

Exhibit 4

DECLARATION OF ANTONIO GUYTON

I, Antonio Guyton, declare under penalty of perjury as follows:

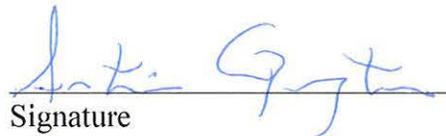
1. I am a United States citizen, over the age of 18, and am capable of making this declaration.
1. I was released on parole on or about April 24, 2025.
2. In 2022, I had brain surgery, and I am still recovering from that surgery. In addition to impacting my balance and the manual dexterity on the right side of my body, the brain surgery impacts my ability to communicate and understand information, and I have difficulty keeping up especially in rushed or complex situations.
3. On or about November 20, 2025, I was arrested for absconding, obstructing a government operation, possession of a controlled substance with intent, possession of drug paraphernalia, and non-financial identity fraud.
4. Following my arrest, I was taken into custody and detained at the Washington County Detention Center.
5. About three or four days after I was detained at the Washington County Detention Center, a community supervision officer (“CSO”) visited me and informed me that I had violated the terms of my parole based on absconding and new criminal charges. The CSO did not give me a copy of my violation report.
6. The CSO told me to sign a paper agreeing to a six-month parole sentence. By signing that paper, I would have waived my right to a parole revocation hearing. I did not want to waive my right to a hearing and accept a six-month sentence. The CSO told me that I could have a hearing, but the CSO said words to the effect of “all I have to do is prove you are in jail” in order to revoke my parole. I did not sign the paperwork waiving my right to a hearing.
7. On or about Friday, December 5, 2025, the CSO informed me that I would have a final revocation hearing on Wednesday, December 10, 2025.
8. The CSO gave me a form to fill out to request witnesses, but I did not have my witnesses’ phone numbers memorized. Because I was incarcerated, I lacked access to my cell phone and could not use my phone to look up the numbers. The CSO did not offer any assistance in locating or contacting my witnesses.
9. The CSO did not inform me that I could hire an attorney to represent me at the hearing. The CSO did not say anything about the possibility of being screened for and appointed an attorney for my hearing at no cost to me.

10. I was still incarcerated at the Washington County Detention Center when I had my final revocation hearing on December 10, 2025.
11. The attendees at my hearing, which took place via videoconference, were my CSO from Little Rock; a CSO from Washington County; the police officer who had arrested me; a police detective; and a parole revocation judge ("PRJ"). I did not have any witnesses in attendance because I did not have the phone numbers to reach out to any witnesses before the hearing.
12. During the hearing, my CSO shared inaccurate information about me. I tried my best to cross-examine my CSO, as well as the police. However, given my lack of formal legal training, I did not feel prepared to conduct these cross-examinations. I also was facing criminal charges related to some of my alleged parole violations and did not want to do or say anything that could negatively impact my criminal case, especially before speaking with a lawyer in my pending criminal case. Because I lack any formal legal training, I did not know what information would be helpful or harmful to my criminal case, so I avoided cross-examining the police regarding issues related to that case or evidence in that case. I also believe that my recovery from brain surgery impacted my ability to effectively cross-examine the witnesses, as it is often difficult for me to communicate and understand information, especially in rushed situations.
13. When I was given an opportunity to speak on my own behalf, I told the PRJ that I had never received a copy of my violation report. I also stated that I did not have a lawyer and would like to have one. I explained that I had brain surgery, which made it hard for me to keep up. I explained that I was facing criminal charges related to the alleged parole violations, and I had not yet had an opportunity to challenge that evidence in court. I also told the PRJ that I would like to have witnesses, but I could not contact any witnesses because I did not have their phone numbers since I did not have access to my cell phone.
14. Even though I explained that I had not received a copy of my violation report, wanted to have a lawyer, wanted to have witnesses, had a pending criminal case, and had difficulty keeping up due to my brain surgery, the PRJ never offered me an opportunity to postpone my hearing. The PRJ did not provide me with a copy of my violation report prior to the hearing. The PRJ did not tell me that I could hire a lawyer or be screened for a court-appointed attorney. In addition, no one offered to assist me in contacting witnesses.
15. At the conclusion of the hearing, the PRJ informed me that I would receive a decision in writing. Later that day, I received a document stating that my parole had been revoked, that I would be placed in the custody of the Arkansas Division of Correction, and that I would appear before the Arkansas Post-Prison Transfer Board in June 2026 for parole consideration.

16. I believe that I would have greatly benefited by being screened for and represented by a no-cost appointed attorney at my final revocation hearing. An attorney could have helped me prepare for the hearing by contacting witnesses and could have better cross-examined the adverse witnesses who testified against me, especially given that my brain surgery impacts my ability to communicate and comprehend information. An attorney also could have helped me figure out how to challenge my alleged parole violations without making any statements that could negatively impact my pending criminal case. Unfortunately, I could not afford to retain a private attorney.
17. Additionally, I believe that I would have benefited from having witness testimony at my final revocation hearing. For example, one of my desired witnesses would have been able to testify about my efforts to find and maintain stable housing during the period of time I was allegedly absconding.

Pursuant to Section 1746 of Title 28 of the United States Code, I declare under penalty of perjury that the statements within this declaration are true and correct.

Executed on: December 11th, 2025
Location: Washington County, AR


Signature

A. G.
Name