

# Exhibit 15

**IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT  
IN AND FOR LEON COUNTY, FLORIDA**

**COMMON CAUSE; LEAGUE OF WOMEN VOTERS  
OF FLORIDA, INC.; and LEAGUE OF UNITED LATIN  
AMERICAN CITIZENS,**

Plaintiffs,

**CASE NO: 2026 CA 00928**

vs.

**RON DESANTIS**, Florida Governor; **CORD BYRD**,  
Florida Secretary of State; **JAMES UTIEMEIER**,  
Florida Attorney General; **DANIEL PEREZ**, Speaker  
of the Florida House; **BEN ALBRITTON**, President  
of the Florida Senate; **MIKE REDONDO**, Chair of  
the Florida House Select Committee on  
Congressional Redistricting; **KATHLEEN  
PASSIDOMO**, Florida Senate Committee on Rules  
Chair; **DON GAETZ**, Florida Senator; **JENNA  
PERSONS-MULICKA**, Florida Representative; the  
**FLORIDA HOUSE**; and the **FLORIDA SENATE**,

Defendants.

\_\_\_\_\_ /

**DECLARATION OF JUAN PROAÑO**

I, Juan Proaño, swear under penalty of perjury that the following information is true to the best of my knowledge and state as follows:

1. I am a resident of Miami, Florida, where I have lived since 2013. I was born in Miami and have lived approximately half my life in Florida.
2. I have served as the Chief Executive Officer (“CEO”) of the League of United Latin American Citizens (“LULAC”) since November 2023. From July 2018 until November 2023, I served as a strategic advisor to LULAC’s National President.
3. LULAC is a nationwide, non-profit, non-partisan, membership-based organization with 421 councils (local chapters) and over 575,000 members, with members in every state in the country. LULAC was established in 1929 and is headquartered in Washington, D.C. LULAC is the largest and oldest Latino civil rights organization in the United States.
4. As LULAC’s CEO, my responsibilities are to oversee the organization’s day-to-day operations, including its staff, finances, programs, services, advocacy, litigation, and membership work across the United States and in Puerto Rico. LULAC has a significant presence in Florida, and its operations in the state are very similar to its work across the country.
5. I am authorized to speak for LULAC in this case.
6. LULAC has been dedicated to improve the lives of Latino families throughout the United States and to protect their civil rights in all respects, including voting rights.
7. LULAC regularly engages in significant voter education, voter registration, and voting rights advocacy. This includes seeking to protect the interests of members to vote under lawful and constitutional voting plans that are not made with partisan intent and do not deny them equal voting power.
8. LULAC has participated in numerous voting rights cases on behalf of the Latino community, including cases concerning redistricting and alleged gerrymandering, like *Abbott v. Perez*, 585 U.S. 579 (2018), *LULAC v. Perry*, 548 U.S. 399 (2006), and *LULAC Council No. 4434 v. Clements*, 999 F.2d 831 (5th Cir. 1993) (en banc).
9. LULAC councils and members in Florida advocated for the passage of Florida’s 2010 Fair Districts Amendment.
10. The Challenged Plan nullifies these efforts, and its effect on the interests LULAC seeks to protect are in contradiction with LULAC’s mission.
11. Prior to and during Florida’s 2026 special legislative session, I followed public statements, watched hearings, and tracked media regarding the Challenged Plan to understand the impact it would have on Florida’s Latino citizens and communities.
12. As part of my responsibilities as CEO, I work with our councils, including those in Florida, to oversee the maintenance of national leadership, supporter, and staff lists, records, and information, including a database of members. As CEO, I have access to this information and work closely with LULAC’s Membership Director, who is responsible for maintaining accurate membership information. LULAC has over 15,000 members throughout Florida.

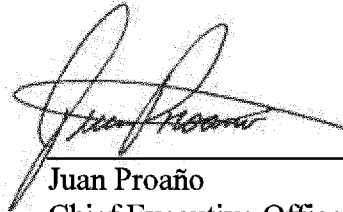
13. Based on my review of the LULAC member database, I am personally aware that we have members who are eligible voters living in the following Challenged Plan Districts:

- a. 8;
- b. 9;
- c. 10;
- d. 11;
- e. 12;
- f. 13;
- g. 14;
- h. 15;
- i. 16;
- j. 18;
- k. 20;
- l. 22;
- m. 23;
- n. 24;
- o. 25; and
- p. 26.

14. In order to be an active member of LULAC, among other responsibilities, an individual must be in good standing in LULAC, participate in council activities and meetings, and abide by LULAC's constitution and bylaws.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on: 5/11/2026

A handwritten signature in black ink, appearing to read "Juan Proaño", written over a horizontal line.

Juan Proaño  
Chief Executive Officer  
League of United Latin American Citizens