

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 WILFREDO RUIZ ON
BEHALF OF CAIR FLORIDA, INC.**

Pursuant to 28 U.S.C. § 1746, I, Wilfredo Ruiz, declare as follows:

1. I am a resident of Broward County, Florida. I am over the age of eighteen. I have personal knowledge of the facts stated in this declaration. If called to testify, I could and would testify competently to these facts under oath. I am providing this declaration in my capacity as the Communications Director of CAIR Florida, Inc. (“CAIR-Florida”). As Communications Director, I am a senior member of CAIR-Florida’s management team and am familiar with CAIR-Florida’s programs, operations, and activities.
2. CAIR-Florida was established in 2001 to challenge stereotypes of Islam and Muslims and defend civil rights and liberties in Florida. Our vision is to

be a leading advocate for justice and mutual understanding in our state and to empower Muslim communities, which are a vital part of civil society in Florida. In furtherance of our mission and vision, we promote a more just and equitable society for all. Since our founding over two decades ago, CAIR-Florida has built a reputation for tenacious efforts to combat discrimination against Florida's diverse Muslim communities through legal- and public-policy advocacy work, interfaith engagement, and client services. No other organization does the comprehensive, statewide work CAIR-Florida does to engage elected officials and represent the concerns of Florida's Muslim communities.

3. If CAIR-Foundation, Inc. ("CAIR") or CAIR-Florida is designated as a "domestic terrorist organization"—with all the criminal and civil penalties that result from designation—we will be unable to operate. The impact on CAIR-Florida and its many stakeholders—board members, employees and staff, volunteers and donors, clients and community members who rely on us—will be devastating. It will take us years to recover, to the extent recovery is possible.

4. If not for the impending designation and the criminal and civil consequences associated with it, CAIR-Florida would continue engaging in advocacy, public education, donor engagement, legal advocacy, civil rights intake, community outreach, and association with CAIR 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-Florida's Advocacy

5. CAIR-Florida is a nonprofit corporation organized under Florida law, with its headquarters in Tampa. It is recognized as tax-exempt under Section 501(c)(3) of the Internal Revenue Code.

6. CAIR-Florida is a chapter of CAIR, which is America's largest Muslim civil rights and advocacy organization. CAIR-Florida shares CAIR's faith-driven mission to enhance the public's understanding of Islam, protect civil rights, promote justice, and empower American Muslims. CAIR-Florida implements its mission through advocacy, which includes legal action in federal courts; education; community organizing; interfaith organizing; public engagement with state officials; and commentary directed at government officials and the public.

7. CAIR and CAIR-Florida further 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.

8. In many instances, CAIR-Florida engages in these activities jointly with CAIR, particularly when issues arising in Florida could have nationwide

impact. In other instances, CAIR-Florida may act alone, or on behalf of itself and CAIR.

9. Often in conjunction with CAIR, CAIR-Florida 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. Its employees also frequently accept speaking engagements to discuss topics related to their work, such as Islamophobia and instances of anti-Muslim discrimination. CAIR-Florida uses electronic communications to let people know about its presence in the community as a resource for information and legal services.

10. As part of CAIR-Florida's public education and advocacy efforts, its employees appear on or are quoted in national and local media outlets to provide commentary on civil rights issues.

11. CAIR-Florida also educates people about their civil rights. For example, CAIR-Florida creates and disseminates "Know Your Rights" materials related to workplace discrimination, immigrant rights, school bullying, free speech, police interactions, and travel. CAIR-Florida visits Florida mosques and other community venues to conduct "Know Your Rights" presentations, and it visits schools and universities to speak with students about their rights. During Ramadan, CAIR-Florida creates specialized programming and also relies on materials

produced by CAIR to provide Muslims with information about how to request accommodations at work and school. CAIR-Florida also makes social media videos featuring its staff to remind community members of their rights.

12. CAIR-Florida communicates and advocates with Florida correctional facilities concerning inmate grievance matters and to remind facilities of their duty under federal and state law not to curtail the rights of Muslims in their custody.

13. CAIR-Florida also provides a range of pro bono legal services to Florida residents, including those who have suffered government and workplace discrimination in violation of their civil rights and those navigating the immigration system.

