

EXHIBIT I

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

TENNESSEE STATE CONFERENCE
OF THE NAACP, et al,

Plaintiffs,

Case No. 3:26-cv-00638

v.

TRE HARGETT, in his official
capacity as Secretary of State of the
State of Tennessee, et al,

Defendants.

DECLARATION OF DAWN HARRINGTON

I, Dawn Harrington, having been duly sworn, do hereby swear and affirm as follows:

1. I am over the age of 18 years, have personal knowledge of the matters stated herein, am competent to make this declaration, and would testify to the same if called as a witness in Court.
2. I live in Nashville, Tennessee.
2. I am the Executive Director of Free Hearts.
3. Free Hearts was founded in Nashville, Tennessee in 2016.
4. Free Hearts is an organization led by formerly incarcerated women that provides support, education, and advocacy in organizing families impacted by incarceration, with the ultimate goals of reuniting families and keeping families together. It has leadership across 18 counties in Tennessee, including Shelby County.
5. Free Hearts' work includes voter education, voting rights restoration, voter participation, and fighting voter suppression.
6. Free Hearts has members, including Black members, and other members of color who are registered voters and reside in former Congressional District ("CD") 9 and all three of the purported Districts that have been created from dismantled CD 9. The Free Hearts'

members' voting power has been reduced given the configuration of the districts in those counties.

7. Under the new Congressional plan, it is difficult for Black voters and Hispanic voters to elect the candidates of their choice. As a result, many voters have stated they believe their vote does not count. Under such conditions, it is more challenging to persuade many Black voters and Hispanic voters to participate in the electoral process. This is especially true for formerly incarcerated and convicted people who must overcome significant legal and procedural hurdles to restore their voting rights.
8. To combat the effects of the new map on communities of color throughout the state, Free Hearts will have to devote more time and resources to voter registration, voter education, and get-out-the-vote efforts, which would have otherwise been spent on Free Hearts' core mission activities.
15. In bringing this litigation, I understand that Free Hearts stands in the shoes of its members for associational standing purposes. As such, as Executive Director for Free Hearts, I can represent that the organization has at least one member in the aforementioned districts.
16. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 3rd day of June 2026 in Santa Cruz, California.



Dawn Harrington
Executive Director
Free Hearts