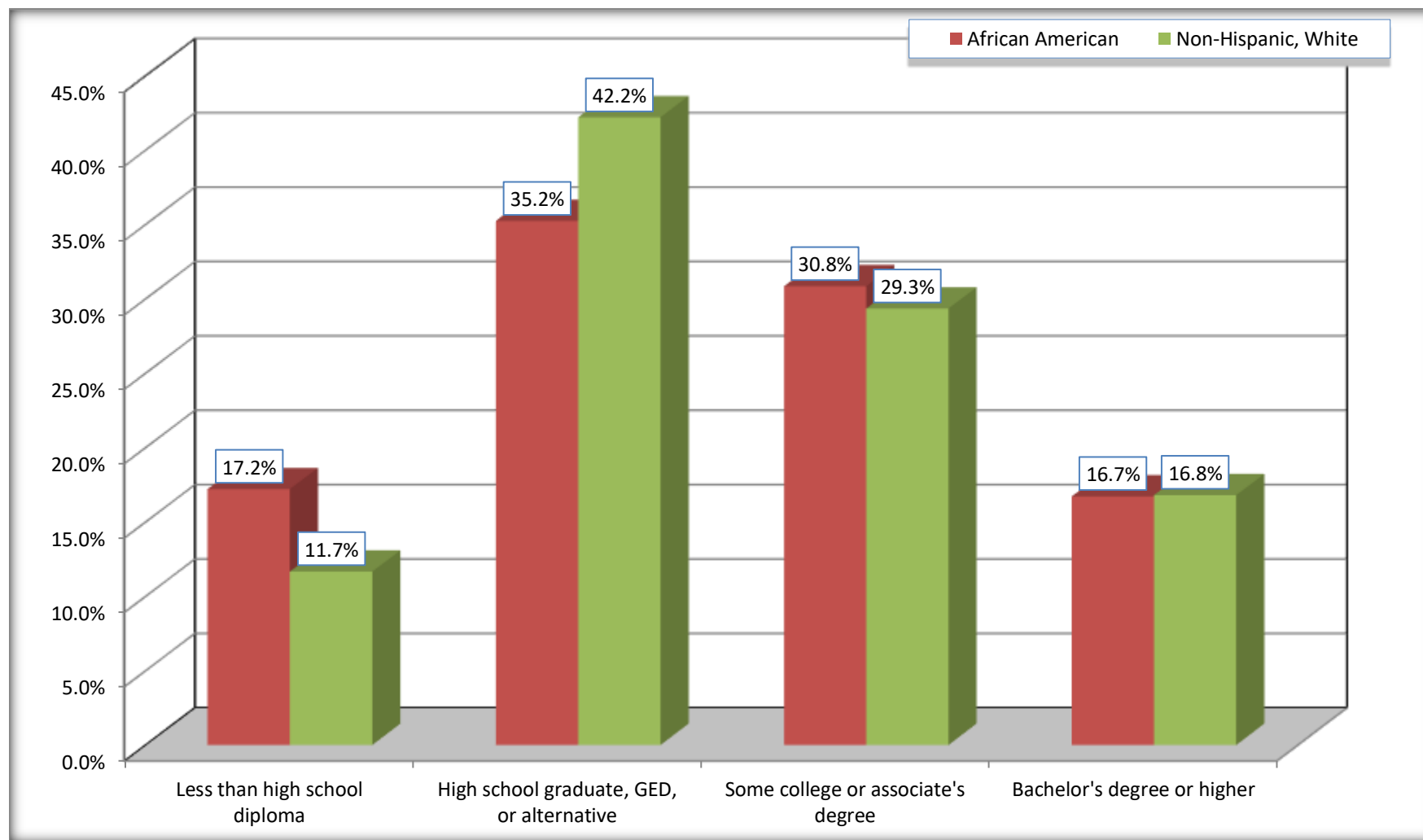
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Educational Attainment for the Population 25 Years and Older

Jefferson County, Arkansas



Source: C15002. SEX BY EDUCATIONAL ATTAINMENT FOR THE POPULATION 25 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

Case 4:20-cv-00341-JM Document 3-16 Filed 03/27/20 Page 23 of 64

B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	37,371	128	100.0%	27,044	23	100.0%
Speak only English	36,820	NC	98.5%	26,552	NC	98.2%
Speak another language	551	NC	1.5%	492	NC	1.8%
Speak English "very well"	401	NC	1.1%	445	NC	1.6%
Speak English "less than very well"	150	NC	0.4%	47	NC	0.2%
Native:	37,142	203	99.4%	26,927	66	99.6%
Speak only English	36,805	277	98.5%	26,506	303	98.0%
Speak another language	337	136	0.9%	421	291	1.6%
Speak English "very well"	240	123	0.6%	394	289	1.5%
Speak English "less than very well"	97	60	0.3%	27	21	0.1%
Foreign born:	229	150	0.6%	117	61	0.4%
Speak only English	15	19	0.0%	46	37	0.2%
Speak another language	214	146	0.6%	71	50	0.3%
Speak English "very well"	161	103	0.4%	51	42	0.2%
Speak English "less than very well"	53	69	0.1%	20	24	0.1%

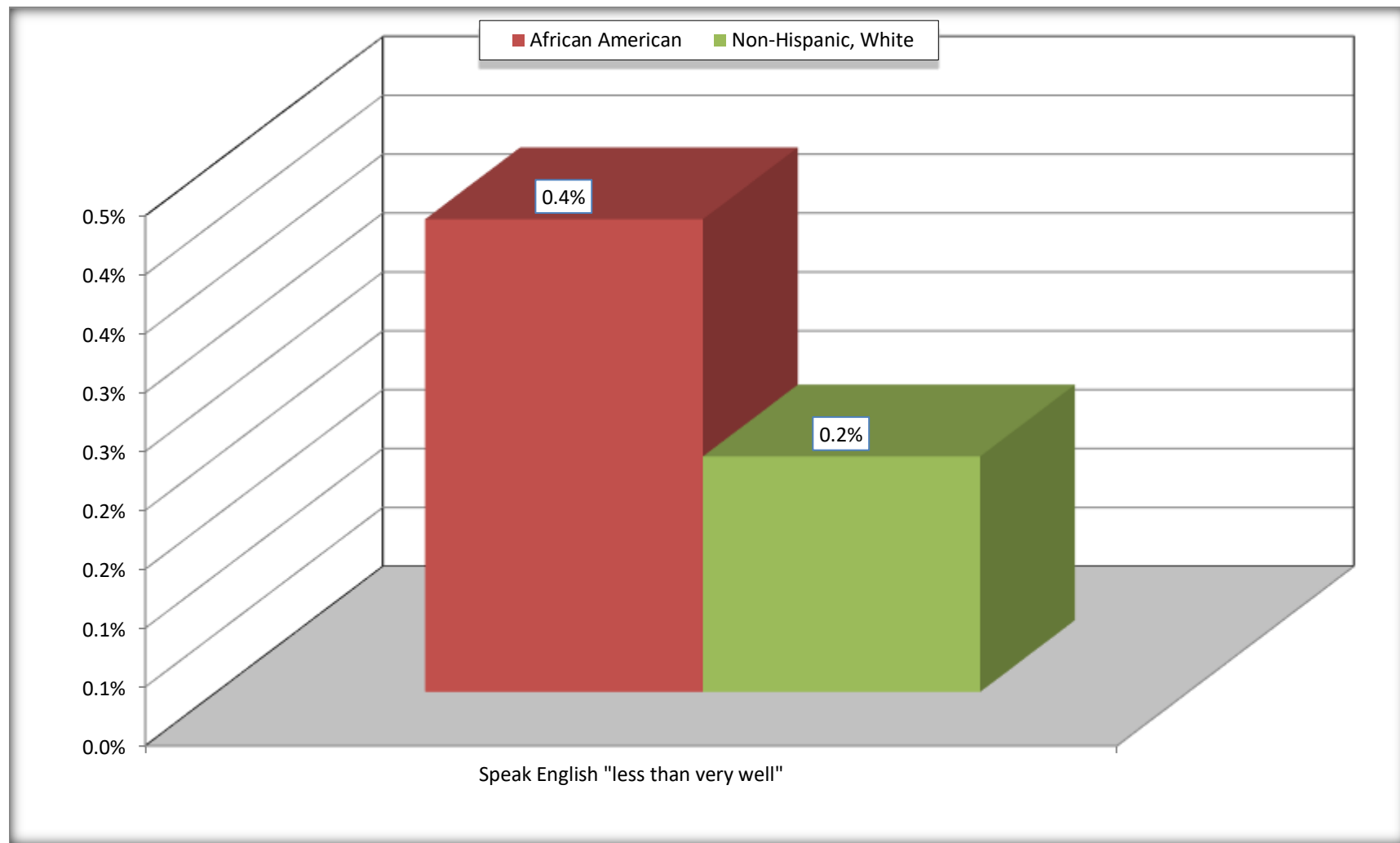
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Speak English "Less than Very Well" (Population 5 Years and Over)

Jefferson County, Arkansas



Source: B16005. NATIVITY BY LANGUAGE SPOKEN AT HOME BY ABILITY TO SPEAK ENGLISH FOR THE POPULATION 5 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	8,862	398	100.0%	7,314	315	100.0%
Income in the past 12 months below poverty level:	2,356	317	26.6%	719	163	9.8%
Married-couple family:	531	156	6.0%	330	129	4.5%
With related children under 18 years	290	132	3.3%	203	112	2.8%
Other family:	1,825	272	20.6%	389	115	5.3%
Male householder, no wife present	197	81	2.2%	74	48	1.0%
With related children under 18 years	133	69	1.5%	74	48	1.0%
Female householder, no husband present	1,628	254	18.4%	315	110	4.3%
With related children under 18 years	1,402	222	15.8%	253	97	3.5%
Income in the past 12 months at or above poverty level:	6,506	370	73.4%	6,595	329	90.2%
Married-couple family:	3,731	348	42.1%	5,575	321	76.2%
With related children under 18 years	1,517	269	17.1%	1,560	218	21.3%
Other family:	2,775	256	31.3%	1,020	222	13.9%
Male householder, no wife present	424	120	4.8%	391	117	5.3%
With related children under 18 years	105	59	1.2%	166	73	2.3%
Female householder, no husband present	2,351	243	26.5%	629	164	8.6%
With related children under 18 years	1,305	192	14.7%	289	119	4.0%

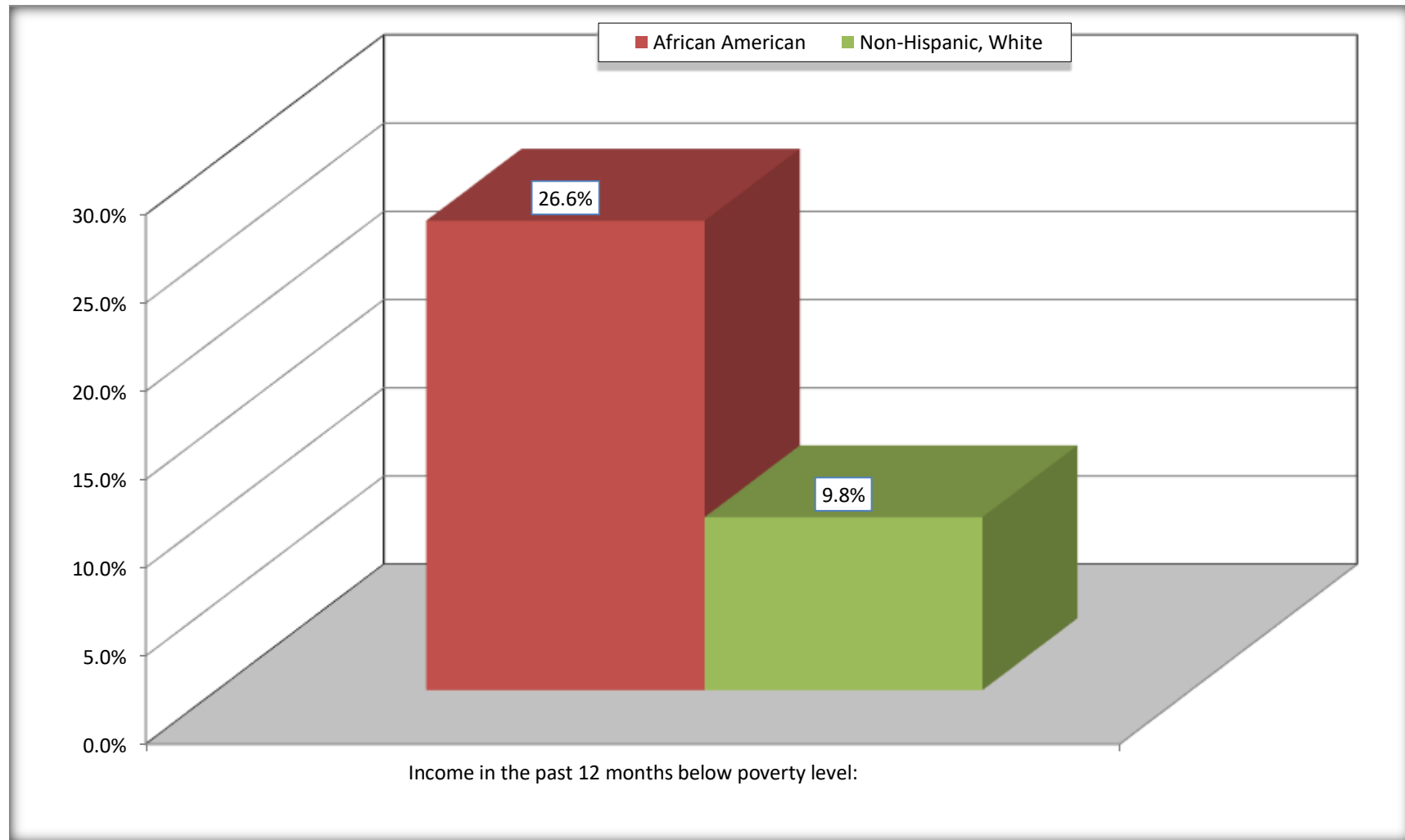
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Family Households Below Poverty in the Past 12 Months

