

Not an Official Court Document

Stipulated Exhibit 37

IN THE CIRCUIT COURT OF COLE COUNTY, MISSOURI

RICHARD VON GLAHN,

Plaintiff,

v.

Case No. 26AC-CC00440

DENNY HOSKINS, in his official
capacity,

Defendant.

**AFFIDAVIT OF DEPUTY GENERAL COUNSEL OF NATIONAL
REPUBLICAN CONGRESSIONAL COMMITTEE**

DISTRICT OF COLUMBIA)

) ss.

I, Merrill Weber, of lawful age, being first duly sworn on my oath, state
as follows:

1. I am the Deputy General Counsel of the National Republican Congressional Committee ("NRCC") and that I am duly authorized to speak on its behalf.
2. NRCC is the duly established congressional campaign committee for the Republican Party.
3. NRCC is a federal political committee registered with the Federal Election Commission and a qualified national party committee.
4. NRCC recruits, supports, and coordinates with Republican candidates for Congress; conducts voter registration, voter education, and get-out-the-vote programs; and allocates staff, volunteers, and funds across congressional districts.

5. NRCC works with the Republican National Committee and the Missouri Republican State Committee, both of which devote resources to supporting Republican candidates for Congress and to educating and turning out voters, across the nation, including in Missouri.
6. House Bill 1, enacted by the General Assembly in 2025, redrew the boundaries of Missouri's eight congressional districts (the "HB1 map").
7. Candidate filing for Missouri's 2026 congressional primary elections opened on February 24, 2026 and closed on March 31. Candidates filed for, and campaigned for, office in the districts as drawn by HB1.
8. In reliance on the HB1 map, and beginning immediately after the passage of HB1, NRCC organized its 2026 congressional election program around the HB1 districts. That work included the assignment of staff and volunteers by district, the allocation of budget among districts, the construction of voter targeting and voter contact universes keyed to the HB1 boundaries, the production of voter contact materials identifying each voter's HB1 district, the coordination of the eight congressional district committees under those boundaries, and allocation of funding towards each district based on NRCC's assessment of priorities and needs across the eight districts as drawn by HB1.
9. As of the date of this affidavit, NRCC has expended significant funds and staff and volunteer hours on activities keyed to the HB1 district boundaries.
10. The August 4, 2026 primary election was conducted using the HB1 map. Republican voters in each of the eight districts as drawn by HB1 selected the Republican nominees who will appear on the November 3, 2026 general election ballot.

11. Missouri will have a Republican candidate on the November 3, 2026 general election ballot for each of Missouri's eight congressional seats. NRCC intends allocate support to some or all of those candidates.
12. If a congressional map other than the HB1 map were ordered into effect for the November 3, 2026 general election, the Republican nominees for Congress would stand for election before an electorate materially different from the electorate that nominated them on August 4, 2026. In all eight districts, voters who had no part in selecting a nominee would be asked to vote for that nominee, and would be unable to cast a ballot for the nominee they voted for in the August 4 primary.
13. NRCC would be required to rebuild its voter targeting, contact, and turnout universes; to discard and re-produce voter contact materials; to reassign staff and volunteers among districts; and to reallocate its budget among districts. The funds already expended on district-specific activities under the HB1 map would be lost and could not be recovered.
14. Every dollar and every hour spent redoing that work is a dollar and an hour not spent on voter registration, voter education, and turnout. NRCC has no source of replacement funds for those expenditures.
15. A change of maps after the primary election would also cause substantial voter confusion. Voters who cast ballots in one congressional district on August 4, 2026 would be assigned to a different congressional district in November, and NRCC would be required to expend additional resources informing those voters of the change. In my experience, voter confusion of this kind depresses both voter confidence and voter turnout.
16. The harms described above cannot be undone if districts other than the HB1 districts are used in the November 3, 2026 general election.

17. Separately, if the proposed referendum is placed on the ballot, NRCC would be required to fund and conduct a statewide campaign in opposition to it, including voter education regarding the referendum, turnout operations directed at defeating it, and public communications regarding its legal and policy defects. NRCC estimates that effort could cost millions of dollars, which is not presently budgeted and would be drawn from funds otherwise committed to other races.
18. These harms cannot be undone if Plaintiff's referendum is placed on the ballot.

The foregoing is true and correct according to my best knowledge, information and belief.

Marcell M. Miller
[NAME]

Subscribed and sworn to before me, the undersigned, a Notary Public in and for the county and state aforesaid, on this 17th day of August, 2026.

[Signature]
Notary Public of the State of District
My Commission Expires: May 31 2029 of Columbia.

