

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

CHARLANE OLIVER, REV. DR. JUDY
CUMMINGS, SHANI GLAPION,
QUITEKA MOTEN, and JOSHUA
WESLEY,

Plaintiffs,

v.

RANDY MCNALLY, *in his individual and
official capacity as Speaker of the
Tennessee Senate*; RUSSELL
HUMPHREY, *in his individual and official
capacity as Chief Clerk of the Tennessee
Senate*; and KRISTA LEE CARSNER, *in
her official capacity as Director of
Legislative Administration of the Tennessee
General Assembly*,

Defendants.

Case No.: _____

COMPLAINT

JURY TRIAL DEMANDED

INTRODUCTION

1. When Tennessee State Senator Charlane Oliver took a stand in the General Assembly against the disenfranchisement of Black voters, Senate Speaker Randy McNally and Chief Clerk Russell Humphrey decided to retaliate. They refused to count Senator Oliver's vote against Tennessee's new gerrymandered congressional map, and they imposed a series of punishments that substantially interfere with Senator Oliver's ability to represent her more than 200,000 constituents. In doing so, they infringed Senator Oliver's right to free speech, her constituents' right to equal representation, and their right to freely associate with one another.

2. Senator Oliver represents Tennessee's 19th Senate District, which includes portions of Davidson County. Throughout her career as a civil servant, nonprofit leader, and community

organizer, and now as an elected official, Senator Oliver has been a zealous advocate for voting rights and Black political power.

3. In May 2026, Tennessee Governor Bill Lee called a special legislative session to gerrymander Tennessee's congressional map. The Republican supermajority of the Tennessee General Assembly aimed to redraw the State's map to crack the predominantly Black city of Memphis, Tennessee, into three districts, eliminating the seat that had traditionally represented Memphis and preventing Black voters there from electing a representative of their choice.

4. At the special session, Senator Oliver spoke out against the map. As the last speaker during the Senate floor session before the commencement of voting on the redistricting plan, Senator Oliver denounced the new map as a blatant attempt to disenfranchise Black voters in Memphis.

5. Not content with silencing Black voters through the new map, Defendants Speaker McNally and Chief Clerk Humphrey sought to silence Senator Oliver as well.

6. Chief Clerk Humphrey or one of his subordinates at his direction turned off Senator Oliver's microphone as she was concluding her floor speech. Senator Oliver attempted to continue reading her speech unamplified. She then stood on her desk and unfurled a banner bearing the words "No Jim Crow 2.0" and "Stop the TN Steal," while singing "Lift Every Voice and Sing," known as the Black National Anthem.

7. In retaliation for Senator Oliver's protest, Chief Clerk Humphrey or one of his subordinates at his direction refused to count Senator Oliver's vote against the redistricting plan.

8. Later that month, Speaker McNally imposed further punishments on Senator Oliver. Ordinarily, members of the General Assembly receive a per diem for attending legislative sessions, legislative committee meetings, and other official meetings and events. *See* Tenn. Code

Ann. § 3-1-106. Members also receive travel reimbursements for attending legislative conferences. *See id.* These per diem payments and travel reimbursements represent a significant—and constitutionally guaranteed—portion of legislators’ income in Tennessee. *See* Tenn. Const. art. II, § 23. But, acting without any lawful authority, Speaker McNally sent Senator Oliver a letter announcing that he was denying her a per diem except on days when the General Assembly is in regular session or when her attendance is required for a committee meeting; refusing to reimburse her travel expenses to attend legislative conferences; and reassigning her to a committee that meets only during regular legislative session, compounding the financial impact of the restrictions on her per diem.

9. Those punishments violate Senator Oliver’s First Amendment right to engage in speech on behalf of her constituents and to be free from retaliation for her expressive activity, the Fourteenth Amendment rights of her constituents to equal representation, and the right of Senator Oliver and her constituents to associate with one another for expressive purposes. They also violate the Tennessee Constitution’s requirement that any punishment against a legislator be issued by their chamber as a whole, not at the whim of one or more of its officers.

10. Senator Oliver and the voters she represents refuse to be silenced or intimidated. This lawsuit seeks to expunge Speaker McNally’s and Chief Clerk Humphrey’s unlawful punishments and to correct the legislative record to reflect the vote that Senator Oliver attempted to cast on behalf of her constituents against disenfranchising Black voters.

JURISDICTION AND VENUE

11. The Court has jurisdiction under the United States Constitution and 28 U.S.C. §§ 1331, 1343, and 1367.

12. Venue is proper in this District under 28 U.S.C. § 1391(b). The events or omissions giving rise to Plaintiffs' claims occurred in this District. In addition, upon information and belief, Defendants reside in this District.

PARTIES

13. Plaintiff **Senator Charlane Oliver** serves as a State Senator in the Tennessee General Assembly. Senator Oliver was first elected in 2022 and has represented Senate District 19, located in Davidson County, since 2023. District 19 is a majority-minority Senate district (41.5 percent Black voting-age population; 12.9 percent Latino voting-age population).¹

14. Before her legislative career, Senator Oliver was a civil servant, nonprofit leader, and community organizer. She co-founded and led a nonprofit called The Equity Alliance, a nonpartisan advocacy organization whose mission is to build independent Black political and economic power and keep government in check. Under Senator Oliver's leadership, The Equity Alliance worked to drastically expand Black voter registration and turnout statewide, achieved legal victories to secure voting rights, and fought to ensure that Black and Brown communities received their fair share of COVID-19 economic assistance.

15. Senator Oliver is nationally recognized as a leader on voting rights and racial justice issues and was named the 2020 "Person of the Year" by The Tennessean and a 2019 Woman of Influence by the Nashville Business Journal.

16. Plaintiff **Reverend Doctor Judy Cummings** is one of Senator Oliver's constituents. She is a retired pastor who previously served as the Senior Pastor at New Covenant Christian Church (Disciples of Christ) in Nashville, the first woman to hold that role since the

¹ These data and all other demographic data herein are drawn from the U.S. Census Bureau's 2020 PL 94-171 file for Tennessee, which is available on the U.S. Census Bureau's website (<https://www.census.gov/programs-surveys/decennial-census/about/rdo/summary-files.html#P1>).

church was founded in 1820. Rev. Dr. Cummings voted for Senator Oliver in 2022 and plans to vote for her in the 2026 election.

17. Plaintiff **Joshua Wesley** is another of Senator Oliver's constituents. Mr. Wesley is a labor organizer whose union represents public sector workers. In that capacity, Mr. Wesley works closely with union members on political education, and he believes that a more informed and civically engaged membership improves the union's ability to secure labor demands and expand its membership. Mr. Wesley voted for Senator Oliver in 2022 and plans to vote for her in the 2026 election.