Jefferson County, Arkansas

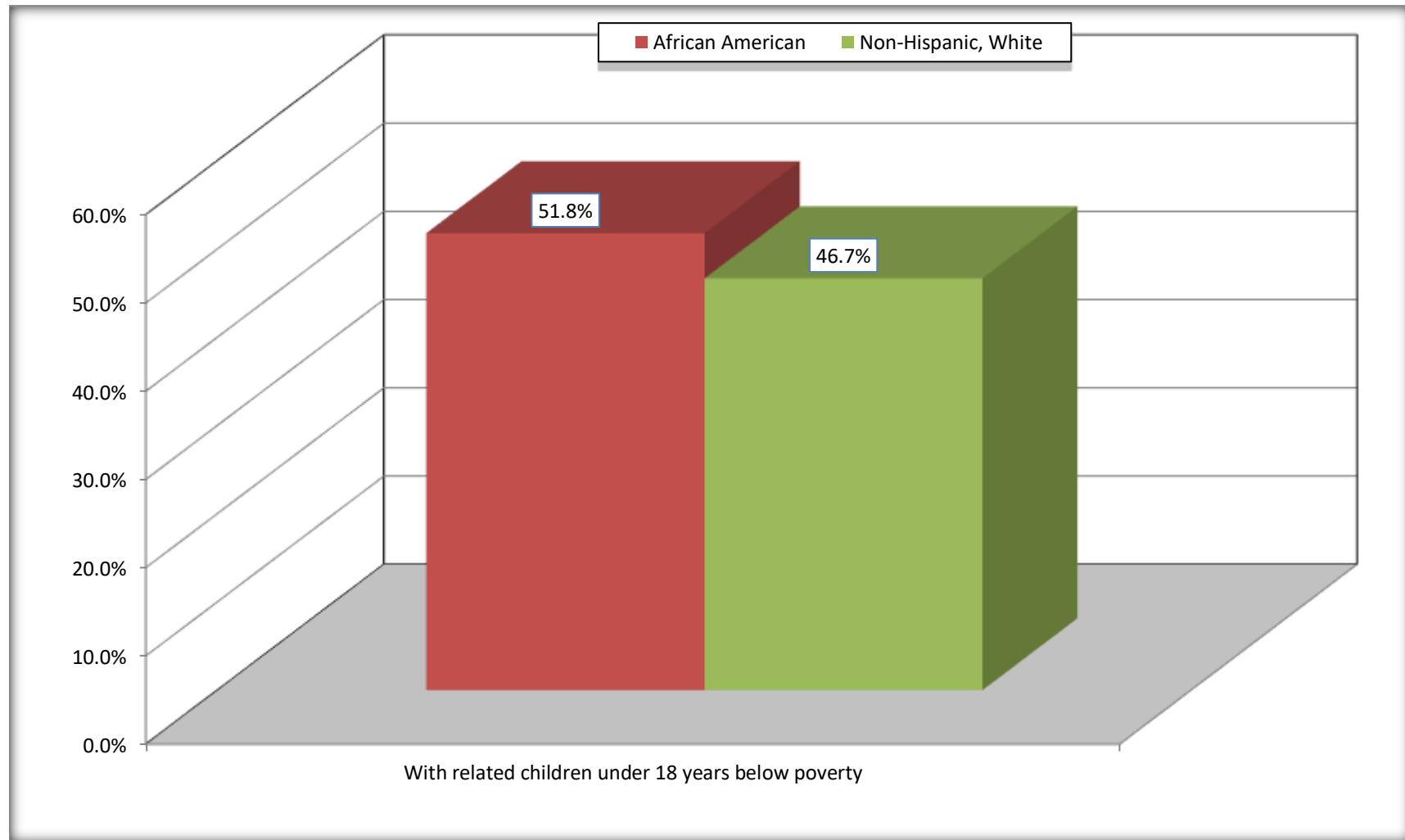


Source: B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

Female-headed Households with Related Children Below Poverty in the Past 12 Months

Jefferson County, Arkansas



Source: B17010. POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES BY FAMILY TYPE BY PRESENCE OF RELATED CHILDREN UNDER 18 YEARS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA By Age	White, Not Hispanic	Margin of Error (+/-)	% of NHW By Age
Total:	36,781	432	100.0%	25,799	444	100.0%
Income in the past 12 months below poverty level:	11,729	1,052	31.9%	4,050	653	15.7%
Under 18 years	4,783	NC	46.3%	1,305	NC	27.6%
18 to 59 years	5,579	237	27.8%	1,965	192	15.1%
60 years and over	1,367	NC	21.5%	780	NC	9.7%
Income in the past 12 months at or above poverty level:	25,052	1,058	68.1%	21,749	799	84.3%
Under 18 years	5,555	NC	53.7%	3,417	NC	72.4%
18 to 59 years	14,498	246	72.2%	11,086	277	84.9%
60 years and over	4,999	NC	78.5%	7,246	NC	90.3%

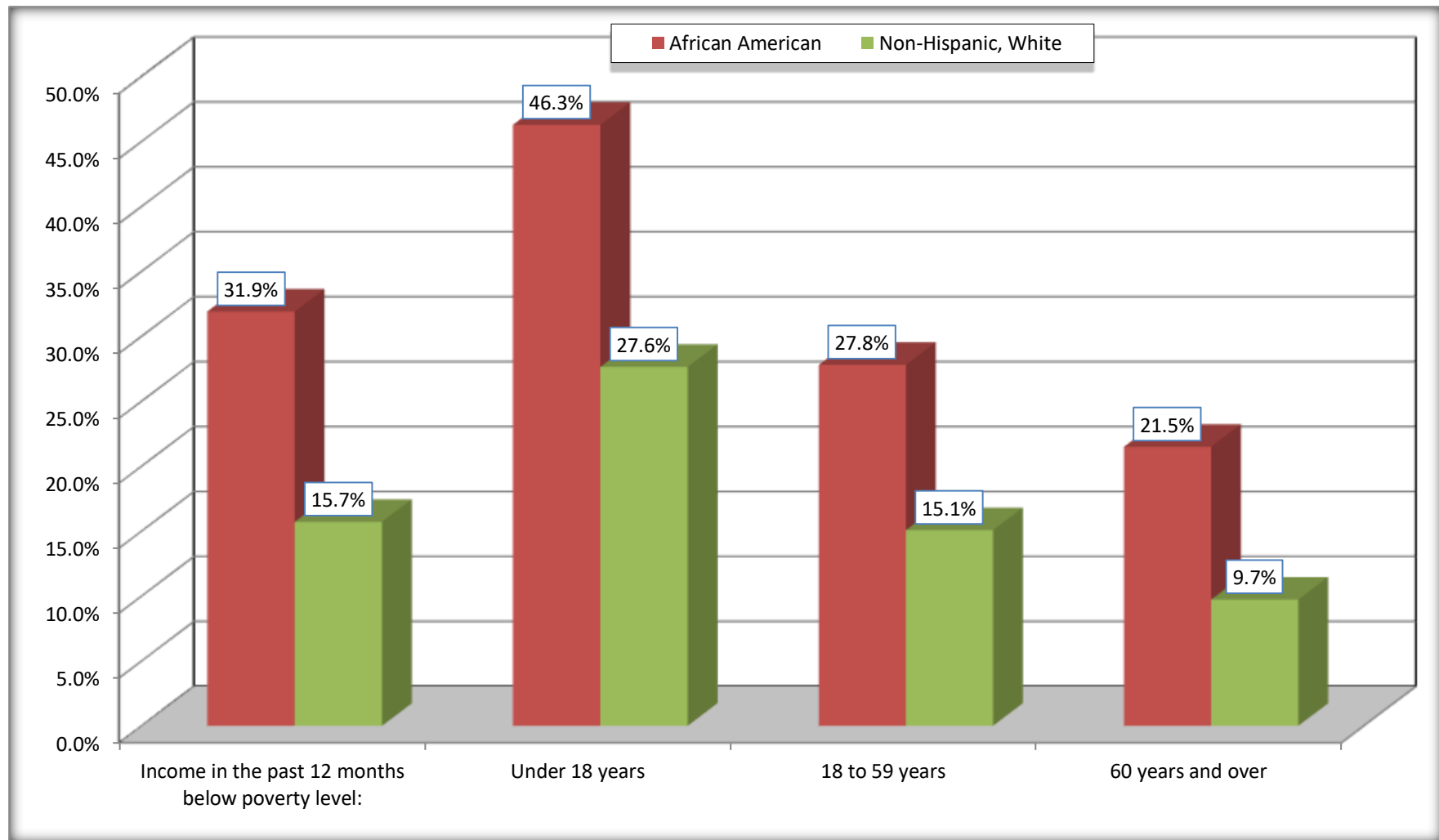
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Population Below Poverty in the Past 12 Months

Jefferson County, Arkansas



Source: B17020 POVERTY STATUS IN THE PAST 12 MONTHS BY AGE - Universe: POPULATION FOR WHOM POVERTY STATUS IS DETERMINED
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19001. HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	14,926	399	100.0%	11,402	420	100.0%
Less than \$ 10,000	2,116	226	14.2%	716	174	6.3%
\$ 10,000 to \$ 14,999	1,657	250	11.1%	666	188	5.8%
\$ 15,000 to \$ 24,999	2,350	NC	15.7%	1,522	NC	13.3%
\$ 25,000 to \$ 34,999	2,055	NC	13.8%	1,217	NC	10.7%
\$ 35,000 to \$ 49,999	2,218	NC	14.9%	1,682	NC	14.8%
\$ 50,000 to \$ 74,999	2,413	NC	16.2%	2,215	NC	19.4%
\$ 75,000 to \$ 99,999	1,238	203	8.3%	1,218	214	10.7%
\$ 100,000 to \$ 149,999	663	NC	4.4%	1,367	NC	12.0%
\$ 150,000 to \$ 199,999	147	84	1.0%	427	122	3.7%
\$ 200,000 or more	69	40	0.5%	372	125	3.3%

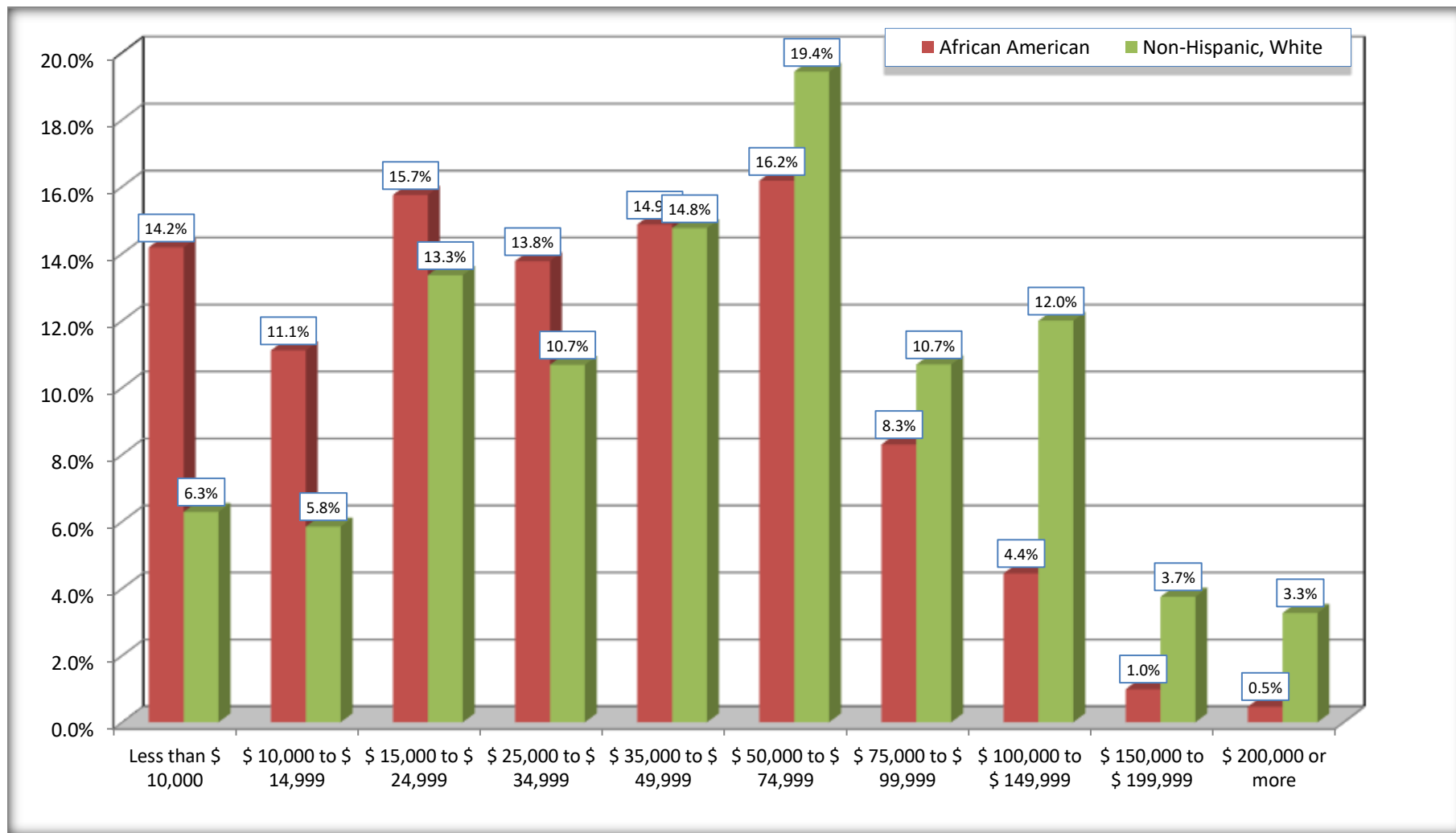
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Household Income in the Past 12 Months

