

Exhibit S 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

TELISE TURNER, HEDY WEINBERG,)
STEPHEN COHEN, CHARLES)
'CHAZ' MCIVER 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 MAYOR CHAZ MOLDER

I, Charles 'Chaz' McIver Molder, 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. I am a resident and registered voter of Maury County, Tennessee, and I am a previously announced (September 4, 2025) and duly qualified candidate for the United States House of Representatives for Tennessee's 5th Congressional District in the August 6, 2026 federal primary election. I am currently the elected Mayor of the City of Columbia. I make this Declaration in support of Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction. The facts stated herein are based on my own personal knowledge.

2. I publicly announced my candidacy for the 5th Congressional District on September 4, 2025, in Columbia, Tennessee, and have been actively campaigning continuously since that time. From the moment of my public announcement, and during all times while contemplating whether to be a candidate for the 5th Congressional District, every strategic, financial, and organizational decision I made was premised on the boundaries of the 5th Congressional District as enacted by the Tennessee General Assembly following the 2020 Census and as in effect throughout the 2024 election cycle (the "2024 Map"). Under the 2024 Map, the 5th Congressional District is anchored in and principally consists of Maury County and its neighboring counties and included parts of Davidson and Wilson counties. That geographic configuration has defined the universe of voters I sought to represent, the issues I prioritized, the coalitions I built, and the resources I deployed and am in the process of deploying, including contractual obligations which remain outstanding and payable in the weeks and months ahead.

3. I timely filed my qualifying petition with the Tennessee Secretary of State to appear on the August 6, 2026 primary ballot for the 5th Congressional District before the statutory qualifying deadline of noon on March 10, 2026, as required by Tenn. Code Ann. § 2-5-101(a)(1). My petition contained the signatures of qualified voters who reside within the 5th Congressional District as drawn under the 2024 Map and included signatures from residents of all counties within the 5th Congressional District as drawn under the 2024 Map—Lewis, Marshall, Maury, and portions of Williamson, Davidson and Wilson counties. Those signatures were collected by my campaign based on the addresses of registered voters within the 5th Congressional District based on the 2024 Map. My petition was accepted, my signatures were verified, and I was certified as a qualified candidate for the 5th Congressional District by the appropriate election officials.

4. Since announcing my candidacy in the fall of 2025, my campaign has engaged in sustained, direct voter contact within the 5th Congressional District as drawn under the 2024 Map. I and my campaign staff and volunteers have personally made phone calls and text messages, attended community functions, house gatherings in living rooms and on back porches, neighborhood meetings, civic association gatherings, and faith community events, and held in-person meet-and-greets across 5th Congressional District.

5. My campaign has raised significant funds from contributors who supported my candidacy specifically because I was running to represent the 5th Congressional District based on the 2024 Map. A significant portion of my donors are themselves residents of the then-existing 5th Congressional District; many others, both inside and outside Tennessee, contributed because of my stated intention and ability to represent the particular community of interest reflected in the existing district – a district represented by an incumbent representative named Andy Ogles. Every contribution solicitation I have signed, every fundraising email my campaign has sent, every pitch I have made to donors, and every campaign finance report I have filed with the Federal Election Commission has been premised on a candidacy in the 5th Congressional District as drawn under the 2024 Map and an anticipated general election contest against Andy Ogles.

6. The infrastructure of my campaign is likewise built entirely around the existing 5th Congressional District and running an anticipated general election against Andy Ogles for the counties in the congressional district based upon the 2024 Map, *to-wit*: Lewis, Marshall, Maury and portions of Williamson, Davidson and Wilson counties. I have leased campaign office space in Maury County, am days away from signing a lease for campaign office space in Davidson County, hired and trained paid campaign staff and consultants, have a confirmed internship program with fifteen offers outstanding to high school and college-age students from counties

represented in the congressional district from the 2024 Map. Additionally, our campaign has recruited and organized hundreds of volunteers from neighborhoods within the district, secured endorsements from elected officials, organizations, and community leaders whose constituencies lie within the existing district, and developed policy platforms responsive to the specific needs of 5th Congressional District residents. These commitments represent months of work and substantial financial expenditures, all of which were made in reliance on the 2024 Map and the configuration of the 5th Congressional District.

