

EXHIBIT 1

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA**

FLORIDA ACTION COMMITTEE, INC.,

Plaintiff,

v.

MARK GLASS, et al.,

Defendants.

DECLARATION OF [REDACTED]

I, [REDACTED] declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am the President of Florida Action Committee, Inc. (FAC), Plaintiff in this action. I have personal knowledge of the matters set forth in this declaration and, if called as a witness, could and would testify competently thereto.

2. FAC is a not-for-profit entity organized under the laws of the State of Florida. FAC currently has more than 3,300 members primarily residing throughout the State of Florida. We have members in each of the sued Counties and Cities.

3. FAC was established to advocate for fair, constitutional, and evidence-based laws and policies affecting individuals required to register as sexual offenders or sexual predators, as well as their families. FAC promotes public safety through education, research, public awareness, legislative advocacy, litigation, and community engagement. FAC works to ensure that laws governing registration, residency restrictions, and related collateral consequences are constitutional, rational, and supported by empirical evidence. Protecting the constitutional rights and legal interests of its members is one of FAC's central organizational purposes.

4. FAC's membership includes individuals who are currently required to register as sexual offenders or sexual predators under Florida law, family members of registrants, attorneys, researchers, treatment providers, and other citizens who support FAC's mission.

5. A majority of FAC's members are directly subject to the laws, regulations, and governmental actions challenged in this lawsuit. Those members are personally affected by the challenged provisions and experience the burdens imposed by those laws on a daily basis.

6. Many of FAC's members moved to Florida or were released from prison and newly subjected to Florida's registration scheme within the last four years. Others have been subject to Florida's registration requirements for longer than four years and have suffered continual, repeated, and ongoing injuries, including those that arise every time officers knock on their doors to confirm their registered residence; every time they must avoid populated areas because of Florida's sex-offender presence restrictions; every time they move residences and are subjected anew to the registration scheme's residency restrictions; every time they must take time out of their days, often missing work, to appear at the sheriff's office to make new in person reports; every time they forego in-state travel that would entail establishing a "temporary" residence for three days or longer; every time they avoid or miss interstate or international travel due to the scheme's reporting and notice obligations; and every time the Florida legislature amends the relevant provisions with additional burdens.

7. FAC regularly communicates with its members regarding Florida registry law, proposed legislation, local ordinances, law enforcement practices, and litigation affecting registrants.

8. FAC devotes significant organizational resources to educating its members about the registration statutes, assisting members in understanding and complying with registration requirements, responding to member inquiries regarding the interpretation and enforcement of registration laws, monitoring proposed legislation and local ordinances, preparing educational materials, and advocating before governmental entities.

9. FAC also expends substantial resources identifying and investigating governmental actions affecting its members, coordinating public records requests, consulting with attorneys and subject matter experts, gathering evidence, communicating with affected members, and participating in litigation designed to protect the constitutional rights of its members.

10. The governmental actions challenged in this lawsuit have directly affected FAC and its members. FAC has been required to devote considerable organizational resources to investigating, researching, educating members about, and responding to the challenged

governmental conduct. These activities have required FAC to divert time, personnel, volunteer effort, and financial resources away from its other organizational priorities and programs.

11. FAC has received numerous communications from members seeking assistance concerning the issues presented in this lawsuit. Responding to those inquiries and assisting affected members has become a recurring and substantial component of FAC's activities.

12. Throughout FAC's existence, residency restrictions imposed upon individuals required to register as sexual offenders or sexual predators have been among the greatest areas of concern for our members. The availability of lawful housing has consistently been the issue about which FAC receives the greatest volume of member inquiries and requests for assistance.

13. FAC regularly receives telephone calls, emails, letters, website inquiries, and other communications from registrants who are unable to locate housing that complies with Florida's sex offender residency restrictions and from family members seeking assistance on behalf of affected registrants.

14. FAC's members all too often face prolonged periods of homelessness, repeated housing denials, failed housing searches, and the inability to reunite with spouses, children, or other family members because compliant housing cannot be located.

15. FAC also regularly receives telephone calls, emails, letters, website inquiries, and other communications from registrants seeking assistance in determining whether a particular residence is legally compliant.

16. FAC's members are frequently unable to determine where exclusion zones begin and end because there is no physical demarcation identifying the boundaries of prohibited areas. Likewise, there is no centralized, comprehensive, or publicly maintained database identifying all schools, parks, playgrounds, childcare facilities, swimming pools or other locations that create exclusion zones.

17. The difficulty is further compounded because the locations giving rise to exclusion zones are constantly changing as new facilities open, existing facilities relocate, and others cease operation. As a result, registrants are often unable to determine with confidence whether a prospective residence complies with applicable law.

18. FAC also frequently receives inquiries concerning the reporting of internet identifiers to the Department of Law Enforcement (FDLE). Members seek guidance on whether particular internet accounts, applications, websites, or online services must be reported under

Florida law. Because the statutory requirements are unclear and there is no authoritative guidance identifying which internet identifiers are subject to registration, registrants are often unable to determine their reporting obligations with confidence.

19. In an effort to obtain clarity for its members, FAC submitted a Petition for Declaratory Statement to FDLE requesting formal guidance concerning whether specific online accounts and services are required to be reported. FDLE declined to provide the requested clarification. As a result, registrants remain subject to inconsistent interpretations and enforcement. FAC has received reports of individuals being arrested for failing to register Google Drive accounts that they were unaware existed because those accounts were automatically provisioned when they created a Gmail email address. FAC has likewise received reports that some jurisdictions treat YouTube accounts as reportable internet identifiers, even though the platform does not facilitate direct person-to-person communication like messaging or social networking applications.

