

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-315-MW-MJF

RON DESANTIS *et al.*,

Defendants.

**DECLARATION OF EDWARD MITCHELL ON BEHALF OF CAIR
FOUNDATION, INC.**

Pursuant to 28 U.S.C. § 1746, I, Edward Mitchell, declare as follows:

1. I am a resident of Georgia and over the age of eighteen. I have personal knowledge of the facts set forth in this declaration. If called to testify, I could and would testify competently to these facts under oath. I am providing this declaration based on my personal knowledge, my role as the National Deputy Director of CAIR-Foundation, Inc. (“CAIR”), information known to me through CAIR’s regular programs, operations, and activities, and my review of CAIR’s records maintained in the ordinary course of business.

2. CAIR is the largest Muslim civil rights and advocacy organization in the United States and was established in 2005. Its predecessor organization was

founded in 1994. CAIR's faith-driven mission is to enhance the public's understanding of Islam, protect and vindicate civil rights, promote justice, and empower American Muslims through lawful advocacy and expressive activity protected by the First Amendment. Our vision is to be a leading advocate for justice and mutual understanding.

3. CAIR pursues its mission nationwide, working in coordination with affiliate chapters in multiple states, including CAIR Florida, Inc. ("CAIR-Florida").

4. Since our founding, CAIR has built a reputation for tenacious efforts to combat discrimination against diverse Muslim communities in the United States through legal and public policy advocacy work, interfaith engagement, and client services. CAIR has developed a unique national infrastructure for legal, policy, public education, and civil rights advocacy on behalf of American Muslims.

5. On July 1, 2026, CAIR learned through a live broadcast held by Governor DeSantis that the Florida Chief of Domestic Security intended to designate CAIR as a "domestic terrorist organization" under Florida's new designation regime.

6. As of the time of filing this declaration, CAIR has not received any written notice or communication from any Florida official explaining the reason for its designation or any evidence supporting any such reason.

7. CAIR has never been charged with, let alone convicted of, a crime. Nor has it ever been designated by the federal government under the federal terrorism sanctions and designation regime. And as CAIR has repeatedly stated, it does not engage in or support terrorist activity. Indeed, ISIS, a U.S.-designated Foreign Terrorist Organization, once threatened to assassinate CAIR's leadership because of CAIR's outspoken opposition to violence and terrorism.

8. If CAIR is designated as a "domestic terrorist organization," it will face substantial harm, both in Florida and nationwide. The impact of such a designation—including on CAIR's reputation, operations, and ability to engage in advocacy—will be significant.

9. The harm would be immediate, severe, and not readily quantifiable. Even if later set aside, designation would require substantial time and resources to repair, and some harm could not be fully undone. It would take us years to recover, if at all.

10. But for Florida's threatened designation and the criminal and civil consequences associated with that designation, CAIR would continue engaging in advocacy, public education, donor engagement, legal advocacy, civil rights intake, community outreach, and association with CAIR-Florida and Florida residents on matters of public concern, including civil rights, religious freedom, free speech, anti-Muslim discrimination, public policy, and Palestinian human rights.

CAIR's Advocacy

11. CAIR is a nonprofit corporation organized under the laws of the District of Columbia, with headquarters in Washington, D.C. It is tax-exempt under Section 501(c)(3) of the Internal Revenue Code.

12. CAIR and its more than 20 affiliated chapters, including CAIR-Florida, work to advance CAIR's mission through advocacy on legal, cultural, social, policy, and civic issues of public concern to American Muslims. Issues CAIR focuses on include promoting religious tolerance and understanding, cultural education, civil rights, and public policy that protects and enhances the equal treatment of Muslims in the United States.

13. CAIR and CAIR-Florida are active in furthering their mission throughout Florida and together have a footprint in nearly every Judicial Circuit through their advocacy work and/or staff presence, especially in the Second, Fourth, Sixth, Ninth, Eleventh, Thirteenth, Fourteenth, Fifteenth, Seventeenth, and Eighteenth Circuits, and also in the First, Third, Fifth, Seventh, Eighth, Tenth, and Twelfth Circuits.

