

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; et al.,

Plaintiffs,

v.

DONALD J. TRUMP, et al.,

Defendants.

C.A. No.:

DECLARATION OF RHODE ISLAND SECRETARY OF COMMERCE
ELIZABETH TANNER

Pursuant to 28 U.S.C. § 1746, I, Elizabeth Tanner, hereby declare as follows:

1. I am a resident of the State of Rhode Island. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed as Secretary of Commerce for the Rhode Island Executive Office of Commerce.

3. The Executive Office of Commerce (“EOC”) is a state agency which leads and assists state departments in order to improve the economy, efficiency, coordination and quality of the business climate in the state. The EOC has oversight authority of other state agencies including the Department of Business Regulation and the Quonset Development Corporation. As Secretary, I serve as the Chief Executive Officer of the Rhode Island Commerce Corporation (“RI Commerce”), a quasi-public agency charged with acquiring and developing real and personal property and providing financing to promote and encourage the preservation expansion and sound development of new and existing industry, business, commerce, agriculture, tourism, recreational, and renewable energy facilities, promoting the economic development of the state and the general welfare of its citizens. Previously, I served as Director of the Department of Business Regulation from 2017 to 2022.

4. RI Commerce supports businesses (including underserved businesses) through programs such as Rhode Island Rebounds, a set of State Fiscal Recovery Fund funded programs including technical assistance and direct grants to support small businesses negatively impacted by the COVID-19 pandemic; Supply RI, a program connecting suppliers and small businesses to

larger businesses and institutions to grow in state purchasing; the Minority Business Accelerator, a program providing technical assistance and direct funding to minority- and woman-owned businesses; and the Small Business Assistance Program, a state backed loan program that encourages banks and credit unions to make slightly riskier loans.

5. As Secretary of Commerce, I have connected Minority Business Development Agency resources to Rhode Island's small business and start up community through financing, grant program management, and technical assistance.

6. I have worked with Rhode Island small businesses in various government and private positions for over two decades. During that time, I have become familiar with and leveraged multiple financial and technical support resources for historically underserved business owners. These resources have been at the local, state, regional, federal, and international level.

7. I submit this declaration in connection with Executive Order 14,238, "Continuing the Reduction of the Federal Bureaucracy," which directed seven federal agencies, including the Minority Business Development Agency (MBDA), to eliminate any non-statutory components and functions to the maximum extent consistent with applicable law, and to reduce the performance of any statutory functions and associate personnel to the minimum presence and function required by law.

8. The MBDA is the primary federal agency tasked to assist Minority Business Enterprises (MBEs) in overcoming the history of social and economic disadvantage that has limited their participation in America's economy.

9. The MBDA provides many valuable services to Rhode Island businesses. Those services include one-on-one guidance and expertise at regional MBDA Business Centers, which educate Rhode Islanders on business strategy, access to capital and financial management, entering

new markets, government procurement opportunities, and global exports and international trade, among other matters.

10. The MBDA also provides grants through pilot projects and programs such as Entrepreneurship Education for Formerly Incarcerated Persons and Enterprising Women of Color Business Centers. For example, the Capital Readiness Program provides technical assistance and invests millions in support of minority, veteran, disabled, women, and other underserved entrepreneurs to help incubate new companies in Rhode Island and across the country.

11. One notable beneficiary of MBDA funding is the Rhode Island Small Business HUB, which supports local Rhode Island businesses with free business planning and operational assistance. The HUB consults with companies on their accounting practices, legal issues, marketing ideas, customer experience, human resource management, IT strategy, networking opportunities, and investment potential. The HUB is managed by Skills for Rhode Island's Future, a 501(c)(3) nonprofit economic development organization, and is funded by Congress in partnership with the State of Rhode Island. The HUB participates in the MBDA's Capital Readiness Program, providing a series of workshops, one-on-one counseling sessions, and networking opportunities to help entrepreneurs access the capital necessary to scale their ideas and bring more diversity to the market.

12. MBDA also provides valuable resources such as the MBDA Research Library and the MBDA Data Warehouse, which inform State initiatives with much-needed information on the status of minority-owned businesses in Rhode Island.

13. In providing those services and that funding, the MBDA supports Commerce's mission.

14. Rhode Island runs on small businesses. Of the approximately 105,000 businesses registered in the state in 2023, approximately 98%—counting for about 51% of the state’s workforce—employ under 100 people. Small businesses drive Rhode Island’s economy. Nearly half of all Rhode Island small businesses are owned by members of historically underinvested communities. 91% of businesses surveyed that received RI Rebounds technical assistance services through RI Commerce between 2023 and 2024 reported those services were beneficial to their business.

15. If the MBDA ceased to function in a meaningful way, it is my opinion that the State of Rhode Island would experience depressed economic development as Rhode Island businesses lose the support they rely upon to grow and flourish. Rhode Islanders across the State would suffer when they struggle against generational barriers to enter the market; when they struggle to find businesses that understand and cater to their diverse tastes and needs; and when they struggle to find representation in their government through diverse state vendors.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on April 3, 2025, at Providence, Rhode Island.



Elizabeth M. Tanner, Esq.