

EXHIBIT B

DECLARATION OF BRYANT GARCIA

Pursuant to 28 U.S.C. § 1746, I, Bryant Garcia, declare the following:

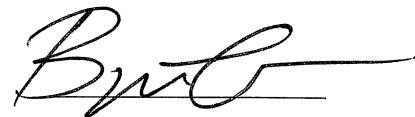
1. My name is Bryant Garcia. I am an eligible, registered voter in Delaware. I am the Executive Director of La Esperanza. I submit this declaration in support of La Esperanza's motion to intervene in this matter.
2. I am over 18 years old and am otherwise competent to testify. I have personal knowledge of the matters in this declaration, and I would testify thereto if I were called as a witness in Court.
3. In 2014, I joined La Esperanza as an outreach coordinator, and in 2025, I became the Executive Director. In my capacity as Executive Director of La Esperanza, my responsibilities include managing and supervising our programs, and overseeing day-to-day operations, fundraising, and budgeting, among others.
4. La Esperanza is a non-partisan, nonprofit organization whose mission is to assist Latinos and immigrant families on their journey to achieve stability, integration, and success. La Esperanza advances this mission through services such as immigration counseling, navigation services, career and college coaching, victim assistance services, and classes regarding citizenship preparation. La Esperanza serves approximately 3,000 clients a year, including clients navigating the process of becoming naturalized citizens throughout Delaware. We provide wrap-round citizenship services that include classes to help eligible applicants prepare for their naturalization interview and exam, and provide legal representation in naturalization cases before the United States Citizenship and Immigration Services.

5. As a core part of its services, La Esperanza promotes non-partisan civic participation and voter registration among the Latino community. Through our resource navigation work we regularly help individuals and families apply for important documents like U.S. passports and State IDs/Licenses and guide individuals in the voter registration process. In 2024, we hosted a voter registration day event at La Esperanza in partnership with National Voter Registration Day.
6. People throughout Delaware have been sensitive to disclosures of their personal information, including in the Latino community. If the federal government were to have access to the unredacted Delaware voter file, this would heighten anxieties about such disclosure and federal overreach, particularly for those who already have trouble trusting the federal government. Delaware voters, particularly Latino voters, would be very concerned if the federal government, or any actors the federal government chooses to share information with, had information about where they live, their partial social security numbers, or their driver's license numbers.
7. This sensitivity is heightened with immigrant voter communities. Many of these eligible voters—including Latino immigrants who have become naturalized citizens or native-born United States citizens with family and friends who are immigrants—would be very concerned if their personal information was shared with the federal government.
8. In light of these and other privacy concerns, if the unredacted statewide voter file were to be shared with the federal government, these voters may also be deterred from registering to vote or updating their current voter registration record. They may also be deterred from voting, suppressing their most fundamental right as citizens.

9. These communities are also particularly concerned about the risk that the federal government would use unredacted voter data to attempt to remove Delaware immigrant citizens from the voter rolls or might share this data with outside organizations with the same goal. These eligible voters could have their data cross-checked against inaccurate or out-of-date information about their voter eligibility (including their citizenship status), or their address or other personal information, which could lead to them being mistakenly removed from the voter rolls.
10. The aforementioned risks and concerns would greatly impact La Esperanza's mission and work, including La Esperanza's core work promoting civic engagement and voter registration in its community. Eligible voters will be less likely to take advantage of La Esperanza's core services related to voting and civic engagement if they think their sensitive personal data would be shared with the federal government.

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

Dated: February 2, 2026



Bryant Garcia