

Exhibit O to  
*Hale v. Lee* Motion for Temporary Restraining  
Order and Preliminary Injunction

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
COLUMBIA DIVISION**

**VICKI HALE, EARLE FISHER,** )  
**TELISE TURNER, HEDY WEINBERG,** )  
**STEPHEN COHEN, CHAZ MOLDER,** )  
**CHANEY MOSLEY,** )  
**JUSTIN PEARSON, and the TENNESSEE** )  
**DEMOCRATIC PARTY,** )

*Plaintiffs,* )

v. )

**BILL LEE, Governor,** )  
**TRE HARGETT, Secretary of State;** )  
**MARK GOINS, Tennessee Coordinator of** )  
**Elections; all in their official capacity only,** )

*Defendant.* )

**CASE NO. \_\_\_\_\_**

**DECLARATION OF TELISE TURNER**

I, Telise Tuner, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct based on my personal knowledge:

1. I am over the age of eighteen (18), of sound mind, and competent to testify to the matters set forth herein.
2. I am a resident and registered voter of Shelby County, Tennessee.
3. I am engaged civically and politically in my community. I am a regular voter, and I have specifically voted in congressional elections, including primary elections to elect party nominees for congressional elections.
4. I am also active in the Democratic Party. I presently serve as the 4<sup>th</sup> Vice President of the National Federation of Democratic Women, and I am the former President of the Tennessee Federation of

Democratic Women. I have served in a variety of leadership positions with the Democratic Party in Memphis and Shelby County.

5. In 2026, I have been particularly involved in the 9<sup>th</sup> Congressional District campaign. I have attended and participated in events, and I have contributed financially to both Congressman Steve Cohen's campaign and the campaign of State Representative Justin Pearson. I have also contributed to the Tennessee Democratic Party for its work in this race.
6. My involvement in the 9<sup>th</sup> Congressional District campaign has focused on engaging with voters on issues important to the people of Memphis and Shelby County, where I have resided for years.
7. I am aware that this week the Tennessee General Assembly has approved new geographic boundaries for Tennessee's congressional districts, including the 9<sup>th</sup> Congressional District. In fact, I understand that Memphis and Shelby County have been divided into three separate congressional districts and each of them include rural West Tennessee counties and even Middle Tennessee suburban counties near Nashville. I am not familiar with all of these geographic areas, and the issues I have been engaged on during this campaign cycle largely have nothing to do with those areas and the people who live there.
8. While I have resided in the 9<sup>th</sup> Congressional District for many years, I am not certain which congressional district I live in now as a result of the Tennessee General Assembly's actions this week to redraw congressional districts in the middle of an election campaign. Additionally, I do not even know who the candidates will be for the congressional district where I reside, and therefore I do not know which candidate I will support in the campaign for the district where I reside.
9. I understand that the Tennessee General Assembly has not only changed the geographic boundaries of the congressional districts that include parts of Memphis and Shelby County, but also has

implemented new qualifying deadlines for candidates to qualify and then run in these newly drawn districts. To be active and involved in a congressional campaign in a new district, I'll have to work to become familiar with the candidates and I'll need to take action to figure out how to associate and support a new candidate for a new district where I reside.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 7 day of May, 2026.



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Telise Turner

## SIGNATURE CERTIFICATE



## REFERENCE NUMBER

0B9413A7-21B4-49B4-96CB-BF1A162DEA56


## TRANSACTION DETAILS

**Reference Number**  
0B9413A7-21B4-49B4-96CB-BF1A162DEA56**Transaction Type**  
Template Signer Link**Sent At**  
05/07/2026 11:24:55 PM EDT**Executed At**  
05/07/2026 11:45:30 PM EDT**Identity Method**  
email**Distribution Method**  
manual**Signed Checksum**  
c3f5ce3dc48bdc90a7991034d82d950ce98b31ee58da93f0a1aa96f13bd568ea**Signer Sequencing**  
Disabled**Document Passcode**  
Disabled**eIDAS Authentication**  
Disabled

## DOCUMENT DETAILS

**Document Name**  
Telise Turner Declaration FINAL FINAL**Filename**  
Telise\_Turner\_Declaration\_FINAL\_FINAL.pdf**Pages**  
3 pages**Content Type**  
application/pdf**File Size**  
145 KB**Original Checksum**  
875976d20d0b4f7deebfbde49442c670e656b037220c6027e36cec66fa2c5b4d

## SIGNERS

SIGNER	E-SIGNATURE	EVENTS
<b>Name</b> Telise Turner	<b>Status</b> signed	<b>Viewed At</b> 05/07/2026 11:24:55 PM EDT
<b>Email</b> tturner3@bellsouth.net	<b>Multi-factor Digital Fingerprint Checksum</b> 106fd2737853b22aab06e9cbaa291c2d9a9dbff673574d4b22095803e8eedd47	<b>Identity Authenticated At</b> 05/07/2026 11:45:30 PM EDT
<b>Components</b> 3	<b>IP Address</b> 146.75.234.48	<b>Signed At</b> 05/07/2026 11:45:30 PM EDT
	<b>Device</b> Safari via Mac	
	<b>Drawn Signature</b> 	
	<b>Signature Reference ID</b> C11A3A9A	
	<b>Signature Biometric Count</b> 7	

## AUDITS

TIMESTAMP	AUDIT
05/07/2026 11:24:55 PM EDT	Signer viewed the document on Safari via Mac from 146.75.234.48.
05/07/2026 11:26:49 PM EDT	Telise Turner (tturner3@bellsouth.net) was requested to verify their identity.
05/07/2026 11:27:07 PM EDT	Telise Turner (tturner3@bellsouth.net) was requested to verify their identity.
05/07/2026 11:45:30 PM EDT	Telise Turner (tturner3@bellsouth.net) signed the document on Safari via Mac from 146.75.234.48.
05/07/2026 11:45:30 PM EDT	Telise Turner (tturner3@bellsouth.net) authenticated via email on Safari via Mac from 146.75.234.49.