18. Plaintiff **Quiteka Moten** is another of Senator Oliver's constituents. Ms. Moten serves as the Leadership Director of Stand Up Nashville, a nonprofit membership organization that seeks to combat racial and economic inequality in Nashville through strategic research, popular education, and community organizing. Stand Up Nashville organizes to ensure that public investments are used to meet local residents' basic needs in housing, transit, childcare, and health. Ms. Moten voted for Senator Oliver in 2022 and plans to vote for her in the 2026 election.

19. Plaintiff **Shani Glapion** is a community organizer and another of Senator Oliver's constituents. Among other work, Ms. Glapion spearheaded the Black Beer Initiative to get more Black people involved in the craft beer scene. She also was part of brewing The Black Is Beautiful Beer with Jackalope Brewing Company, a worldwide initiative with over 1,000 breweries to help bring awareness in the wake of George Floyd's murder to the issues of police brutality and the injustices that people of color face at the hands of law enforcement, and to raise money for police reform. Ms. Glapion voted for Senator Oliver in 2022 and plans to vote for her in the 2026 election.

20. Defendant **Randy McNally** is Speaker of the Tennessee Senate and therefore the Lieutenant Governor of Tennessee. *See* Tenn. Code Ann. § 8-2-102. He is sued in his individual and official capacities.

21. Defendant **Russell Humphrey** is the Chief Clerk of the Tennessee Senate. *Senate Staff*, Tenn. Gen. Assembly, <https://perma.cc/TBE4-X6SZ> (last visited Sept. 25, 2026). He is sued in his individual and official capacities. Chief Clerk Humphrey oversees and directs an office composed of a Deputy Chief Clerk, a Senior Policy Advisor, a Journal Clerk who is responsible for maintaining the Senate Journal, and three audio/visual specialists.

22. Defendant **Krista Lee Carsner** is the Director of Legislative Administration for the Tennessee General Assembly. *Joint Staff*, Tenn. Gen. Assembly, <https://perma.cc/P28N-D6HQ> (last visited Sept. 25, 2026). The Office of Legislative Administration is responsible for “[p]rovid[ing] for the payment of compensation and of expense and mileage allowances to members” of the General Assembly and “the payment of travel expenses of all employees.” Tenn. Code Ann. § 3-13-101(a)(6).

FACTS

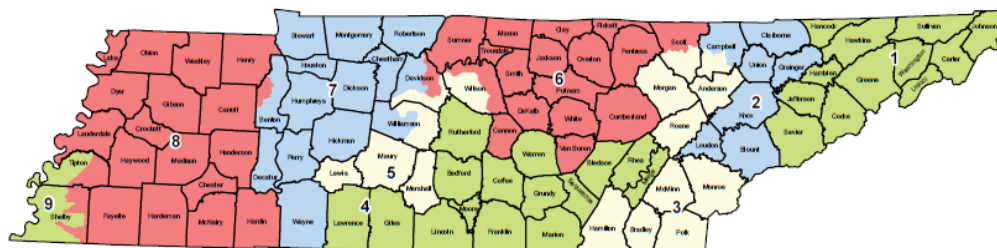
Elimination of Memphis’s Majority-Black Congressional District

23. For at least a century, Tennessee had a congressional district centered around Memphis, Tennessee.² Decennial redistricting following the 2020 Census retained a Memphis-based district as Tennessee’s Ninth Congressional District (Congressional District 9). *See* 2022 Tenn. Pub. Acts, ch. 597, § 1(b)(9). Memphis is Tennessee’s second most populous city, with more than 630,000 residents according to the 2020 Census. It is home to the densest concentration

² Matt Brown, *Tennessee Redistricting Plan Splits Memphis Neighborhoods and Reshapes Midterms as Other States Follow*, AP (May 9, 2026), <https://perma.cc/T8Q2-755V>.

of Black people in Tennessee. According to 2020 Census figures, 61.3 percent of Memphis’s voting-age population is Black.

2022 Tennessee Congressional Districts



24. On May 1, 2026, Tennessee Governor Bill Lee announced plans to convene a Second Extraordinary Session of the 114th General Assembly to “formally review the state’s congressional map.” Press Release, Gov. Lee Calls Special Legislative Session to Review Congressional Map, Tenn. Off. of the Governor (May 1, 2026), <https://perma.cc/Y2TU-K8S2>. In response to this announcement, Speaker McNally posted on social media: “Tennessee now has the opportunity to send another Republican voice to Washington. We intend to seize it.” Randy McNally (@ltgovmcnally), X (May 1, 2026, at 6:06 p.m.), <https://perma.cc/L6K2-35UX>.

25. The push for mid-decade redistricting in Tennessee and other states was spurred by a seismic shift in voting-rights law. Before the Supreme Court’s recent decision in *Louisiana v. Callais*, 146 S. Ct. 1131 (2026), a Memphis-based congressional district was not only deeply rooted in history but also legally necessary to comply with Section 2 of the Voting Rights Act of 1965, 52 U.S.C. § 10301. Congress adopted Section 2 as a “permanent, nationwide ban on racial discrimination in voting.” *Shelby County v. Holder*, 570 U.S. 529, 557 (2013). Among other prohibited conduct, Section 2 forbids any “electoral law, practice, or structure” that “interacts with social and historical conditions to cause an inequality in the opportunities enjoyed by black and white voters.” *Allen v. Milligan*, 599 U.S. 1, 17 (2023) (quoting *Thornburg v. Gingles*, 478 U.S.

30, 47 (1986)). This prohibition against vote dilution required a congressional district covering Memphis to ensure the city’s Black majority maintained an opportunity to elect a candidate of their choice. *See Allen*, 599 U.S. at 18.

26. In *Callais*, the Supreme Court announced a new test for vote dilution that posits maximization of “partisan advantage” as a “constitutionally permissible criterion” and “race-neutral aim” that “States may rely on as desired” in undertaking redistricting. 146 S. Ct. at 1156. Under this test, a court may not impose Section 2 liability unless a plaintiff challenging a redistricting plan offers “an alternative map that achieves all the State’s objectives—including partisan advantage and any of the State’s other political goals—at least as well as the State’s map.” *Id.* at 1157. Because race and party affiliation are highly correlated,³ many have understood *Callais* to permit legislatures to eliminate majority-minority districts previously required by Section 2, so long as doing so is consistent with political objectives.