Jefferson County, Arkansas



Source: B19001. HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median household income in the past 12 months (in 2017 inflation-adjusted dollars)	\$ 31,167	\$ 2,284	\$ 48,797	\$ 3,444

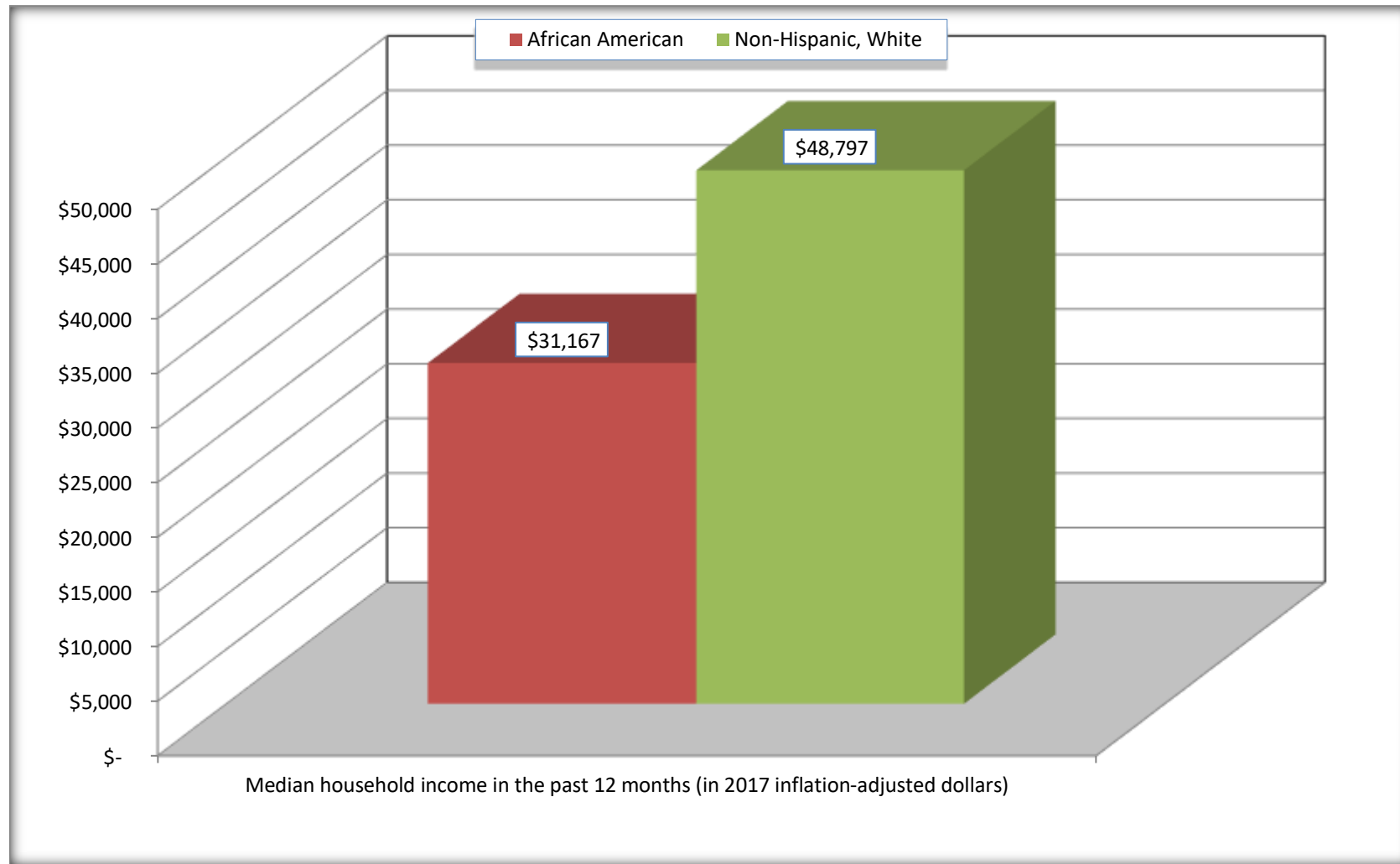
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median Household Income in the Past 12 Months

Jefferson County, Arkansas



Source: B19013. MEDIAN HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19101. FAMILY INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

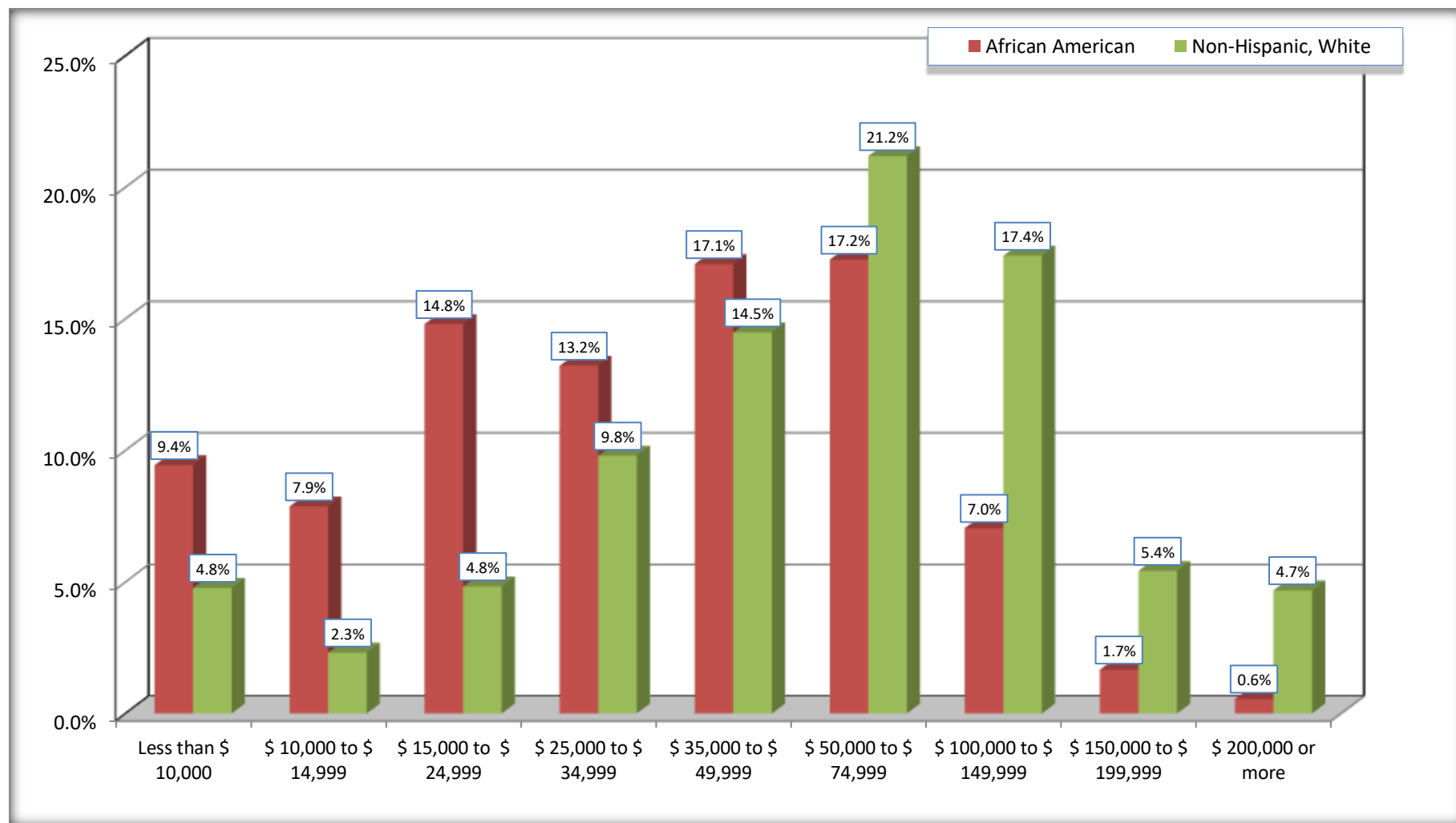
Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	8,862	398	100.0%	7,314	315	100.0%
Less than \$ 10,000	836	202	9.4%	349	130	4.8%
\$ 10,000 to \$ 14,999	697	184	7.9%	169	83	2.3%
\$ 15,000 to \$ 24,999	1,311	NC	14.8%	353	NC	4.8%
\$ 25,000 to \$ 34,999	1,171	NC	13.2%	716	NC	9.8%
\$ 35,000 to \$ 49,999	1,513	NC	17.1%	1,059	NC	14.5%
\$ 50,000 to \$ 74,999	1,528	NC	17.2%	1,549	NC	21.2%
\$ 100,000 to \$ 149,999	624	NC	7.0%	1,272	NC	17.4%
\$ 150,000 to \$ 199,999	147	84	1.7%	396	113	5.4%
\$ 200,000 or more	49	34	0.6%	342	122	4.7%

Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Family Income in the Past 12 Months**Jefferson County, Arkansas**

Source: B19101. FAMILY INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19113. MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median family income in the past 12 months (in 2017 inflation-adjusted dollars)	\$ 39,002	\$ 2,950	\$ 65,740	\$ 4,098

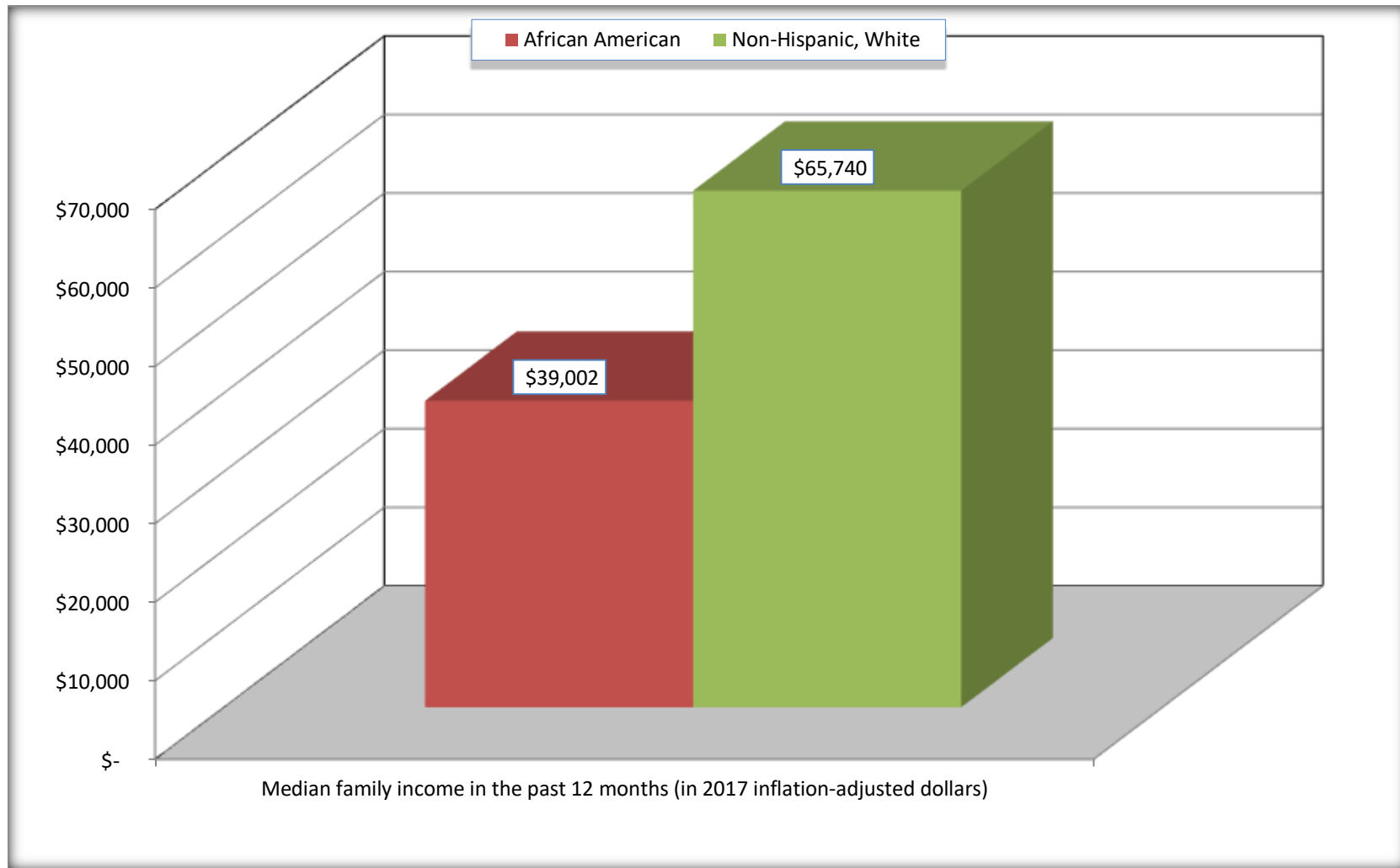
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median Family Income in the Past 12 Months

