



TEXAS LANDOWNER BORDER LAW HANDBOOK

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I. INTRODUCTION

Texas landowners near the border face a growing crisis. From fear for their own safety to excessive amounts of property damage to concern about potential liability if a trespasser is injured on their property, there is no shortage of risk for these landowners.

The problems continue to grow more serious. According to one Kinney County, Texas, landowner, while he used to see 10 to 20 trespassers per year on his land, by 2021 he saw multiple groups cross his property daily (Croix, 2021). Statistics from the government paint the same picture. In fiscal year (FY) 2022, there were over 2.76 million enforcement actions related to illegal border crossings, an increase of over 700,000 from FY 2021 (U.S. Customs and Border Protection, 2023). This is more than two times the number recorded in 2019. Texas Department of Public Safety Lieutenant Chris Olivarez reports 7,000 to 8,000 immigrants crossing the border each day (Office of the Texas Governor, 2022).

One common concern for landowners near the border is the constant property damage. For example, gates and fences are frequently damaged, resulting in tens of thousands of dollars of necessary repairs to be paid by the landowner. One landowner in Brooks County reports spending approximately \$20,000 a year repairing damaged fencing (del Bosque, 2014). Other damage occurs to growing crops, forage, or pasture. The loss of stolen property, equipment, and vehicles is also a common occurrence.

In addition to property damage, landowners report fears of being physically assaulted by trespassers (Croix, 2021). They also worry about the liability they could face in the event a trespasser is injured on their land. "The biggest fear I have these days is litigation," said one Brooks County landowner (del Bosque, 2014).

Although this handbook will not solve all of these problems, our hope is that this information will provide landowners with a better understanding of the particular laws, steps to take, and important contacts that might be applicable to their current situation.

II. CURRENT STATE OF THE BORDER

The situation at the Texas-Mexico border is a crisis that has commanded national attention for decades. Over time, the scale of the problem has grown exponentially, and solutions seem out of reach. What is often lost in policy discussions about the border are the direct impacts on Texas landowners and producers who live and operate in the counties adjacent to the border. These ranches are the front line for illegal entry, smuggling activities, and other related threats.

A. The Texas-Mexico Border

The border between Texas and Mexico makes up 63 percent of the United States' southern boundary with Mexico, consisting of 1,254 miles of common border and joined by 28 international bridges and border crossings (Texas Department of Transportation, 2024). At least 32 Texas counties lie within 100 miles of the border with Mexico. Issues that arise at the border, therefore, directly impact the lives and livelihoods of millions of Texans. These issues encompass a broad spectrum of concerns, such as economic development, citizen security, drug control, migration, human trafficking, environmental protection, climate change, and public health (U.S. Department of State, 2023).

B. The Increase of Border Crossings

U.S. Customs and Border Patrol (CBP) maintains current data on border encounters along the U.S.-Mexico border. As shown in Figure 1, the United States has seen a significant increase in migrant encounters at the southern border over the past three years, and 2024 is in the running

to be another record-breaking year. Significantly, these “encounter” statistics do not account for the estimated hundreds of thousands of migrants who elude CBP apprehension and are counted among the “gotaways” every year (U.S. Department of Homeland Security, 2022).

The first half of FY 2024 showed a 9 percent increase in the number of encounters compared to the same period in FY 2023 (U.S. Customs and Border Protection, 2024b). This is significant given that FY 2023 set a new record of 2.5 million encounters, which was a 4 percent increase from the number of encounters in 2022 and a 43 percent increase from 2021. Current data shows little hint of this pattern changing.

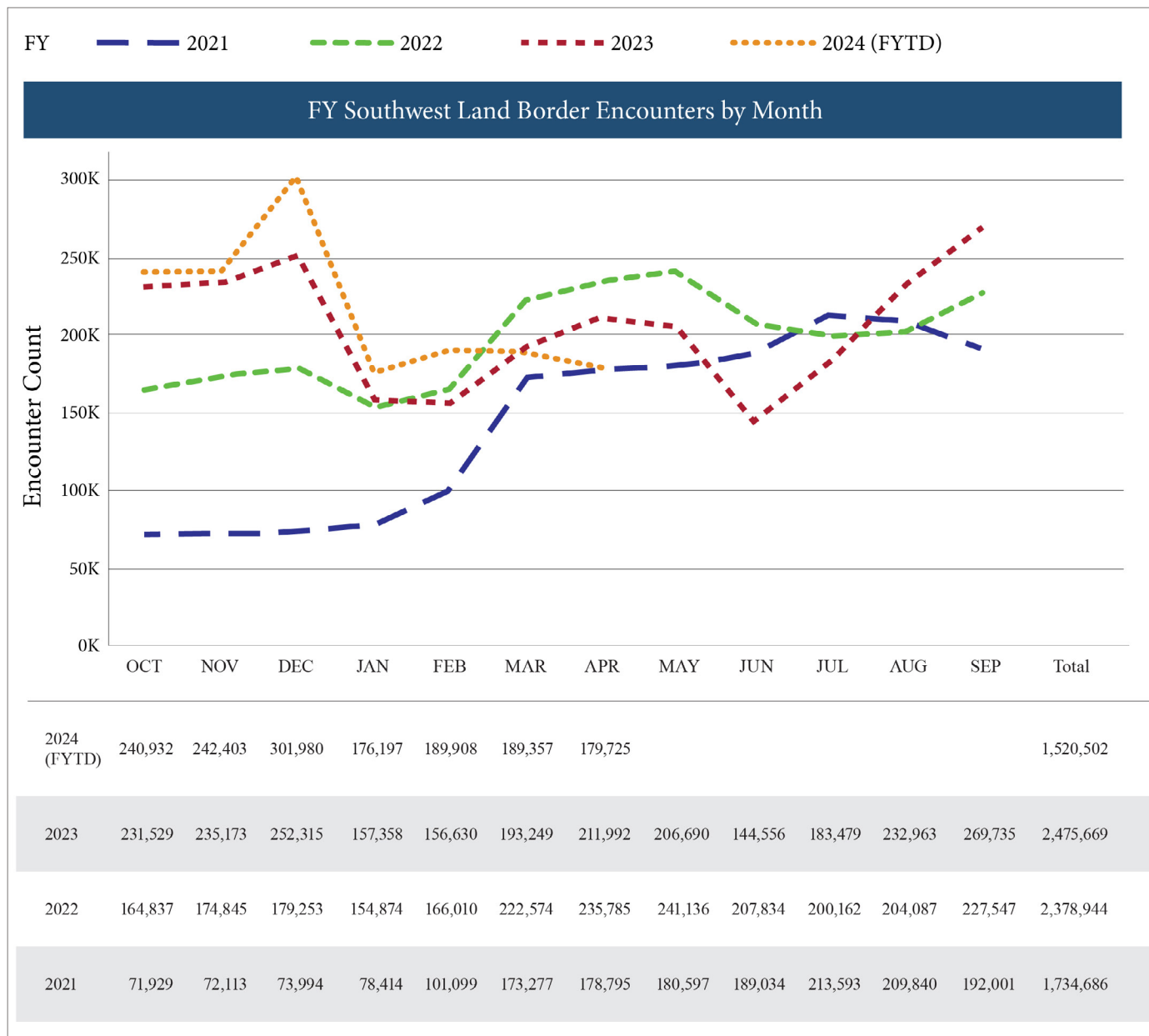


Figure 1. Title 8 Apprehensions, Title 8 Inadmissible, and Title 42 Expulsions from the U.S. Border Patrol and the Office of Field Operations (U.S. Customs and Border Protection, 2024b)

As shown in Figures 2 and 3, Texas counties along the southern border are severely affected by the volume of illegal crossings (U.S. Customs and Border Protection, 2024d). Although encounters decreased in all Texas sectors during the first seven months of FY 2024 when compared to the same period in FY 2023, the number of encounters remains high. For example, the Del Rio Sector has seen the third-highest number of encounters out of all sectors in FY 2024. The El Paso Sector, which includes the area near El Paso and all of New Mexico, has seen the fourth-highest number of encounters in FY 2024. Taken together, Texas sectors have seen over 44 percent of the total number of encounters along the border, a higher percentage than any other state. Given the record-breaking FY 2023, it is yet unclear how Texas counties along the border may fare for FY 2024 and the impacts on Texas landowners in these counties.