27. In the immediate aftermath of *Callais*, Tennessee and other States rushed to eliminate majority-minority districts.⁴

28. During the three-day special session called by Governor Lee, the Tennessee General Assembly first repealed a state law specifically prohibiting mid-decade redistricting. 2026 Tenn. Pub. Acts (2d Ex. Sess.), ch. 1 (codified at Tenn. Code Ann. § 2-16-102). The General

³ Pew Rsch. Ctr., *Changing Partisan Coalitions in a Politically Divided Nation* 13–14 (2024), <https://perma.cc/KX2U-5ZGF> (noting that “Black voters continue to overwhelmingly associate with the Democratic Party”); Hajnal, Zoltan, *Dangerously Divided: How Race and Class Shape Winning and Losing in American Politics* 53–55 (2020).

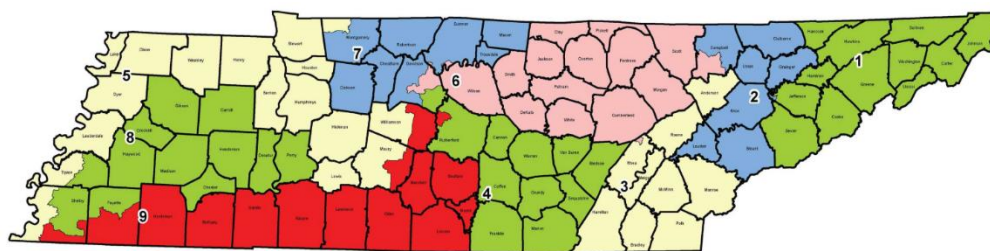
⁴ *See* Rahul Mukherjee, *How Predominantly Black Areas in 6 States Have Been Split Up by Redistricting*, NPR (July 23, 2026), <https://perma.cc/B2GS-M2QT>; Sam Levine, *US Southern States Rush to Redraw Electoral Maps to Dilute Black Voting Power*, The Guardian (May 14, 2026), <https://perma.cc/2HGF-D3GZ>; Debbie Elliott, *Southern States Rush to Draw New Congressional Districts After Supreme Court Ruling*, NPR (May 12, 2026), <https://tinyurl.com/3jwc3ux3>; Matt Ford, *Southern Republicans Are Already Deleting Black Districts*, The New Republic (May 7, 2026), <https://perma.cc/8ACH-SHPS>.

Assembly then enacted H.B. 7003, which adopted new congressional districts. Pub. Acts (2d Ex. Sess.), ch. 3 (codified at Tenn. Code. Ann. § 2-16-103).

29. H.B. 7003 split what had been Congressional District 9 into three congressional districts. Whereas the prior District 9 had had a 61.1 percent Black voting-age population, the Black voting-age population does not constitute a majority in any of the three new districts. See *Sherman v. Hargett*, No. 3:26-cv-616, 2026 WL 1471870, at *3 (M.D. Tenn. May 26, 2026). The new Districts 5, 8, and 9 have Black voting-age populations of 28 percent, 27 percent, and 32 percent, respectively. *Id.*

30. To accomplish the cracking of Congressional District 9 without creating new opportunities for minority representation, H.B. 7003 also altered the three congressional districts covering Davidson County, where Senator Oliver’s Senate district is located. In 2022, the General Assembly had dismantled the congressional district that had long encompassed Davidson County and that contained a heavy concentration of minority voters. H.B. 7003 thus subjected Senator Oliver’s constituents to further redistricting on top of a fundamental change to their representation in Congress less than five years prior.⁵

2026 Tennessee Congressional Districts



⁵ Before taking office, Senator Oliver testified against the 2022 redistricting in her capacity as the Executive Director of The Equity Alliance and presented an alternative map that would have kept diverse Davidson County intact and ensured fair representation of minority Tennesseans in Congress. *Senate Ad Hoc Committee on Redistricting*, Tenn. Gen. Assembly, at 13:45–17:35 (Dec. 14, 2021), <https://tinyurl.com/3dyhv6wh>.

Senator Oliver Speaks Out Against H.B. 7003

31. During the General Assembly’s consideration of H.B. 7003, Senator Oliver used her position as a duly elected member of the Tennessee Senate to speak out on behalf of her constituents and people of color throughout Tennessee to oppose elimination of the State’s only majority-Black congressional district.

32. Hundreds of Tennesseans protested outside the Capitol during the three-day special session that culminated in the enactment of H.B. 7003.⁶ Protesters were joined by Democratic lawmakers, civil rights activists, and clergy.

33. These demonstrations were accompanied by protests inside the Capitol itself, with “chants and boos reverberat[ing] around the halls of the building” during the special session.⁷ Plaintiff Ms. Moten was among those in the gallery during the session.

34. At the same time, the Tennessee House of Representatives’ Republican supermajority adopted rules for the special session to limit public participation and comment, reducing the amount of time afforded to the public to view the proposed new map, and barring any person removed from the gallery or a committee hearing for disorderly conduct from returning for the remainder of the special session.⁸ The lawmakers also rejected Democratic proposals to require public hearings in Memphis on the redistricting effort and to require the legislature to explain the legal basis for mid-decade redistricting and how the new map complies with the U.S. Constitution and the Voting Rights Act.⁹

⁶ Sam Stockard et al., *Tenn. GOP to Limit Public Input on Redrawing U.S. House Map as Protesters Descend on Capitol*, Tenn. Lookout (May 5, 2025), <https://tinyurl.com/3h5a9vud>.

⁷ Emily Cochrane, *Republicans Unveil Map Carving Up Tennessee’s Majority-Black House District*, N.Y. Times (May 6, 2026), <https://tinyurl.com/yce2etdk>.

⁸ Stockard et al., *supra* note 6.

⁹ *Id.*

35. In light of these limitations on public input and transparency, Democratic lawmakers sought to amplify public opposition to the redistricting effort. On the last day of the special session, each of the Senate’s six Democratic members delivered floor speeches in opposition to H.B. 7003. Senator Oliver anchored the opposition by giving the final speech before voting on the bill commenced. She denounced the gerrymandered map as an affront to “descendants of people who were beaten on bridges, jailed in courthouses, murdered in churches, not for committing crimes, but for trying to vote.”¹⁰

36. Senator Oliver condemned the redistricting plan as the latest in a series of “deeply, profoundly wrong things” that had been done to Black Americans by self-described “good people” who told themselves those actions were about “economics, heritage, party, or patriotism.”¹¹ But Senator Oliver argued that, like past wrongs committed against Black people, H.B. 7003 was racism, pure and simple.

