

**IN THE CHANCERY COURT OF SUMNER COUNTY, TENNESSEE
AT GALLATIN**

PASCAL JOUVENCE,)	
)	
Plaintiff,)	
)	
vs.)	
)	Case No.: 25-CV-263
PAIGE BROWN, in her official capacity)	
as mayor of the City of Gallatin, and)	
THE CITY OF GALLATIN,)	
)	
Defendants.)	

DECLARATION OF PASCAL JOUVENCE

I, Pascal Jouvence, having been duly sworn, do attest as follows:

1. I am over the age of 21 and am competent to testify.
2. I have direct knowledge of the facts and information set forth herein.
3. I am a resident of Sumner County, Tennessee and I am a duly elected councilman of the City of Galatin for District 3.
4. On September 2, 2025, during a council meeting and in the course and scope of my position as an elected councilman, I addressed directly the item on the agenda, to wit: Gallatin Municipal Code § 025-0741, which dealt with the rezoning of the Wedgewood town homes from R-15 residential to mixed-use.
5. During the course of my comments, I asked Jenna Landstrom, who was operating the AV System during the meeting, to display an aerial picture of the neighborhood which I had presented to her prior to the meeting. *See* Complaint, Exhibit A. Upon doing so, Mayor Paige Brown interrupted me and ultimately refused to allow me to use the visual aid. A true and accurate

copy of the video of the September 2, 2025 Council meeting is available at <https://www.youtube.com/watch?v=TJS7MHG9yJM>.

6. After the meeting, on September 25, 2025, I had a conversation with Jenna Landstrom regarding her interaction with Mayor Brown before the meeting in which she showed Mayor Brown the aerial photo I intended to use as part of the legislative debate during the Council meeting. A true and accurate copy of that conversation is available in a Dropbox at <https://www.dropbox.com/scl/fo/bnvuymj6vefmb5rldxzbs/AAUQZ7XqBFD7WbT8VAyuSmU?rlkey=qqqq8loz4jmv3vfyyllxxas5hq&st=8eiehq2m&dl=0>.

7. Notably, before the September 2, 2025, Council meeting, I witnessed Mayor Brown speaking with Jenna Landstrom and looking at her computer.

FURTHER AFFIANT SAYETH NOT.

RULE 72 DECLARATION

I, PASCAL JOUVENCE, UPON THE PENALTY OF PERJURY, DO HEREBY VERIFY AND CERTIFY THAT THE FOREGOING IS TRUE AND CORRECT ON THIS 13th DAY OF JANUARY, 2026.

Signed by:

AFB339F36EC40C
PASCAL JOUVENCE