14. As part of CAIR's public education and advocacy efforts, CAIR employees regularly appear on or are quoted in national and local broadcast, print, and digital media outlets to discuss, debate, inform, and provide commentary on issues of public concern, including civil rights issues. CAIR regularly issues press

releases and action alerts on its website, holds press conferences, and posts on social media outlets, such as X, Instagram, Facebook, and YouTube, to communicate with members of the public and government officials. CAIR uses electronic communications to let people know about its presence in the community as a resource for information and legal services. Its employees also frequently accept speaking engagements to discuss topics related to their work, such as Islamophobia and instances of anti-Muslim discrimination.

15. CAIR's advocacy includes commenting on proposed legislation at the federal and state level and on issues that impact Muslim communities, including matters of United States foreign policy and state government action. For example, in 2025, CAIR publicly opposed Florida House Bill 119, commonly referred to as the "No Shari'a Act," and publicly expressed disagreement with statements made by Governor Ron DeSantis in support of the bill.

16. CAIR educates people on their civil rights through presentations and advocacy materials. For example, CAIR publishes "Know Your Rights" guides and reports on incidents affecting Muslim communities nationwide, such as discrimination in the workplace, in correctional settings, at elementary and secondary schools, as well as colleges and universities. CAIR also creates and disseminates guides for Muslims who are traveling, and for those who are approached by law enforcement.

17. To further its faith-driven mission, CAIR also regularly communicates and meets with local, state, and federal government officials, other organizations, civic groups, and religious institutions, and members of the public.

18. During Ramadan, CAIR creates specialized programming that includes how to request accommodations at work and at school. CAIR shares this programming with CAIR-Florida.

19. As part of its civic engagement efforts, CAIR promotes voter participation through nonpartisan voter education and registration activities. For example, CAIR routinely participates in and supports National Muslim Voter Registration Day.

20. As part of its advocacy and public education work, CAIR engages with members of the public, the media, government officials, and leaders of other faiths to educate them about Islam and to address false stereotypes, prejudices, tropes and narratives, disinformation, and misinterpretations of Islamic tenets, including with respect to Sharia, which is frequently invoked in political discourse. CAIR has repeatedly explained that Sharia is a moral and spiritual framework that guides American Muslims' ordinary, personal exercise of faith and requires Muslims to comply with the laws of the land in which they reside, including the U.S. Constitution and other federal and state laws. And CAIR has issued public statements and published educational materials explaining that when Muslims pray

to God five times a day, donate to charity, fast in Ramadan, or speak up against injustice, among many other practices, they are observing Sharia—just as Jews observe Halakha and Catholics abide by canon law.

21. CAIR frequently engages in advocacy activities in partnership with its affiliated chapters, including CAIR-Florida. Much of CAIR’s work in Florida involves collaboration with CAIR-Florida and its affiliates, third-party organizations, and community members in the state.

22. Working in association with other faith-based and civil rights organizations, CAIR strives to build a vibrant constitutional democracy where people of all religious traditions can thrive.

23. CAIR organizes civic engagement activities that encourage participation in the democratic process, both nationwide and in Florida. For example, CAIR hosts Muslim Hill Day in Washington, D.C., which brings Muslims from across the country to meet with members of Congress. In 2026, representatives from CAIR-Florida participated in the event.

24. CAIR advocates for civil rights by providing legal representation and legal advocacy through its Legal Defense Fund. CAIR receives intakes and also represents clients from across the country, including from Florida, in litigation seeking to vindicate legal and constitutional rights.