USBP FY23 Month(s) v FY24 Month(s) Encounters Percent Change							
FYTD	OCT	NOV	DEC	JAN	FEB	MAR	APR
	FY23 Month(s)			FY24 Month(s)			% Change
	San Diego	134,556		222,839		▲65.6%	
	El Centro	39,954		11,473		▼-71.3%	
	Yuma	130,680		39,336		▼-69.9%	
	Tucson	180,159		373,220		▲107.2%	
	El Paso	308,220		180,723		▼-41.4%	
	Big Bend	8,458		3,083		▼-63.5%	
	Del Rio	238,741		204,537		▼-14.3%	
	Laredo	31,649		19,322		▼-38.9%	
	Rio Grande Valley	170,042		106,272		▼-37.5%	
	Grand Total	1,242,459		1,160,805		▼-6.6%	

Figure 2. (U.S. Customs and Border Protection, 2024d)

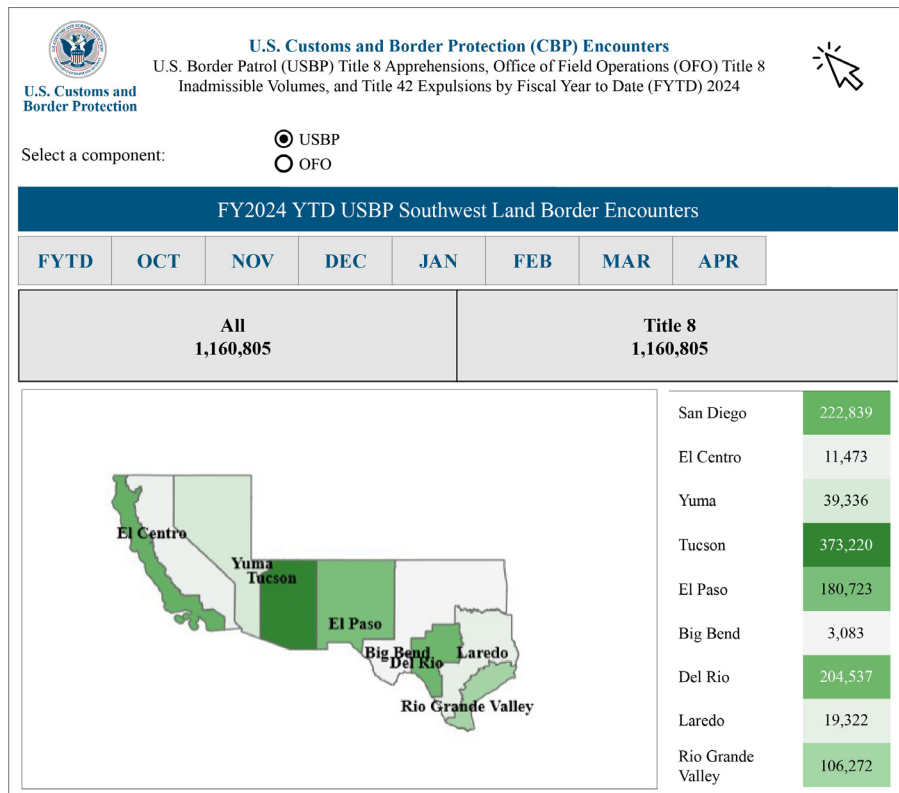


Figure 3. (U.S. Customs and Border Protection, 2024d)

The Texas Department of Public Safety (DPS) in the border region has also seen an uptick in illegal activity at the border, as shown in their most recent report (Fig. 4) (Texas Department of Public Safety, 2021). In 2021 alone, the DPS detected nearly 300,000 more undocumented immigrants than it did in the two previous years.

DPS Apprehension Support to U.S. Border Patrol in the DPS Border Region				
	2019	2020	CYTD 2021	Operation total (06/14-08/21)
Illegal Alien Detections and Interdiction Assistance				
Camera Detections	151,175	115,497	350,958	1,002,959
Aviation Detections	1,793	1,385	4,719	13,203
Marine Unit Detections	150	189	201	2,014
Illegal Alien Referrals*	2,408	1,389	64,942	76,577
Total Apprehension Support to U.S. Border Patrol	155,526	118,460	420,820	1,094,752

*Numbers are subject to change as reports are processed.
DPS did not capture Texas Highway Patrol Illegal Alien Detections and Referrals prior to December 1, 2015. Referrals prior to March 4, 2021 reflect THP reporting statewide. Referrals since March 4, 2021 reflect reporting documented as part of Operation Lone Star. This table was updated in December 2021.

Figure 4. (Texas Department of Public Safety, 2021)

C. Increased Traffic and Threats to Private Property

With a surge of illegal crossings at the Texas-Mexico border, Texas communities and landowners have seen an increase in migrant traffic through their properties and increases in damages associated with this kind of traffic. Some landowners cite costs in the tens of thousands of dollars to repair fences and gates destroyed by human smugglers transporting undocumented persons through their land (Burnett, 2021). However, it is not just fences that are destroyed. Rural landowners face other threats to their property, including vandalized homes and barns, stolen equipment and vehicles, and increased litter and trash left behind by smugglers and undocumented immigrants (Tomascik, 2021). Additionally, ranchers and local law enforcement are concerned by the new and increasingly reckless tactics used by human smugglers. Brooks County Sheriff Benny Martinez stated in one incident that a “speeding truck full of migrants careened 15 miles straight across the backcountry, busting through barbed wire fences and spooking cattle the whole way” (Burnett, 2021). Smugglers have grown so bold that local officials in the town of Cotulla warned parents to be watchful of their children being outside because the sheriff’s department was conducting 8 to 10 high-speed car chases a day. Car chases and bailouts that at one time occurred weekly are now a daily occurrence. Unauthorized traffic by undocumented immigrants on private property has become so problematic that some ranchers in Webb County have signed agreements with DPS to allow troopers to arrest anyone on their property for trespassing (McCullough, 2022).



III. WHO HAS JURISDICTION?

One of the biggest challenges concerning border law is understanding which law enforcement agency has jurisdiction. For Texas landowners dealing with persistent trespass on their properties, knowing who to call is essential. Significantly, multiple law enforcement agencies—state and federal—can have jurisdiction.

A. Law Enforcement and the Border

In Texas, there are many federal, state, and local law enforcement agencies working in conjunction to secure the United States' borders and combat smuggling, illegal immigration, and various other offenses that occur along our national boundary. This section discusses the various law enforcement agencies; their general responsibilities, duties, and jurisdictions; and how they work together to accomplish their objectives concerning the Texas-Mexico border. Contact information for specific law enforcement agencies may be found in the last section of this handbook.

B. Federal Jurisdiction Over the Border

Immigration is an issue addressed by the U.S. Constitution, and accordingly, federal agencies maintain primary jurisdiction for administering immigration laws along the Texas-Mexico border. Various executive agencies currently administer immigration laws in the United States. The U.S. Department of Homeland Security (DHS) is the newest Cabinet department, which merged 22 federal agencies and was created after the events of 9/11 (U.S. Immigration and Customs Enforcement, 2024c). There are three primary immigration organizations within the DHS: U.S. Immigration and Customs Enforcement (ICE), U.S. Citizenship and Immigration Services (UCIS), and U.S. Customs and Border Protection (CBP) (Department of Homeland Security, 2024).

1. Customs and Border Protection

The CBP is one of the largest federal law enforcement agencies within the DHS and is the country's principal border control organization (U.S. Customs and Border Protection, 2024a). The primary goal of CBP is to secure U.S. international land borders and coastal waters between ports of entry while also facilitating international trade and travel. To accomplish this, CBP is split up into several different offices, including Air and Marine Operations, the Office of Field Operations, the U.S. Border Patrol, the Office of Trade, the Enterprise Services Office, and the Operations Support Office (U.S. Customs and Border Protection, 2024c).