Jefferson County, Arkansas



Source: B19113. MEDIAN FAMILY INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median nonfamily household income in the past 12 months (in 2017 inflation-adjusted dollars)	\$ 21,423	\$ 1,790	\$ 25,075	\$ 2,767

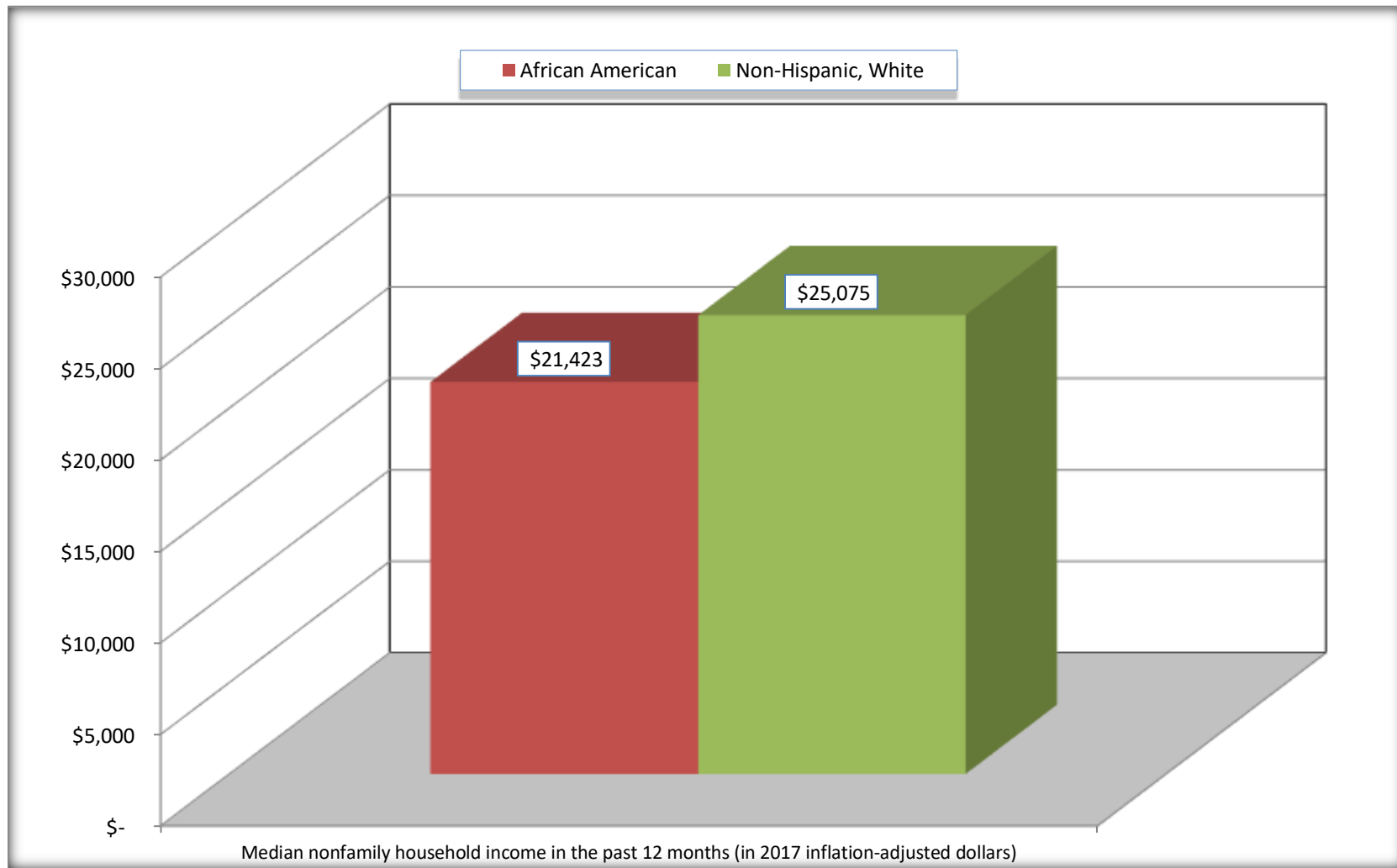
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median Non-Family Income in the Past 12 Months

Jefferson County, Arkansas



Source: B19202. MEDIAN NONFAMILY HOUSEHOLD INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Per capita income in the past 12 months (in 2017 inflation-adjusted dollars)	\$ 15,885	\$ 630	\$ 26,930	\$ 1,605

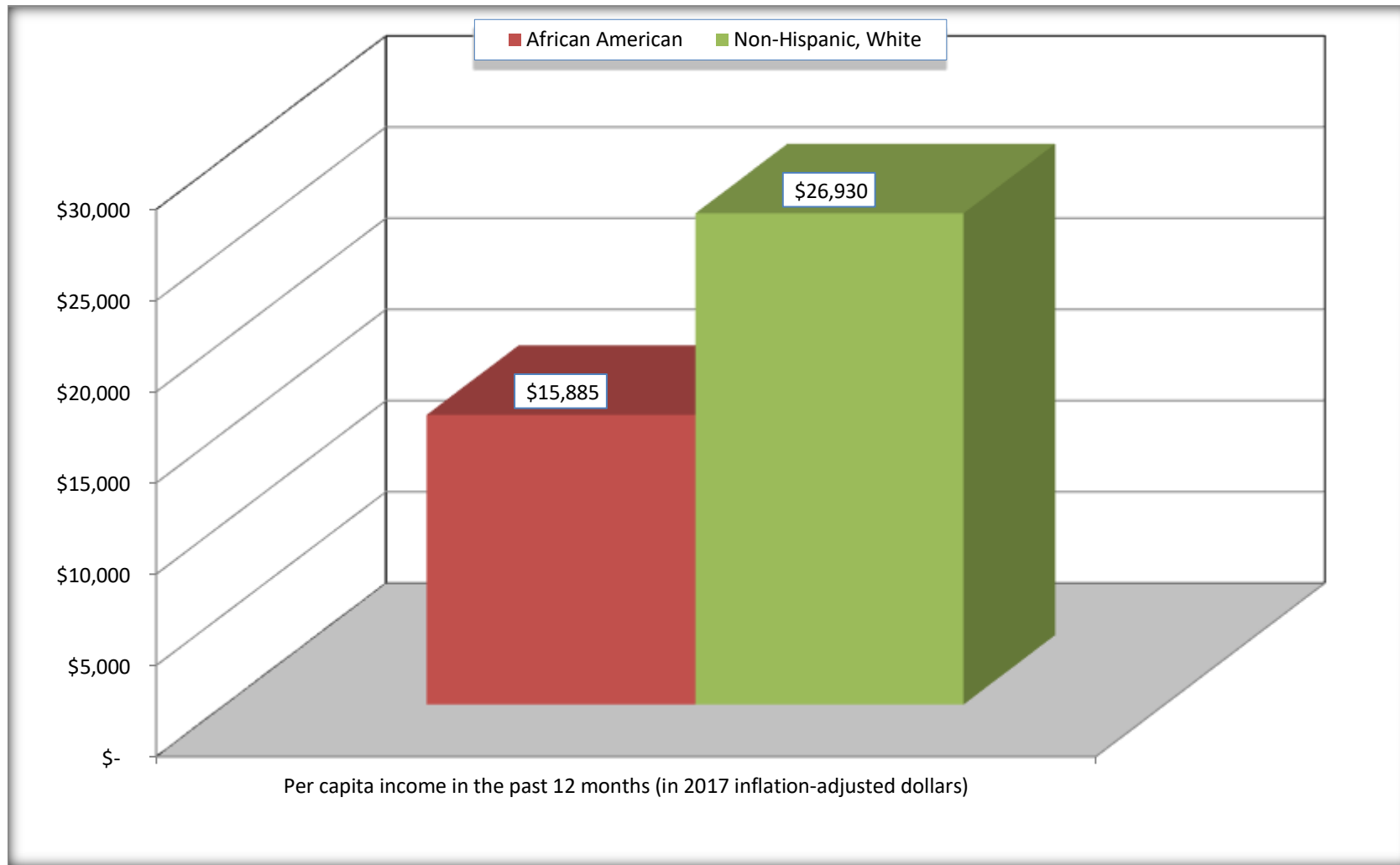
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Per capita Income in the Past 12 Months

Jefferson County, Arkansas



Source: B19301. PER CAPITA INCOME IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS)

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas			
	African American	Margin of Error (+/-)	White, Not Hispanic	Margin of Error (+/-)
Median earnings in the past 12 months (in 2017 inflation-adjusted dollars) --				
Total:	\$ 24,453	\$ 1,451	\$ 34,089	\$ 2,225
Male --				
Total	\$ 28,210	\$ 2,918	\$ 40,320	\$ 2,337
Worked full-time, year-round in the past 12 months	\$ 36,152	\$ 2,354	\$ 48,135	\$ 4,402
Other	\$ 6,640	\$ 2,187	\$ 8,881	\$ 2,071
Female --				
Total	\$ 22,500	\$ 1,746	\$ 27,295	\$ 2,094
Worked full-time, year-round in the past 12 months	\$ 30,760	\$ 1,352	\$ 37,313	\$ 3,059
Other	\$ 7,767	\$ 1,081	\$ 10,168	\$ 1,748

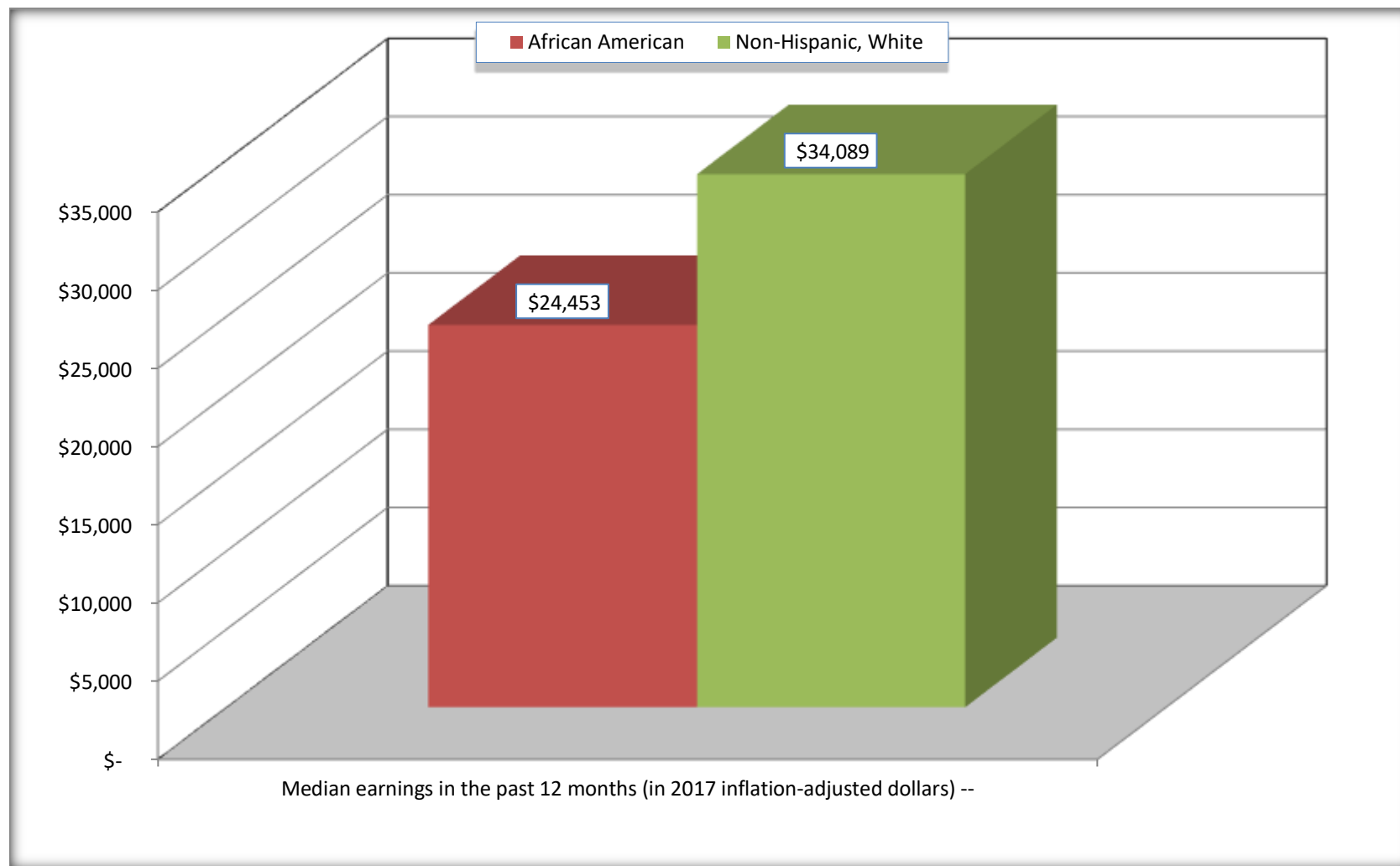
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Median earnings in the Past 12 Months (16 Years and Over with Earnings)

