

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 17-cv-00210-RBJ

LIST INTERACTIVE, LTD. D/B/A UKNIGHT INTERACTIVE,  
LEONARD S. LABRIOLA,  
Plaintiffs,

v.

KNIGHTS OF COLUMBUS,  
Defendant.  
KNIGHTS OF COLUMBUS,  
Counterclaim Plaintiff

v.

LIST INTERACTIVE, LTD. D/B/A UKNIGHT INTERACTIVE,  
LEONARD S. LABRIOLA, WEBSINC.COM, STEPHEN S. MICHLIK, JONATHAN S.  
MICHLIK, AND TERRY A. CLARK,  
Counterclaim Defendants.

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**AFFIDAVIT OF ALBERT A. CALA**

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I, Albert A. Cala, being duly sworn, state:

1. I am over 18 years of age, of sound mind, and competent to make this declaration and swear to the matters herein. The statements herein are true and correct and based on my personal knowledge.

2. I became a member of the Knights of Columbus in 2000.

3. In 2003, I became an employee of the Knights of Columbus. My positions have been: Hispanic Development Field Coordinator from 2003 to 2006; Director of Hispanic Growth from 2006 to 2012; Manager of Membership Growth from 2012 to 2014; Deputy Director of Membership Growth from 2014 to 2016; and Director of Membership Development from 2016 to the present.

4. For the past 13 years, I have worked extensively in the Eastern United States to reach out to Catholic immigrant communities and have spoken to hundreds of prospective members about joining the Order.

5. My job with the Order has been to form Spanish-speaking councils in urban and suburban areas of the country and later to supervise this effort throughout the United States and Canada. In order to form these councils, it has been necessary to recruit parishioners from each of the parishes visited, most of whom were immigrants from Mexico, Central and South America.

6. Many of the Spanish-speaking men in these parishes have told me and my team that they are fearful to sign up for the Knights of Columbus because they are undocumented. They have volunteered this information even though we never ask them if they are undocumented, since citizenship and legal residence are not requirements for membership.

7. When my team has collected identifying information from prospective members, such as their full names and current addresses, we assure them that this information will remain confidential. We always told the prospective members that the information that they provided us would never be shared with any third parties.

8. Many immigrant members have told me that they are afraid that the information that they provide the Order, such as their full names and addresses, could be divulged to ICE or to other governmental entities who could track them down and deport them to their country of origin.

9. It has been difficult forming these Spanish-speaking councils because even after long periods of building trust with the immigrant parishioners, many would be still unwilling to

join. Trust is very important and it is very difficult to earn, especially when we are not part of their communities. Many prospective members told me that they did not want to root themselves very deeply in their communities because they had to move at a moment's notice when news would come of raids at their workplaces. They did not want to commit themselves to anything for fear that if they moved unexpectedly, they would leave a void in the group.

10. Despite their fears, some of these immigrant men would still join the Knights of Columbus, holding onto their faith and their trust in the Order that nothing detrimental would happen to them because the Knights of Columbus would keep their information private.

11. If the Knights of Columbus is forced to turn over its membership list, I will feel that I will have broken my promise to the men I recruited that the Knights of Columbus would keep their information private.

12. Based on my experience, I believe that the Knights of Columbus would lose many Spanish-speaking members and it would be much harder to recruit new Spanish-speaking men to the Order if the Knights of Columbus is forced to turn over its membership lists.

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

  
Albert A. Cala

STATE OF CONNECTICUT        )  
  ) ss.  
COUNTY OF NEW HAVEN        )

Subscribed and sworn to before me on October 10, 2017, by Albert A. Cala.

WITNESS MY HAND AND OFFICIAL SEAL.

  
Notary Public

My Commission expires: 08/31/2018