37. Senator Oliver argued that H.B. 7003 was possible only because the Supreme Court “fundamentally rewrote the Voting Rights Act of 1965.”¹² No court order, census reapportionment, or any other “legitimate legal trigger” accounted for the General Assembly’s actions.¹³ “The only thing that changed,” Senator Oliver explained, “is that the Supreme Court removed the last legal protection standing between Black voters in Tennessee and this supermajority’s naked ambitions.”¹⁴

¹⁰ *Senate Session – 2d Extraordinary Session – 3d Extraordinary Day*, Tenn. Gen. Assembly, at 2:57:38–2:58:49 (May 7, 2026), <https://tinyurl.com/5t3pfzaf> [hereinafter *Floor Video*].

¹¹ *Id.* at 3:01:12–3:01:44.

¹² *Id.* at 3:01:48–57.

¹³ *Id.* at 3:02:16–47.

¹⁴ *Id.* at 3:02:47–59.

38. Senator Oliver also questioned the premise advanced by H.B. 7003’s proponents that the purpose of the redistricting was solely to secure partisan advantage rather than to disenfranchise Black voters. Noting that the new map achieved its goal of “silencing Memphis” in part by further altering the district lines of Nashville’s sizable and previously cracked Black and Latino populations, while leaving majority-white Democratic-leaning areas intact, Senator Oliver contended that “[t]he racial effect” of the redistricting plan “is not incidental to the partisan goal; the racial effect is the partisan goal.”¹⁵

39. Although Rule 12 of the Senate Rules of Order provides that Senators are allowed to speak for 20 minutes during their first speech on any subject,¹⁶ Speaker McNally interrupted Senator Oliver’s speech after she had spoken for less than her allotted time and informed her that she needed to wrap up.¹⁷

40. Continuing her remarks, Senator Oliver stated, “Tennessee is not a red state, Mr. Speaker. Tennessee is a gerrymandered state. We are a suppressed state, and today y’all are proving my point.”¹⁸

41. At that point, Chief Clerk Humphrey or one of his subordinates at his direction turned off Senator Oliver’s microphone.

42. Observers in the Senate gallery and outside the chamber erupted in protest, as Senator Oliver’s five Democratic colleagues—Senators Raumesh Akbari, Heidi Campbell, Sara

¹⁵ *Id.* at 3:08:29–3:11:02.

¹⁶ *Permanent Rules of Order of the Senate for the One Hundred and Fourteenth General Assembly*, Off. of the Chief Clerk of the Senate, Tenn. Gen. Assembly (2025–2026), <https://perma.cc/Z7U7-A97D> [hereinafter *Senate Rules of Order*].

¹⁷ *Floor Video*, *supra* note 9, at 3:16:53–3:17:00.

¹⁸ *Id.* at 3:18:01–16.

Kyle, London Lamar, and Jeff Yarbrow—stood in the well of the Senate chamber in a display of solidarity with Senator Oliver and opposition to H.B. 7003.¹⁹

43. Refusing to be silenced, Senator Oliver completed her remarks without amplification. She then stood on her desk and unfurled a banner bearing the words “No Jim Crow 2.0” and “Stop the TN Steal,” and sang “Lift Every Voice and Sing,” known as the Black National Anthem.²⁰



44. Chief Clerk Humphrey, along with a Senate sergeant at arms, ripped the banner from Senator Oliver’s hands.²¹

¹⁹ *Id.* at 3:18:20–3:19:48.

²⁰ *See id.* at 3:18:17–3:23:18.

²¹ *Id.* at 3:21:24–3:22:07.



45. Eventually, Senator Bill Powers moved for a vote on H.B. 7003, shouting over the protesting Senators and observers.²²

46. During the roll-call vote, Speaker McNally announced from the dais that “you have to be in your seat to vote.”²³ Rule 59 of the Senate Rules of Order requires Senators to “vote only at [their] desk.” In practice, however, Chief Clerk Humphrey and his subordinates consistently record oral votes by Senators, even when they are not at their desks.

47. When Senator Oliver heard Speaker McNally’s directive, she bent down while standing on her desk to vote against H.B. 7003 by using the electronic voting system on the desk, in compliance with Rule 59’s plain text. She then noticed that her name still appeared in white text on the voting board instead of red, indicating that her no vote had not been recorded. Senator Oliver bent down and pressed the button to record her no vote again, but her name still appeared

²² *Id.* at 3:23:18–28.

²³ *Id.* at 3:26:04–20.

in white text on the voting board.²⁴ At that point, she realized that her button had been turned off intentionally. Ultimately, Senator Oliver’s vote was not recorded.²⁵

48. In contrast, votes against the bill by Senator Oliver’s Democratic colleagues were recorded, even though they—unlike Senator Oliver—were not at their desks and were standing in the well of the Senate during the roll-call vote.²⁶ Indeed, in the video of the floor proceedings, Senator Yarbrow can be heard orally casting his vote while he was still standing in the well.²⁷

49. At the conclusion of voting, Speaker McNally ordered Chief Clerk Humphrey to state the vote. Chief Clerk Humphrey stated the vote as 25 in favor and 5 opposed, omitting Senator Oliver’s no vote.²⁸ Approximately one second later, Speaker McNally declared H.B. 7003 passed with a constitutional majority.²⁹

50. Roughly one minute after Chief Clerk Humphrey announced the vote on H.B. 7003, the Senate adjourned the special session by voice vote.³⁰

The Punishments Imposed on Senator Oliver

51. The refusal by Chief Clerk Humphrey or subordinates under his direction to record Senator Oliver’s vote against H.B. 7003 was the first punishment imposed against her for her expressive speech and conduct during the special session, but it was not the final one.

²⁴ See *id.* at 3:26:11–17.

²⁵ *Legislation 114th General Assembly (2025–2026): HB 7003*, Tenn. Gen. Assembly, <https://perma.cc/6LGJ-3VSQ> (last visited Sept. 25, 2026) (“Votes” tab).

²⁶ See *id.*

²⁷ *Floor Video*, *supra* note 9, at 3:26:00–03.

²⁸ *Id.* at 3:26:20–26.

²⁹ *Id.* at 3:26:27–37.

³⁰ *Id.* at 3:26:38–3:27:38.

52. Speaker McNally added further punishments in a letter that he sent to Senator Oliver, dated May 27, 2026. *See* Ex. A.

53. Speaker McNally stated that Senator Oliver’s “actions on the Senate Floor on May 7, 2026 violate the Senate Rules regarding order and decorum in the chamber.” Specifically, the letter identified as the offending conduct that Senator Oliver “stood on [her] desk in the chamber, unfurled a banner that [she] resisted handing over to the sergeant of arms [sic] when he requested [that she] do so, and sang while dancing on [her] desk.” The letter cites no specific rule that Senator Oliver supposedly violated.