Jefferson County, Arkansas



Source: B20017. MEDIAN EARNINGS IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS) BY SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS FOR THE POPULATION 16 YEARS AND OVER WITH EARNINGS IN THE PAST 12 MONTHS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	29,565	104	100.0%	23,498	24	100.0%
Veteran	1,640	NC	5.5%	2,562	NC	10.9%
Nonveteran	27,925	NC	94.5%	20,936	NC	89.1%
Male:	13,798	74	46.7%	11,892	7	50.6%
18 to 64 years:	11,933	73	40.4%	8,995	7	38.3%
Veteran	833	185	2.8%	1,008	168	4.3%
Nonveteran	11,100	190	37.5%	7,987	168	34.0%
65 years and over:	1,865	13	6.3%	2,897	27	12.3%
Veteran	596	110	2.0%	1,342	182	5.7%
Nonveteran	1,269	112	4.3%	1,555	182	6.6%
Female:	15,767	58	53.3%	11,606	22	49.4%
18 to 64 years:	13,146	58	44.5%	8,062	27	34.3%
Veteran	199	80	0.7%	197	104	0.8%
Nonveteran	12,947	98	43.8%	7,865	104	33.5%
65 years and over:	2,621	11	8.9%	3,544	22	15.1%
Veteran	12	19	0.0%	15	23	0.1%
Nonveteran	2,609	22	8.8%	3,529	33	15.0%

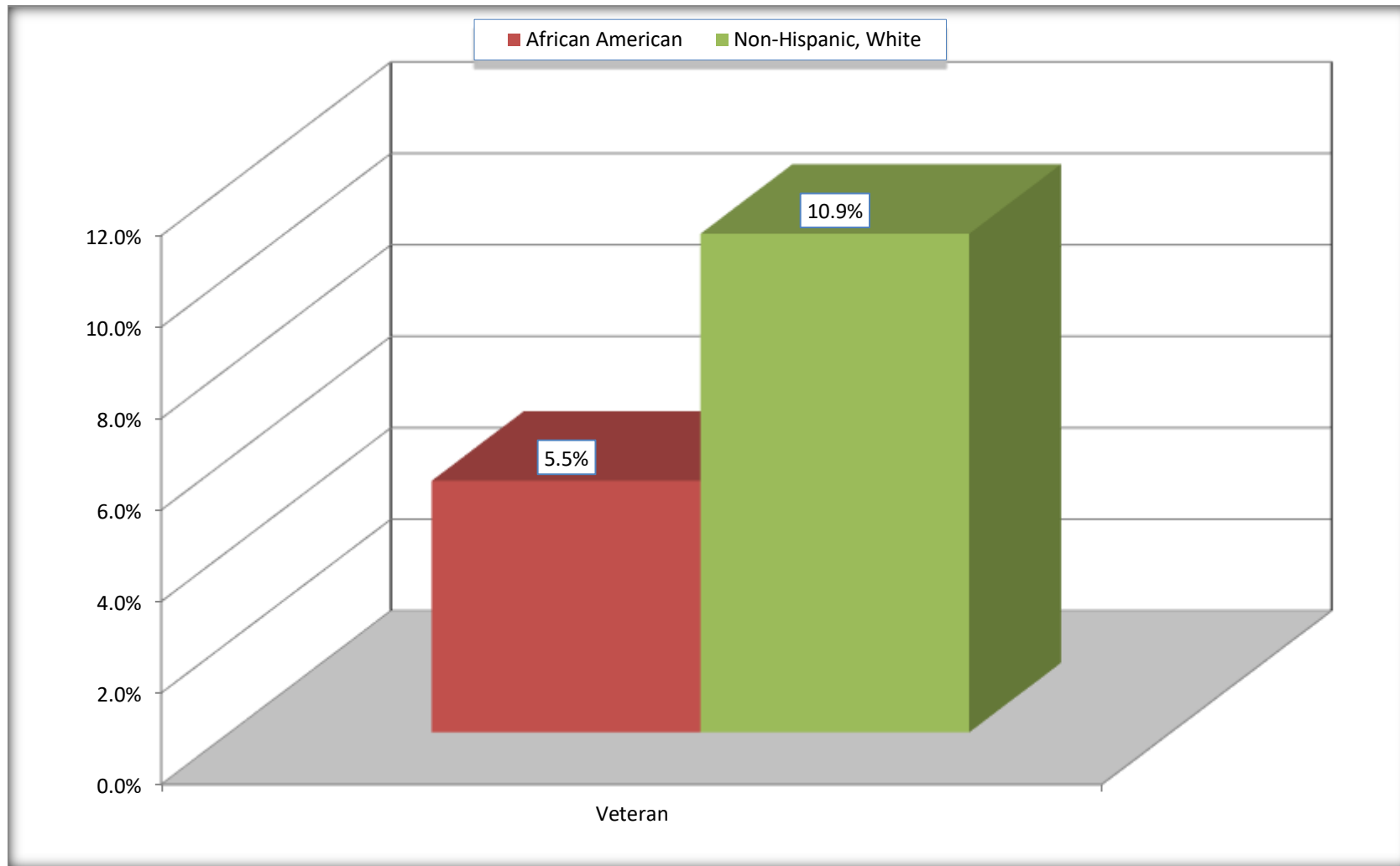
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Veterans in the Civilian Population 18 Years and Over

Jefferson County, Arkansas



Source: C21001. SEX BY AGE BY VETERAN STATUS FOR THE CIVILIAN POPULATION 18 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B20005. SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS BY EARNINGS IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS) FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	30,614	172	100.0%	24,055	99	100.0%
Worked full-time, year-round in the past 12 months:	9,994	NC	32.6%	8,764	NC	36.4%
No earnings	0	NC	0.0%	0	NC	0.0%
With earnings:	9,994	NC	32.6%	8,764	NC	36.4%
\$ 1 to \$ 9,999 or less	195	NC	0.6%	102	NC	0.4%
\$ 10,000 to \$ 19,999	1,497	NC	4.9%	744	NC	3.1%
\$ 20,000 to \$ 29,999	2,384	NC	7.8%	1,656	NC	6.9%
\$ 30,000 to \$ 49,999	3,618	NC	11.8%	2,662	NC	11.1%
\$ 50,000 to \$ 74,999	1,657	NC	5.4%	2,155	NC	9.0%
\$ 75,000 or more	643	NC	2.1%	1,445	NC	6.0%
Other:	20,620	NC	67.4%	15,291	NC	63.6%
No earnings	14,682	NC	48.0%	11,560	NC	48.1%
With earnings: less than full time, year-round	5,938	NC	19.4%	3,731	NC	15.5%
Male:	14,358	123	46.9%	12,213	68	50.8%
Worked full-time, year-round in the past 12 months:	4,535	347	14.8%	4,878	384	20.3%
No earnings	0	27	0.0%	0	27	0.0%
With earnings:	4,535	347	14.8%	4,878	384	20.3%
\$ 1 to \$ 9,999 or less	67	NC	0.2%	74	NC	0.3%
\$ 10,000 to \$ 19,999	522	NC	1.7%	288	NC	1.2%
\$ 20,000 to \$ 29,999	883	NC	2.9%	702	NC	2.9%
\$ 30,000 to \$ 49,999	1,712	NC	5.6%	1,466	NC	6.1%
\$ 50,000 to \$ 74,999	794	NC	2.6%	1,297	NC	5.4%
\$ 75,000 or more	557	NC	1.8%	1,051	NC	4.4%

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Other:	9,823	332	32.1%	7,335	376	30.5%
No earnings	7,354	374	24.0%	5,612	430	23.3%
With earnings:	2,469	297	8.1%	1,723	261	7.2%
Female:	16,256	116	53.1%	11,842	76	49.2%
Worked full-time, year-round in the past 12 months:	5,459	363	17.8%	3,886	313	16.2%
No earnings	0	27	0.0%	0	27	0.0%
With earnings:	5,459	363	17.8%	3,886	313	16.2%
\$ 1 to \$ 9,999 or loss	128	NC	0.4%	28	NC	0.1%
\$ 10,000 to \$ 19,999	975	NC	3.2%	456	NC	1.9%
\$ 20,000 to \$ 29,999	1,501	NC	4.9%	954	NC	4.0%
\$ 30,000 to \$ 49,999	1,906	NC	6.2%	1,196	NC	5.0%
\$ 50,000 to \$ 74,999	863	NC	2.8%	858	NC	3.6%
\$ 75,000 or more	86	NC	0.3%	394	NC	1.6%
Other:	10,797	378	35.3%	7,956	333	33.1%
No earnings	7,328	398	23.9%	5,948	303	24.7%
With earnings:	3,469	330	11.3%	2,008	294	8.3%

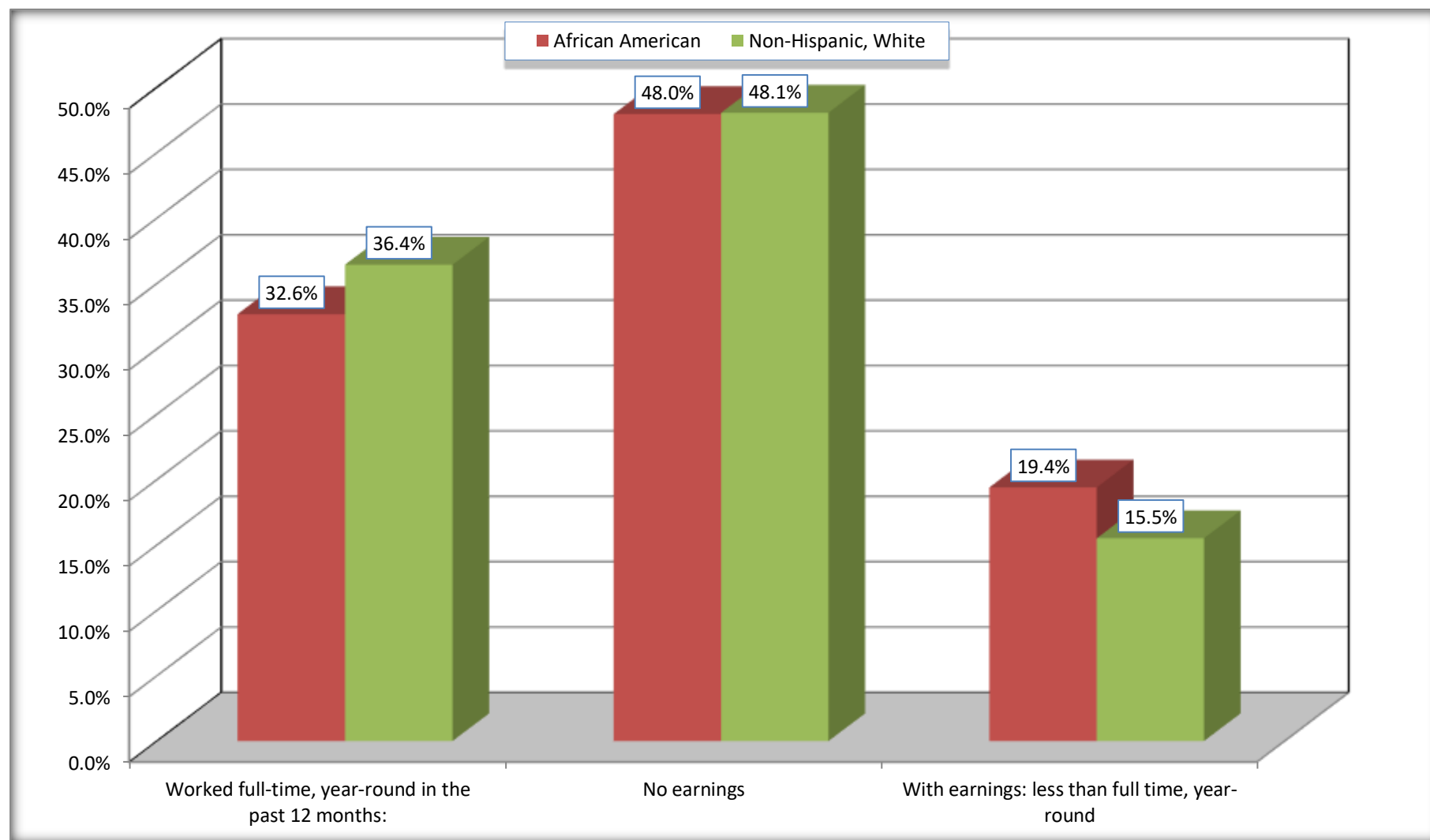
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Employment and Earnings in the Past 12 Months (16 Years and Over)