14. Individually and alongside other organizations, CAIR-Florida participates in civic engagement activities that encourage engagement in the democratic process. For example, CAIR hosts an annual Muslim Hill Day in Washington, D.C., and in 2026, representatives from CAIR-Florida traveled to Washington, D.C. to participate in the event. CAIR-Florida also hosts its own Muslim Day at the state Capitol in Tallahassee, Florida. The 2026 event included more than 50 participants and addressed issues such as free speech and legislation directly harming Muslim American communities. It culminated in the passage of House Resolution 8001, which celebrated the contributions of Florida's Muslim

American community and recognized February 2026 as “Muslim American Heritage Month.”

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

16. As part of its civic engagement efforts, CAIR-Florida promotes voter participation through nonpartisan voter education and registration activities.

17. CAIR-Florida also 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, and disinformation about Islam.

18. For example, in meetings with Florida elected officials preceding the 2026 legislative session, CAIR-Florida addressed misinformation about Sharia, a moral and spiritual framework that guides Muslims’ ordinary, personal exercise of faith in furtherance of values like honesty, service, and community. CAIR-Florida also posts materials correcting misconceptions about Sharia on social media and distributes them at public events. As CAIR-Florida has explained, Sharia 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.

19. In 2025, CAIR-Florida publicly opposed Florida House Bill 119, commonly referred to as the “No Shari’a Act,” and publicly criticized statements made by Governor Ron DeSantis in support of the bill.

20. CAIR-Florida also issued public statements urging the Florida Legislature to censure then-State Representative Randy Fine in response to statements he made on social media concerning the death of a Turkish-American human rights activist.

21. As part of its broader civil rights work, and frequently in conjunction with CAIR, CAIR-Florida engages in advocacy and legal support related to Palestinian human rights. For example, CAIR and CAIR-Florida have 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 disfavored viewpoints 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).

22. CAIR-Florida also helped successfully advocate for the return of Mohammed Ibrahim—a 16-year-old U.S. citizen detained by Israeli authorities

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

23. CAIR-Florida's advocacy also relates to the impact of anti-Palestinian sentiment in Florida, and has included petitioning state officials. For example, in March 2025, CAIR-Florida issued a press release and action alert urging Florida residents to request that State Attorney Amira D. Fox pursue hate-crime charges in connection with vandalism of a Palestine supporter's vehicle.

24. CAIR-Florida 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-Florida has also condemned Hamas violence against Israeli civilians, including Hamas's attacks on October 7, 2023.

CAIR-Florida's Operations

25. CAIR-Florida operates statewide, with offices located in Tampa and Sunrise. It has six board members, all of whom are based in Florida; twelve staff members, eleven of whom are based in Florida; and four paid interns, all of whom are based in Florida. It also works with eight contractors, seven of whom are based in Florida, and two subcontractors, who are not based in Florida.

26. CAIR-Florida's staff includes four licensed attorneys, advocacy specialists with prior government experience, communications personnel with

extensive media and public relations expertise, and human resources personnel with institutional knowledge.

27. CAIR-Florida's staff and board members have chosen to work for the organization 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.

28. CAIR-Florida has interests in properties and leases that run through July 2027, including in the building in which its Tampa office is located.

29. CAIR-Florida leases office space in Sunrise, Florida for its South Florida staff. That lease runs through September 2028.

30. CAIR-Florida has several financial accounts at multiple financial institutions.

31. To sustain its day-to-day operations, CAIR-Florida has entered numerous contracts, including for: utilities, internet access, staff cell phones, a phone system for fielding calls from community members seeking legal or advocacy support, a subscription service for managing legal files, a subscription service for managing legal dockets, and insurance coverage for employees and board members.

32. On a daily basis, CAIR-Florida responds to requests for legal or advocacy support from Florida residents statewide. It either provides those services

itself or, when it cannot do so, refers clients to other organizations that can provide adequate assistance.

Targeting by Florida Officials

33. On December 8, 2025, Governor DeSantis issued Executive Order 25-244, which unilaterally designated CAIR as a “terrorist organization,” imposing severe penalties on CAIR and on persons or entities that obtain benefits or privileges regulated by Florida and provide “material support” to CAIR. 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 against CAIR. In discovery in the lawsuit, Governor DeSantis admitted that he also considers CAIR-Florida a “terrorist organization.”

34. In January 2026, through an X post, Florida Attorney General James Uthmeier put the city commission of Coral Springs, Florida, “on notice” that “state and local resources cannot be used by any organization affiliated with CAIR.” Following Attorney General Uthmeier’s post, the South Florida Muslim Federation dissociated from CAIR-Florida, which had been a member of the Federation since its inception. CAIR-Florida was unable to take part in the Federation’s annual conference in Coral Springs, of which CAIR-Florida had been a sponsor. CAIR-

Florida employees were also forced to withdraw from planned participation in multiple conference panels.