54. As punishment for that conduct, Speaker McNally’s letter announced several punishments intended to reduce Senator Oliver’s pay.

55. The Tennessee Constitution guarantees members of the General Assembly an annual salary, as well as “other allowances for expenses in attending sessions or committee meetings as may be provided by law.” Tenn. Const. art. II, § 23. These other allowances include a per diem not only for attending sessions but also for “other official meetings and endeavors concerning state business and the duties of a legislator” and reimbursement for the costs of attending legislative conferences out of state. Tenn. Code Ann. § 3-1-106(a), (b)(2).

56. In his May 27 letter, Speaker McNally announced that—contrary to what the Tennessee Constitution and state law guarantees as legislator compensation—going forward, Senator Oliver would: (1) be “approved for per diem” only “on days the General Assembly is in session or on days [her] attendance is required for a standing committee meeting”; (2) “not be approved for reimbursement for travel to any legislative conferences held outside the state”; and (3) be “reassigned from the Government Operations Committee to the State and Local Government

Committee,” which meets only during regular sessions. The letter identifies no end date for these punishments.

57. Senator Oliver’s Democratic colleagues received similar letters. But Senator Yarbrow, for example, was punished only through a committee reassignment. Ex. B. Senator Campbell received only a warning. Ex. C. Speaker McNally did not deny any of Senator Oliver’s colleagues their per diem or travel expenses.

Speaker McNally and Chief Clerk Humphrey Had No Power to Punish Senator Oliver

58. Neither Speaker McNally nor Chief Clerk Humphrey have any power to unilaterally impose punishments against Senator Oliver for her alleged misconduct in speaking out on behalf of her constituents and Black voters in Tennessee.

59. The Tennessee Senate as a whole is the sole entity authorized to “punish its members for disorderly behavior.” Tenn. Const. art. II, § 12.

60. Under the Senate Rules of Order, the Clerk “shall preserve the record of the votes of the members by making the printed roll call as authenticated by the Roll Call System a part of the Clerk’s rough journal.” Senate Rule of Order 51. But that Rule does not give the Chief Clerk discretion to prevent a Senator from casting her vote using the electronic roll-call system or to decline to record her vote in the Senate Journal.

61. No constitutional provision or statute provides any “authority . . . to prevent a member of the General Assembly . . . from voting on pending legislation and matters related thereto.” *Legislative Discipline*, Tenn. Op. Att’y Gen. No. 05-163, 2005 WL 3521001, at *3 (Oct. 24, 2005). “[T]he right to vote on legislation is central to the office of state legislator and removing it, even temporarily, is tantamount to expulsion.” *Id.* “[T]he only way either House could deprive a member of the right to vote is by expelling him or her by a two-thirds vote.” *Id.*

62. The Speaker is required under the Senate Rules of Order to “preserve order and decorum,” Senate Rule of Order 2, but only through carefully circumscribed actions designed to ensure contemporaneous control over the chamber that do not amount to punishments.

63. The Speaker is authorized to “speak to points of order in preference to other members” and must “decide questions of order, subject to appeal to the Senate by any member.” *Id.* Under this authority, whenever “any member, in speaking, or otherwise, transgresses the Rules of the Senate, the Speaker shall . . . call him or her to order, in which case the member so called shall immediately sit down, when the point of order shall be at once decided by the Speaker . . . , subject to an appeal to the Senate.” Senate Rule of Order 15. After a point of order is decided, “the member having the floor can proceed, subject to the decision made.” *Id.*

64. In addition, the Speaker is empowered to order that the Senate chamber or gallery be cleared “[i]n case of any disturbance or disorderly conduct” in those areas. Senate Rule of Order 7.

**Senator Oliver Notifies Speaker McNally and Chief Clerk Humphrey
of Their Unlawful Conduct**

65. In an effort to overturn her punishments without resort to litigation, Senator Oliver, through counsel, sent a letter to Speaker McNally and Chief Clerk Humphrey on July 8, 2026, explaining that they lacked power to impose the punishments, which violate her and her constituents’ constitutional rights. *See Ex. D.*

66. Senator Oliver requested a response to her letter by July 31, 2026.

67. Neither Speaker McNally nor Chief Clerk Humphrey responded to the letter.

68. On August 13, 2026, Senator Oliver issued a statement on her Substack account announcing that she had sent the July 8 letter to Speaker McNally and Chief Clerk Humphrey but that they “didn’t bother to respond.”³¹

69. In response, Speaker McNally’s office issued a statement condemning Senator Oliver’s protest as “an embarrassing and performative display” and defending the punishments that Speaker McNally issued as “measured, appropriate, and entirely legal.”³²

70. Speaker McNally’s office denied that Senator Oliver was prevented from voting. According to Speaker McNally’s office, “The vote had been called and the board was closed, just as it was for every other senator.”³³ Senator McNally’s office also claimed that “[e]ven after the vote concluded, [Senator Oliver] could have gone to the clerk’s desk and requested that her vote be recorded before adjournment.”³⁴

71. In fact, the Senate Rules of Order provide that a Senator may change his or her vote only “prior to the result being announced by the Speaker or by the Clerk of the Senate.” Senate Rule of Order 60.

72. It is not clear how Speaker McNally expected Senator Oliver to correct Chief Clerk Humphrey’s refusal to count her vote in the one second that elapsed between the closing of the vote and announcement of the vote on H.B. 7003. But even if the Rules of Order allowed a Senator to modify his or her vote after the announcement of a vote, it is equally unclear how Senator Oliver

³¹ Sen. Charlane Oliver, *UPDATE: The Punishments Are Unconstitutional*, The Senator Source (Aug. 13, 2026), <https://perma.cc/G8PJ-P378>.

³² Erin McCullough, *State Sen. Charlane Oliver Threatens Legal Action Over ‘Unlawful’ Special Session Punishment*, WKRN.com (Aug. 13, 2026), <https://tinyurl.com/2ry9p6bs>.

³³ *Id.*

³⁴ *Id.*

could have accomplished that in the one minute that elapsed between the announcement of the vote and the adjournment of the special session.

73. Senator McNally’s office concluded its statement by chiding Senator Oliver for “cho[o]s[ing] to prioritize a political performance over the duties of her office” and for what the Speaker viewed as her “immature, aberrant and disrespectful display.”³⁵

Harms to Plaintiffs

74. By precluding Senator Oliver from casting a vote against H.B. 7003, Chief Clerk Humphrey prevented her from carrying out her official duty as a duly elected Tennessee Senator and from representing the people of Senate District 19.

