

EXHIBIT 1

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

SIERRA CLUB, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

No. 4:19-cv-00892-HSG

DECLARATION OF MILLARD F. LEMASTER

I, Millard F. LeMaster, declare as follows:

1. I am the Deputy Chief, United States Border Patrol Strategic Planning and Analysis Directorate (SPAD), U.S. Customs and Border Protection (CBP), an agency of the Department of Homeland Security. I have held this position since February 2018. Over the course of my career I have served in multiple roles within the United States Border Patrol (USBP). I entered on duty with USBP in 2000. In that time I have served as a frontline Border Patrol Agent for five years, a Supervisory Border Patrol Agent for two different USBP Stations over the course of four years, and a second line supervisor in the field (Field Operations Supervisor, Watch Commander, and Deputy Patrol Agent In Charge) for two years until promotion to USBP Headquarters. Over the course of more

than five years at the headquarters level I have served as an Assistant Chief, Associate Chief, and finally as the Deputy Chief for SPAD.

2. In my current position I am personally aware of the fiscal year 2019 year-to-date drug apprehensions for the United States Border Patrol El Paso Sector (El Paso Sector) and the United States Border Patrol Yuma Sector (Yuma Sector).
3. The statements in this declaration are based on my personal knowledge and information that I have received in my official capacity.
4. Year-to-date in fiscal year 2019, there have been 314 drug events between border crossings in the El Paso Sector, through which USBP has seized over 9,500 pounds of marijuana, over 113 pounds of cocaine, over 139 ounces of heroin, over 228 pounds of methamphetamine, and over two pounds of fentanyl.
5. Year-to-date in fiscal year 2019, there have been 478 drug events between border crossings in the Yuma Sector, through which USBP has seized over 2,166 pounds of marijuana, .04 pounds of cocaine, over 160 ounces of heroin, over 664 pounds of methamphetamine, and over 36 pounds of fentanyl.

This declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct to the best of my current knowledge.

Executed on this 28th day of May, 2019.



Millard F. LeMaster
Deputy Chief
Strategic Planning and Analysis Directorate
United States Border Patrol