The CBP is responsible for enforcing a wide array of activities, including apprehending, detaining, and interrogating individuals attempting to enter the United States illegally; disrupting and preventing the flow of illegal drugs, human trafficking, and other contraband; protecting U.S. agricultural interests from harmful pests and diseases; protecting American businesses from theft of their intellectual property; preventing terrorists and terrorist weapons from entering the United States; and regulating and facilitating international trade, collecting import duties, and enforcing U.S. trade laws (Federal Register, 2024; U.S. Customs and Border Protection, 2024a). CBP is also mandated by statute to seize and forfeit all merchandise that is stolen, smuggled, or clandestinely imported or introduced into the United States (U.S.C.A. § 1595a).

Regarding jurisdiction, CBP has broad authority at the border and beyond. Under the Fourth Amendment, searches of persons and their possessions arriving at U.S. ports of entry are deemed reasonable (*United States v. Ramsey*, 1977; INA § 287[c]; 8 U.S.C. § 1357[c]). Therefore, CBP agents do not need to obtain a warrant or have probable cause before searching a person or their personal items at a port of entry. Further, CBP may search for noncitizens on "private lands, but not dwellings" within 25 miles of the border (INA § 287[a][3]; 8 U.S.C. § 1357[a][3]). CBP must still obtain a search warrant or consent from the occupants or owner to enter a private

dwelling (*United States v. Romero-Bustamente*, 2003; *United States v. Castellanos*, 2008). CBP agents may also search for noncitizens on any “railway car, aircraft, conveyance, or vehicle” that is “within a reasonable distance from any external boundary of the United States” (INA § 287[a][3], 8 U.S.C. § 1357[a][3]). In this context, a “reasonable distance” means within 100 air miles from any external boundary of the United States (8 C.F.R. § 287.1[a][2]). However, CBP agents must have “reasonable suspicion” of unlawful activity before performing a search in this 100-mile zone beyond the border (*United States v. Brignoni-Ponce*, 1975; *Gonzalez-Rivera v. INS*, 1994; *Almeida-Amaral v. Gonzales*, 2006). Finally, CBP officers have the authority to arrest citizens and noncitizens for various immigration and non-immigration offenses during the course of their duties (INA § 287[a][2], 8 U.S.C. § 1357[a][2]; INA § 287[a][5], 8 U.S.C. § 1357[a][5]).



2. *Immigration and Customs Enforcement*

Immigration and Customs Enforcement is the principal investigative and enforcement arm of the DHS and is responsible for enforcing federal immigration and customs laws and for the removal of undocumented immigrants who have entered the United States (U.S. Immigration and Customs Enforcement, 2024b). ICE has over 20,000 law enforcement and support personnel in more than 400 offices in the United States and around the world. ICE generally prioritizes its immigration enforcement activities according to the threat posed by the immigrants or offense, placing special emphasis on undocumented immigrants who are a threat to national security, convicted criminals, gang members, and those who are especially disruptive to the U.S. immigration system.

ICE also collaborates closely with local law enforcement agencies through the Section 287(g) program (U.S. Immigration and Customs Enforcement, 2024a). This mutually beneficial program authorizes the Director of ICE to enter into agreements with state and local law enforcement agencies that permit designated officers of these agencies to perform limited immigration law enforcement functions on behalf of ICE. More specifically, the program allows participating agencies and officers to assist in the identification, arrest, and service of warrants and detainers of undocumented individuals with criminal charges or convictions. As a result, participating state and local partners benefit by reducing the number of criminal offenders released back into the community without being screened for immigration violations.

C. *Texas Jurisdiction and the Border*

Notwithstanding the federal government’s preemptive jurisdiction over immigration laws, Texas law enforcement agencies are an essential part of administering and enforcing U.S. immigration laws and protecting Texas citizens. Working in conjunction with their federal counterparts, many state and local law enforcement agencies along the border are working daily to secure and protect private lands along the Texas border.

1. Sheriff Departments

Texas sheriffs are constitutionally created positions whose duties are prescribed by the Texas Legislature (Tex. Const. art. V, § 23). The Texas Constitution further mandates one sheriff for each of the 254 Texas counties. A sheriff is a peace officer who holds public office and, as such, is elected by popular vote every four years.

Sheriffs in Texas are required to assume many different duties and roles during their time in office. Once elected, sheriffs have countywide jurisdiction, which gives them jurisdiction in both local municipalities and unincorporated areas of a county (Tex. Code Crim. Proc. Art. 2.17 [will be repealed and replaced by art. 2A.063 as of January 1, 2025]; Texas Association of Counties, 2024). As the chief law enforcement officer for the county, sheriffs are responsible by statute for enforcing the criminal laws of the state, operating and managing the county jails, investigating crimes, enforcing judgments, serving civil process, transporting prisoners and other offenders, providing security for the courts, and maintaining communications with other law enforcement organizations (Tex. Const. art. V, § 23; Tex. Code Crim. Proc. Art. 2.17; Tex. Association of Counties, 2024). In addition, sheriffs receive reports of stray livestock on public and private property and impound, sell, or return animals according to the stray act (Tex. Agric. Code Ann. § 142.003).

2. Constables

Similar to sheriffs, constables are also peace officers authorized by the Texas Constitution (Tex. Const. art. V, § 18). The voters who reside within a particular precinct of a county elect the constable for that precinct every four years. A constable's primary jurisdiction is within the geographic boundaries of that precinct. Constables have statewide jurisdiction to execute any criminal process and countywide jurisdiction to execute any civil process (Tex. Loc. Gov't Code Ann. § 86.021).

A constable's duties include, among other things, serving as a licensed peace officer, enforcing state traffic regulations, executing any civil or criminal process in the county, serving warrants and civil papers such as subpoenas and temporary restraining orders, serving as bailiff for Justice of the Peace Court, enforcing felonies or offenses against public peace committed in view, assisting other state and local law enforcement agencies, and like sheriffs, constables may obtain warrants to impound cruelly-treated animals (Brooks, 2023).

3. Police

In comparison, police departments are not required by law. Instead, a municipality may create and fund a police department at its own discretion (Tex. Loc. Gov't Code Ann. § 341.001-.003). Additionally, unlike sheriffs, police only have jurisdiction within the boundaries of the municipality they serve, and the chief of police is not elected. Rather, the municipality's governing body or the city manager hires the chief of police and determines the term of employment and how many additional police officers to hire.

A police officer's duties include enforcing state criminal and traffic laws, enforcing local ordinances adopted within their jurisdiction, serving arrest warrants, serving as bailiff for the municipal court, and sometimes managing and operating a municipal jail for housing misdemeanor violators or detainees awaiting transfer to the county jail (Tex. Code Crim. Proc. Art. 2.13).

4. Texas DPS and Texas Rangers

The Texas Rangers comprise the primary criminal investigative department of the Texas DPS (Texas Department of Public Safety, 2024b). As a part of their duties, the Texas Rangers oversee the DPS border security program with a mission "to deter, detect, and interdict criminal activity

across the Texas/Mexico border” (Texas Department of Public Safety, 2024c, para. 2). Through the DPS border security program, the Rangers directly support CBP by assisting in operations, including intelligence and detection technologies. Texas Rangers are chosen from applicants who undergo an extensive and rigorous application, interview, and selection process (Texas Department of Public Safety, 2024a). Texas Ranger responsibilities extend far beyond assisting with border security and include all manner of criminal investigations, including murder, sexual assault, bank fraud, and corruption of public officials. They focus on suppressing crime and violence through investigations, apprehending criminals, protecting life and property, and suppressing major disturbances (Texas Department of Public Safety, 2024b).