Jefferson County, Arkansas



Source: B20005. SEX BY WORK EXPERIENCE IN THE PAST 12 MONTHS BY EARNINGS IN THE PAST 12 MONTHS (IN 2017 INFLATION-ADJUSTED DOLLARS) FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	14,926	399	100.0%	11,402	420	100.0%
HH received Food Stamps/SNAP in the past 12 months	4,338	303	29.1%	1,110	198	9.7%
HH did not receive Food Stamps/SNAP in the past 12 months	10,588	407	70.9%	10,292	423	90.3%

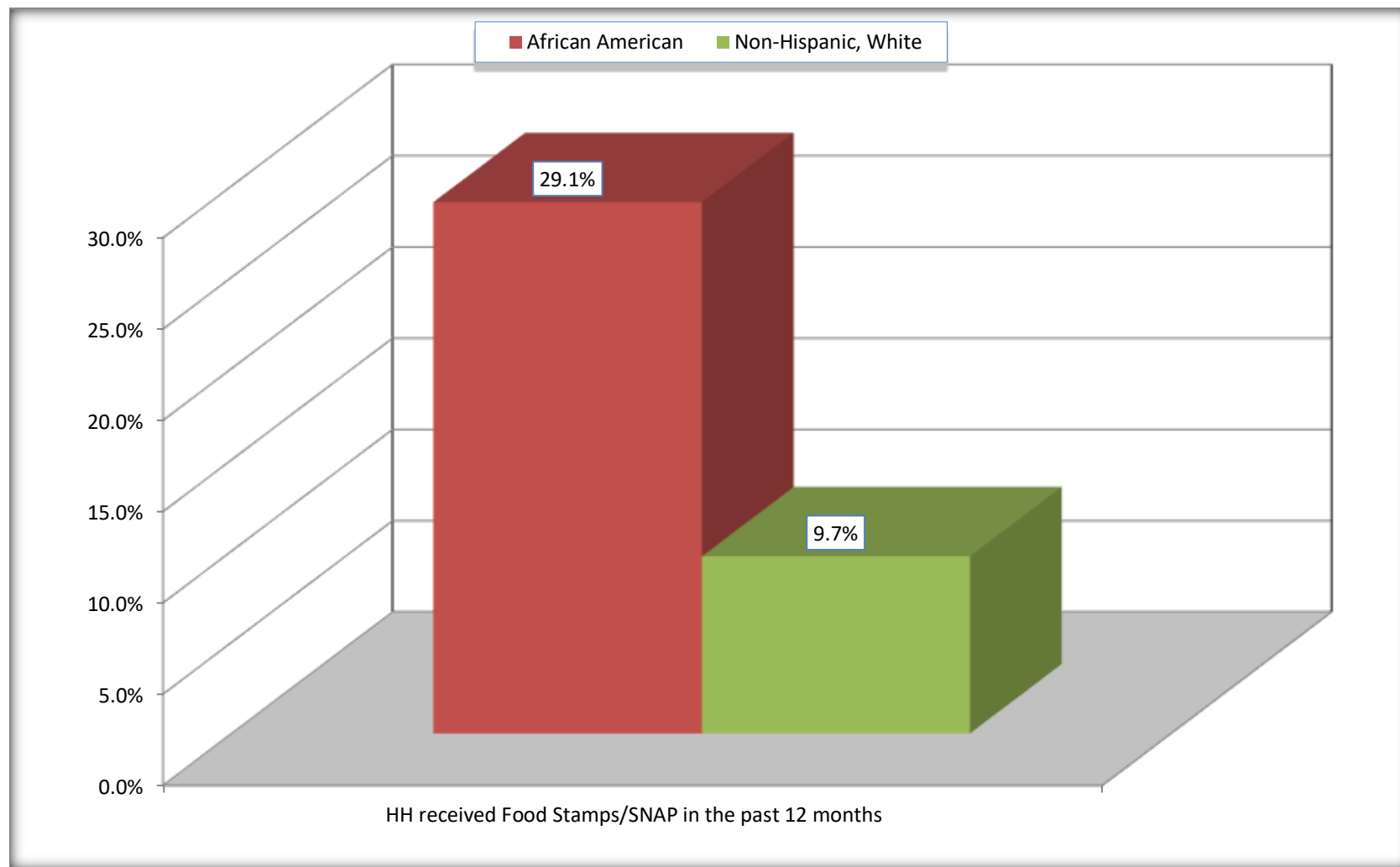
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Receipt of Food Stamps/SNAP in the Past 12 Months by Household

Jefferson County, Arkansas



Source: B22005. RECEIPT OF FOOD STAMPS/SNAP IN THE PAST 12 MONTHS BY RACE OF HOUSEHOLDER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	30,614	172	100.0%	24,055	99	100.0%
In labor force:	16,520	NC	54.0%	11,992	NC	49.9%
In Armed Forces	2	NC	0.0%	2	NC	0.0%
Civilian:	16,007	NC	52.3%	10,925	NC	45.4%
Employed	14,295	NC	46.7%	11,298	NC	47.0%
Unemployed	2,223	NC	7.3%	692	NC	2.9%
Not in labor force	14,094	NC	46.0%	12,063	NC	50.1%
Male:	14,358	123	46.9%	12,213	68	50.8%
16 to 64 years:	12,493	122	40.8%	9,316	68	38.7%
In labor force:	7,017	398	22.9%	5,704	438	23.7%
In Armed Forces	2	4	0.0%	2	4	0.0%
Civilian:	7,015	398	22.9%	5,702	438	23.7%
Employed	5960	345	19.5%	5360	448	22.3%
Unemployed	1,055	235	3.4%	342	135	1.4%
Not in labor force	5,476	384	17.9%	3,612	433	15.0%
65 years and over:	1,865	13	6.1%	2,897	27	12.0%
In labor force:	223	69	0.7%	565	126	2.3%
Employed	204	68	0.7%	565	126	2.3%
Unemployed	19	21	0.1%	0	27	0.0%
Not in labor force	1,642	70	5.4%	2,332	126	9.7%

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Female:	16,256	116	53.1%	11,842	76	49.2%
16 to 64 years:	13,635	115	44.5%	8,298	75	34.5%
In labor force:	8,992	366	29.4%	5,223	248	21.7%
In Armed Forces	0	27	0.0%	0	27	0.0%
Civilian:	8,992	366	29.4%	5,223	248	21.7%
Employed	7,860	369	25.7%	4,873	255	20.3%
Unemployed	1,132	219	3.7%	350	134	1.5%
Not in labor force	4,643	367	15.2%	3,075	240	12.8%
65 years and over:	2,621	11	8.6%	3,544	22	14.7%
In labor force:	288	92	0.9%	500	116	2.1%
Employed	271	81	0.9%	500	116	2.1%
Unemployed	17	26	0.1%	0	27	0.0%
Not in labor force	2,333	92	7.6%	3,044	117	12.7%

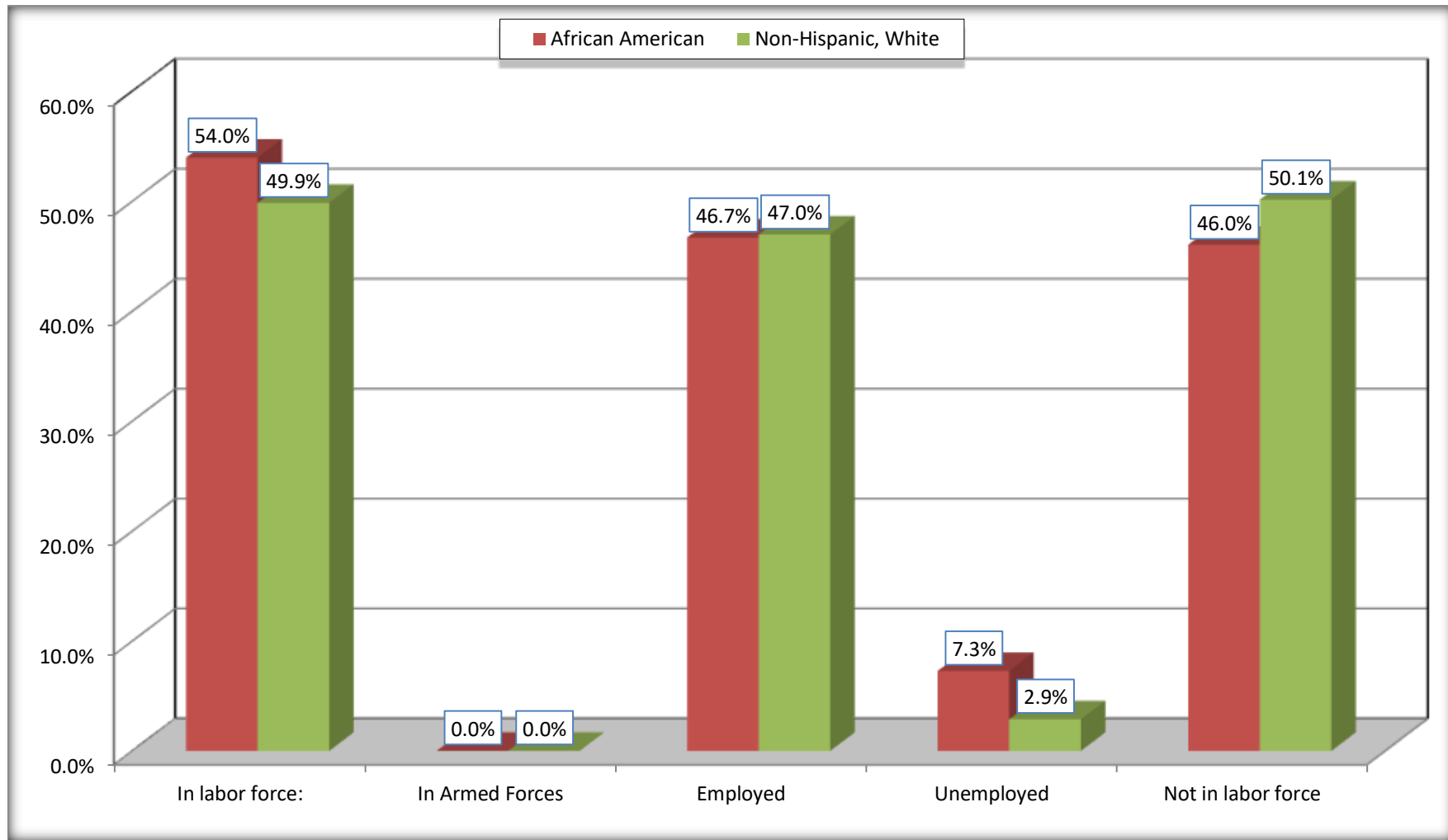
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Employment Status for the Population 16 years and over

