

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

CAIR-FOUNDATION, INC., AND CAIR-
FLORIDA, INC.,

Plaintiffs,

v.

RONALD DESANTIS, in his official
capacity as Governor, State of
Florida,

Defendant.

Case No. 4:25-cv-00516-MW-MJF

**DECLARATION OF CHRISTOPHER KIMBALL IN SUPPORT OF
MOTION FOR PROTECTIVE ORDER**

I, **Christopher Kimball**, being of lawful age, declare as follows:

1. **Identity of Declarant:** I am an attorney within the Executive Office of the Governor who was involved in drafting Executive Order 25-244.
2. **Purpose of Declaration:** I am submitting this declaration to formally assert the deliberative process privilege protecting me from testifying on certain matters described in any subpoena and/or asked at any potential deposition in this case.
3. **Privileged Topics:** I am claiming the deliberative process privilege regarding the following information:
 - Whether other organizations were considered for designation, and the criteria used and any analysis thereof.
 - Why draft “whereas” clauses were removed before the Order issued and any analysis thereof.

- Whether anyone in the Governor's office reviewed sources cited in Mr. Arnold's declaration and the analysis thereof.
 - Whether anyone in the Governor's office considered the EO's First Amendment implications before it issued and any analysis thereof.
 - Whether the Governor's office considered alternative measures before designating CAIR, and why they were rejected, including any analysis thereof.
 - Whether the Governor's office assessed the sufficiency of existing Florida law before issuing the Order.
 - The internal deliberations about Executive Order 25-244 and any discussions or communications related thereto.
 - Any and all questions that may implicate internal legal analysis made for the purpose of legal advice given to Governor DeSantis.
 - Any and all questions that may implicate predecisional and deliberative discussions, communications, or analysis that helped form Executive Order 25-244.
4. **Basis for the Privilege:** The questions posed in each of these topics (and those which relate to communications implicating the deliberative process privilege as described in Defendant's privilege log) would require the disclosure of predecisional and deliberative information related to Executive Order 25-244. The nature of the inquiries identified above would require disclosure of information that reflects the collaborative give-and-take of the consultative process, which drives internal governmental decision-making. Disclosure would chill that process and minimize effective governance.
5. **No Waiver:** I have maintained the confidentiality of this information and have not waived this privilege through disclosure to any third parties or public forums.

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

Executed on this 14th day of October, 2026.



Christopher Kimball