25. CAIR’s civil rights work includes advocacy and legal support related to Palestinian human rights.

26. For example, CAIR and CAIR-Florida represented and advocated on behalf of Students for Justice in Palestine (“SJP”) chapters targeted with governmental suppression of their exercise of freedom of speech and assembly, based on their speech and association in support of Palestinian human rights. In November 2023, CAIR and CAIR-Florida sued Florida officials, including Governor DeSantis, on behalf of a local SJP chapter at the University of South Florida, challenging a state directive concluding that SJP chapters at Florida public universities must be deactivated. *See Students for Justice in Palestine at the Univ. of So. Fla. v. DeSantis*, No. 1:23-cv-00281 (N.D. Fla. 2023).

27. In early 2025, CAIR and CAIR-Florida successfully advocated for the return of Mohammed Ibrahim—a 16-year-old U.S. citizen and Florida resident who was detained by Israeli authorities beginning in February 2025—including by sending a letter to U.S. Secretary of State Marco Rubio urging him to take urgent action to secure Mohammed’s release from Israeli custody through lawful diplomatic channels.

28. CAIR also issued a February 2025 press release challenging President Donald Trump's assertion that the “U.S. will take over the Gaza Strip” and ‘own

it.” CAIR also issued an April 2025 letter to the U.S. Department of Justice calling on it to prosecute the murder of an American citizen by Israeli settlers.

29. In March 2025, CAIR and CAIR-Florida issued public statements condemning actions taken by the Mayor of Miami Beach to close a movie theatre that was screening an Oscar-winning Palestinian documentary.

30. CAIR has consistently condemned U.S. support for the Israeli government’s human rights abuses against the Palestinian people as a matter of public policy advocacy. CAIR has also regularly condemned Hamas violence against Israeli civilians, including Hamas’s attacks on October 7, 2023.

CAIR’s Employees and Board Members

31. CAIR’s employees and board members have chosen to work for CAIR and serve on its board, respectively, because they believe in, and wish to contribute to, its policy, religious, and civil-rights advocacy, including through their provision of specialized skills and speech to the organization.

32. CAIR has three employees who live in Florida and perform remote work for CAIR on national and interstate matters, including its Chief Operations Officer, its Legal Operations Manager, and its Information Technology Director. Their residence in Florida creates a substantial risk that they could be unable to continue performing their roles if CAIR is designated under Florida law.

33. Two members of CAIR's Board live in Florida, including the Board Chair. Both work remotely from Florida on CAIR matters, including matters relating to CAIR's work in Florida.

34. CAIR has one volunteer who lives in Florida who works as a Strategic Campaign Specialist. She works remotely on CAIR matters, including on matters related to CAIR's work in Florida based on publicly available information, such as researching and investigating events in Florida to assist in preparing CAIR's Hostile Campus Report, which discusses universities' and colleges' treatment of free speech, respect for civil rights, the right to protest and opposition to Islamophobia in Florida's places of higher education.

Executive Order 25-244

35. On December 8, 2025, Governor DeSantis issued Executive Order 25-244, which unilaterally designated CAIR as a "terrorist organization" and imposed severe punishments on CAIR and on people or entities that obtain benefits or privileges regulated by Florida and provide "material support" to CAIR.

36. On December 15, 2025, CAIR and CAIR-Florida filed a lawsuit challenging Executive Order 25-244 as violating their rights under the First and Fourteenth Amendments of the U.S. Constitution. On March 4, 2026, the district court granted a preliminary injunction enjoining enforcement of the Executive Order.

Consequences of Designation

37. If CAIR is designated as a “domestic terrorist organization”—with all the criminal and civil penalties that will result—it will experience significant harm, both in Florida and in its nationwide operations.

38. Immediately upon CAIR’s designation becoming effective, CAIR will suffer substantial reputational harm. Further, in the event CAIR is designated, and unless the Court grants relief, CAIR will be forced to immediately suspend any operations it identifies as based in Florida, such as advocacy and fundraising activities, donor communications, public outreach, and other operational activity in the state. CAIR would also be forced to take protective measures regarding Florida-based employees and board members, including placing Florida-based employees on administrative leave and directing all Florida-based board members to recuse themselves from CAIR board activity. CAIR intends to take these steps solely to reduce the risk that CAIR and people who work for, associate with, donate to, receive services from, or provide services to CAIR could face severe criminal penalties under Florida law.