7. The Tennessee General Assembly has enacted legislation that redraws Tennessee's congressional district boundaries, long after the March 10, 2026 qualifying deadline for the August 6, 2026 primary had passed. I have reviewed the boundaries of the new 5th Congressional District as set forth in the challenged legislation. The new map dramatically alters the 5th Congressional District by eliminating Davidson County, Wilson County, and Marshall County voters from the district. It splits Lewis County and Maury County, which had been totally contained within the 5th Congressional District in the 2024 Map, and adds a sweeping set of counties from Hickman County, up to the Kentucky border, west to the Mississippi River, and includes parts of Shelby County. As a result, a significant portion of the voters whose doors I have knocked, whose calls I have returned, whose contributions I have received, and who have been inspired by our policies and the movement we are creating, and whose support I have cultivated over more than half a year, no longer reside in the district for which I am now qualified to run under the new legislation. Indeed, many of the signatures on my Qualifying Petition, which specifically lists the counties and portions thereof contained within the district, can no longer serve as qualifiers under the newly drawn 5th Congressional District boundaries.

8. The mid-cycle redistricting causes my campaign concrete, immediate, and irreparable harm. The voter contact data my campaign has built—including identified supporters,

persuasion targets, volunteer lists, and donor relationships—is now of greatly diminished value because much of it pertains to voters who no longer reside in the redrawn 5th Congressional District. The direct mail, digital advertising, and paid media I have already purchased and delivered to voters within the existing 5th Congressional District cannot be recovered, and any further communications will require new geographic targeting, new lists, new advertising, and new vendor expenditures—at a time when fewer than ninety days remain before the August 6, 2026 primary.

9. The mid-cycle redistricting also re-opens the qualifying deadline for the 5th Congressional District, allowing new candidates to join the race and current candidates, such as Andy Ogles, to leave the race if they desire, or choose a new race if they desire. A changing list of candidates and potential opponents will require my campaign to incur costs for a new race that were not contemplated at the time I publicly announced my candidacy and/or as of the March 10, 2026 qualifying deadline. The voter contact data my campaign has built—including identified supporters, persuasion targets, volunteer lists, and donor and volunteer relationships—is now of significantly diminished value because much of it pertains to voters drawn out of the redrawn 5th Congressional District. The direct mail, digital advertising, and paid media I have already purchased and delivered to voters within the then existing 5th Congressional District cannot be recovered, and any further communication will require new geographic targeting, new lists, new advertising, and new vendor expenditures—at a time when fewer than ninety days remain before the August 6, 2026 primary. In effect, the new map and new opposing candidates forces me to restart a campaign which has been underway more than six months, without funds I have already spent and cannot recoup, and with a fraction of the time I had originally planned to introduce myself to voters.

10. The mid-cycle redistricting also severs coalitions and relationships I have built over time with the voters and supporters who have invested their time, money, and trust in my candidacy. Voters who circulated my petitions, donated to my campaign, hosted house gatherings on my behalf, posted yard signs, and committed to vote for me on August 6, 2026 will, under the new map, find themselves placed in a different congressional district where my name will not appear on their ballot, or alternatively will be told that the candidate they qualified to support is no longer running in the same race in which they had been preparing to vote.

11. For all the foregoing reasons, I respectfully ask this Court to enter a temporary restraining order and preliminary injunction barring Defendants from implementing the newly enacted congressional map for the 2026 election cycle and ordering that the August 6, 2026 primary election proceed under the 2024 Map under which I and other candidates have qualified, campaigned, and competed and under which registered voters have qualified and supported my candidacy.

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

Executed this ____ day of _____, 2026, in Maury County, Tennessee.



Charles 'Chaz' McIver Molder
Mayor, Columbia, Tennessee
Qualified Candidate for U.S. Congress TN-5 (2024 Maps)