

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 3
Declaration of Donald ("Dee") Margo**

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)	(RMC-TBG-BAH)
UNITED STATES OF AMERICA,)	[Three-Judge Panel]
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)	
Defendant-Intervenors.)	
)	

DECLARATION OF DONALD (“DEE”) MARGO

My name is Donald (“Dee”) Margo. 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 the Chairman and Chief Executive Officer at the John D. Williams Company in El Paso, Texas. My business focuses on insurance and brokerage sales. In November 2010, I was elected to the Texas House of Representatives by the people of Texas House District 78. My current address is 4845 Villa Encanto, El Paso, Texas 79922.

By way of background, I was born in Oklahoma City, Oklahoma and went to high school in Huntsville, Alabama. I attended Vanderbilt University on a college football scholarship, where I earned a Bachelor’s Degree in history and economics. I am married and I have two children.

I have lived in El Paso County for more than thirty years. During that time, I have been active in many civic organizations, including the Greater El Paso Chamber of Commerce, the El Paso Regional Economic Development Corporation and the Paso Del Norte Group. I am 25% Hispanic (my grandfather was Hispanic and from Rio Grande City, Texas; he did not speak English until he was 18 years old). I am a Republican.

In 2006, I ran for public office for the first time when I ran for a seat in the Texas State Senate against then-state Senator Eliot Shapleigh. Senator Shapleigh represented Texas State Senate District 29, which covers the vast majority of El Paso County. Senator Shapleigh was re-elected in the general election.

In 2008 I ran against and successfully challenged Pat Haggerty - who was the incumbent State Representative at the time and had been for the previous 18 years - in the Republican Party primary election for Texas House District 78. I was defeated by Joe Moody in the general election.

In 2010, I ran against and successfully challenged then-State Representative Joe Moody in House District 78. I was elected because of my committed leadership to make El Paso a great place to live and raise a family. I delivered on my campaign promise to put El Paso first by working closely with the other members of our city's legislative delegation and always voting for El Paso's interest. Following the session the El Paso Times said, "It's good to see our delegation, for the first time in several sessions, standing together as one..."

The El Paso County Delegation in the Texas House of Representatives is comprised of five members: Joe Pickett, Marisa Marquez, Naomi Gonzalez, Chente Quintanilla and myself. Representatives Pickett, Marquez, Gonzalez and Quintanilla are all Democrats; I am the only Republican representing El Paso County in the Texas House.

After the census numbers came out in February 2011, we learned that El Paso County would contain five Texas State House districts, just like it did under the benchmark plan. In other words, El Paso County would not lose or gain a Texas State Representative seat as a result of the 2011 redistricting cycle. We also learned that population shifts over the last decade required that some district lines within the County would have to be moved.

Chairman Pickett informed the members of the El Paso delegation that we would be responsible for developing a redistricting plan for El Paso County and that if we could agree on a plan, then the plan would be “dropped in” to the overall state map. After some very brief discussions between the members of the El Paso delegation, a county-wide proposal was developed. All five members of the delegation reviewed this proposal and agreed that it was acceptable.

After we all agreed on this county-wide proposal, Representative Marisa Marquez approached me and asked if I would agree to revise the proposal to move into her district (District 77) an area that otherwise would have been in mine. I had no objection to her request, and because this new change was obviously important to her (and because her revision would not have affected the other members of the delegation), I was happy to agree to it. As such, we revised the originally agreed-to proposal to accommodate Representative Marquez.

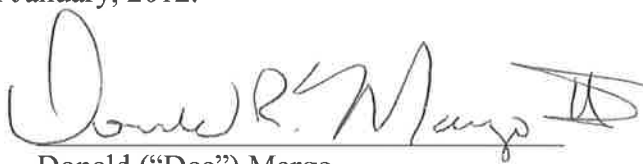
Also, as I indicated, the changes that were made to House District 78, along with changes that were made to the other House Districts in El Paso County, were the products of agreements that were reached and signed-off on by the members of the entire El Paso delegation. To the best of my knowledge, not one member of the delegation had a problem with or an objection to any House District in El Paso County. I am aware that some members of the delegation ultimately voted against the Texas House map as a whole on final passage, but, to the best of my

knowledge, none of them had an issue with any of the districts that we drew together in El Paso County.

As for me, I had relatively little input and few meaningful discussions with anyone on the contours of House District 78. I reviewed the county-wide proposal that was developed after our conversations among the delegation, I determined that it was acceptable to me and I did not offer any objections. Furthermore, when Representative Marquez asked me to consider revising the initial county-wide proposal, I agreed.

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

Executed on this the 10th day of January, 2012.


Donald ("Dee") Margo