

Exhibit Q 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 VICKI HALE**

I, Vicki Hale, 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 Maury County, Tennessee.
3. I am politically active. 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 serve on the Tennessee Democratic Party Executive Committee, and I routinely support Democratic candidates by attending events, volunteering, putting up yard signs, and in other ways by voicing my support.

5. I have been particularly involved in Chaz Molder's campaign for the Democratic Party's nomination to run in Tennessee's 5<sup>th</sup> Congressional District against the Republican nominee. I signed Mr. Molder's petition for him to qualify as a candidate for that race. I have contributed to his campaign financially. I have talked with voters about why I am supporting him politically in this race, and I have attended events to support his candidacy. I am particularly active in Mr. Molder's campaign because I have resided in what the Tennessee General Assembly approved as within the geographic boundaries of the 5<sup>th</sup> Congressional District in 2022. Because I resided in that district, I have been as active politically as I reasonably could be in this campaign.
6. Another reason I have been involved in Mr. Molder's campaign is because of the geographic boundaries of the 5<sup>th</sup> Congressional District as enacted by the Tennessee General Assembly in 2022. Prior to the 2022 election, the 5<sup>th</sup> Congressional District included all of Davidson County, Tennessee, and parts of other areas, but it did not include Maury County. After 2022, the 5<sup>th</sup> Congressional District included a large portion of Davidson County, in addition to Maury County, and I became involved in Mr. Molder's campaign because I believed his candidacy could appeal to voters in this specific geographic district. I also used my financial resources and voice to communicate about his candidacy in a positive way in various areas of the district.
7. Yet another reason I have been meaningfully involved in supporting Mr. Molder's campaign is that I expected his opponent to be Congressman Andy Ogles in the general election. My views are very much different than Congressman Ogles' views, and I was eager to use my voice, resources, and time to advance the candidacy of Mr. Molder who I believe could win more votes in support of his candidacy than Congressman Ogles could win.
8. I am aware that this week the Tennessee General Assembly has approved new geographic boundaries for Tennessee's congressional districts, including the 5<sup>th</sup> Congressional District. I

understand that the 5<sup>th</sup> Congressional District includes large portions of West Tennessee counties, including Shelby County. I am not familiar with these new geographic boundaries, but I know that the campaign I have supported and my activity in supporting this campaign has not been focused in these areas.

9. While I know the congressional boundaries have changed as a result of these newly drawn congressional districts in May 2026, I am still not sure which district I reside in. I do know that my campaign efforts for the previously draw 5<sup>th</sup> Congressional District that Mr. Molder qualified to run in and has been campaigning may have been wasted or at least direct towards voters who will be unable to vote in this election.
10. I understand that the Tennessee General Assembly has not only changed the geographic boundaries of the congressional district, including the 5<sup>th</sup> Congressional District where I have been active in a campaign, 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 research 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.

*Vicki Hale*

\_\_\_\_\_  
Vicki Hale

## SIGNATURE CERTIFICATE



**REFERENCE NUMBER**  
BE46FE83-C073-4E7F-8364-C1C087D1CCA5

### TRANSACTION DETAILS

**Reference Number**  
BE46FE83-C073-4E7F-8364-C1C087D1CCA5

**Transaction Type**  
Template Signer Link

**Sent At**  
05/07/2026 10:10:34 PM EDT

**Executed At**  
05/07/2026 10:14:22 PM EDT

**Identity Method**  
email

**Distribution Method**  
manual

**Signed Checksum**  
bf660d4254a4cc370e5929d0651a45639be5a9cbb4451a3ca8860f87ba82c378

**Signer Sequencing**  
Disabled

**Document Passcode**  
Disabled

**eIDAS Authentication**  
Disabled

### DOCUMENT DETAILS

**Document Name**  
Vicki Hale Declaration FINAL

**Filename**  
Vicki\_Hale\_Declaration\_FINAL.pdf


**Pages**  
3 pages

**Content Type**  
application/pdf

**File Size**  
148 KB

**Original Checksum**  
01e6f5e4ccbf549772211e549a59f8dee3415c19ee0938a11f8ad1f1f9708b0

## SIGNERS

SIGNER	E-SIGNATURE	EVENTS
<b>Name</b> Vicki Hale	<b>Status</b> signed	<b>Viewed At</b> 05/07/2026 10:10:34 PM EDT
<b>Email</b> vhale116@yahoo.com	<b>Multi-factor Digital Fingerprint Checksum</b> 3d4d84dc0c0d0c4a33463f9960cf310fc8b5f5b08bf3e022f57a4111a2454277	<b>Identity Authenticated At</b> 05/07/2026 10:14:22 PM EDT
<b>Components</b> 3	<b>IP Address</b> 97.76.235.197	<b>Signed At</b> 05/07/2026 10:14:22 PM EDT
	<b>Device</b> Mobile Safari via iOS	
	<b>Typed Signature</b> 	
	<b>Signature Reference ID</b> F8DD2EC1	

## AUDITS

TIMESTAMP	AUDIT
05/07/2026 10:10:34 PM EDT	Signer viewed the document on Mobile Safari via iOS from 97.76.235.197.
05/07/2026 10:13:51 PM EDT	Vicki Hale (vhale116@yahoo.com) was requested to verify their identity.
05/07/2026 10:14:22 PM EDT	Vicki Hale (vhale116@yahoo.com) signed the document on Mobile Safari via iOS from 97.76.235.197.
05/07/2026 10:14:22 PM EDT	Vicki Hale (vhale116@yahoo.com) authenticated via email on Mobile Safari via iOS from 97.76.235.197.