

IN THE UNITED STATES DISTRICT COURT
FOR WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

HUNTER DEMSTER, JESSICA)
CHODOR, KENNETH HALT, AND)
MELISSA PEELER,)

Plaintiffs,)

v.)

Case No. 2:26-cv-02546-MSN-atc

TODD BLANCHE, in his official)
capacity as Acting Attorney General)
of the United States; *et al.*,)

Defendants.)

DECLARATION OF COLONEL MATT PERRY

I, Colonel Matt Perry, declare the following:

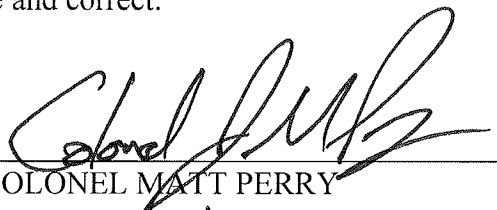
1. I am an adult over eighteen years of age and competent to testify. I provide the information below to the best of my knowledge, under penalty of perjury.

2. I am the Colonel of the Tennessee Highway Patrol ("THP"). I was sworn in as Colonel by Governor Bill Lee in December of 2020. I have almost 22 years with the Tennessee Highway Patrol and 2 years with Williamson County Sheriff Office. I have been a Sergeant, Lieutenant, Captain, Major, and Lieutenant Colonel prior to becoming Colonel in 2020. I also served and supervised both the Field and Administrative Bureaus of the Tennessee Highway Patrol.

3. Tennessee Highway Patrol has issued no citations pursuant to Tenn Code Ann. § 39-16-612.

4. On May 6, 2026, the American Civil Liberties Union (ACLU) and the ACLU of Tennessee filed a complaint with the Department, on behalf of Plaintiff Jessica Chodor, with the THP Office of Professional Accountability (“OPA”) regarding Ms. Chodor’s previous encounters and arrest by THP officers on October 28, 2025. The OPA is currently investigating the complaint. This internal complaint was filed just one week before Plaintiff Chodor filed this litigation on May 13, 2026.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



COLONEL MATT PERRY
7/8/2026

Date