35. CAIR-Florida planned to use the 22nd floor of the Florida State Capitol—traditionally used by organizations hosting similar events—for its 2026 Muslim Day at the Capitol. CAIR-Florida submitted a reservation request on December 3, 2025, and subsequently followed up on it over the course of one month. CAIR-Florida received no indication that the space was reserved, merely being told that it was under review. On January 13, 2026, Capitol staff informed CAIR-Florida that the 22nd floor was no longer available.

36. On February 2, 2026, one day before Muslim Day at the Capitol, Attorney General Uthmeier again posted on X, describing CAIR-Florida’s planned advocacy on behalf of Muslim Americans as a designated foreign terrorist organization “call[ing] for a presence around the Florida Capitol.” He also requested that law enforcement “be on heightened alert for any possible security threats” and asked the public to alert law enforcement of “suspicious activity.” An unusually large law enforcement presence focused on the event and its attendees, causing attendees to feel stigmatized and unsafe.

37. CAIR-Florida 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. As CAIR-Florida has repeatedly stated, it does not engage in or support terrorist activity.

Consequences of Designation

38. On July 1, CAIR-Florida learned that the Chief of Domestic Security had sent Governor DeSantis a notice of intent to designate CAIR as a “domestic terrorist organization.” Governor DeSantis and other Florida officials have already indicated that they also consider CAIR-Florida to be a “terrorist organization.”

39. Florida officials’ prior statements have targeted both CAIR and CAIR-Florida, and CAIR and CAIR-Florida work closely with each other. The announcement of CAIR’s imminent designation requires CAIR-Florida to take immediate measures to protect itself and its stakeholders from criminal and civil liability.

40. Unless the court prevents the impending designation of CAIR and the substantially likely designation of CAIR-Florida, CAIR-Florida will be forced to fully suspend its operations to protect itself and its employees, board members, contractors, volunteers, donors, and other community members from harsh criminal, civil, and administrative penalties. From my knowledge of CAIR-Florida, its stakeholders, and the community, I know that people have viewed the July 1 effective date of the law with fear already because of the criminal prosecution and

civil penalties risks it carries. CAIR-Florida also wants to protect its stakeholders from that risk.

41. CAIR-Florida wants to reduce the risk of liability to itself and its personnel, but winding down its operations will take time. CAIR-Florida is putting all staff on one month's paid administrative leave before July 8, 2026, the anticipated date designation will become effective. This will render CAIR-Florida unable to carry out its ordinary activities.

42. An effective designation (one published in the Florida Administrative Register) will force CAIR-Florida to terminate communications with, and outreach to, its network of hundreds of volunteers who support and assist CAIR-Florida in its statewide work.

43. Based on Florida officials' intended designation, CAIR-Florida has placed staff on standby to immediately shut down its social media presence. This means CAIR-Florida's staff will remove organizational social media accounts from their devices, turn off viewers' ability to interact with its posts, and post no new content. CAIR-Florida will also stop posting new press releases on its website, which it typically does once or twice per month.

44. An effective designation will prevent CAIR-Florida from continuing its longstanding association with CAIR to empower, educate, and defend Florida Muslims. CAIR-Florida will be forced to stop reporting to, and acting jointly with,

CAIR to carry out the organizations' shared mission through policy and legal advocacy, press releases, and other public communications and social media coordination. In addition, within Florida, CAIR-Florida will be unable to continue to associate with the mosques, community groups, and other nonprofit organizations with whom it has built ongoing partnerships, and with the members of the Florida public it serves.

45. An effective designation will leave CAIR-Florida unable to maintain its community helpline, leaving members of Florida's Muslim community who have experienced discrimination without access to its legal and advocacy support.

46. An effective designation will also prevent CAIR-Florida's attorneys from continuing to provide their clients with effective counsel. CAIR-Florida attorneys maintain a substantial immigration docket of more than 100 files, representing clients in Miami and Orlando immigration courts as well as in interactions with U.S. Citizenship and Immigration Services. CAIR-Florida's immigration practice frequently involves emergency matters, such as referrals from individuals in detention or facing other serious harm. CAIR-Florida also represents multiple clients across several cases related to discrimination, including cases currently pending before the Equal Employment Opportunity Commission. All communications between these clients and the federal government occur through CAIR-Florida. CAIR-Florida's clients will also require representation in two

upcoming mediations. In addition, CAIR-Florida jointly represents several Florida residents alongside CAIR in an out-of-state proceeding.

