

EXHIBIT 25

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

STATE OF TEXAS, et al.,

Plaintiffs,

v.

Case No. 1:14-cv-00254

UNITED STATES OF AMERICA, et al.

Defendants.

DECLARATION OF SHERI POLLOCK

I, Sheri G. Pollock, have personal knowledge of the following facts and declare:

1. I am the Deputy Chief Legal Counsel of the Wisconsin Department of Workforce Development. I provide legal advice and services for the Department, which includes advice on the administration of the state's Unemployment Insurance Program.

2. The Unemployment Insurance Program, administered by the Wisconsin Department of Workforce Development, is governed by both federal and state law. The program provides unemployment insurance benefit payments, as determined by state law, to eligible workers who lose

employment through no fault of their own. Benefit payments are funded entirely through taxes paid by Wisconsin employers.

3. An individual who is not a citizen of the United States but is lawfully present in the United States and otherwise qualifies by having employment and losing employment in accordance with the requirements of state law, is eligible to apply for and receive unemployment insurance benefit payments.

4. Deferred action status under the U. S. Department of Homeland Security memorandum dated November 20, 2014, causes an individual covered by such status to be lawfully present in the United States for the purposes of the Wisconsin state unemployment insurance law. These individuals will work pursuant to a federally issued work authorization.

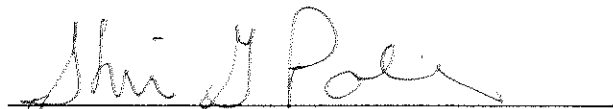
5. An otherwise eligible applicant, who has deferred action status, will be paid unemployment benefits that are funded entirely through taxes paid by Wisconsin employers.

6. In 2013, DWD paid claims for unemployment benefits, totaling \$570,745 to 168 unique claimants who indicated they were non-citizens, working lawfully under a federal work authorization.

Declaration of Sheri G. Pollock
Case No. 1:14-cv-00254

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

Executed on December 22, 2014.

A handwritten signature in cursive script, appearing to read "Sheri G. Pollock", is written over a horizontal line.

Sheri G. Pollock