

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

VICKI HALE, EARLE FISHER,)	
TELISE TURNER, HEDY WEINBERG,)	
STEPHEN COHEN, CHARLES ‘CHAZ’)	
MCIVER MOLDER, CHANEY)	
MOSLEY, JUSTIN PEARSON, and the)	
TENNESSEE DEMOCRATIC PARTY,)	
)	
<i>Plaintiffs,</i>)	CASE NO. 3:26-cv-00603
)	
v.)	JUDGE CAMPBELL
)	
BILL LEE, Governor,)	
TRE HARGETT, Secretary of State;)	
MARK GOINS, Tennessee Coordinator)	
of Elections; all in their official capacity)	
only,)	
)	
<i>Defendants.</i>)	

SUPPLEMENTAL 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.

2. I am attesting to the statements in this Supplemental Declaration to supplement the statements I made in a Declaration filed in this matter on May 8, 2026.

3. Under House Bill 7003/Senate Bill 7003 passed by the Tennessee General Assembly during its Second Extraordinary Session and signed by Governor Lee on May 7, 2026, my home in the City of Columbia, Maury County, was moved from the pre-existing Fifth

Congressional District into a redrawn Ninth Congressional District, which now extends some 200 miles westward from the City of Columbia to Shelby County, including parts of Memphis. Similarly, the new Fifth Congressional District is not the Fifth Congressional District I qualified to run in under the rules and deadlines then in place, and where I have been campaigning since, at a minimum, the date of my public announcement regarding my candidacy on September 4, 2025..

4. Under House Bill 7001/Senate Bill 7001 passed by the Tennessee General Assembly during its Second Extraordinary Session and signed by Governor Lee on May 7, 2026, and based upon correspondence I received on Saturday, May 9, 2026, via overnight certified mail from the Tennessee Coordinator of Elections Mark Goins, I understand that I have until noon on May 15, 2026, to notify the Tennessee Coordinator of Elections (and, thereby, the voters of Tennessee) if I choose not continue to be a candidate in Congressional District Five. Alternatively, by noon on May 15, 2026, I can notify the Tennessee Coordinator of Elections that I intend to run in a congressional district created by the General Assembly on May 7 other than the Fifth Congressional District. .

5. In other words, even though I qualified to run in a congressional district that could not be redrawn under Tenn. Code Ann. § 2-16-102 until the 2030 census (this restriction was repealed by House Bill 7002/Senate Bill 7002 during the Second Extraordinary Session), the Tennessee General Assembly's May 7 legislation removed me from that district and now requires me, by noon on Friday, May 15, to notify the Tennessee Coordinator of Elections and, therefore, the public, which of these newly drawn districts I choose to be a candidate in, even though I am a plaintiff in this lawsuit, which challenges the imposition of these new districts on this timeline in this Court. I was (understandably) only legally qualified to run in the pre-existing Fifth Congressional District prior to the passage on May 7 of Section 2 of House Bill 7001/Senate Bill

7001, as that bill repealed the requirement in Tenn. Code Ann. § 2-13-209 that candidates reside in the congressional district where they seek to qualify as a primary election candidate.

6. I decided to announce my candidacy for Congress in the previously drawn Fifth Congressional District largely due to the geographic scope of the District, which included my hometown of Columbia and home county of Maury, large sections of south and east Nashville, significant portions of Williamson County and Wilson County, and all of Lewis County and Marshall County. I also decided to run for Congress in the Fifth Congressional District to defeat Congressman Andy Ogles, under the boundaries then and there set. Andy Ogles has served as Congressman in this District since 2023. I have very different views and opinions of Congressman Ogles both in substance and style and disagree with him on many policy and political issues which my campaign has previously articulated via paid and non-paid communications. I also disagree with much of his personal conduct in professional and non-professional capacities since his election to Congress in 2022. Since my announcement in September 2025, I have conducted my campaign and used my voice to offer Tennesseans a distinct and different type of candidate to serve in this office with a much different voice and approach to issues and people.

