Exhibit A
I, Mark Shannon Leslie, declare as follows:

1. I am employed by the United States Department of the Army at Fort Polk, Louisiana. I am the Chief of Plans and Operations and have held that position since August 2016. Prior to that, I was Lieutenant Colonel in U.S. Army with 30 years of active Army service. During my active duty career, I served at Fort Polk from 2014 to 2016 as an infantry battalion commander and as the installation Chief of Plans and Operations.

2. My duties in my current position include synchronization and mission command on behalf of the commander concerning installation activities and events. I am also responsible for identifying hazards to the mission and the garrison’s population. In my role as the Chief of Plans and Operations, I am responsible for developing methods to mitigate these hazards and reduce risk. Additionally, I coordinate response efforts to training and safety events.

3. Although the trespass horse population has caused safety accidents and training
impacts prior to 2015, these incidents were not formally tracked. JRTC-F-000004-82. Since November 2015, Fort Polk has attempted to track all incidents with horses, although it remains likely that all such incidents are not reported. JRTC-F-000098-258. Since November 2015, 53 documented incidents and 174 reports to the installation department of emergency service have been reported. See diagram showing incidents and reports, attached hereto as Exhibit 1.

4. The Joint Readiness Training Center ("JRTC") trains brigade size units. JRTC-B-000051. In recent years, the Army has restructured its Brigade Combat Teams to increase their size from approximately 3,000 soldiers to approximately 5,000 soldiers. With the necessary support elements required by these units, this change has resulted in more soldiers on the installation. In addition, the focus of the training rotations has shifted in recent years from Iraq and Afghanistan-based counterinsurgency training to more complex training scenarios focused on a wide-range of real world scenarios. This shift means that the training is less focused on site-specific simulated villages, but on larger maneuver based training across the entire training landscape. As a result, a larger number of soldiers and a larger number of horses have been forced into the same size training area as the scope of training has evolved and encompassed a more intensive use of the training space.

5. The horses impact Fort Polk in two major ways, (1) training impediments and (2) safety risks. JRTC-B-000054. Due to the presence of horses, training events have been canceled and delayed. JRTC-B-000055, JRTC-F-000082, -98-2358. Frequently, training must be halted until trespass horses are cleared from a drop zone, firing range, or from an aircraft landing strip. JRTC-B-000055, JRTC-F-000082. Attempts to clear the horses from these areas are usually of limited success and the horses will move back into the area after clearing efforts cease.

6. Each delay causes a substantial loss of man hours and money to Fort Polk. For
example, when an aircraft has to be diverted from landing, substantial fuel costs are incurred. Likewise, personnel must be diverted from their normal tasks to clear the horses. JRTC-B-000181-191, JRTC-H-000001-226.

7. These impediments to training also result in degraded training to the soldiers. JRTC at Fort Polk is one of three Combat Training Centers in the Army. JRTC-B-000057. The training area at JRTC is engaged in training soldiers throughout the year. JRTC-B-000051. These soldiers, and their units, travel from other installations to train at JRTC. Id. Due to the limited availability of the training area and training time, if a unit’s training is impeded by horses, the unit cannot simply come back at a later time and redo the training. Instead, each delay in training is a training opportunity permanently lost to those soldiers, who often then deploy into a theater of combat. JRTC-B-000057.

8. In addition to impeding critical training, the horses present an unacceptable risk of harm to soldiers, dependents, civilian employees, and members of the general public. JRTC-B-000055-56. The horses are present in significant numbers on critical training areas, such as the drop zones, and many have become conditioned to the training presence and do not react when confronted with military vehicles. JRTC-B-000162. Further, soldiers often parachute into the training area, sometimes at night. JRTC-B-000055. The presence of horses in the “drop zone” or landing area, creates a significant risk that a soldier will land in a group of horses and become injured by the horse striking them or by a parachute becoming caught on a horse that runs away. In addition, the horses may be startled by the parachuting soldiers and run away through the positions of soldiers already on the ground on the edge of the drop zones.

9. Additionally, military vehicles often operate under limited visibility conditions in the training area, as part of the training requires that vehicles operate under light restrictions. Id.
Trespass horses located on the dirt roads that these vehicles are operate creates a significant risk of harm to soldiers and horses during low-light conditions. *Id.*

10. The horses often intrude into the cantonment area, which is the non-training area of Fort Polk dedicated to housing, shopping, and office space. JRTC-F-000098-258. The horses walk across and on asphalt roadways, some of which have speed limits up to 50 miles per hour. As a result, there have been several motor vehicle accidents on Fort Polk involving horses. *Id.*

11. The horses also walk into and stand in parking lots, creating a situation in which employees must walk near the trespass horses to reach either their office or their vehicle. JRTC-F-000252. The horses walk into the driveways, yards, and children’s playgrounds in the housing areas which creates an unreasonable risk of harm to the families of soldiers as they go about their daily lives. JRTC-F-000220.

12. The horses also leave Fort Polk land and enter adjacent public highways, which has resulted in motor vehicle accidents. JRTC-F-000240.

13. Any delay in the capture of the horses creates an unacceptable risk of harm to all persons of the Fort Polk community as the horses will continue to present the above noted risks on a daily basis. The risks posed can be mitigated by reducing the number of horses on Fort Polk during the pendency of the above captioned lawsuit.

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

Executed this 19th day of January, 2018, in Fort Polk, Louisiana.

Mark Shannon Leslie
Chief of Plans and Operations
Fort Polk, LA
Exhibit 1
53 reported, documented events since 06NOV15, including cancelled training, horses in roadways, horses in built up areas, dead or injured horses, horse damage.

174 reports to the Fort Polk Department of Emergency Services (DES) concerning vehicles and horse, including numerous accidents with several requiring hospitalization.