

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

CAIR-FOUNDATION, INC. and  
CAIR FLORIDA, INC.,

*Plaintiffs,*

v.

Case No. 4:26-cv-521-MW-MAF

RON DESANTIS, *et al.*,

*Defendants.*

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**DECLARATION OF NICHOLAS WARREN**

I, Nicholas Warren, declare as follows:

1. I am a senior staff attorney with the ACLU Foundation of Florida.
2. I attended the September 29, 2026 Florida Cabinet meeting with a colleague from the American Civil Liberties Union Foundation, Hina Shamsi, who represents Plaintiffs CAIR-Foundation, Inc. (“CAIR”) and CAIR Florida, Inc. (“CAIR-Florida”) in this action. I understood that, during this meeting, Governor DeSantis and the Cabinet intended to vote to approve or reject the Domestic Security Officer’s recommended designation of CAIR and CAIR-Florida as “domestic terrorist organizations” under Florida’s new state terrorist organization designation regime.
3. Ms. Shamsi and I arrived at the Cabinet Meeting Room early. Before the meeting began, we sought to find a cabinet aide to inform them that Ms.

Shamsi was present on behalf of CAIR and CAIR-Florida and request to speak during the meeting on their behalf. We spoke with the only cabinet aide behind the well of the Cabinet Meeting Room at the time we arrived, Victoria Dehner, who is Cabinet Affairs Director for the Chief Financial Officer. We informed Ms. Dehner that Ms. Shamsi represented CAIR and CAIR-Florida, was at the meeting to speak on the proposed designation, and wished to let the right Cabinet officials know so that she could be heard during the meeting. Ms. Dehner told us she would let the right people know and that she or another person would get back to us. She did not speak to us again. We waited for a response at the front of the room, where we had spoken to Ms. Dehner, until the audience was asked to sit down because Governor DeSantis was arriving.

4. After the meeting began and several topics had been discussed, Governor DeSantis asked Mark Glass, the Commissioner of the Florida Department of Law Enforcement and Chief of Domestic Security, to address the pending designations of various groups as “terrorist organizations.” Mr. Glass did so briefly, recommending that the designations be approved based on the information contained in the notice of intent provided for each organization. Governor DeSantis swiftly moved the approval process forward. Ms. Shamsi and I did not know at this time whether Governor DeSantis would or would not

recognize her to speak on behalf of CAIR and CAIR-Florida before the Cabinet was asked to approve the designations.

5. As Governor DeSantis began to state that the motion to approve the designations carried without objection, Ms. Shamsi stood up (in the third row of the audience, which was the first row with seating not reserved for state agency staff) and asked, “Governor, may I speak on behalf of CAIR and CAIR-Florida?” Governor DeSantis ignored Ms. Shamsi, concluded the agenda item, and congratulated Commissioner Glass.

6. The entire process of approving the pending designations—from when Commissioner Glass began speaking about the designations, to when Governor DeSantis and the Cabinet approved the designations without pausing for any objection, comment, discussion, or debate—took about 30 seconds.

I declare under penalty of perjury that the foregoing is true and correct.

Executed October 2, 2026.

/s/ Nicholas Warren  
Nicholas Warren