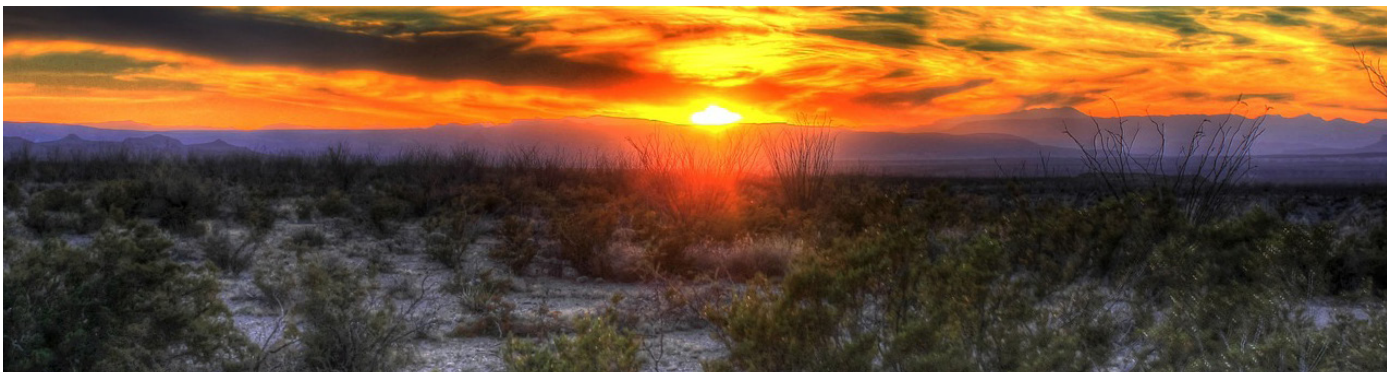
5. Texas Southwestern Cattle Raisers Association Special Rangers

Special Rangers are employees of the Texas and Southwestern Cattle Raisers Association who are commissioned by the director of the Texas DPS to aid law enforcement agencies in investigating the theft of livestock or related property (Tex. Code Crim. Proc. Art. 2.125). There are currently 30 Special Rangers stationed in districts across Texas and Oklahoma. These agents investigate approximately 1,000 agricultural crime cases and recover an average of \$5 million in stolen cattle and assets for ranchers annually (Texas and Southwestern Cattle Raisers Association, 2024).

Except for traffic citations, a Special Ranger may make arrests and exercise the authority of a peace officer when necessary to prevent or abate the commission of an offense involving livestock or related property (Tex. Code Crim. Proc. Art. 2.125). More specifically, the daily duties of TSCRA Special Rangers include investigating thefts of cattle, horses, saddles, trailers, equipment, and poaching; pursuing white-collar criminals who commit agricultural fraud; determining the ownership of estray or stray livestock; and educating landowners on how to prevent theft and other agricultural crimes (Texas and Southwestern Cattle Raisers Association, 2024). Reports on missing and stolen livestock and equipment are regularly distributed to TSCRA’s network of more than 700 law enforcement agencies and their other national and international connections.

IV. TEXAS LAW FOR LANDOWNERS

Texas landowners along the Texas-Mexico border face numerous challenges in protecting their land, property, and beyond. What does the law say about the events unfolding along the border? What do Texas landowners need to understand before responding to trespassers on their property? What risks and liability do landowners face when addressing migrant traffic on and along their property? How do Texas landowners safely protect their private property? While this book does not profess to hold all of the answers, it provides an overview of relevant statutory and case law concerning the issues facing Texas landowners along the border, as well as provides additional resources for landowners.



A. Landowner Liability

A number of legal issues arise when persons enter the land of another without permission.

1. Liability for Trespasser Injured on Property

One concern many landowners have, and rightly so, is their potential liability if a person who is on their property without permission is injured. Texas law is fairly clear on this issue.

a. Texas law

The threshold question in any negligence or premises liability case is whether the defendant landowner owed a duty to the plaintiff. This is determined based on the factual circumstances and the category under which the plaintiff falls. Anyone who enters the property without permission is categorized, for liability purposes, as a trespasser. A landowner owes the lowest duty of care to persons falling into the trespasser category. Under Texas law, the “only duty the premises owner or occupier owes a trespasser is not to injure him willfully, wantonly, or through gross negligence” (*Texas Utilities Elec. Co. v. Timmons*, 1997). As such, a claim based on ordinary negligence is not generally available to an injured trespasser.

This fact pattern was at issue in *Boerjan v. Rodriguez*, a case decided by the Texas Supreme Court in 2014. In that case, a driver was hired to transport a mother, father, and child along with another immigrant from Mexico to Houston or New Orleans. The driver entered the Jones Ranch without permission from the landowner. An employee of the ranch stopped the driver to inquire as to why the vehicle was on the property. The driver fled at a high rate of speed down a caliche road. The ranch employee followed the vehicle. Five miles later, the fleeing driver lost control, and the vehicle rolled, killing all three family members and injuring the other passenger. The survivors of the deceased family members filed suit against the ranch. The Texas Supreme Court dismissed the plaintiffs’ negligence claim as the landowners owed no duty to the plaintiffs that would support a negligence claim.

On the question of gross negligence, the Court held that a ranch employee following a vehicle did not rise to the level of gross negligence. In order to state a claim for gross negligence, a party must show (1) the defendants’ action, as viewed from the defendants’ standpoint, must involve an extreme degree of risk, considering the probability and magnitude of potential harm to others; and (2) the actor must have actual, subjective awareness of the risk involved,

but nevertheless proceed in conscious indifference to the rights, safety, or welfare of others (*Lee Lewis Construction v. Harrison*, 2001). In the *Boerjan* case, the Court noted merely following a vehicle was insufficient to create a likelihood of serious injury to the plaintiffs. The Court explained, however, that had the facts been different—i.e., if the employee made any aggressive moves, followed the fleeing vehicle extremely close, or drove at excessive rates of speed—a claim could potentially rise to the level of gross negligence.

Given the prevalence of this issue, the Texas Legislature amended the Texas Civil Practice and Remedies Code Section 75.006 during the 2023 Legislative Session to offer additional protection for landowners if a trespasser is injured on their property in certain situations.



A landowner, lessee, or occupant of agricultural land is not liable for any damage or injury to any person or property that arises from (1) the actions of a peace officer or federal law enforcement officer when the officer enters or causes another to enter the agricultural land with or without permission of the landowner; (2) the act or omission of a trespasser who enters the landowner's or lessee's property; (3) an act or omission of a third party who enters the landowner's or lessee's property without permission and damages a fence or gate on the property; or (4) wildlife or an act of God (Texas Civil Practice & Remedies Code § 75.006).

Importantly here, "agricultural land" is defined as Texas land "suitable for: (a) use in production of plants and fruits grown for human or animal consumption, or plants grown for the production of fibers, floriculture, viticulture, horticulture, or planting seed; (b) forestry and the growing of trees for the purpose of rendering those trees into lumber, fiber, or other items used for industrial, commercial, or personal consumption; or (c) domestic or native farm or ranch animals kept for use or profit" (Texas Civil Practice & Remedies Code § 75.001[1]).

For example, if a trespasser were injured due to the action of law enforcement officers on agricultural land, or if a trespasser were injured by their own action, the landowner or lessee would not be liable due to this statutory provision.

b. What should landowners take from this discussion?

A landowner owes only a limited duty to trespassers on his or her property. That duty is not to injure the trespasser willfully, wantonly, or through gross negligence. This essentially provides landowners with a strong defense to injury claims by trespassers unless the landowner's action rises to an extreme level, constituting gross negligence or intentional harm. In order to avoid facts giving rise to these types of claims, landowners should carefully consider the degree of risk in any actions taken toward a trespasser and act with regard to the rights, safety, and welfare of others. For example, landowners could potentially face liability in situations where they have a physical altercation with a trespasser, hit or strike a trespasser, threaten or use a firearm, or chase the trespasser on foot or at high rates of speed while dangerously driving an ATV or vehicle. Landowners should also be aware of the new statutory protections afforded by the Texas Legislature in the situations discussed above.

2. Liability if Guest is Injured by Trespasser on Property

Another concern for landowners may be their potential liability if a trespasser injures a guest on the property.

a. Texas law

This was the issue in *Burnside v. SM Energy Co.* (2018). There, the plaintiff was a passenger in a vehicle traveling across a ranch road in South Texas. The road was controlled by SM Energy. SM Energy instructed the plaintiff and driver of the vehicle that undocumented immigrants regularly appeared on the road, and they should not stop for any persons due to a substantial risk of injury.

On the first half of the road, SM installed checkpoints and enforced the speed limit by radar. On the second half of the road, near the Texas-Mexico border, the road was not monitored and did not have posted speed limit signs. While driving on this second portion of the road, an unknown person stepped in the middle of the road in front of the vehicle in which the plaintiff was riding. The driver did not stop and swerved to miss the person, which caused the driver to lose control of the vehicle and resulted in injuries to the plaintiff. The plaintiff filed a premises liability claim against SM.