Jefferson County, Arkansas

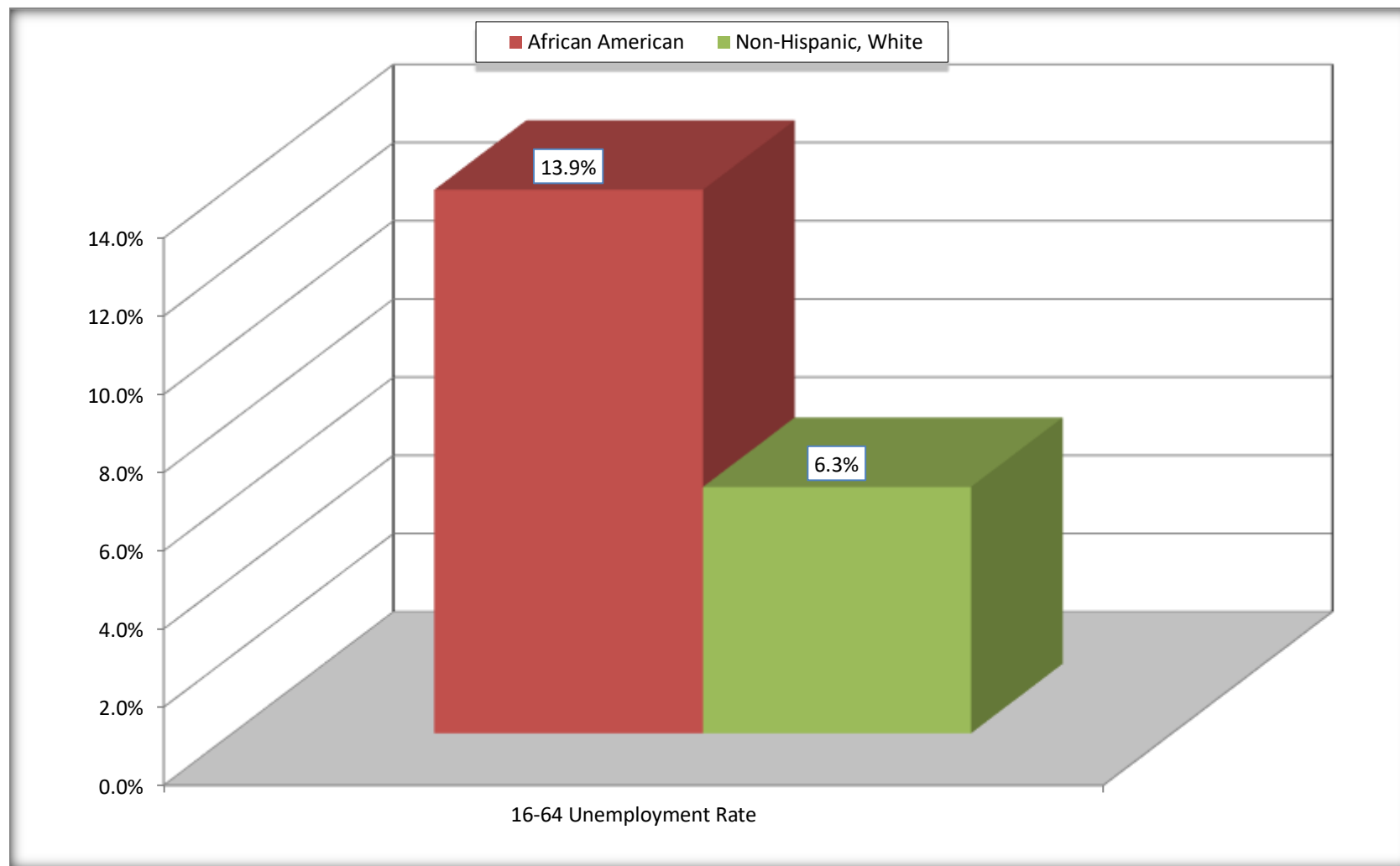


Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

**Unemployment of Working Age Population (Ages 16 to 64)
(As a Percent of 16-64 Civilian Labor Force)**

Jefferson County, Arkansas



Source: C23002. SEX BY AGE BY EMPLOYMENT STATUS FOR THE POPULATION 16 YEARS AND OVER
Data Set: 2013-2017 American Community Survey 5-Year Estimates

C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	14,295	542	100.0%	11,298	540	100.0%
Management, professional, and related occupations	3,408	NC	23.8%	3,695	NC	32.7%
Service occupations	3,356	NC	23.5%	1,653	NC	14.6%
Sales and office occupations	2,851	NC	19.9%	2,993	NC	26.5%
Natural resources, construction, and maintenance occupations:	711	NC	5.0%	1,138	NC	10.1%
Production, transportation, and material moving occupations	3,969	NC	27.8%	1,819	NC	16.1%
Male:	6,164	360	43.1%	5,925	472	52.4%
Management, business, science, and arts occupations:	948	242	6.6%	1,532	213	13.6%
Service occupations	1,203	226	8.4%	849	165	7.5%
Sales and office occupations	626	152	4.4%	845	191	7.5%
Natural resources, construction, and maintenance occupations:	683	176	4.8%	1,099	214	9.7%
Production, transportation, and material moving occupations	2,704	352	18.9%	1,600	287	14.2%
Female:	8,131	375	56.9%	5,373	288	47.6%
Management, professional, and related occupations	2,460	309	17.2%	2,163	304	19.1%
Service occupations	2,153	281	15.1%	804	213	7.1%
Sales and office occupations	2,225	345	15.6%	2,148	305	19.0%
Natural resources, construction, and maintenance occupations:	28	27	0.2%	39	34	0.3%
Production, transportation, and material moving occupations	1,265	272	8.8%	219	92	1.9%

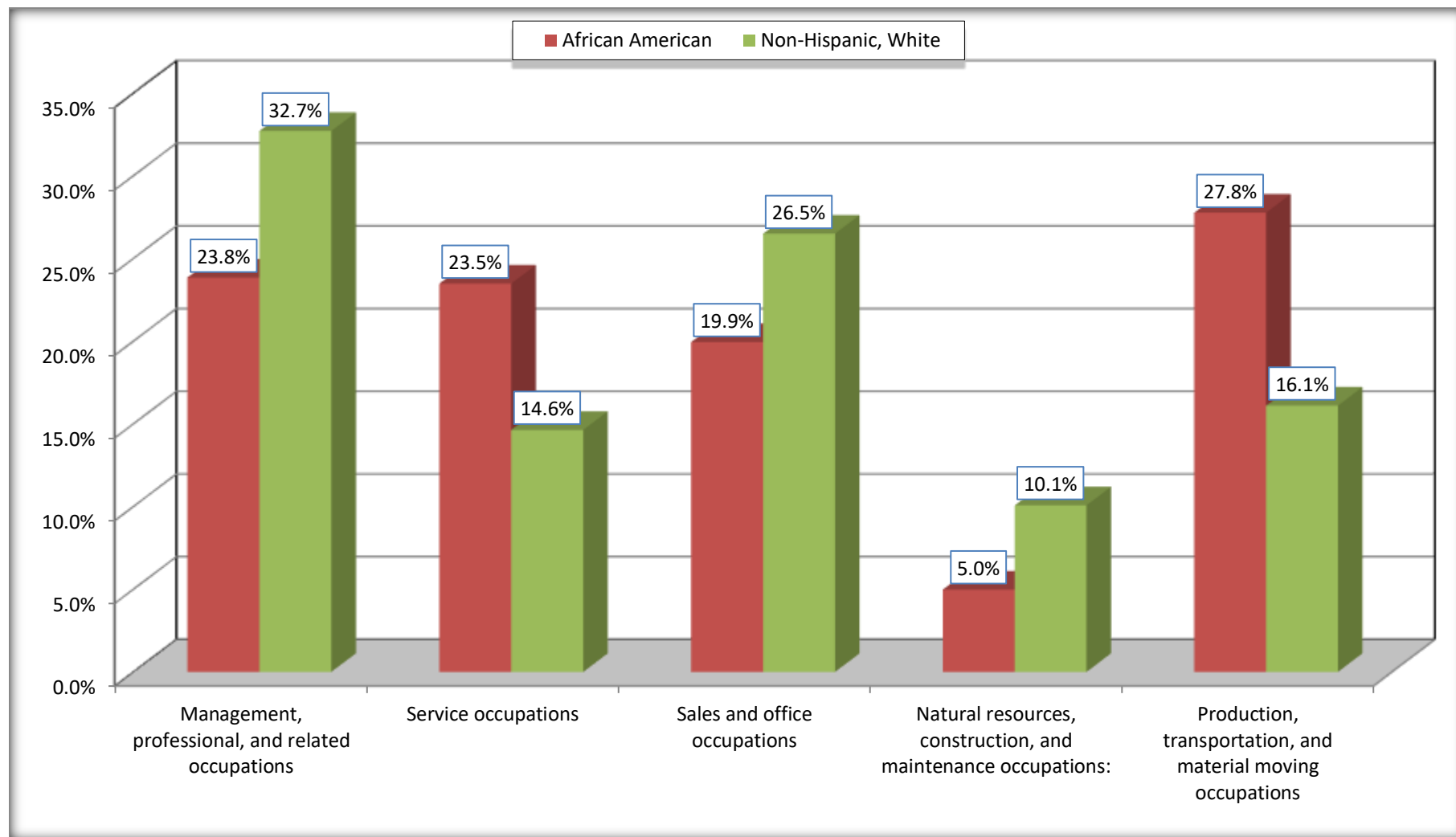
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Occupation for the Civilian Employed 16 Years and Over Population

Jefferson County, Arkansas



Source: C24010. SEX BY OCCUPATION FOR THE CIVILIAN EMPLOYED POPULATION 16 YEARS AND OVER
 Data Set: 2013-2017 American Community Survey 5-Year Estimates

B25003. TENURE - Universe: OCCUPIED HOUSING UNITS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	14,926	399	100.0%	11,402	420	100.0%
Owner occupied	7,672	367	51.4%	9,192	411	80.6%
Renter occupied	7,254	432	48.6%	2,210	317	19.4%

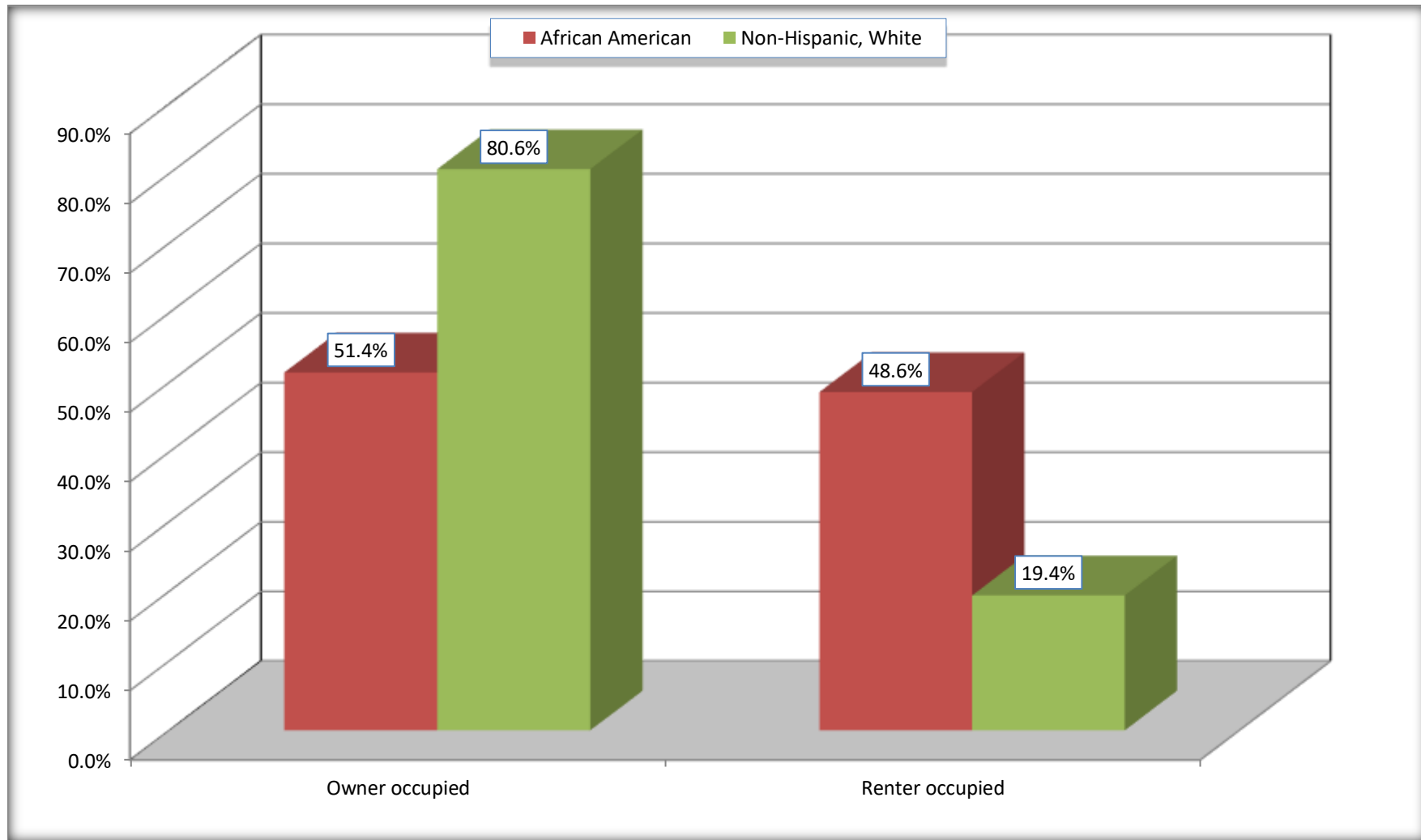
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.h>

Home Owners and Renters by Household

Jefferson County, Arkansas



Source: B25003. TENURE - Universe: OCCUPIED HOUSING UNITS
Data Set: 2013-2017 American Community Survey 5-Year Estimates

B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	14,926	399	100.0%	11,402	420	100.0%
1.00 or less occupants per room	14,503	408	97.2%	11,304	409	99.1%
1.01 or more occupants per room	423	142	2.8%	98	62	0.9%