Impairment of Advocacy and Fundraising Activity in Florida

39. If its designation becomes effective, CAIR will also be forced to suspend its advocacy work in Florida, including association with CAIR-Florida, an affiliated chapter.

40. For example, CAIR will not be able to bring CAIR-Florida representatives to its annual Muslim Day Event in Washington, DC.

41. Designation will also hinder CAIR's ability to discover, engage with, and comment on Florida events relevant to its mission. For example, CAIR will not be able to monitor and report on free speech, respect for civil rights, the right to protest, and opposition to Islamophobia in Florida's places of higher education. CAIR also will not be able to petition or request information from government officials in Florida, including at correctional or educational facilities.

42. Neither will CAIR be able to support CAIR-Florida in its advocacy on issues of shared public concern. To further its mission, CAIR speaks to, receives information from, and associates with CAIR-Florida to empower, educate, and defend Florida Muslims. If CAIR's designation goes into effect, both organizations will face criminal penalties for their speech and association in support of each other's advocacy work.

43. CAIR's ability to provide legal representation to its Florida-based clients also may be impaired if its designation becomes effective. CAIR currently represents several Florida residents in litigation outside of Florida. The breadth of Florida's designation regime creates a risk that CAIR or its employees may be subject to prosecution, including those who provide representation to CAIR's Florida-based clients.

44. In anticipation of its designation going into effect, CAIR is also taking steps to prevent any advocacy action communications—concerning topics of nationwide and state importance to CAIR’s stakeholders—from being sent to Florida residents.

45. In addition, in preparation for its anticipated designation, CAIR is taking steps to stop donor solicitations and community and public outreach to Florida residents, to the extent CAIR has information identifying them as residents of Florida. For example, CAIR intends to geographically limit its internet advertising, SMS mobile messaging, and emails sent to Florida residents. CAIR also intends to stop all in-person fundraising activity in Florida, as well as fundraising activities conducted through webinars and other programs that cultivate donors by educating them about CAIR’s advocacy and work on behalf of Muslim communities in Florida.

46. Preparing for the threatened designation has already required CAIR to divert senior staff, legal, development, and information technology resources from ordinary mission work to efforts necessary to shut down that work in Florida.

Severe Reputational Harm

47. If Florida state officials designate CAIR as a “domestic terrorist organization,” CAIR will suffer reputational harm, both in Florida and across the country. Being labeled as a “domestic terrorist organization” is inherently

stigmatizing and undermines the trust and credibility that CAIR has built over the lifetime of its existence with donors, community members, volunteers, and supporters. This goes beyond a monetary value and is integral to CAIR's ability to carry out its mission. Being falsely labeled as a "domestic terrorist organization" will irreparably harm CAIR's reputation and its civil rights work on behalf of Muslims across the country

Loss of Critical Executive Employees and Board Members

48. If its designation becomes effective, CAIR will be forced to take protective measures regarding its Florida-based employees and board members, including placing its three Florida-based employees on administrative leave and directing its two Florida-based board members to recuse themselves from participation in any CAIR board function or activity. Loss of the operational or board services each of these individuals provides to CAIR will have a debilitating impact on its ability to carry out its work.

49. CAIR's Chief Operating Officer ("COO") works remotely from Florida and oversees all of CAIR's operations nationwide. The functions our COO oversees include human resources, staffing, employee benefits, vendor and contract administration, information technology, accounting, fundraising, development, and insurance. As a member of the Compliance and Policy Committee, they provide compliance and policy support. In addition, the COO supports CAIR's Board by

preparing board materials, coordinating logistics, and helping implement board-approved policies and governance decisions. The COO is critical to CAIR's functions. If we are forced to lose their institutional knowledge of CAIR's operations as well as their performance of their managerial, compliance, and oversight role, even temporarily, CAIR's ability to operate will be significantly impaired.

