

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

STATE OF TEXAS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
and ERIC H. HOLDER, JR. in his	)	Case No. 11-CV-01303
official capacity as Attorney General	)	(RMC-TBG-BAH)
of the United States,	)	[Three-Judge Panel]
	)	
Defendants,	)	
	)	
	)	
WENDY DAVIS, <i>et al.</i> ,	)	
	)	
Defendant-Intervenors.	)	

**PLAINTIFF STATE OF TEXAS' NOTICE OF FILING OF DIRECT WRITTEN  
TESTIMONY**

**EXHIBIT 1  
Declaration of Charlie Geren**

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Plaintiff,	)	
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v.	)	Case No. 11-CV-01303
	)	(RMC-TBG-BAH)
UNITED STATES OF AMERICA,	)	[Three-Judge Panel]
and ERIC H. HOLDER, JR. in his	)	
official capacity as Attorney General	)	
of the United States,	)	
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Defendants,	)	
	)	
WENDY DAVIS, <i>et al.</i> ,	)	
	)	
Defendant-Intervenors.	)	
	)	

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**DECLARATION OF CHARLIE GEREN**

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My name is Charlie Geren. I am over the age of 18, of sound mind, and fully competent to make this declaration. I have personal knowledge of the facts stated in this declaration, and they are true and correct.

I am a small business owner in Fort Worth, Texas where my business interests center around farming and ranching, real estate and restaurants. In November 2000 I was elected to serve in the Texas House of Representatives by the people of Texas House District 99, which includes a part of Tarrant County. I have served in the Texas House since that time. I am currently the Chairman of the House Committee on Administration. I was also a member of the House Committee on Redistricting during the 82<sup>nd</sup> Regular and 82<sup>nd</sup> 1<sup>st</sup> Called Sessions. My address is 501 Eastwood, Fort Worth, Texas 76107.

By way of background, I was born in Fort Worth, Texas and have lived here all of my life other than the time I spent in college. I attended Southern Methodist University where I earned a Bachelor's Degree in business administration. I am involved in numerous civic and charitable organizations throughout Tarrant County, including the Fort Worth Chamber of Commerce and the Southwestern Exposition and Livestock Show (which is commonly referred to as the Fort Worth Livestock Show and Rodeo). I am Anglo and I am a Republican.

The Tarrant County delegation in the Texas House of Representatives is currently comprised of ten members: Lon Burnam, Kelly Hancock, Todd Smith, Barbara Nash, Diane Patrick, Marc Veasey, Bill Zedler, Mark Shelton, Vicki Truitt and myself. Representatives Burnam and Veasey are Democrats; the other eight members of the delegation are Republicans.

After the census numbers came out in February 2011, we learned that Tarrant County would gain an additional seat in the Texas House. In other words, the delegation would increase from ten members to eleven as a result of the 2011 redistricting cycle. This new House seat, as well as population shifts that occurred within Tarrant County over the last decade, required the movement of some district lines within the County.

Early in the Regular Session, Representative Burt Solomons, the Chairman of the Redistricting Committee in the House, informed me that the members of the Tarrant County delegation would be responsible for developing a redistricting plan for Tarrant County, and that if we could agree on a plan, then the plan would be "dropped in" to the overall state map. I then informed each of the other members of the Tarrant County delegation to submit their proposed districts to me, and that I would use these proposals to develop a draft county-wide map. I told them that our goals were, to the extent possible, to accommodate the interests and proposals of each member of the delegation, and to draw the additional Tarrant County district so as to favor a

Democratic candidate. This newly-drawn seat would raise the number of Democrats representing Tarrant County in the Texas House from two to three, when compared to the current plan. After these proposals were submitted to me by the other members of the delegation, a map was developed that accommodated everyone's requests except for those put forth by Representative Barbara Nash.

Representative Nash represents what is House District 93 in the benchmark plan. We were unable to draw House District 93 in the way that Representative Nash requested because of the delegation's desire to draw the additional Tarrant County House Seat (which is now House District 101) as a Democratic-leaning seat. So, House District 93 was redrawn significantly from what Representative Nash proposed; Representative Nash lives in what is now House District 91 and she has filed to run for the Texas House from that District.

Each member of the delegation supported the map we proposed and signed a copy of it to indicate that support. Therefore, the map that I circulated satisfied our two goals of protecting each member's interests and creating a new Democratic-leaning district in Tarrant County.

After this map was agreed to and submitted by the Tarrant County delegation, Chairman Solomons, at the House Redistricting Committee meeting on April 19, 2011, offered an amendment to the Tarrant County map that changed two districts – mine (District 99) and Lon Burnam's (District 90). The effect of the amendment was to increase the number of Hispanic voters in District 90 by moving a predominantly Hispanic part of my district into Representative Burnam's district.

This amendment was offered in response to testimony that the Redistricting Committee received from Luis Figueroa, on behalf of the Mexican American Legal Defense and Educational Fund ("MALDEF"), at a Redistricting Committee hearing on April 15, 2011. In that testimony,

Mr. Figueroa offered a proposal that would increase the Latino population in District 90 from both the benchmark plan and the plan that was initially proposed for Tarrant County. Chairman Solomons' amendment accomplished the goals set forth by Mr. Figueroa, on behalf of MALDEF.

I voted for Chairman Solomons' amendment when it was presented to the Committee for a vote. Representative Veasey, who was also a member of the Redistricting Committee and is a member of the Tarrant County delegation, voted against it. Representative Burnam was not a member of the House Redistricting Committee, but it is my understanding that he did not support Chairman Solomons' amendment. In fact, Representatives Veasey and Burnam attempted to undo the effects of Chairman Solomons' amendment during the legislative process. These attempts failed.

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

Executed on this the 9th day of January, 2012.



Charlie Geren