

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

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

**TELISE TURNER, HEDY WEINBERG,)
STEVE COHEN, CHARLES 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. _____

JUDGE _____

DECLARATION OF CHANEY MOSLEY

I, Chaney Mosley, Ph.D., 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 Davidson County, Tennessee, and I am a duly announced and qualified candidate for the United States House of Representatives for Tennessee's 6th Congressional District in the August 6, 2026 federal primary election. I am a United States military veteran and professor at Middle Tennessee State University. 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 6th Congressional District in October 2025 and have been actively campaigning continuously since that time. From the moment I launched my campaign, every strategic, financial, and organizational decision I made was premised on the boundaries of the 6th 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 6th Congressional District is anchored in and principally consists of portions of Davidson County, Sumner County, portions of Wilson County, Trousdale County, Macon County, Smith County, Van Buren County, and further counties to the east. 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.

3. I timely filed my qualifying petition with the Tennessee Secretary of State to appear on the August 6, 2026 primary ballot for the 6th 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 contains the signatures of qualified voters who reside within the 6th Congressional District as drawn under the 2024 Map. Those signatures were collected by my campaign based on the addresses of registered voters within 6th Congressional District and the under the 2024 Map. To my knowledge, my petition was accepted, my signatures were verified, and I was certified as a qualified candidate for the 6th 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 6th Congressional District as drawn under the 2024 Map. My campaign and I have made phone calls and text messages, attended community forums, neighborhood meetings, civic association gatherings, and other events, and held in-person meet-

and-greets across the 6th Congressional District. Every voter list we used and every targeting model we built was generated using the precinct and block boundaries of the 6th Congressional District as it has existed since the 2022 redistricting cycle.

5. My campaign has raised significant funds from contributors who supported my candidacy specifically because I was running to represent the 6th Congressional District as currently constituted. Many of my donors are themselves residents of the existing 6th 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 John Rose. Every contribution solicitation I have signed, every pitch I have made to donors, and every campaign finance report I have filed with the Federal Election Commission has been premised on, and reported, a candidacy in the 6th Congressional District as drawn under the 2024 Map.

6. The infrastructure of my campaign is likewise built entirely around the existing 6th Congressional District. I have fundraised, worked with volunteers from neighborhoods and community leaders whose constituencies lie within the existing district, and spent time and money developing policy platforms responsive to the specific needs of the 6th Congressional District residents. These commitments represent months of work and campaign expenditures, all of which were made in reliance on the 2024 Map and the configuration of the 6th Congressional District.

7. The Tennessee General Assembly has enacted legislation that redraws Tennessee's congressional district boundaries after the qualifying deadline for the August 6, 2026 primary has already passed. I have reviewed the boundaries of the new 6th Congressional District as set forth in the challenged legislation. The new map dramatically alters the 6th Congressional District by,

among other things, eliminating most of Sumner County, Warren County, Cannon County, Trousdale County, and Macon County voters from the district. As a result, a significant portion of the voters whose votes I have pursued, whose calls I have returned, whose contributions I have received, and whose support I have spent more than half a year cultivating no longer reside in the district for which I qualified to run.

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 drawn out of the redrawn 6th Congressional District. The expenses my campaign has incurred within the existing 6th Congressional District cannot be recovered, and any further communication will require new geographic targeting, new lists, new creative, 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 6th Congressional District, allowing new candidates who had not previously had an active campaign to now join the race. These new candidates will need to be researched and voter contact will have to change if new candidates are now allowed to enter the race. It is unknown to me, but my likely opponent may change. 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 drawn out of the redrawn 6th Congressional District. The work I have done and resources I have spent communicating with voters within the existing 6th Congressional District cannot be recovered, and any further communication will require new geographic targeting, new lists, new creative, 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 candidates forces me to restart a campaign I have been waging for more than six months, with money 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 my associational relationship with the voters and supporters who have invested their time, money, and trust in my candidacy. Voters who signed my petitions, donated to my campaign, told me they intended to host house parties on my behalf, and committed to vote for me on August 6, 2026 may, 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 they had been preparing to vote in.

11. As a military veteran, I am specifically concerned that my supporters and likely voters who live overseas will be disenfranchised by the mid-cycle redistricting, especially in light of the fact that Tennessee election officials have sworn that such redistricting will disenfranchise military and overseas voters, and that postponing election-related deadlines will cause irreparable harm to all Tennessee voters.

12. 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.

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

Executed this 7th day of May, 2026.

Chaney Mosley
Chaney Mosley (May 7, 2026 23:05:21 CDT)

Chaney Mosley

Mosley Declaration - FINAL

Final Audit Report

2026-05-08

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