50. CAIR's Information Technology Director ("IT Director") works remotely from Florida and oversees not only our technology infrastructure and daily needs, but also has responsibilities similar to a Chief Information Officer. Our IT Director manages and supervises all of CAIR's information technology systems, which include email, and donor management and fundraising platforms; cybersecurity programs and policies; and internet network and infrastructure. The IT Director is integral to CAIR's operations, and if they are forced to stop working, their loss will significantly impair CAIR's operations nationwide, including its secure communications and donor and fundraising activity.

51. CAIR's Legal Operations Manager works remotely from Florida, providing support for legal compliance matters as well as CAIR's nationwide litigation and legal advocacy program. Our Legal Operations Manager is integral to our ability to ensure CAIR's compliance with federal and state laws and manage

our legal program and losing them, even temporarily, will significantly impair CAIR's legal functions.

52. If its designation becomes effective, CAIR's two Florida-based board members, including its Board Chair, will recuse themselves from all Board governance and decision-making activity. The Board Chair is responsible for the effective function of CAIR's Board and governance. She also chairs CAIR's Executive Committee, which addresses significant governance, policy, and other organizational matters. Both board members' recusal, and particularly the Board Chair's recusal, will cause CAIR substantial harm and interfere with its ability to operate.

Loss of Key Service Providers Based in Florida and Potential Impairment of Florida-Based Contracts

53. Designation could prevent CAIR and its employees from receiving or using contractual services to be performed in Florida or by Florida-based persons or entities. Designation also could cause CAIR to default on these contracts if CAIR is unable to pay under their terms.

54. For example, if CAIR's designation becomes effective, a Florida-based contractor who performs national development functions would be unable to continue providing services related to donor outreach and management, donor communications, grant-writing coordination, CAIR's mailing lists and internet advertising, and other fundraising operations. If CAIR is forced to lose the

essential services of this individual, it would severely impact our donor outreach and fundraising activities, nationwide and in Florida.

55. CAIR also has a contract with a telecommunication service provider for telephone service to one of CAIR's Florida-based employees. The designation regime's prohibition on providing services to designated organizations could frustrate this contract should the telecommunication service provider decide not to continue providing services to a CAIR employee based in Florida.

56. CAIR has several other contracts that involve services to be performed in Florida or by Florida-based entities. These could be impaired if CAIR's designation becomes effective. For example, CAIR has insurance policies and contracts applicable to its Florida-based board members, which, if invoked, would require payments being made in Florida. CAIR also contracts with Florida-based vendors to maintain and operate one of its websites and to provide leadership coaching services. Because of the substantial criminal and civil penalties imposed on designated organizations and associated third parties, including contractors, it is not clear whether the parties to these contracts could fulfill their obligations or that CAIR could pay them for doing so.

The Harm of Designation Cannot Easily, If At All, Be Reversed

57. CAIR will suffer substantial harm if the designation becomes effective, even if the designation is later overturned.

58. As discussed above, CAIR will be unable to engage in advocacy and speech activities in Florida while the designation is effective. It also will be unable to engage in activities to further its mission in Florida, including by working with CAIR-Florida to advocate on behalf of Florida Muslims.

59. If the designation becomes effective, it will profoundly damage CAIR's reputation. Even if the designation is later overturned, repairing the reputational damage it inflicts will require a tremendous amount of time and resources. CAIR will need to rebuild and reestablish its relationships with donors, community members, volunteers, and supporters. It took decades for CAIR to build these relationships, and it might never be able to restore them.

60. If its designation becomes effective, CAIR's staff who work remotely from Florida may need to secure other jobs to support themselves, or they may leave because of professional concerns about affiliation with an organization that state officials have chosen to label "terrorist." The loss of staff members with expertise and deep institutional knowledge about CAIR would damage the organization's ability to further its mission. In addition, CAIR would be required to delay its work while it hires and trains new personnel.

I declare under penalty of perjury that the foregoing is true and correct. This declaration is executed on July 2, 2026.

/s/ Edward Mitchell
Edward Mitchell