

EXHIBIT O

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

TENNESSEE STATE CONFERENCE OF THE
NAACP, LEAGUE OF WOMEN VOTERS OF
TENNESSEE, SHELBY COUNTY VOTERS
ALLIANCE, FREE HEARTS, MEMPHIS
URBAN LEAGUE, VICKIE TERRY, NOEL
HUTCHINSON, PASTOR IVORY JACKSON,
BISHOP MARVIN F. THOMAS, SR.,
TAJUAN STOUT MITCHELL, and GLORIA
SWEET-LOVE,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee,
MARK GOINS, in his official capacity as
Coordinator of Elections for the State of
Tennessee; the STATE ELECTION
COMMISSION, and DONNA BARRETT,
JUDY BLACKBURN, JIMMY ELDRIDGE,
MIKE MCDONALD, SECONDRA
MEADOWS, VANECIA BELSER KIMBROW,
and KENT YOUNCE, in their official capacities
as members of the State Election Commission,

Defendants.

Case No. 3:26-cv-638

**DECLARATION OF GALE JONES CARSON ON BEHALF OF
MEMPHIS URBAN LEAGUE IN SUPPORT OF PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

I, Gale Jones Carson, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a Black U.S. citizen and resident of Memphis, Tennessee, where I have lived all my life.
2. I am a lawfully registered voter. I regularly vote in local, state, and federal elections.

3. I have always voted in the congressional district for Memphis. Prior to 2002, I voted in Congressional District 8. After the 2002 redistricting, I voted in Congressional District 9. After the most recent May 2026 redistricting, I will vote in Congressional District 5.

4. I earned my college degree in broadcast journalism from the University of Memphis. Since then, I have worked as a journalist, in communications at FedEx, as an executive assistant and chief spokesperson for the Mayor of the City of Memphis, and, most recently, as Vice President of Community & External Affairs at Memphis Light, Gas and Water. I retired from my role at Memphis Light, Gas and Water in October 2023.

5. I am currently the President and CEO of the Memphis Urban League (“MUL”). I became Interim President and CEO in March 2024 and became the permanent President and CEO in November 2024.

6. I have been a member of MUL since 2024. During this time, I have been responsible for the overall leadership, management, and strategic direction of the organization. This includes developing and implementing strategic plans, overseeing daily operations, managing staff, and cultivating relationships with stakeholders. Fundraising, financial management, and focusing on impactful programming and events centered around improving and elevating citizens in Memphis and Shelby County to improve and expand their economic opportunities.

7. Through my current leadership role and membership, I am familiar with and receive updates about MUL’s voting-related activities and initiatives that focus on many different issues, including nonpartisan civic engagement, election education, and other advocacy.

8. I also serve on the boards of Cocaine Alcohol Awareness Program Inc. (CAAP), Women’s Foundation for a Greater Memphis, Association of Executives of United Way Agencies (AEUWA), and Memphis & Shelby County Film & Tape Commission and Technology-

Enhanced Advanced Mobility in Tennessee (TEAM TN). I am also a member of the U.S. Commission on Civil Rights State Advisory Committee and National Association for the Advancement of Colored People (NAACP) Tennessee State Conference, and serve as Vice President of the NAACP Memphis branch.

Memphis Urban League

9. MUL, a 501(c)(3) nonprofit and nonpartisan membership organization, is an affiliate of the National Urban league, which was formed in 1910. MUL was founded in 1943 and is one of the 93 affiliates of the National Urban League, serving over 300 communities in 37 states and the District of Columbia. Consistent with National Urban League's nationwide mission, MUL seeks to empower all members of the Memphis community towards self-sufficiency and shared prosperity.

10. MUL is a social justice organization that designs and offers programs to build skills, expand opportunities, and strengthen the Memphis community. We have five key programmatic pillars: workforce & economic development; digital skills & education; education & youth development; business entrepreneurship training accelerator; and financial literacy & empowerment. We also develop programming in other areas through our Memphis Urban League Young Professionals (MULYP) group discussed in greater detail below.

11. As of 2026, we have seven employees, including myself. While our membership count varies depending on how many individuals pay dues each year, we consistently at least have between 25-50 dues-paying members. In addition, we have at least 60 young professionals who pay dues to be a part of MULYP and who are also members of MUL as explained below. We have over 100 members, volunteers, and others on our distribution list.

