

EXHIBIT B-2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MARANDA LYNN O'DONNELL, et al.	)	
	)	
Plaintiffs,	)	
	)	Case No. 16-cv-01414
v.	)	(Class Action)
	)	The Honorable Lee H. Rosenthal
HARRIS COUNTY, TEXAS, et al.	)	U.S. District Judge
	)	
Defendants.	)	
	)	

**DECLARATION OF
HARRIS COUNTY DISTRICT ATTORNEY SEAN TEARE**

1. My name is Sean Barry Teare. My State of Texas Bar Card number is 24054113. I am over eighteen years of age, of sound mind, and capable of composing this declaration. The facts stated herein are true and correct and are recited to the best of my recollection and belief.

2. I am the elected District Attorney for Harris County and lifelong resident of Harris County. I was elected in 2024 and took office on January 1, 2025. Prior to this position, I served as a prosecutor in Harris County for eleven years, including six years as the Division Chief of the Vehicular Crimes Unit.

3. The Harris County District Attorney's Office is not a party to the *ODonnell v. Harris County* Consent Decree. However, I am supportive of the Decree's objectives.

4. Rule 9, including its release provisions, make sense from a safety and efficiency standpoint. They allow us to focus resources on bail determinations for riskier arrestees.

5. Law enforcement should focus on preventing and prosecuting felony offenses and crimes of violence. Individuals charged and convicted of those offenses should be incarcerated,

rather than defendants charged with misdemeanors who are penalized for being unable to afford cash bail.

6. There is no question that the Consent Decree has made the criminal justice system fairer, reduced unnecessary incarceration, and saved taxpayers' dollars.

7. Over the past nineteen months, significant progress has been made decreasing the population of the Harris County Jail. There are approximately 1,200 fewer inmates today than in January 2025. The Consent Decree played a role in this decline by keeping lower-risk arrestees out of jail.

8. If the Consent Decree is vacated, and/or Rule 9 is modified to eliminate the General Order Bond process, the Harris County District Attorney's Office will be required to prepare for dozens more bail hearings every day—both in the Joint Processing Center and in the County Criminal Courts at Law. This will tax our resources.

9. Before Rule 9 went into effect, Harris County routinely incarcerated defendants unable to afford cash bail. This practice led to many indigent defendants pleading guilty or no contest in order to be released from jail rather than contest the criminal charge against them. Confidence in the criminal justice system was unquestionably harmed as a result.

10. I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st of August, 2026.



Sean Barry Teare
District Attorney
Harris County, Texas