20. The absence of clear, uniform guidance with respect to housing, loitering, proximity standards, and internet identifier reporting has resulted in inconsistent enforcement across Florida, to the extent that two law enforcement officers within the same agency may provide different interpretations of a registrant's reporting obligations. This uncertainty exposes registrants to criminal prosecution despite their good-faith efforts to comply with the law and has required FAC to devote substantial organizational resources responding to member inquiries and attempting to interpret ambiguous statutory requirements for which no definitive guidance exists.

21. FAC's volunteers routinely assist members by reviewing maps, researching statutes and local ordinances, identifying potential exclusion zones, explaining applicable legal requirements, and attempting to help members locate lawful housing. These activities consume significant time and resources that FAC would otherwise devote to its other public safety, sexual harm prevention, educational and advocacy programs.

22. FAC has sent hundreds of calls, letters, Public Information Act requests and requests for declaratory statement to legislators, FDLE, to county sheriff's offices, and local police departments seeking guidance on behalf of our members. These correspondences go largely ignored. At best we are told that it's the registrant's burden to identify these locations on their own or that the FDLE cannot provide "legal advice." At worst, the agencies tell us it's not their problem and the registrant "should have thought of that before they did what they did."

23. Soliciting the cooperation of lawmakers and law enforcement is further complicated by the fact that our members are viewed first and foremost as “registered sex offenders” and therefore treated with greater suspicion and bias than other members of the public seeking help or guidance from their government officials or officers.

24. Based upon FAC’s experience and communications with its members throughout Florida, shame and bias toward individuals required to register is a recurring concern reported by registrants and their families.

25. The recently enacted amendments to Florida’s residency restrictions have significantly compounded the problem of locating compliant housing. By adding “public swimming pools” the amendments have dramatically reduced the amount of housing available for lawful residence and made housing more difficult to identify.

26. Another significant concern affecting FAC’s members is the constantly changing nature of Florida’s registration laws and the uncertainty those changes create. For example, when Florida reduced the definition of a “temporary residence” to include a location where a registrant spends three or more days in the aggregate during a calendar year, the practical impact on many registrants was substantial. A person who previously visited a parent, child, or other family member on a monthly or quarterly basis could now exceed the statutory threshold after only three visits if that family member’s residence is located within an area that is otherwise prohibited under a residency restriction. Or, a residence that was compliant on June 30, 2026, may have become prohibited on July 1, 2026 because the family member lives in a community with a pool. As a result, conduct that many individuals and families reasonably viewed as ordinary familial interaction for years became subject to felony liability.

27. These repeated statutory changes make it increasingly difficult for registrants and their families to understand their obligations and have required FAC to expend significant resources monitoring legislative developments, educating members about new requirements, and responding to questions from individuals attempting in good faith to remain compliant with an ever-changing legal framework.

28. Compliant housing is, in many communities, functionally unavailable because no lawful housing exists within the remaining unrestricted areas. As a result, many registrants face the impossible choice of remaining homeless, relocating far from employment and family, or risking criminal prosecution.

29. The unavailability of lists, maps, red circles on the ground or any means to accurately identify where all exclusion zones begin or end (ie: whether a property boundary is 999 or 1,001 feet from a prohibited landmark), has led members to residing unknowingly in an area later determined to be prohibited and be arrested or forced to move.

30. The recently enacted amendments to Florida's loitering (proximity) law have also significantly compounded the problem of knowing where a registrant can or cannot be present or who they can or cannot "communicate" with. Personally, I am a father of minor children. I generally accompany my children whenever they are out in the community. I have done so without incident their entire lives. Now, I can't say hello to their friends or even be present within 500 feet of a "place where children congregate."

31. The challenged laws have substantially increased the demand for FAC's services, requiring the organization to devote additional time, volunteer effort, and financial resources to assisting members in trying to figure out increasingly complex and ever-changing residency and presence restrictions. These additional expenditures have diverted FAC's limited organizational resources away from other core aspects of its mission.

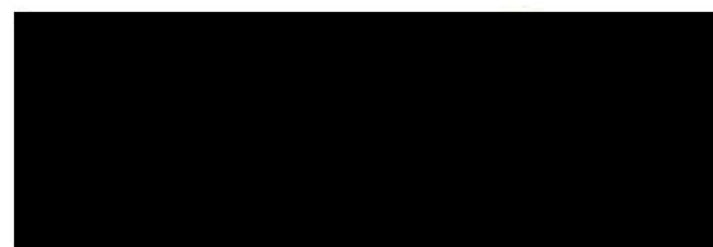
32. The interests FAC seeks to protect in this litigation are germane to its organizational mission. This lawsuit concerns laws and governmental practices that directly affect FAC's members and the rights FAC was created to protect.

33. The declaratory and injunctive relief sought in this action would benefit FAC's members by preventing the continued enforcement of the challenged governmental actions.

34. FAC brings this action on behalf of itself and its members because the challenged governmental conduct adversely affects FAC's organizational mission and directly impacts the rights and interests of FAC members in uniform ways throughout Florida.

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

Sworn to and signed by me on August 8, 2026.



Florida Action Committee, Inc.