7. The General Assembly's May 7 legislation permits me to run in the newly drawn Fifth Congressional District—the same district in which Congressman Ogles now lives—even though the legislation removed my home from that District. And the May 7 legislation permits me to run in any other congressional district in the state, including the Ninth Congressional District, where the legislation adjusted the district maps to include my home, but also including any other Congressional District in the state.

8. Requiring me to communicate my preference concerning how to participate in an election on terms I am actively seeking to enjoin at this late stage of the election cycle as violations

of my constitutional rights to vote and associate would compel me to speak in tacit endorsement of legislation that should be enjoined for this election cycle.

9. Requiring me to take action with the State, or to decide not to take action, by noon on May 15, 2026, before this Court has determined whether enactment of new congressional districts for the 2026 cycle violates my constitutional rights and the constitutional rights of voters across Tennessee, places me and other candidates who qualified by the March 10, 2026, qualifying deadline in an untenable position. Put differently, I and other congressional candidates should not be compelled by the State to tacitly endorse an election structure that violates our constitutional rights and that we are, therefore, actively asking this Court to enjoin for the 2026 election.

10. For this reason, I respectfully ask this Court to enter a temporary order restraining the State from implementing and enforcing the legislation redrawing Tennessee's congressional maps for the 2026 election cycle, and particularly to enjoin the noon May 15, 2026, deadline for all duly qualified candidates to declare in which newly constituted congressional district we choose to run. Such an injunction would prevent the State from coercing me, and other candidates, to communicate a message of tacit support for the General Assembly's unconstitutional attempt to impose new congressional districts on candidates after the qualification window has closed and within a few months of the election.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 10th date of May, 2026.



Mayor Chaz Molder

SIGNATURE CERTIFICATE



REFERENCE NUMBER
D3377346-22A7-4C1A-B645-CABEAE227D79

TRANSACTION DETAILS

Reference Number
D3377346-22A7-4C1A-B645-CABEAE227D79

Transaction Type
Template Signer Link

Sent At
05/10/2026 03:02:54 PM EDT

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Distribution Method
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Signed Checksum
ddcd1653fc005d6c4ceca61b2c77a7cc94d33c93c1da9653d86e422a2d2865ce

Signer Sequencing
Disabled

Document Passcode
Disabled

eIDAS Authentication
Disabled

DOCUMENT DETAILS

Document Name
Chaz Molder Supplemental Declaration

Filename
Chaz_Molder_Supplemental_Declaration.pdf


Pages
4 pages

Content Type
application/pdf

File Size
156 KB

Original Checksum
a4802e1f9cb5e47d332b8ef4aba0f041a7ef0734e0234c24990adc76df527c4c

SIGNERS

SIGNER	E-SIGNATURE	EVENTS
Name CHARLES M MOLDER Email chaz.molder@gmail.com Components 2	Status signed Multi-factor Digital Fingerprint Checksum a6f7a427fa4e41c6504db34b58e594ddfc3c7bc8fa56df450699e0c1eda02fcc IP Address 76.9.162.180 Device Mobile Safari via iOS Drawn Signature  Signature Reference ID 57993CE3 Signature Biometric Count 1	Viewed At 05/10/2026 03:02:54 PM EDT Identity Authenticated At 05/10/2026 03:04:33 PM EDT Signed At 05/10/2026 03:04:33 PM EDT

AUDITS

TIMESTAMP	AUDIT
05/10/2026 03:02:54 PM EDT	Signer viewed the document on Mobile Safari via iOS from 76.9.162.180.
05/10/2026 03:04:33 PM EDT	CHARLES M MOLDER (chaz.molder@gmail.com) signed the document on Mobile Safari via iOS from 76.9.162.180.
05/10/2026 03:04:33 PM EDT	CHARLES M MOLDER (chaz.molder@gmail.com) authenticated via email on Mobile Safari via iOS from 76.9.162.180.

Dated: May 10, 2026

Respectfully submitted,

/s/ David W. Garrison

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this *Supplemental Declaration of Mayor Chaz Molder* was filed electronically with the Clerk's office and served upon Defendants using the Court's CM/ECF system on May 10, 2026, through their counsel of record as indicated below:

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/s/ David W. Garrison

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