The plaintiff in this case was an “invitee,” as he was on the property with permission and for the mutual benefit of himself and SM, the entity controlling the land. As such, SM had a duty to “make safe or warn against any concealed, unreasonably dangerous conditions of which the landowner is, or reasonably should be aware, but the invitee is not.” Here, because SM specifically warned both the plaintiff and the driver about the risk of unauthorized persons entering the roadway, the court held the plaintiff failed to state a premises liability claim.



Additionally, the amendments to Civil Practice and Remedies Code Section 75.006 offer protection in this situation as well. A landowner, lessee, or occupier of agricultural land is not liable for any damage or injury to any person or property that arises from the actions of an individual who enters or causes another person to enter the agricultural land without the express permission of the owner, lessee, or occupant because of: (1) the actions of a peace officer or federal law enforcement officer when the officer enters or causes another to enter the agricultural land with or without permission of the landowner; (2) the act or omission of a trespasser who enters the landowner’s or lessee’s property; (3) an act or omission of a third party who enters the landowner’s or lessee’s property without permission and damages a fence or gate on the property; or (4) wildlife or an act of God (Texas Civil Practice & Remedies Code § 75.006).

b. What should landowners take from this discussion?

Landowners who are aware of frequent trespassers on their property should consider providing warnings (preferably in writing) to guests, customers, or others entering the property with permission. These types of warnings will likely satisfy the duty of care owed to the guests if they are injured by a trespasser. For example, if a rancher will have hunting tenants on the property, it may be prudent to include a warning about trespassers being common on the property within the hunting lease and/or liability waiver document. Landowners should also be aware of the new statutory protections afforded by the Texas Legislature in the situations discussed above.

3. Liability if Livestock Causes Damage or Injury

Another common concern for border landowners is potential liability if their livestock causes damage or injury. For example, landowners frequently report situations where fences are cut or driven through by trespassers, resulting in livestock being hit on roadways through no fault of the landowner.

a. Texas law

The Texas Legislature has addressed the issue of damage or injury caused by livestock in two statutory provisions: Section 75.006 of the Texas Civil Practice and Remedies Code and the Texas Farm Animal Liability Act.

First, effective September 1, 2023, livestock landowners or lessees are not liable for damages arising from their livestock, regardless of whether the damage occurs on the landowner's or lessee's property due to: (1) the actions of a peace officer or federal law enforcement officer when the officer enters or causes another to enter the property with or without permission of the landowner; (2) the act or omission of a trespasser who enters the landowner's or lessee's property; (3) an act or omission of a third party who enters the landowner's or lessee's property without permission and damages a fence or gate on the property; or (4) wildlife or an act of God.

"Livestock" is defined as cattle, horses, mules, asses, sheep, goats, llamas, alpacas, exotic livestock, including elk and elk hybrids, and hogs (Texas Civil Practice & Remedies Code § 75.006[a][3]; Texas Agriculture Code § 1.003[3]). Critically, note that this protection extends not only to the landowner or lessee's property but to any location where the injury or damage may occur, such as a public roadway, for example. Further, these protections can be lost if the landowner fails to cure any resulting defects in a reasonable time. For example, if a trespasser runs through a fence with a vehicle and the landowner does not take any action to cure this for several weeks, these statutory protections could potentially not apply.

Thus, if a trespasser cuts a fence and cattle end up getting hit on an adjacent roadway, this statute prevents the landowner or lessee who owns the cattle from being found liable. Similarly, if law enforcement action on the property results in livestock injuring a trespasser, law enforcement officer, or anyone else, the landowner or lessee is not liable.

Second, the Texas Farm Animal Liability Act protects landowners from injuries caused by inherent risks of farm animal activities (Texas Civil Practice & Remedies Code § 87). The protections of this statute are limited to those situations involving participants in farm animal activities but given the breadth of the "farm animal activity" definition, it could potentially apply in a situation in which law enforcement or a trespasser was herding, moving, or otherwise engaging in an activity with a farm animal. While this publication will not go into all of the details, landowners or lessees with livestock should at least be aware of this statute and hang the required signage.

A "farm animal" is defined under this statute as an equine, bovine, sheep, goat, pig or hog, ratite, chicken or other fowl, or honeybees kept in a managed colony (Texas Civil Practice & Remedies Code § 87.001[2][2-b]). In order to claim the available statutory protections, a landowner or lessee must hang a Texas Farm Animal Liability Act sign on their property at or near the stable, corral, or arena. The sign should read as follows:

WARNING

UNDER TEXAS LAW (CHAPTER 87, CIVIL PRACTICE AND REMEDIES CODE), A FARM ANIMAL PROFESSIONAL OR FARM OWNER OR LESSEE IS NOT LIABLE FOR AN INJURY TO OR THE DEATH OF A PARTICIPANT IN FARM ANIMAL ACTIVITIES, INCLUDING AN EMPLOYEE OR INDEPENDENT CONTRACTOR, RESULTING FROM THE INHERENT RISKS OF FARM ANIMAL ACTIVITIES.

b. What should landowners take from this discussion?

Landowners or lessees who own livestock or farm animals should be aware of these two important statutory protections available to their operation. Landowners or lessees should take time to review both statutes and to ensure they post the required Texas Farm Animal Liability Act signage. Further, landowners or lessees with livestock should take care to act reasonably and repair any fencing issues within a reasonable manner in order to qualify for statutory limited liability.

4. Trespass

There are both civil and criminal trespass claims that may be available if people are entering a landowner's property without permission. Practically speaking, however, these claims may not offer significant results to landowners seeking to keep trespassers off their property.

a. Civil Trespass

A civil trespass claim is filed by one individual against another and typically seeks monetary damages or an injunction against further trespassing. An example would be a landowner filing a civil trespass claim against a person on his or her land without permission. The burden of proof is on the plaintiff to prove the defendant entered onto the plaintiff's property without the plaintiff's consent (*Environmental Processing Systems, L.C. v. FPL Farming Ltd.*, 2015). If a plaintiff can prove monetary damages, these may be recovered in a civil trespass suit.

In situations involving undocumented immigrants near the border, a civil trespass suit likely does not provide practical assistance for a landowner. First, a landowner likely is unable to identify every trespasser on his or her property in order to name them in a lawsuit and serve them with the suit. Second, even if the landowner was able to successfully file and receive a judgment, the defendant may not have the financial ability to pay damages. Third, the landowner would be faced with paying filing costs and attorneys' fees for each lawsuit.

b. Criminal Trespass

Criminal trespass is the act of knowingly entering private property without the consent of the owner when the trespasser had notice that the entry was forbidden or received notice to depart but did not do so (Texas Penal Code § 30.05[a]). As with all criminal cases, a criminal trespass case is filed and prosecuted by the government against the defendant. Criminal trespass is usually a Class B misdemeanor, but those penalties may be enhanced in certain situations. For example, if trespass occurs on agricultural land within 100 feet of the boundary of the land, it constitutes a Class C misdemeanor.

The important distinction between proving civil and criminal trespass is that for criminal trespass, the defendant must have notice that trespassing is prohibited. Notice may be accomplished in any of five ways: (1) oral or written communication by the owner or someone with apparent authority to act for the owner; (2) fencing or other enclosure obviously designed to exclude intruders or contain livestock; (3) a sign or signs posted on the property at the entrance to the building, reasonably likely to come to the attention of trespassers that entry is forbidden; (4) placement of identifying purple paint marks on the fence posts or trees as described by statute; or (5) the visible presence of a crop grown for human consumption on the property under cultivation, harvest, or that would be marketable if harvested at the time of entry (Texas Penal Code § 30.05[b][2]).

Again, practically speaking, this may not be an effective tool to curb undocumented immigrants trespassing on rural land. Facing misdemeanor criminal charges may not be a sufficient deterrent to those already illegally entering the country. Further, the conviction of a trespasser does not provide reimbursement or compensation to the landowner for any damages.

c. What should landowners take from this discussion?

