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.
_________________________________/

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

CAIR-Florida, for the reasons set out in paragraphs 33 to 37 of my previous declaration (ECF No. 19-2) and paragraphs 89 to 136 of the Complaint (ECF No. 1). But even if the likelihood of designation had been lower, we still would have had to take protective measures in advance. That is because we and others faced such immense harm (like criminal prosecution and decades in prison), and because we could not feasibly or reasonably do everything we had to do to comply with the law in the short window of time (a) after the vote but (b) before the effective date of designation under the statute.

3. As of July 1, the window of time between a vote and the effective date of the designation would have been seven days at most, and it could have been as few as zero days.

4. Leading up to July 1, 2026 (the effective date of HB 1471), members of our staff were gravely concerned about the risk of criminal penalties if staff continued to work for CAIR-Florida. We held several meetings to address these concerns, including with CAIR-Foundation, Inc. ("CAIR"), with counsel. We needed to hold these meetings to understand the risks of designation and address our staff members' concerns. We spent time securing criminal defense attorneys, in the event of investigation and prosecution. This required us to divert resources away from our other work, including advocacy work to defend civil rights and

liberties in Florida, to challenge stereotypes of Islam and Muslims, and to empower Muslim communities.

5. Leading up to July 1, because of the looming threat of designation, two CAIR-Florida staff members—our Policy Director and Programs and Outreach Manager—left the organization. Their departures heavily damaged our work in support of our Florida community.

6. Also leading up to July 1, senior members of our staff devoted significant time to developing contingency plans for shutting down our operations because of a designation. We necessarily had to develop and start implementing these plans in advance of a vote on designation. Suspending our operations requires advance planning and actions necessary to wind down the operations I described in my previous declaration, including suspension of payroll and benefits for staff; ensuring legal and financial compliance; ensuring security of legal client and donor data; suspending vendor contracts, such as for office equipment and staff work cell phones; suspension of donations and other fundraising as described further below; communications to stakeholders and community members who rely on us for legal and advocacy services. That, too, diverted resources from our normal administrative, fundraising, and advocacy work.

7. After June 10, 2026, in anticipation of our designation under HB 1471, we started turning away prospective legal clients we otherwise would have taken on,

even though representing members of our community is extremely important to us. We did not feel we had any other choice, because (a) we understood that if we were designated, our attorney employees would not be able to work for us without risking severe criminal punishment, (b) if we waited until the last moment before designation, we would run the risk of being unable to secure alternative counsel for our clients, and (c) we were concerned that taking on new clients, under the circumstances, might violate the Florida Bar's ethical rules. We also did not think it would be in any prospective client's interests to begin an attorney-client relationship with us and then have us suddenly become unable to work with them due to HB 1471. We have since resumed conducting intakes and consults, but we are not initiating new litigation or long-term matters.

8. On July 1, we learned that the Chief of Domestic Security had sent Governor DeSantis a notice of intent to designate CAIR as a "domestic terrorist organization."

9. We work closely with CAIR. Florida officials' prior statements have targeted both CAIR and CAIR-Florida, making no apparent distinction between the two organizations. Also, by July 1, Governor DeSantis had already admitted in a lawsuit that he considers CAIR-Florida to be a "terrorist organization." When Florida officials announced that CAIR was on the verge of being designated,

CAIR-Florida had no choice but to take immediate measures to protect itself and its stakeholders from criminal and civil liability.

10. We knew that continuing any of our operations after the designation was published in the Florida Administrative Register would expose us, our personnel, and our community stakeholders to extremely serious criminal punishments and civil liability. We also knew that the designation could be published as early as July 8. So we had to start taking action right away. We could not afford to wait, because we knew that winding down our operations would take time.

11. On July 1, CAIR-Florida began cancelling its recurring donations and shutting down its payment processors. Those steps were complete on July 2. We did this to protect our donors—who support our mission and our work—from potential criminal charges under HB 1471.

12. On July 1, due to HB 1471, we paid a one-month advance to our staff, so that, in the event the designation became effective, they could stop work with at least a little financial cushion—for most of our staff, their jobs are their primary source of income. For obvious reasons, we did not want to terminate all of our staff before a designation went into effect and pending a constitutional challenge; without staff, CAIR-Florida cannot function. But we also did not want to create legal risks for staff if the designation went into effect, and we did not want to end up in a scenario where staff had no financial buffer if the organization were forced

to shut down. We felt we had no choice but to pay this one-month advance due to HB 1471, which diverted funds from other organizational work.

13. After we and CAIR filed this lawsuit in July, we learned that Florida officials committed to not designating us until after they issued certain regulations—August 10 at the earliest. At that point, we tried to reinstate our recurring donations. Our staff put considerable time and effort into this. We were able to reinstate some of our recurring donations, but not all.

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

/s/Wilfredo Ruiz
Wilfredo Ruiz