

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)
official capacity as Attorney General)
of the United States,)
)
Defendants,)
)
)
WENDY DAVIS, <i>et al.</i> ,)
)
Defendant-Intervenors.)

Case No. 11-CV-01303
(RMC-TBG-BAH)
[Three-Judge Panel]

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

**EXHIBIT 4
Declaration of Senator Florence Shapiro**

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)	

DECLARATION OF SENATOR FLORENCE SHAPIRO

My name is Florence Donald Shapiro. 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.

1. I represent Senate District 8, and I am an Anglo Republican. My district is in Dallas and Collin Counties. In September 2011, I announced that I would not be seeking reelection.

2. I was first elected to the State Senate in 1992 and began serving my first term in 1993. The 2011 redistricting cycle was my third redistricting cycle. I was not on the Senate Select Committee on Redistricting, and I only attended one Committee hearing in Dallas County. That hearing occurred in September 2010.

3. Senate District 8 had excessive population in 2011, so before the legislative session, in late 2010 or January 2011, I met with Doug Davis to discuss removing some constituents. Doug Davis was the chief map drawer for the Senate. When you talk about where you're going to change the lines, the concern was that if we did something in Dallas County, we might have to split Collin County between three districts. I remember that a lot of people were concerned that Collin County would be divided, and I shared that concern with Doug Davis in our meeting. Dallas County is divided by many Senators on the northern part, and I was also worried that Senate District 8 would lose a part of northern Dallas County

4. Doug Davis and I had one additional meeting during the legislative session. I do not remember having any other meetings with Doug Davis about redistricting. In early May 2011, a member of my staff showed me the proposed configuration of Senate District 8. The proposed plan avoided splitting Collin County into three districts, but I was not very happy with Senate District 8. The next day, I approached Senator Seliger on the floor and let him know that I was not very happy. Senator Seliger was the Chairman of the Senate Select Committee on Redistricting. He told me not to worry and that I still had a good chance of getting reelected, but I was not concerned about my reelection.

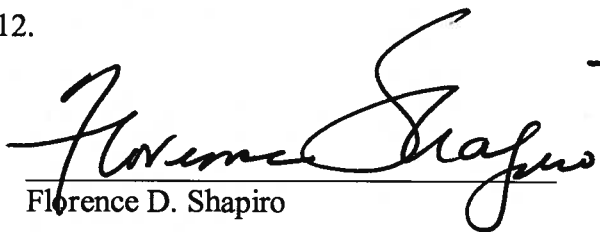
5. The proposed district drafted by Mr. Davis ultimately became part of the final map. Most of what I asked for in Senate District 8 did not become a part of the district. In fact, the enacted Senate District 8 was essentially the opposite of what I requested. The Dallas County portion was taken away. The only piece of Dallas County that stayed was Richardson, and a small portion of Sachse, which I had never represented before. I was unhappy about losing my Dallas County constituents. I felt that those were my constituents, and that I had served them

well. I believed that they wanted me to continue as their Senator and I wanted to continue as their Senator, so I was disappointed.

6. I only remember Senator Seliger expressing two goals about redistricting. These were to be fair and to fulfill legal requirements. We also talked about maintaining communities of interest, which is a term I have heard used in redistricting for twenty years. Maintaining communities of interest seems to be a redistricting principle that Texas follows.

7. I never believed that being an Anglo Republican granted me better access to the redistricting process than members of the Democrat Senate delegation. My status as an Anglo Republican certainly did not guarantee the outcome that I desired for my district.

Executed on this the 9th day of January 2012.


Florence D. Shapiro