

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.*

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**SUPPLEMENTAL 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,” “we,” “our,” or “us”), 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. When Governor DeSantis signed HB 1471 into law, we fully expected that state officials would wrongly use their new designation authorities against

CAIR, for the reasons set out in paragraphs 35 to 36 of my previous declaration (ECF No. 19-1) and paragraphs 89 to 136 of the Complaint (ECF No. 1).

3. As I stated in my previous declaration (ECF No. 19-1 ¶¶ 44–46), in anticipation of its designation going into effect, CAIR took steps to prevent any advocacy action communications, donor solicitations, and public and community outreach from being sent to Florida residents. CAIR began taking those steps before July 1. As of July 1, CAIR had in fact restricted dissemination of those communications to Florida residents.

4. As noted above, we fully expected (and expect) the designation of CAIR to go into effect. But even if the likelihood of designation had been lower, we still would have had to take these measures in advance. That is because of the magnitude of the harm we and others faced, and the fact that these measures could not feasibly or reasonably be implemented in the short window of time after the vote but before the effective date of designation under the statute. As of July 1, we understand that window of time would have been seven days at most, and it could have been as few as zero days.

5. Separately, on July 1, in response to Governor DeSantis's announcement, a Florida-based company that provides CAIR with information-technology network services—including website-hosting, cybersecurity, and technical support—initiated a “compliance review” concerning the risk to the

company if it continued to provide services to CAIR. The IT company told a CAIR employee about this matter on July 1—a discussion that diverted time from the employee’s other work to advance CAIR’s mission and required other employees to divert time to identify other potential IT providers. The IT company terminated its relationship with CAIR a few days later. Finding and transferring services to a new IT provider diverted significant staff time from CAIR’s other work. The new IT provider was also more expensive, resulting in additional expenditures by CAIR due to HB 1471.

I declare under penalty of perjury that the foregoing is true and correct. This declaration is executed on September 23, 2026.

/s/ Edward Mitchell

Edward Mitchell