47. An effective designation will also force CAIR-Florida to suspend its community education work. For example, between July and October 2026, CAIR-Florida will have to cancel approximately ten planned trainings. During that period, its legal team is planning four Know Your Rights trainings for community members, and its communications staff have organized a series of media trainings for journalists and leaders of nonprofit organizations.

48. The cumulative effect of these consequences of designation is that CAIR-Florida's institutional voice will be silenced, and its advocacy on legal, policy, cultural, social, and civic issues of public concern will be completely suppressed. CAIR-Florida will also be indefinitely unable to benefit from the expertise of its employees, including its attorneys, advocacy specialists, and communications experts.

49. An effective designation will also jeopardize CAIR-Florida's fundraising, which will have a debilitating effect on the organization. CAIR-Florida depends entirely on grants and donations, neither of which it will be able to solicit once it suspends its operations.

50. Three annual fundraising galas are life-sustaining for CAIR-Florida because they account for more than half of its annual fundraising and support all

aspects of the organization's work, from staff salaries and operational expenses to civil rights work, advocacy, outreach, and trainings. All three of CAIR-Florida's galas would typically be held from September to November. If CAIR-Florida were forced to cancel or postpone these events, it would significantly impair the organization's ability to fund its work.

51. CAIR-Florida is also concerned that its bank accounts will be frozen once a designation is effective, making it unable to fulfill its existing contractual obligations.

52. CAIR-Florida is also concerned that it will be unable to receive rent payments from tenants who lease properties in which CAIR-Florida has an interest. One tenant has already expressed concern to CAIR-Florida about exposure to criminal liability for paying rent.

53. By forcing CAIR-Florida to stop any communications and work with its stakeholders, criminalizing the basic functions and transactions it requires to operate, and silencing its speech across all its public platforms, an effective designation would effectively shut down the organization and prevent it from carrying out its faith-driven mission.

54. An effective designation will profoundly damage CAIR-Florida's standing in the community and its reputation. I believe it will cause community members to view CAIR-Florida and its employees with suspicion and

uncertainty—and people will cut ties or at least distance themselves from CAIR-Florida.

55. An effective designation will also hurt CAIR-Florida's ability to obtain its own counsel to represent it in current and future lawsuits. For example, CAIR-Florida is currently represented by counsel in Florida in *Illoominate Media, Inc. v. CAIR Florida, Inc.*, No. 9-cv-81179 (S.D. Fla. 2019), in which it is receiving settlement payments. There is a substantial risk that either designation will force CAIR-Florida's counsel to cut ties with it, leaving it unrepresented. An effective designation may also prevent CAIR from obtaining proceeds to which it is entitled from the case.

56. The costs of even a temporary suspension of CAIR-Florida's activities will be catastrophic, and the administrative burden of restarting CAIR-Florida's operations will be substantial. CAIR-Florida is a statewide operation with multiple offices and departments, all requiring contracts and subscriptions (such as Filevine and Quickbooks) to function.

57. If the designation becomes effective, CAIR-Florida will also be responsible for payments under any contracts it was unable to suspend before discontinuing operations, even if it is unable to use those services.

58. If the designation becomes effective, CAIR-Florida's staff 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 any staff members with institutional knowledge and expertise from their tenure with CAIR-Florida would hurt the organization’s ability to further its mission. In addition, CAIR-Florida would be required to delay its work while it hires and trains new personnel.

59. If the designation becomes effective, CAIR-Florida knows that repairing the reputational damage inflicted by the designation would require an extensive investment of time and resources. If CAIR or CAIR-Florida is designated as a “domestic terrorist organization,” it will severely hurt CAIR-Florida’s relationships with its donors, its partner organizations, and the communities it serves.

60. Further, following an effective designation, there is no guarantee that CAIR-Florida will ever be able to fully rebuild these relationships. For example, even though a court stopped CAIR’s designation under Governor DeSantis’s Executive Order from going into effect, CAIR-Florida has been unable to reestablish a regular presence at some mosques that stopped communicating with it when that designation was announced.

61. Similarly, an effective designation would force CAIR-Florida to rebuild its funding streams and donor relationships. Because it will not receive any donations or grants during the period for which its designation is in effect, CAIR-

Florida would have to divert substantial additional time, effort, and resources into its fundraising efforts to avoid falling into a deficit.

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

/s/Wilfredo Ruiz

Wilfredo Ruiz