12. MUL officers and board members frequently convene to discuss updates and programming. The Executive Committee, which includes the Board Chairperson, Vice Chairperson, Secretary, Treasurer and any chairperson of a standing committee, meets at least quarterly to discuss ongoing action items, board agenda items, and events that require Board approval. MULYP members meet monthly to discuss upcoming events, ongoing projects, and any updates from the National Urban League, MUL, or other affiliates.

13. Young professionals, ages 21-40, who want to further MUL's mission can also become a member by joining MULYP, which provides members unique networking, professional development, and volunteer opportunities. Though MULYP has its own leadership team, it still operates within MUL's nonprofit structure and under the leadership of MUL's President and CEO. In addition to MUL's programmatic pillars, MULYP provides critical civil engagement and advocacy support to ensure that Memphians are informed and educated on political issues that affect their lives and communities. Any member of MULYP are automatically members of the National Urban League, National Urban League Young Professionals, and MUL.

14. On behalf of its members and other constituents, MUL expends significant time and resources to hold and sponsor voter education and registration events every year. Many of these events are in collaboration with National Urban League, our MULYP members, local organizations, and school districts to ensure Memphians are registered to vote in advance of upcoming elections. For example, during the 2024 election cycle, MUL and MULYP members knocked on over 250 doors of potential voters, held six get-out-the-vote and voter registration events, four voter registration drives, one canvassing event, and held an event to transport over 80 high school seniors to polls so they could vote for the first time.

Tennessee General Assembly's Targeting of Memphis

15. Based on my experience and role as President and CEO of MUL, I believe Tennessee's General Assembly has targeted Memphis, MUL's members, and Memphians at large. This has made me and other MUL members increasingly concerned as the Legislature tries to dismantle Black Memphians' collective power.

16. The Legislature and Governor Bill Lee's recent actions related to the Memphis-Shelby County School Board is one such example of the State's excessive interference and control over our local governance. On May 22, 2026, Governor Lee signed legislation that allows state officials to seize control over Memphis-Shelby County School Board. I understand that the Governor, alongside two other White state lawmakers, has appointed eight out of the nine-person oversight board that will have complete decision-making power over the faculty decisions, curriculum, and budget of a majority Black school district.

17. This decision, as well as the General Assembly's recently redrawn congressional map breaking up Memphis, has made me and other MUL members concerned that they are intentionally targeting Memphis and Shelby County because we are historically a majority Black city and county.

Impact of the 2026 Congressional Map on MUL and Its Members

18. In preparation for the 2026 midterm elections, MUL and MULYP have spent the last six months engaging with Memphians to educate them on their congressional district, congressional candidates, and ballot issues. As a part of the National Urban League's 2026 Reclaim Your Vote campaign, MUL and MULYP have been preparing in-person and webinar events to educate Memphians on the 2026 midterms voter registration requirements and deadlines, polling locations, and the candidates and issues. MUL has also been working with local organizations

and churches to build out its community outreach efforts and disseminate critical information on the upcoming election, voter registration, and voter education. Much of this work will need to be redone as a result of the legislature's 2026 congressional redistricting.

19. MULYP has also set aside a specific budget dedicated to civic engagement and voter education work in Memphis. Following the 2026 congressional redistricting, MUL and MULYP will work with partner organizations to raise funds to revise its voter education materials and ensure that Memphians are fully educated on their updated congressional district, polling locations, and congressional candidates.

20. Many of our members are also affected by the new 2026 congressional map. Since 2022, members that live in Memphis have understood that they will be voting in Congressional District 9 for the upcoming midterms. For majority of our members—as well as Memphis—that is no longer the case. And, importantly, many of our members and Memphians at large lead full lives—working full time, sometimes working multiple jobs, raising children, taking care of family members—and are not able to closely follow the legislative proceedings or the news to understand the complicated changes to the congressional districts. This has led to confusion and concern about how to vote. I understand that members and other Memphians generally are facing great confusion and concern about which district to vote in, which candidates to vote for, and which polling sites to go to.

21. It is important for me, other members of MUL and Black Memphians to have meaningful influence in congressional representative. It is imperative that we have an elected official who represents and serves our needs. I understand that the Tennessee General Assembly has redrawn the congressional map in a way that makes it impossible for Memphians to elect their candidate

of choice. This has harmed MUL members and Black Memphians at large because it means that we no longer have a say over who represents us.

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct.

Executed on June 7, 2026, in Memphis, Tennessee.

A handwritten signature in blue ink, reading "Gale Jones Carson". The signature is written in a cursive, flowing style.

Gale Jones Carson