

# Exhibit I

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

**ELIZABETH HEALEY, et al.,**

**Plaintiffs,**

**v.**

**STATE OF MISSOURI, et al.,**

**Defendants.**

**AFFIDAVIT IN SUPPORT OF PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION AND CONSOLIDATION  
OF TRIAL ON COUNT I WITH PRELIMINARY INJUNCTION HEARING**

I, Elizabeth Healey, declare as follows in support of Plaintiffs' Motion for Preliminary Injunction and Consolidation of Trial on Count I with Preliminary Injunction Hearing:

1. I am over the age of 18, have personal knowledge of the facts below, and can competently testify to their truth.

2. I am a registered voter at [REDACTED], Kansas City, Missouri. I have lived at this address for 13 years.

3. I currently reside in Congressional District 5 under the 2022 Map.

4. Under the 2025 map as set out in House Bill 1, I will be drawn into Congressional District 6, which also includes the northeastern and northwestern corners of Missouri. The district also includes portions of Clark County, Missouri,

which are more than 200 miles away from my home. In my 60 years of living in Missouri, I don't recall ever going to Clark County.

5. If House Bill 1 goes into effect, I will no longer be in the same district as the rest of Kansas City, which I consider to be the center of both my personal and my professional community. For instance, I will be in a different district from my daughter and grandchildren, who live and go to school in Lee's Summit, just outside of Kansas City. While they were previously in Congressional District 5, they will be in Congressional District 4 under House Bill 1.

6. Under House Bill 1, I will also be in an entirely different district from Operation Breakthrough, a nonprofit in downtown Kansas City that I have supported and volunteered with for more than 20 years. Operation Breakthrough is one of Missouri's largest Head Start and Early Head Start programs and receives grant funding from the federal government. As a volunteer, I have worked in the classroom with Pre-K kids to help them get ready for kindergarten and currently tutor school-age children in the after-school program.

7. Under House Bill 1, Operation Breakthrough, which serves families across Kansas City, will literally be split in two by the new district lines. Operation Breakthrough is comprised of two buildings on either side of Troost Avenue, connected by a sky bridge. Because House Bill 1 divides the city along Troost Avenue, one half of the organization will be in Congressional District 4, and the

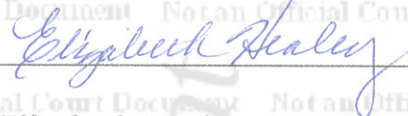


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other half will be in Congressional District 5.

8. Representative Cleaver of Congressional District 5 has been a strong advocate for expanding federal funding and eligibility for Head Start programs like Operation Breakthrough. As a result of House Bill 1, I will be unable to vote for a representative with a vested interest in advocating for this Kansas City institution that I care deeply about.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 9/23/2025

  
Elizabeth Healey

State of Missouri

County of Clay

On this 23<sup>rd</sup> day of September 2025, before me, the undersigned notary, personally appeared Elizabeth Healey, proved to me through identification documents, which were Driver's license, to be the person who signed the preceding or attached document in my presence and who swore or affirmed to me that the contents of the document are truthful and accurate to the best of her knowledge and belief.



SARAH M. GRIFFIN  
Notary Public-Notary Seal  
STATE OF MISSOURI  
Clay County  
My Commission Expires Jan. 30, 2026  
Commission # 22260916