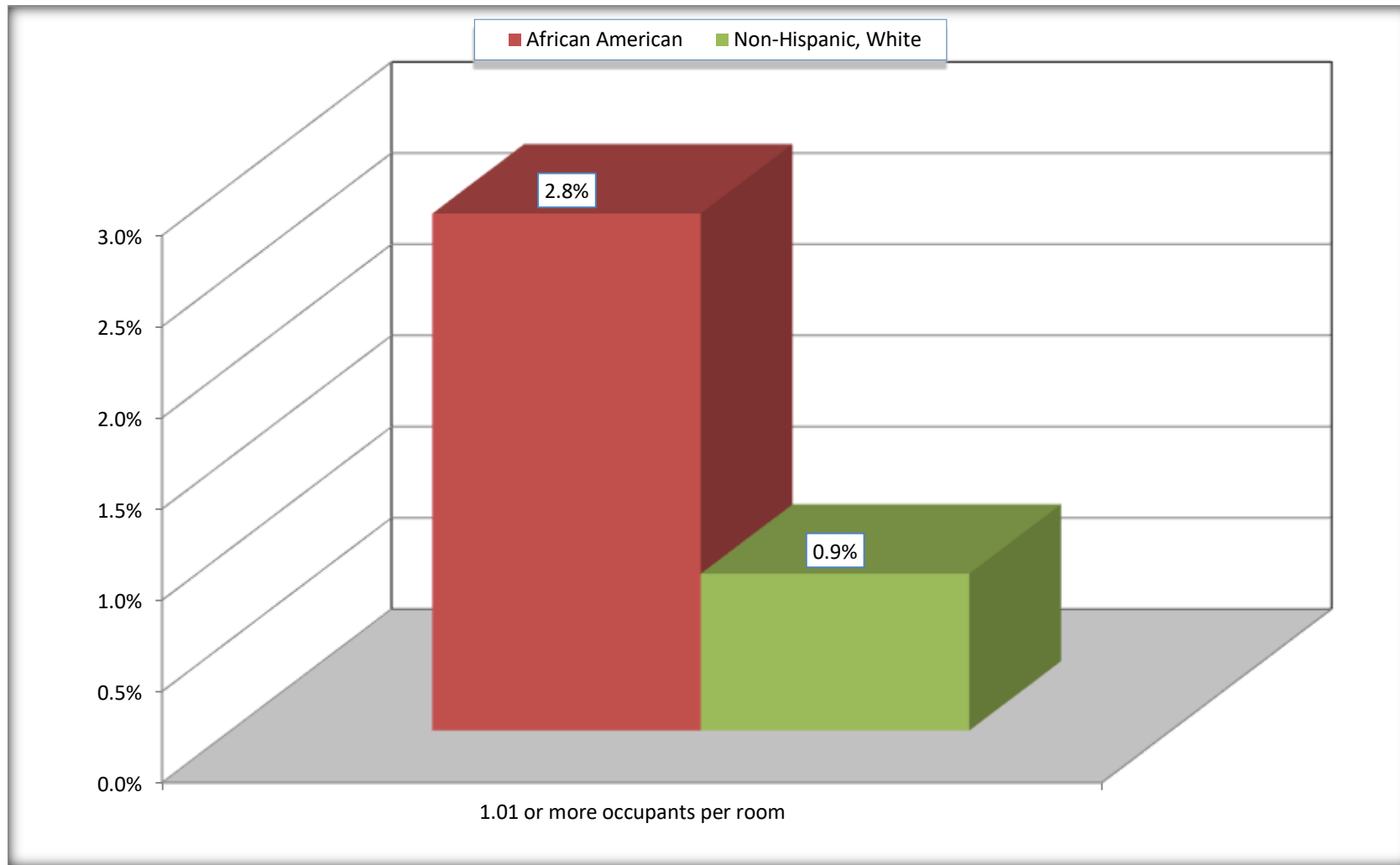
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.ht>

More than One Person per Room (Crowding) by Household

Jefferson County, Arkansas



Source: B25014. OCCUPANTS PER ROOM - Universe: OCCUPIED HOUSING UNITS
Data Set: 2013-2017 American Community Survey 5-Year Estimates

Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	38,321	341	100.0%	25,896	438	100.0%
Under 18 years:	10,626	89	27.7%	4,730	161	18.3%
With a disability	606	216	1.6%	243	100	0.9%
No disability	10,020	235	26.1%	4,487	105	17.3%
18 to 64 years:	23,433	329	61.1%	14,928	431	57.6%
With a disability	3,964	339	10.3%	2,419	303	9.3%
No disability	19,469	439	50.8%	12,509	470	48.3%
65 years and over:	4,262	61	11.1%	6,238	128	24.1%
With a disability	1,714	212	4.5%	2,864	222	11.1%
No disability	2,548	202	6.6%	3,374	245	13.0%

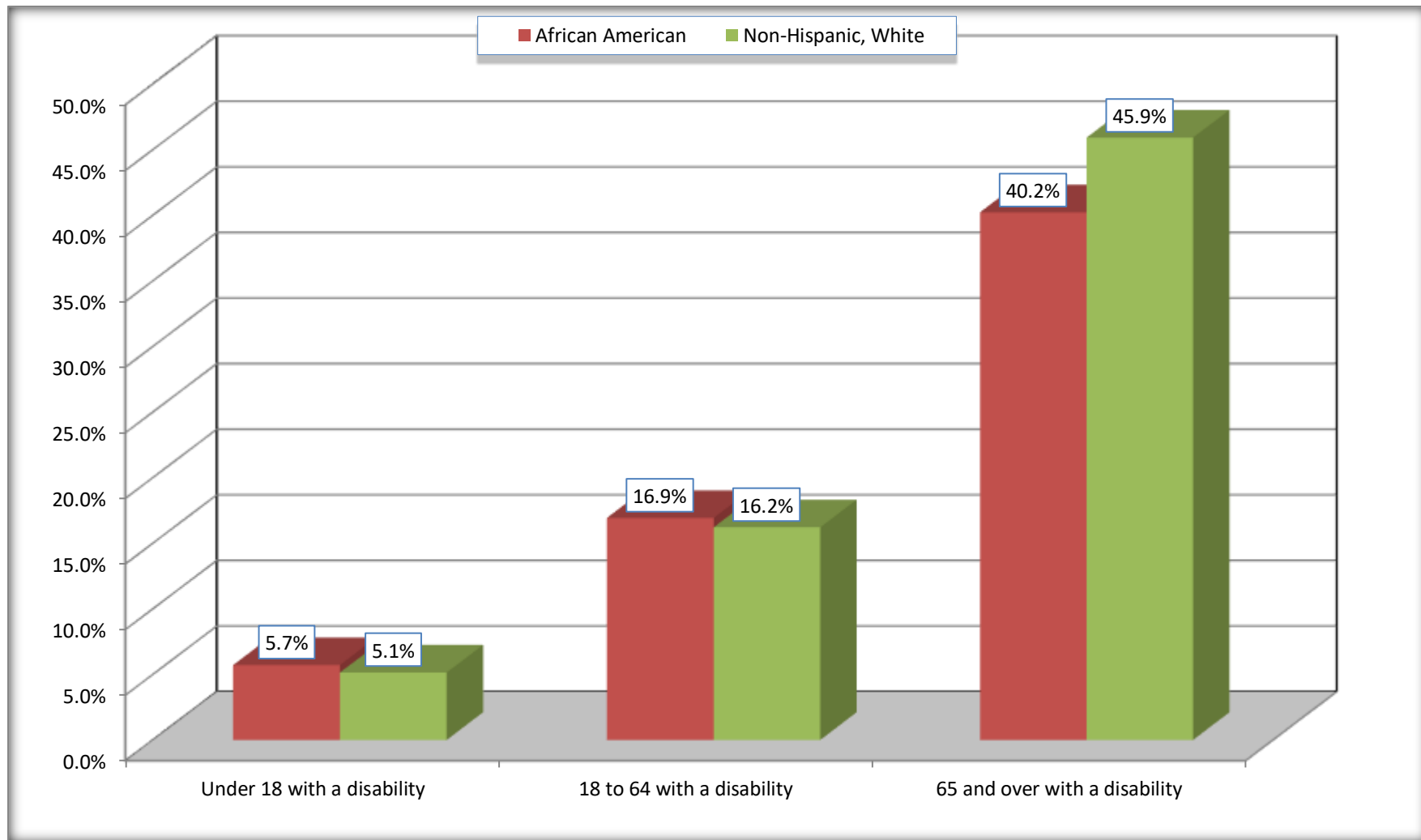
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Disability by Age

Jefferson County, Arkansas



Source: B18101. AGE BY DISABILITY STATUS

Data Set: 2013-2017 American Community Survey 5-Year Estimates

C27001B. HEALTH INSURANCE COVERAGE STATUS BY AGE
Data Set: 2013-2017 American Community Survey 5-Year Estimates

	Jefferson County, Arkansas					
	African American	Margin of Error (+/-)	% of AA Total	White, Not Hispanic	Margin of Error (+/-)	% of NHW Total
Total:	38,321	341	100.0%	25,896	438	100.0%
Under 18 years:	11,377	158	29.7%	5,036	79	19.4%
With health insurance coverage	11,087	213	28.9%	4,862	130	18.8%
No health insurance coverage	290	143	0.8%	174	98	0.7%
18 to 64 years:	22,682	342	59.2%	14,622	447	56.5%
With health insurance coverage	19,591	484	51.1%	12,662	520	48.9%
No health insurance coverage	3,091	357	8.1%	1,960	308	7.6%
65 years and over:	4,262	61	11.1%	6,238	128	24.1%
With health insurance coverage	4,236	64	11.1%	6,227	128	24.0%
No health insurance coverage	26	23	0.1%	11	17	0.0%

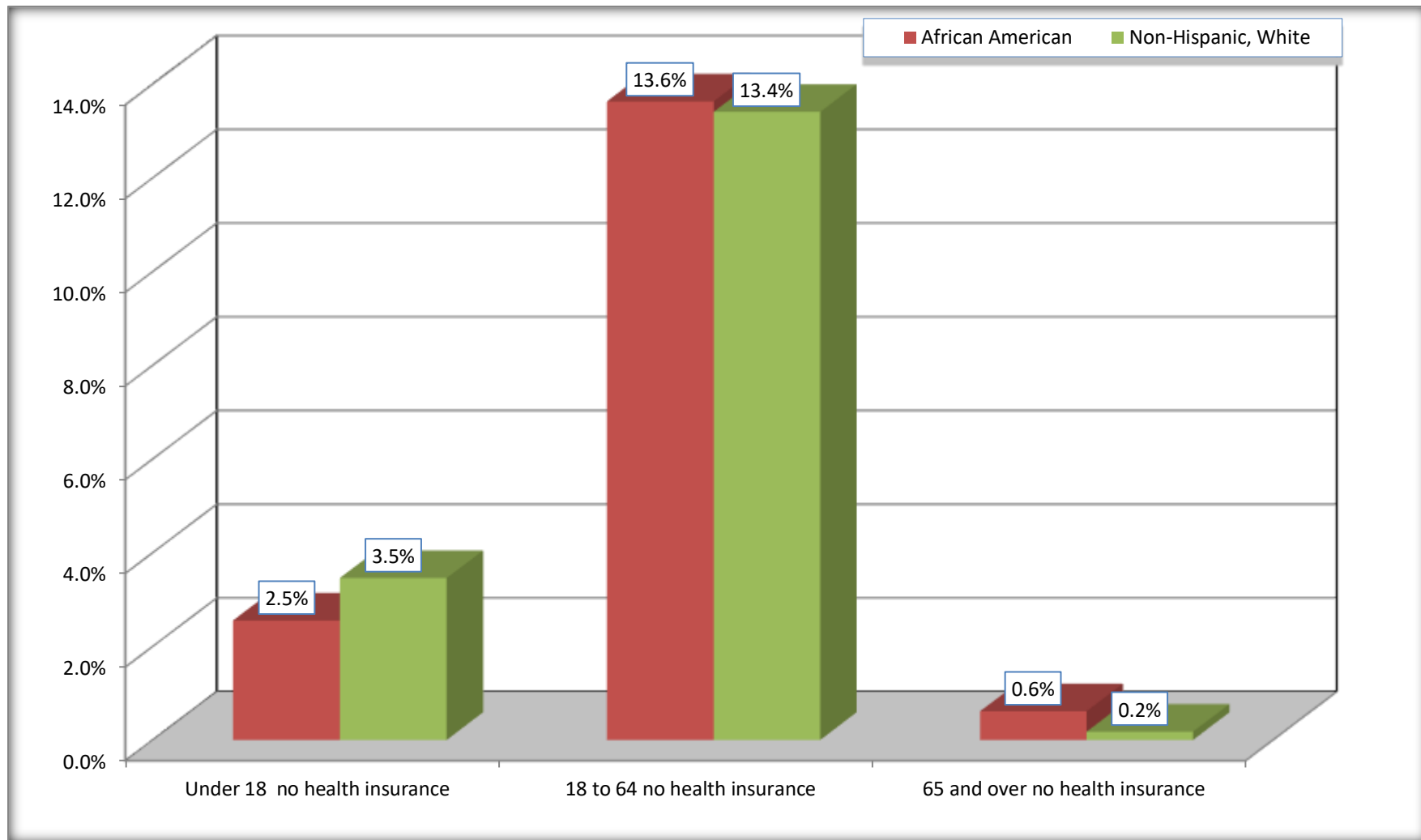
Source: U.S. Census Bureau, 2013-2017 American Community Survey

For information on confidentiality protection, sampling error, nonsampling error, and definitions, see Survey Methodology.

<http://www.census.gov/acs/www/UseData/index.htm>

Lack of Health Insurance Coverage by Age

Jefferson County, Arkansas



Source: C27001B. HEALTH INSURANCE COVERAGE STATUS BY AGE

Data Set: 2013-2017 American Community Survey 5-Year Estimates