While there are both civil and criminal trespass claims available, neither is likely to provide very practical relief for landowners facing trespass issues near the border. Regardless, a landowner should ensure one of the five methods of notice is present on his or her property in the event that a criminal trespass claim might be available.

5. Use of Force

While some Texas statutes address the use of force in certain contexts, the risks that come with the use of force are significant, both for criminal and civil liability. Accordingly, it is generally not advisable to consider the use of force as an appropriate response to trespassers. It is important to understand that whether a landowner's use of force is considered necessary or reasonable will depend on the understanding, opinions, or perspectives of law enforcement, prosecutors, lawyers, judges, and juries who may see the facts of a particular incident differently from the landowner.



Additionally, the Texas statutes are unequivocal that any criminal justification for using force does not in any way impact or negate the possibility of civil liability for injury or damages to a trespasser who is injured or killed by a landowner's use of force. Undocumented immigrants possess Constitutional rights by being on American soil (*Yick Wo v. Hopkins*, 1886, quoting the U.S. Constitution amendment XIV). The U.S. Supreme Court has recognized undocumented immigrants' right to sue in court, stating that both the Fifth and Fourteenth Amendments "protect every one of these persons from deprivation of life, liberty, or property without due process of the law. Even one whose presence in this country is unlawful, involuntary, or transitory is entitled to that constitutional protection" (*Mathews v. Diaz*, 1976). Accordingly, undocumented immigrants injured by landowners in Texas can sue landowners for damages, including assault, false imprisonment, intentional infliction of emotional distress, negligence, and gross negligence (Martinez, 2020). The statements in this section, however, are cautionary and intended to assist landowners with understanding the many risks associated with the use of force before they may face undertaking any such action.

V. FREQUENTLY ASKED QUESTIONS

1. *Can I use deadly force to protect myself or my property?*

Texas law contains statutory provisions on the very limited circumstances under which Texas citizens may use force or deadly force in response to another person's actions. As discussed above, the ramifications for a landowner using any type of force, both from a criminal perspective and from a civil liability perspective, are significant, and as such, it is not advisable to consider the use of force as an option for addressing trespass to land or property.

2. *If I find trespassers on my property, can I detain them there until the police arrive?*

The key considerations in response to this question likely deal more with safety than legality. A landowner should carefully consider his or her own safety when making the decision to detain trespassers on the property. Further, as discussed above, if a landowner takes any action toward the trespasser that would be considered willful, wanton, or grossly negligent, liability could arise for any injuries suffered by the trespasser. Similarly, other claims that could potentially arise against a landowner in this situation include criminal claims of assault, battery, and false imprisonment.

3. Can an undocumented immigrant file a lawsuit against a United States citizen?

Yes. Texas courts have held that a plaintiff's immigrant status does not change a defendant's duty of care or damages resulting from the defendant's negligence (e.g., see *Grocers Supply v. Cabello*, 2012).

4. If a vehicle runs through my fence and is abandoned, can I get compensation for the fence damage and/or keep the vehicle?

Again, this is a common situation for which there is not an easy solution for landowners. There is a statute titled "Lien Related to Damaged Fence," which provides a lien for a landowner whose fence is damaged by a vehicle. However, the requirements likely make it inapplicable in most situations involving undocumented immigrants. Texas Property Code § 70.501-.506 provides a landowner may obtain a lien against a motorist who damages the landowner's fence. In order to do so, however, the vehicle must be owned by the motorist, or the motorist must have consent from the owner of the vehicle to drive it at the time of the damage. These requirements are unlikely to exist in most situations for landowners facing damage caused by illegal immigration. However, to the extent the car was owned by the driver, or the driver had permission from the owner, the landowner may be able to get a lien against the vehicle that caused the damage in the amount of the lesser of the fair market value of the vehicle or the actual costs incurred by the landowner to repair the fence, recapture any livestock or animals that escaped due to the damage, and have the vehicle towed or stored.

As far as the right of the landowner to keep the vehicle, there is no statute specifically addressing the right to do so. There seem to be some significant concerns about making the decision to keep a stolen vehicle. For example, there could be other stolen items, drugs, or contraband in the vehicle that could end up, unknowingly, in the landowner's possession or could make it likely the driver could come back for the items. Similarly, a landowner does not know what other types of criminal activities or collisions the vehicle might have been involved in or the issues or claims that might flow from such activities later and potentially implicate the landowner.

5. Can I build a concrete berm or other structure to prevent vehicles from coming through and damaging my fences?

Again, this is a question for which landowners should consider potential landowner liability concerns if this berm or structure results in injuries to the driver or passenger in a vehicle. Generally, landowners have the right to build fences on their property. Those fences, when built in accordance with normal practices, would likely not cause any liability to the landowner. For example, many landowners build steel H braces and concrete these into the ground. If a vehicle were to hit an H brace normally constructed in this manner, a landowner would likely not face liability. If, however, the landowner built a structure intended to injure the persons in the vehicle, or that was uncommonly dangerous as compared to standard fences, then the landowner may need to be concerned about the potential of an injured person being able to successfully claim the landowner acted with willfully, wantonly, or with gross negligence and, thus, should be held liable.



6. *How can I get reimbursement for damage to my land/property caused by trespassers?*

Currently, there are few options available to landowners facing property damage.

The most recent attempt to address this issue came out of the 88th Texas Legislature in 2023. In Senate Bill 1133, effective September 1, 2023, the Legislature instructed the Attorney General to create a landowner compensation program for damage caused to agricultural land either by a trespasser as a result of arson, criminal mischief, reckless damage or destruction, or graffiti, or damaging railroads or critical infrastructure that was committed in the course or furtherance of a border crime or by law enforcement in response to a trespasser who was engaged in a border crime (Texas Code of Criminal Procedure § 56C.003). For purposes of this statute, “agricultural land” is defined as land the use of which qualifies for appraisal based on agricultural use pursuant to the tax code (Texas Code of Criminal Procedure § 56C.001). A “border crime” is defined as conduct constituting an offense under certain statutes (i.e., controlled substances, human smuggling, evading arrest, or human trafficking) and involving transnational criminal activity.

The Attorney General established rules and criteria for the program (Texas Code of Criminal Procedure § 56C.003[b]). The maximum amount awarded per incident is \$75,000. Importantly, compensation may not be awarded unless the damage is documented in a written law enforcement report by an agency as having occurred in connection with a border crime (Texas Code of Criminal Procedure § 56C.003[c]). Applications for compensation may be filed on the Attorney General’s website and must be completed within 90 days of the incident resulting in damage.

This program is a “payer of last resort” for qualifying real property damage (Texas Code of Criminal Procedure § 56C.006[a]). This means that compensation shall not be awarded if the applicant is eligible for reimbursement from another source, such as an insurance contract or a state, local, or federal program, and the landowner failed to seek such reimbursement (Texas Code of Criminal Procedure § 56C.006[b]). This Act expires on the second anniversary of the date that all money appropriated for the program has been expended (Texas Code of Criminal Procedure § 56C.007).

In May 2024, Attorney General Ken Paxton launched the program. More information, an application form, and frequently asked questions may be found at [Landowner Compensation Program, Office of the Attorney General \(texasattorneygeneral.gov\)](https://www.texasattorneygeneral.gov/landowner-compensation-program).



In February 2022, the USDA National Resource Conservation Service (NRCS) announced it would offer funding through the Environmental Quality Incentive Program (EQIP) to farmers and ranchers along the southern border who have suffered damage to fields and farming infrastructure in certain counties. Eligible counties include Brewster, Brooks, Cameron, Crockett, Culberson, Dimmit, Duval, Edwards, El Paso, Frio, Hidalgo, Hudspeth, Jeff Davis, Jim Hogg, Jim Wells, Kenedy, Kinney, Kleberg, La Salle, Live Oak, Maverick, McMullen, Pecos, Presidio, Reeves, Starr, Sutton, Terrell, Uvalde, Val Verde, Webb, Willacy, Zapata, and Zavala. The first round of applications was due in July 2022, with those selected for funding announced by August 2022. Landowners in these counties should check with their local USDA-NRCS field office to determine deadlines and application requirements for future years.

