

AFFIDAVIT OF TAMMY BROWN

Affiant first being duly sworn, on her oath attests:

1. I served as a local election official for 25 years in Jackson County, Missouri. I was a Commissioner on the Jackson County Election Board from 2001 to 2008, and then I was the Republican Director of the Board from 2009 until my retirement in July 2026.

2. During my tenure as a Commissioner and the Republican Director, I helped facilitate over 100 elections in Jackson County, Missouri. The Jackson County Election Board serves about 270,000–280,000 registered voters who reside within our jurisdiction.

3. During my 25 years at the Board, I assisted with implementing new congressional maps three different times: in 2012, in 2022, and then in 2026 for the implementation of the House Bill 1 map.

4. I personally assisted with implementing Missouri's new congressional map in 2026. I also helped prepare ballots for absentee and military voters for the August primary election. The primary election was held on August 4, 2026. Under Missouri law, that election must be certified by August 18, 2026.

5. I am aware that there is a lawsuit seeking to change Missouri's congressional map after the August 2026 primary election. I have never heard of a lawsuit like this before.

6. Based on my 25 years of experience as a local election official, I believe that it is literally impossible to change Missouri's 2026 congressional map after the primary election and before the general election on November 3, 2026. In my view, changing the congressional map after the primary election would put the entire election at risk.

7. Implementing a new congressional map is an arduous, time-intensive duty for local election authorities. It involves manually reassigning precincts to a new congressional

district in the Missouri Centralized Voter Registration (“MCVR”) database. This is a step-by-step, meticulous process that involves printing maps, proofing lines, assigning each precinct to the correct congressional district, and ensuring that each voter is placed in the correct district. This requires the assistance of every member of our office and usually takes 2 weeks to complete. If pressed for overtime and weekend work, I estimate that the Jackson County Election Board could implement a new map in the MCVR database in 7–10 days. I do not know how long it would take other local election authorities to implement a new congressional map in the MCVR database.

8. During any ongoing election, the MCVR database prevents us from moving any voters from one district to another. This makes congressional district lines impossible to change during any election—whether or not the election is congressional in nature. The database locks 8 to 10 weeks before any election because of military voters and absentee voters who need to receive mail ballots before election day. The MCVR database remains locked at least until the election is certified, which must occur within 2 weeks after election day under State law.

9. Jackson County is holding a recall election on September 1, 2026, for an Independence City Council member. Absentee voting for that recall election began on July 21, 2026, and no excuse absentee voting will begin on August 18, 2026. The Jackson County Election Board will then have until September 14, 2026, to certify the results of that recall election. During that timeframe, the MCVR database will remain locked and cannot be changed.

10. Meanwhile, the certification date for Missouri’s general election is August 25, 2026, under state law. At that time, the congressional district lines will already be set up in the MCVR database, and the database cannot be changed. Thus, there is no time window to change

the congressional district lines in the MCVR database between now and the general election on November 3, 2026.

11. Changing a congressional map before an election also involves more than just altering the district assigned to each voter in MCVR. After a map is changed in MCVR, local election authorities must design and test ballots to ensure that the ballots are tabulating correctly. This process usually takes about 2 weeks. Local election authorities also need an additional week to send ballots for printing after we finish designing ballots.

12. Local election officials must comply with federal law that requires them to send mail ballots to military voters no later than 45 days before the election. This federal law is known as the Uniformed and Overseas Citizens Absentee Voting Act (“UOCAVA”).

13. Under State law, local election officials must also prepare ballots for absentee voters no later than 42 days before an election.

14. To comply with these deadlines, local election officials start preparing military and absentee ballots 10 weeks before an election. At that time, we design, proofread, and test the ballots. Then, we send the military and absentee ballots for printing 8 weeks before the election.

15. I am aware that the Missouri Secretary of State can request a waiver from UOCAVA’s deadlines in some circumstances where it is impossible to comply with the 45-day deadline for sending mail ballots to military voters. However, I have never heard of Missouri requesting a waiver or receiving a waiver under UOCAVA. Also, even if we obtained a waiver under UOCAVA, state law would still require us to send ballots to absentee voters 42 days before the election. Thus, even if we could obtain a waiver, that would only provide an additional 3 days to prepare and send ballots to absentee voters.

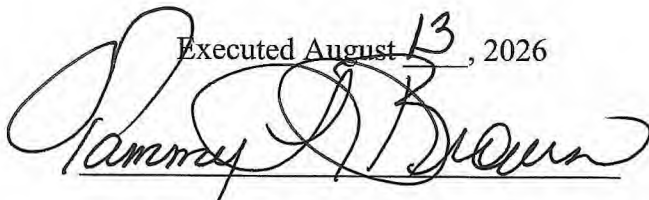
16. I have never heard of a State changing its congressional map after completing its primary election. I cannot imagine how a State could justify forcing voters to vote in different districts for a primary and general election.

17. I was provided the opportunity to review the affidavit of Brianna Lennon, the County Clerk and Election Authority of Boone County. Ms. Lennon states that 2022 congressional district has not been overwritten in MCVR. Ms. Lennon also states that no additional work would be needed to re-implement the 2022 congressional districts.

18. Ms. Lennon's representation is wrong as to Jackson County. In Jackson County, we exclusively implemented the HB 1 congressional map in the MCVR database for the 2026 congressional election. Reverting to the 2022 map would require us to reopen the MCVR database and to manually adjust each precinct's and each voter's congressional district back to the 2022 map. As far as I am aware, there is no "magic button" that would suddenly allow us to revert to the 2022 congressional districts.

19. For these reasons, I believe that is impossible to change Missouri's congressional map after the 2026 primary election. The MCVR database will remain locked between now and the General Election in November 2026. Also, even if the database somehow opened, changing the congressional map, preparing ballots, and sending mail ballots to overseas and absentee voters would take weeks that local election officials do not have.

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

Executed August 13, 2026

Affiant, Tammy Brown

State of Missouri
County of Jackson

In witness whereof, I have hereunto subscribed my name and affixed my official seal.
Subscribed and sworn before me this 13th day of August in the year 2026.

Jessica Herrera
Notary Public

My commission expires: April 15, 2028

