

EXHIBIT 13

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

STATE OF TEXAS, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:14-cv-00254
)	
UNITED STATES OF AMERICA, et al.,)	
)	
Defendants)	

DECLARATION OF JAMES DUNKS

My name is James Dunks, and I am over the age of 18 and fully competent in all respects to make this declaration. I have personal knowledge and expertise of the matters herein stated.

1. I am a Captain Game Warden with the Texas Parks and Wildlife Department ("TPWD"). In this capacity, I oversee certain TPWD border security operations on land and water, particularly in the area around Hidalgo and the Anzalduas Dam.

2. I have worked as a TPWD Captain Game Warden since on or about January 2013, both in the Rio Grande Valley and Laredo. Prior to my current position, I served as a sergeant with TPWD.

3. Along with the efforts of other local, state, and federal agencies, TPWD personnel, in addition to carrying out the TPWD mission, work in patrol vessels and land units along the Texas-Mexico border, principally focused on deterring and

disrupting activity that endangers the State's security, including drug trafficking, human smuggling, and other violent crime.

4. As a Captain Game Warden in the Rio Grande Valley, I have been actively involved in the execution of Operation Strong Safety since the program was launched in June 2014. Before Operation Strong Safety began, the surge of unaccompanied children and other undocumented immigrants coming across the Texas-Mexico border was overwhelming, and TPWD game wardens were referring staggering numbers of individuals to the U.S. Border Patrol. In the six months since Operation Strong Safety was initiated, the efforts of TPWD and other law enforcement agencies responding to the border surge have contributed to a decrease in the number of undocumented individuals turned over to U.S. Border Patrol. Operation Strong Safety remains ongoing to this day.

5. On many occasions, I have interacted directly with persons crossing the Texas-Mexico border, including families and unaccompanied minors. When TPWD personnel first come into contact with individuals crossing the border, we generally try to communicate with these individuals to see what country they are from and whether they need any water, food, or immediate medical attention, before referring them to the Border Patrol .

6. In my experience, most undocumented individuals are looking for the first law enforcement officer they can find once they cross the border. It also is my experience that these individuals, particularly unaccompanied children, are often seeking to reunite with family members or friends who already live in the United

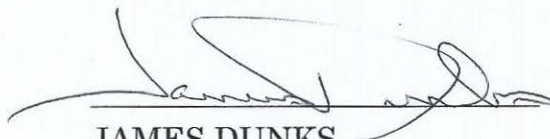
States. I have encountered many undocumented individuals who consider the notices that they receive from federal immigration authorities to be "*permisos*," or passes that grant them permission to remain in the United States indefinitely. Undocumented individuals have commonly expressed through an interpreter to me, as well as to other TPWD personnel, that they came to the United States because they believed they would be allowed to stay in this country and not be deported, sometimes because they have seen flyers in their home countries promoting the federal government's favorable immigration policies.

7. Based on my experience with TPWD, including my first-hand involvement in Operation Strong Safety, I expect that the conditions that led to the initiation of Operation Strong Safety will continue for the foreseeable future.

8. All of the facts and information contained within this declaration are within my personal knowledge and are true and correct.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 23 day of December, 2014.


JAMES DUNKS