Congress attempted to address this issue in 2021 but was unsuccessful in doing so. Two bills were filed in the United States Congress in 2021. Representative August Pfluger (R-Texas) introduced the RAPID Act, HR 4896. This bill would have established a program to reimburse agricultural producers for damages to livestock, crops, and property resulting from the actions of undocumented immigrants. The bill received bipartisan support from the Texas delegation, with Representative Tony Gonzales (R-TX), Henry Cuellar (D-TX), and Vicente Gonzalez (D-TX) serving as co-sponsors. It was referred to the Agriculture Committee, but no further action was taken on this bill. In December 2021, Representative Stephanie Bice (R-OK) introduced the SAFE Border Act, HR6120, which would have required FEMA to create a temporary grant program to reimburse landowners for loss or damage to property or to increase security on their property. Landowners within 10 miles of the U.S.-Mexico border who have experienced or are at risk of experiencing property theft or damage would have been eligible. Neither of these bills passed in the 117th Congress.

VI. BEST PRACTICES FOR LANDOWNERS

- ▶ Have emergency and law enforcement contact information on hand in homes, barns, and vehicles.
- ▶ Do not take any action that might be viewed as willful, wanton, or grossly negligent if the person is injured. This includes chasing, striking, hitting, physical altercations, and pulling firearms.
- ▶ Warn invited guests or customers, preferably in writing, of the potential for encountering trespassers on the property.
- ▶ Ensure trespassers have notice in one of the five ways discussed in the Trespass Section above, such that a criminal trespass claim might be available.
- ▶ Landowners who suffer property damage related to a border crime should obtain a written police report listing the damage as being related to a border crime and consider submitting a request for compensation to the Attorney General pursuant to the Texas Code of Criminal Procedure Chapter 56C within 90 days of the damage.
- ▶ If landowners live in the following counties, Brewster, Brooks, Cameron, Crockett, Culberson, Dimmit, Duval, Edwards, El Paso, Frio, Hidalgo, Hudspeth, Jeff Davis, Jim Hogg, Jim Wells, Kenedy, Kinney, Kleberg, La Salle, Live Oak, Maverick, McMullen, Pecos, Presidio, Reeves, Starr, Sutton, Terrell, Uvalde, Val Verde, Webb, Willacy, Zapata, or Zavala, they should check with the local NRCS office to determine if they might be available to receive EQIP funds to help with the costs of property damage caused by undocumented immigrants.
- ▶ Be in contact and build good relationships with law enforcement in the area, including DPS, Border Patrol, County Sheriffs, and the TSCRA Special Ranger.
- ▶ Notify law enforcement of any unusual activity or evidence of trespass activity.
- ▶ Be in contact with neighbors and communicate with one another when trespassers or damage from trespass activity may be noticed.
- ▶ Document as much as possible. Take photographs, make notes, and write statements of events that occur. It is impossible to know how this type of information might be helpful in the future.
- ▶ Train employees on how to deal with trespassers, damages, and the need for documentation of events.
- ▶ Landowners or lessees who own farm animals should hang Texas Farm Animal Liability Act signs at or near their stable, corral, or arena.

VII. CONTACT INFORMATION FOR LAW ENFORCEMENT AGENCIES

Counties Bordering Mexico Sheriff Information (updated 5/1/2024)

- ▶ **Brewster County**
Sheriff: Ronny D. Dodson
(432) 837-3488
sheriff.dodson@co.brewster.tx.us
201 W Avenue E
Alpine, TX 79830
- ▶ **Cameron County**
Sheriff: Eric Garza
(956) 554-6700
eric.garza@co.cameron.tx.us
7300 Old Alice Road
Olmito, TX 78575-5132
- ▶ **El Paso County**
Sheriff: Richard Wiles
(915) 538-2217
rwiles@epcounty.com
3850 Justice Dr.
El Paso, TX 79938
- ▶ **Hidalgo County**
Sheriff: J. E. "Eddie" Guerra
(956) 383-8114
sheriff.guerra@hidalgoso.org
PO Box 1228
Edinburg, TX 78541-1228
- ▶ **Hudspeth County**
Sheriff: Arvin West
(915) 369-2161
awest@hudspethsheriff.org
PO Box 39
Sierra Blanca, TX 79851-0039
- ▶ **Jeff Davis County**
Sheriff: William Kitts
(432) 426-3213
jdcsojd1@co.jeff-davis.tx.us
PO Box 1061
Fort Davis, TX 79734-1061
- ▶ **Kinney County**
Sheriff: Brad Coe
(830) 563-2788
sheriffbradcoe@co.kinney.tx.us
PO Box 1200
Brackettville, TX 78832-1200
- ▶ **Maverick County**
Sheriff: Tom Schmerber
(830) 773-2321
sheriff@maverickcountysheriff.com
1051 Balboa Jones Memorial Dr.
Eagle Pass, TX 78852-6196
- ▶ **Presidio County**
Sheriff: Danny C. Dominguez
(432) 729-4308
pcsheriff_1997@co.presidio.tx.us
PO Drawer V
Marfa, TX 79843
- ▶ **Starr County**
Sheriff: Rene "Orta" Fuentes
(956) 487-5571
rfuentes@starrcountyso.org
102 East 6th St.
Rio Grande City, TX 78582-3550
- ▶ **Terrell County**
Sheriff: Thaddeus Cleveland
(432) 345-2525
thad.cleveland@co.terrell.tx.us
PO Box 320
Sanderson, TX 79848-0320
- ▶ **Val Verde County**
Sheriff: Joe Frank Martinez
(830) 774-7513
jfmartinez@valverdecounty.texas.gov
PO Box 1201
Del Rio, TX 78841-1201
- ▶ **Webb County**
Sheriff: Martin Cuellar
(956) 523-4500
martincuellar@webbcountytexas.gov
902 Victoria St
Laredo, TX 78040
- ▶ **Zapata County**
Sheriff: Raymundo Del Bosque, Jr.
(956) 765-9961
raydelbosque@zapatacountytexas.gov
200 East 7th Ave.
Suite 415
Zapata, TX 78076

Counties Near Mexico Border Sheriff Information (updated 5/1/2024)

- ▶ **Brooks County**
Sheriff: Urbino Martinez
(361) 325-3696
umartinez@co.brooks.tx.us
PO Box 558
Falfurrias, TX 78355-0558
- ▶ **Crockett County**
Sheriff: Antonio Gomez Alejandro, III
(325) 392-2661
antonio.alejandro@co.crockett.tx.us
PO Box 1931
Ozona, TX 76943
- ▶ **Culberson County**
Sheriff: Oscar Carrillo
(432) 283-2060
culbersoncounty@gmail.com
PO Box 159
Van Horn, TX 79855-0159
- ▶ **Dimmit County**
Sheriff: Chris A. Castaneda
(830) 876-3508
ccastaneda@dimmitcounty.org
PO Box 885
Carrizo Springs, TX 78834-0885
- ▶ **Duval County**
Sheriff: Romeo Ramirez
(361) 279-3351
romeo.ramirez@co.duval.tx.us
PO Box 547
San Diego, TX 78384-0547
- ▶ **Edwards County**
Sheriff: James Guthrie
(830) 683-4104
J.GuthrieECSO@swtexas.net
PO Box 156
Rocksprings, TX 78880-0156
- ▶ **Jim Hogg County**
Sheriff: Erasmo Alarcon, Jr
(361) 527-3389
sheriff@co.jim-hogg.tx.us
PO Box 937
Hebbronville, TX 78361
- ▶ **Kenedy County**
Sheriff: Ramon Salinas, III
(361) 294-5205
rsalinas@kenedycountysheriff.org
PO Box 10
Sarita, TX 78385-0010
- ▶ **La Salle County**
Sheriff: Anthony Zertuche
(830) 879-3044
anthony.zertuche@co.la-salle.tx.us
101 Courthouse Square
Cotulla, TX 78014
- ▶ **Pecos County**
Sheriff: Thomas Perkins
(432) 336-3521
tj.perkins@co.pecos.tx.us
PO Box 1647
Fort Stockton, TX 79735-1647
- ▶ **Real County**
Sheriff: Nathan Johnson
(830) 232-5201
sheriffnathanjohnson@co.real.tx.us
PO Box 445
Leakey, TX 78873-0445
- ▶ **Reeves County**
Sheriff: Arturo Granado
(432) 445-4901
art.granado@reevescounty.org
PO Box 910
Pecos, TX 79772-0910
- ▶ **Uvalde County**
Sheriff: Ruben Nolasco
(830) 278-4111
sheriff@uvaldecounty.com
339 King Fisher Ln Box 1
Uvalde, TX 78801-4762
- ▶ **Willacy County**
Sheriff: Jose Salazar
(956) 689-5576
joe.salazar@co.willacy.tx.us
1371 Industrial Dr
Raymondville, TX 78580
- ▶ **Zavala County**
Sheriff: Eusevio Salinas, Jr
(830) 374-3615
eusevio.salinas@zavalacounty.org
200 Blk E Uvalde St
Crystal City, TX 78839