75. In addition, by removing Senator Oliver’s per diem for days when the General Assembly is not in session or her committee is not meeting, Speaker McNally has deprived and continues to deprive Senator Oliver of thousands of dollars in compensation that she receives in a typical year for her legislative work. In 2025, for example, Senator Oliver’s total compensation for her legislative work was just over \$57,000, more than \$14,500 of which was from her per diem.

76. The change in Senator Oliver’s committee assignment exacerbates that harm. Because the Government Operations Committee is one of the few Senate committees that meets year-round, the intended effect of reassigning Senator Oliver to the State and Local Government Committee was to make more severe the financial consequences of restricting her access to a per diem.

77. Without full access to a per diem, Senator Oliver has had to decrease the number of days that she works from the Capitol building, preventing her from fully serving her constituents.

³⁵ *McCullough*, *supra* note 31.

78. By barring Senator Oliver from receiving travel reimbursement, Speaker McNally has forced her either to divert funds from her campaign committee to attend legislative conferences that are crucial for networking with policymakers and advocates and educating herself on important policy issues affecting her constituents, or to forgo attending them entirely.

79. For example, Senator Oliver diverted campaign funds to attend the annual National Conference of State Legislatures (NCSL) Legislative Summit in Chicago, Illinois, from July 27–29, 2026. The NCSL Legislative Summit is the one conference that nearly every state legislator in the country from both parties attends. Because of the lack of travel reimbursement, Senator Oliver has forgone attending other essential conferences such as the Council of State Government Southern Legislative Conference, the National Organization of Black Elected Legislative Women (NOBEL Women) Annual Legislative Conference, the Congressional Black Caucus Foundation Annual Legislative Conference, and the National Black Caucus of State Legislators Annual Legislative Conference.

80. The restriction on Senator Oliver’s per diem and resulting diversion of her campaign funds to pay for travel expenses has prevented Senator Oliver from taking part in other activities that she ordinarily would finance with campaign funds. For example, because of the drain on Senator Oliver’s campaign funds, she will not be able to participate in the Tennessee Black Caucus of State Legislators’ statewide listening tour, undermining her ability to represent Black Tennesseans who live in parts of the State where they are unable to elect their preferred candidates under existing district lines.

81. The mistreatment that Senator Oliver has suffered has also taken an emotional toll on her.

82. Plaintiffs Rev. Dr. Cummings, Wesley, Moten, and Glapion (collectively, Constituent Plaintiffs) were injured by Chief Clerk Humphrey's refusal to permit Senator Oliver to cast her vote against H.B. 7003. Constituent Plaintiffs want future generations to be able to look back at this moment and see that their Senator spoke out and took a stand on behalf of her constituents and in support of the principles of fair elections and accountable government. But Chief Clerk Humphrey's refusal to permit Senator Oliver to vote on H.B. 7003 means that the legislative record does not reflect her opposition or, in our representative system of government, her constituents' opposition.

83. Aside from representing Constituent Plaintiffs as residents of Senate District 19, Senator Oliver also represents them as Black Tennesseans. As one of only three Black Senators in the Tennessee General Assembly, Senator Oliver seeks to give voice to Black residents statewide who are underrepresented in the legislature. By denying Senator Oliver the ability to vote against H.B. 7003, Chief Clerk Humphrey compounded the legislation's disenfranchisement by further silencing Black Tennesseans like Constituent Plaintiffs from having their opposition to racial gerrymandering registered through Senator Oliver's vote.

84. The additional punishments that Speaker McNally imposed on Senator Oliver for her protest against H.B. 7003 further diminish her representation of Constituent Plaintiffs and other residents of Senate District 19. Stripping Senator Oliver of her per diem for days when the General Assembly is not in session prevents Senator Oliver from providing the same level of constituent services that she previously provided. And eliminating Senator Oliver's travel reimbursement means that Senator Oliver cannot attend as many conferences, preventing her from engaging in political networking, legislative strategy, and coalitional work that allows her to fully represent her constituents.

85. These changes harm the Constituent Plaintiffs by depriving them of the same level of representation in the General Assembly that residents of every other Senate District receive. Their chosen representative has been hamstrung in her ability to serve her constituents. Senator Oliver continues to conduct some meetings at the Capitol when the General Assembly is out of session. For example, Senator Oliver has met with two student groups because she believes it would have been irresponsible to refuse to meet with them. But she has had to reduce the number of constituent events that she holds at the Capitol because she is not receiving a per diem for that work. Her inability to attend conferences and to go on listening tours impedes her ability to successfully advance her constituents' interests.

86. Each of the Constituent Plaintiffs has been specifically harmed by the punishments leveled against Senator Oliver. It is important to Rev. Dr. Cummings to have Senator Oliver representing her community in the General Assembly because Senator Oliver is bold, courageous, and deeply understands the issues that affect the community. Rev. Dr. Cummings trusts Senator Oliver to listen to the voices of her and her neighbors and to advocate for their concerns. In Rev. Dr. Cummings's opinion, the punishments issued against Senator Oliver are excessive and troubling because punishment directed at a Black lawmaker protesting the weakening of Black voting power can further silence communities that have historically faced political exclusion. She believes these punishments undermine both free expression and equal representation.

87. Mr. Wesley believes strongly that Senator Oliver is someone who listens to and cares deeply about her constituents and their concerns. He objects to the failure to count Senator Oliver's vote against H.B. 7003 because without a vote on record, it is as if Senate District 19 had nothing to say about the congressional maps, when in fact residents of the district had a lot to say. And he believes that the further punishments against Senator Oliver are part of a larger campaign

of vengeance and cruelty toward anyone who takes a meaningful stance of opposition to the status quo in Tennessee.

88. Ms. Moten believes that Senator Oliver is *the* direct proxy for the social and economic interests of her constituents. The failure to count Senator Oliver's vote added insult to the injury of disenfranchisement wrought by the gerrymandered congressional map. And she feels strongly that punishing Senator Oliver is punishing her constituents.

89. Ms. Glapion appreciates that Senator Oliver understands and listens to her community and leads with the understanding that her people are not a monolith and all deserve respect and support. She wants Senator Oliver's vote against H.B. 7003 to be counted to solidify that piece of history. She believes that the punishments issued to Senator Oliver are egregious and pure retaliation. To Ms. Glapion, Senator Oliver's punishment felt like her whole district was being punished.

90. These punishments are not tailored to rectifying any supposed breach of decorum but are meant to weaken Senator Oliver's representation of Senate District 19.