TSCRA Special Rangers on the Border

- ▶ **Brewster County, El Paso County, Hudspeth County, Jeff Davis County, Presidio County**
Clay McKinney
Special Ranger
District 18, Region 2
PO Box 1622
Pecos, TX 79772
(432) 448-9367
- ▶ **Terrell County**
HD Brittain
Special Ranger
District 19, Region 2
PO Box 65
Christoval, TX 76935
(325) 853-2062
- ▶ **Kinney County, Maverick County, Val Verde County**
Kevin Marmor
Special Ranger
District 28, Region 4
1833 FM 2200 W
Devine, TX 78016
(210) 215-4168
- ▶ **Cameron County, Hidalgo County, Starr County, Webb County, Zapata County**
Joe Aguilar, Jr.
Special Ranger
District 29, Region 4 Supervisor
PO Box 341
Mission, TX 78573
(956) 513-0297

U.S. Immigration and Customs Enforcement Agency (ICE)

ICE tip reporting by phone; report crimes, suspicious activity, and suspected child exploitation. U.S. and Canada: (866) 347-2423

U.S. Customs and Border Protection

Submit questions, compliments, complaints, or tips online or by calling (877) CBP-5511 (227-5511). Those outside the United States must call +1 (202) 325-8000.

Border Patrol Sectors and Stations in Texas

Big Bend Sector Texas

Big Bend Sector Headquarters

PO Box I
Marfa, TX 79843
(432) 729-5200
or (888) 536-6204

▪ **Alpine Station**

3003 West Highway 90
Alpine, TX 79830
(432) 837-6100

▪ **Fort Stockton Station**

1801 Front St.
PO Box 607
Fort Stockton, TX 79735
(432) 336-2468

▪ **Marfa Station**

717 South Highland
PO Box I
Marfa, TX 79843
(432) 729-5600

▪ **Presidio Station**

Highways 170 and 67
PO Box 929
Presidio, TX 79845
(432) 229-3330

▪ **Sanderson Station**

Highway 90 West
PO Box 628
Sanderson, TX 79848
(432) 345-2972

▪ **Sierra Blanca Station**

900 Aztec Dr.
PO Box 8
Sierra Blanca, TX 79851
(915) 369-4000

▪ **Van Horn Station**

500 Laurel St.
PO Box 368
Van Horn, TX 79855
(432) 283-3100

Del Rio Sector Texas

Del Rio Sector Headquarters

2401 Dodson Ave.
Del Rio, TX 78840
(830) 778-7000

- **Abilene Station**
1945 Industrial Blvd.
PO Box 3076
Abilene, Texas 79601
(325) 698-5552
- **Brackettville Station**
802 W. Spring St.
PO Box 216
Brackettville, TX 78832
(830) 563-6000
- **Carrizo Springs Station**
1868 Hwy 85 East
PO Box 194
Carrizo Springs, Texas 78834
(830) 876-1453

- **Comstock Station**
27685 Highway 90 West
Comstock, Texas 78837
(432) 292-4600

- **Del Rio Station**
2300 Highway 90 East
Del Rio, Texas 78840
(830) 778-300

- **Donna M. Doss Station**
605 W. Main Street
PO Box 576
Rocksprings, Texas 78880
(830) 683-2255

- **Eagle Pass South Station**
4156 El Indio Highway
Eagle Pass, TX 78852
(830) 752-3300

- **Eagle Pass Station**
2285 Del Rio Blvd.
Eagle Pass, TX 78852
(830) 758-4000

- **San Angelo Station**
8210 Hangar Road
PO Box 61106
San Angelo, TX 76906
(325) 949-0139

- **Uvalde Station**
#30 Industrial Park
Uvalde, Texas 78801
(830) 486-7600

El Paso Sector Texas

El Paso Sector Headquarters

8901 Montana Ave.
El Paso, TX 79925-1212
(915) 834-8350

- **Alamogordo Station**
1997 Highway 54 South
Alamogordo, NM 88310-7377
(575) 812-6840

- **Clint Station**
13400 Alameda Ave.
Clint, TX 79836
(915) 872-4100

- **Deming Station**
3300 J Street
Deming, NM 88030-7146
(575) 544-6100

- **El Paso Station**
9201 Gateway South Blvd.
El Paso, TX 79924
(915) 585-1924

- **Fort Hancock Station**
828 South Hwy 1088
Fort Hancock, TX 79839
(915) 769-1700

- **Las Cruces Station**
3120 North Main
Las Cruces, NM 88001-1162
(575) 528-6600

- **Lordsburg Station**
26 Pipeline Road
Lordsburg, NM 88045-1231
(575) 542-6000

- **Santa Teresa Station**
1005 NM Highway 9
PO Box 16
Santa Teresa, NM 88008
(575) 874-6800

- **Truth or Consequences Station**
Mile Post 82, I-25 North
Box 3310
Truth or Consequences, NM 87901
(575) 744-5235

- **Ysleta Station**
12245 Pine Springs Dr.
El Paso, TX 79936-7828
(915) 435-1100

Laredo Sector Texas

Laredo Sector Headquarters

207 W. Del Mar Blvd.
Laredo, TX 78041
(956) 764-3200

- **Cotulla Station**

3423 Interstate Highway 35
Cotulla, TX 78014
(210) 242-1600

- **Dallas Station**

2800 South Pipeline Road
Eules, TX 76040
(817) 571-2146

- **Freer Station**

5087 Highway 44
Freer, TX 78357
(361) 698-5400

- **Hebbronville Station**

34 East Highway 359
Hebbronville, TX 78361
(361) 886-1700

- **Laredo North Station**

11119 McPherson Road
Laredo, TX 78045
(956) 764-3800

- **Laredo South Station**

9001 San Dario Avenue
Laredo, TX 78045
(956) 764-3600

- **Laredo West Station**

Colombia Port of Entry
202 State Highway 255
Laredo, TX 78045
(956) 417-2100

- **San Antonio Station**

5000 N.W. Industrial Drive
San Antonio, TX 78238
(210) 521-7926

- **Zapata Station**

105 Kennedy Street
Zapata, TX 78076
(956) 519-5600

Rio Grande Valley Sector Texas

Rio Grande Valley Sector Headquarters

4400 South Expressway 28
Edinburg, TX 78542
(956) 289-4800

- **Brownsville Station**

940 N. FM 511
Olmito, TX 78575
(956) 983-1100

- **Corpus Christi Station**

9149 State Highway 44
Corpus Christi, TX 78406
(361) 879-4300

- **Falfurrias Station**

933 County Road 300
PO Box 479
Falfurrias, TX 78355
(361) 325-7000

- **Fort Brown Station**

3305 S. Expressway 83
Brownsville, TX 78521
(956) 983-7100

- **Harlingen Station**

3902 S. Expressway 77
Harlingen, TX 78552
(956) 366-3000

- **Kingsville Station**

2422 E. Senator Carlos Truan Blvd.
Kingsville, TX 78363
(361) 595-8700

- **McAllen Station**

3000 West Military Highway
McAllen, TX 78503
(956) 217-3700

- **Rio Grande City Station**

730 Border Patrol Lane
Rio Grande City, TX 78582
(956) 487-1044

- **Weslaco Station**

1501 E. Expressway 83
Weslaco, TX 78559
(956) 647-8800

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