JURY TRIAL DEMANDED

91. Plaintiffs demand a jury trial on each and every claim for which a jury trial is available.

CAUSES OF ACTION

Count I

Freedom of Speech – Retaliation

42 U.S.C. § 1983; U.S. Const. amends. I, XIV

Senator Oliver against Defendants

92. Plaintiffs restate and re-allege all preceding paragraphs as if fully set forth herein.

93. The Free Speech Clause of the First Amendment to the U.S. Constitution, made applicable to the States through the Fourteenth Amendment, prohibits the government from

“abridging the freedom of speech.” U.S. Const. amend. I; see *Cantwell v. Connecticut*, 310 U.S. 296, 303 (1940).

94. “The freedom of speech . . . guaranteed by the Constitution embraces at the least the liberty to discuss publicly and truthfully all matters of public concern without . . . fear of subsequent punishment.” *Thornhill v. Alabama*, 310 U.S. 88, 101–02 (1940).

95. The government engages in impermissible retaliation under the First Amendment when it takes an “adverse action” against a person in response to his speech that “would not have been taken absent the retaliatory motive.” *Nieves v. Bartlett*, 587 U.S. 391, 399 (2019) (citing *Hartman v. Moore*, 547 U.S. 250, 260 (2006)).

96. Senator Oliver engaged in First Amendment protected speech on a matter of public concern when she protested the proposal to rig Tennessee’s electoral map to disenfranchise Black voters.

97. Senator Oliver’s speech is no less protected because she is an elected official. “The manifest function of the First Amendment in a representative government requires that legislators be given the widest latitude to express their views on issues of policy.” *Bond v. Floyd*, 385 U.S. 116, 135–36 (1966). And “[l]egislators have an obligation to take positions on controversial political questions” to fully inform and vigorously represent their constituents. *Id.* at 136–37. The Supreme Court has squarely rejected the notion that legislators’ speech is entitled to less First Amendment protection than that of “citizen-critics.” *Id.* at 136.

98. To retaliate against Senator Oliver’s protected speech, Speaker McNally and Chief Clerk Humphrey punished her in ways that have infringed her freedom of expression, interfered with her ability to perform her elected duties, and denied her the privileges of the office to which she was duly elected. *Cf. Houston Cmty. Coll. Sys. v. Wilson*, 595 U.S. 468, 479 (2022) (noting

that censure of elected representative “did not prevent [him] from doing his job” or “deny him any privilege of office”).

99. Most directly, Chief Clerk Humphrey prevented Senator Oliver from doing her job by refusing to allow her to vote on legislation of utmost importance to her constituents.

100. In imposing further penalties, Speaker McNally likewise prevented Senator Oliver from doing her job and denied her the privileges of office by removing Senator Oliver from the Senate Government Operations Committee and refusing her per diem for legislative work when the General Assembly is not in regular session. These punishments substantially reduce Senator Oliver’s compensation and severely hinder Senator Oliver’s ability to represent her constituents effectively and to engage in expression on their behalf.

101. By denying travel reimbursements, Speaker McNally further impeded Senator Oliver’s ability to do her job by preventing her from engaging with fellow legislators and networking with policymakers and advocates.

102. These punishments would chill a person of ordinary firmness from continuing to engage in First Amendment protected activity. *See Maben v. Thelen*, 887 F.3d 252, 262 (6th Cir. 2018).

103. Retaliating against Senator Oliver’s protected speech was the reason Speaker McNally and Chief Clerk Humphrey imposed the punishments.

104. Chief Clerk Humphrey initially punished Senator Oliver by refusing to record her vote as her protest was ongoing, an immediate temporal proximity that alone creates an inference of retaliatory motive. *See Muhammad v. Close*, 379 F.3d 413, 417–18 (6th Cir. 2004); *see also Lemaster v. Lawrence County*, 65 F.4th 302, 309 (6th Cir. 2023). Moreover, Speaker McNally specifically cited Senator Oliver’s protest as the basis for the subsequent punishments in his May

27, 2026, letter, presenting strong “indicia of retaliatory conduct.” *Sensabaugh v. Halliburton*, 937 F.3d 621, 630 (6th Cir. 2019).

105. The punishments against Senator Oliver for engaging in First Amendment protected speech are therefore unconstitutional.

Count II
Freedom of Speech – Suppression
42 U.S.C. § 1983; U.S. Const. amends. I, XIV
Senator Oliver against Defendants

106. Plaintiffs restate and re-allege all preceding paragraphs as if fully set forth herein.

107. First Amendment protections are at their “zenith” when applied to “core political speech,” *Meyer v. Grant*, 486 U.S. 414, 422, 425 (1988) (internal quotation marks omitted), such as debates about the drawing of district lines to disenfranchise Black voters.

108. Government officials “cannot ... use the power of the State to punish or suppress disfavored expression.” *NRA of Am. v. Vullo*, 602 U.S. 175, 188 (2024).

109. The government engages in impermissible suppression of speech when it seeks “to restrict expression because of its message, its ideas, its subject matter, or its content.” *Ashcroft v. ACLU*, 535 U.S. 564, 573 (2002) (internal quotation marks omitted). “It is axiomatic that the government may not regulate speech based on its substantive content or the message it conveys.” *Rosenberger v. Rector & Visitors of Univ. of Va.*, 515 U.S. 819, 828 (1995).

110. Senator Oliver engaged in First Amendment protected speech on a matter of public concern when she protested the proposal to rig Tennessee’s electoral map to disenfranchise Black voters. More broadly, Senator Oliver engages in protected speech when she represents her constituents in the General Assembly.

111. The punitive measures that Speaker McNally and Chief Clerk Humphrey have taken against Senator Oliver have the purpose and effect of suppressing her core political speech

based on its content and viewpoint. Viewpoint discrimination is a particularly “egregious form of content discrimination” that punishes speech based on “the opinion or perspective of the speaker.” *Rosenberger*, 515 U.S. at 829.

112. These restrictions are imposing ongoing harm by preventing Senator Oliver from doing her job and thus restricting her ability to engage in protected expression on behalf of her constituents.

113. These content- and viewpoint-based speech restrictions are subject to and cannot survive strict scrutiny. *Reed v. Town of Gilbert*, 576 U.S. 155, 163 (2015).

Count III
Freedom of Association
42 U.S.C. § 1983; U.S. Const. amends. I, XIV
Senator Oliver against Defendants

114. Plaintiffs restate and re-allege all preceding paragraphs as if fully set forth herein.

115. The Supreme Court has “long understood as implicit in the right to engage in activities protected by the First Amendment a corresponding right to associate with others.” *Ams. for Prosperity Found. v. Bonta (APF)*, 594 U.S. 595, 606 (2021) (quoting *Roberts v. U.S. Jaycees*, 468 U.S. 609, 622 (1984)); *see also generally NAACP v. Alabama ex rel. Patterson*, 357 U. S. 449, 462 (1958).

116. “[T]he Supreme Court ‘has recognized a right to associate for the purpose of engaging in those activities protected by the First Amendment—speech, assembly, petition for the redress of grievances, and the exercise of religion.’” *Anderson v. City of LaVergne*, 371 F.3d 879, 881 (6th Cir. 2004) (quoting *Roberts*, 468 U.S. at 618).

117. The freedom of association provides “protection to collective effort[s] on behalf of shared goals.” *Roberts*, 468 U.S. at 622. “Protected association furthers ‘a wide variety of political, social, economic, educational, religious, and cultural ends,’ and ‘is especially important

in preserving political and cultural diversity and in shielding dissident expression from suppression by the majority.” *APF*, 594 U.S. at 606 (quoting *Roberts*, 468 U.S. at 622).

118. The freedom of association protects not only “advocacy groups” but any group of people that “engage[s] in some form of expression, whether it be public or private.” *Boy Scouts of Am. v. Dale*, 530 U.S. 640, 648 (2000).

119. Senator Oliver engages in a wide variety of protected expression in association with and on behalf of her constituents and others. *See Bond*, 385 U.S. at 135–36 (“The manifest function of the First Amendment in a representative government requires that legislators be given the widest latitude to express their views on issues of policy.”).

120. By punishing Senator Oliver for her protected expression, and by substantially interfering with her ability to do her job, Speaker McNally and Chief Clerk Humphrey have stifled her expressive association with her constituents, her colleagues, and others, as well as her advocacy for her constituents’ interests.

121. This substantial burden on the freedom of association is subject to and cannot survive exacting scrutiny. *See APF*, 594 U.S. at 607 (plurality op.).

Count IV
Equal Protection
42 U.S.C. § 1983; U.S. Const. amend. XIV
All Plaintiffs against Defendants

122. Plaintiffs restate and re-allege all preceding paragraphs as if fully set forth herein.

123. “[T]he distinguishing feature” of the republican form of government “is the right of the people to choose their own officers for governmental administration, and pass their own laws in virtue of the legislative power reposed in representative bodies.” *In re Duncan*, 139 U.S. 449, 461 (1891).

124. Senator Oliver does not vote on her own behalf when she votes in favor of or against legislation in the Tennessee Senate. Instead, her vote “belongs to the people” of Senate District 19. *Nev. Comm’n on Ethics v. Carrigan*, 564 U.S. 117, 126 (2011).

125. The Equal Protection Clause of the Fourteenth Amendment demands “substantially equal state legislative representation.” *Reynolds v. Sims*, 377 U.S. 533, 568 (1964).

126. Equal protection applies to “the initial allocation of the franchise” and “the manner of its exercise.” *Bush v. Gore*, 531 U.S. 98, 104 (2000) (per curiam).

127. Constituent Plaintiffs voted in the 2022 election for Senator Oliver and intend to vote for her again in the 2026 election.

128. Barring Senator Oliver from voting against the redistricting bill dilutes Constituent Plaintiffs’ 2022 election votes in violation of the Equal Protection Clause’s “one person, one vote” principle. Whereas every other Senator in Tennessee was able to cast a vote on H.B. 7003’s functional disenfranchisement of Memphis’s Black majority, Senator Oliver alone was denied that opportunity to exercise her duty as a duly elected Senator.

129. Barring Senator Oliver from voting against the redistricting bill dilutes Constituent Plaintiffs’ votes and disenfranchises them through “arbitrary and disparate treatment.” *Bush*, 531 U.S. at 104.

130. Reducing Senator Oliver’s pay to the point that it substantially interferes with her ability to do her work denies her constituents equal representation in the General Assembly and “run[s] counter to our fundamental ideas of democratic government.” *Reynolds*, 377 U.S. at 564 (quoting *Wesberry v. Sanders*, 376 U.S. 1, 8 (1964)).

Count V
Tenn. Const. art. II, § 12
All Plaintiffs against Defendants

131. Plaintiffs restate and re-allege all preceding paragraphs as if fully set forth herein.

132. The Tennessee Constitution vests each chamber of the Tennessee General Assembly with exclusive authority to “punish its members for disorderly behavior.” Tenn. Const. art. II, § 12.

133. Reflecting that exclusive authority, the Tennessee Senate’s Rules of Order do not empower either the Speaker of the Senate or the Chief Clerk of the Senate to unilaterally punish members of that body.

134. Speaker McNally and Chief Clerk Humphry acted without authority in issuing punishments to Senator Oliver that only the Senate as a whole—if any entity—could issue.

135. Speaker McNally’s May 27, 2026, letter states that the punishments set forth therein were issued in response to Senator Oliver’s alleged “violat[ion] of the Senate Rules regarding order and decorum in the chamber,” but it identifies no specific Senate Rule that she transgressed.

136. Nor were the punishments set forth in the letter issued pursuant to Speaker McNally’s power to decide points of order, as he did not find a supposed violation “at once” or provide Senator Oliver an opportunity to appeal any such finding to the Senate as a whole. *See* Senate Rule of Order 15.

137. The punishments against Senator Oliver are therefore invalid and must be revoked.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court enter judgment in their favor, and grant the following relief:

- a. A declaration that Speaker McNally and Chief Clerk Humphrey violated the First and Fourteenth Amendments to the U.S. Constitution and Article II, § 12 of the Tennessee Constitution;
- b. A permanent injunction (1) ordering Chief Clerk Humphrey to amend the Tennessee Senate Journal to reflect Senator Oliver's vote against H.B. 7003 during the Second Extraordinary Session of the 114th General Assembly, (2) ordering Speaker McNally to rescind the punishments issued against Senator Oliver in his May 27, 2026, letter, (3) ordering Defendant Carsner to issue wrongfully withheld per diem and travel reimbursements to Senator Oliver and to issue such payments going forward; and (4) enjoining Defendants from issuing any other punishments against Senator Oliver for her conduct during the Second Extraordinary Session of the 114th General Assembly;
- c. An award to Senator Oliver of compensatory and punitive damages under 42 U.S.C. § 1983;
- d. An award to Plaintiffs of reasonable costs and attorneys' fees; and
- e. Such other and further relief that this Court may deem just and proper.

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**Motions for admission pro hac vice
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