Exhibit 11 to Davis Intervenors’ Opposition to Plaintiff State of Texas’ Motion for Summary Judgment

Sworn Declaration of Sen. Royce West
DECLARATION OF TARRANT COUNTY SENATOR ROYCE WEST

Pursuant to 28 U.S.C. 1746, I, Royce West declare that:

1. My name is Royce West, and I am an African American resident of Dallas, Texas and have served as a Texas State Senator representing District 23 since 1993. My district includes most of the African American neighborhoods in Dallas County and many Hispanic neighborhoods as well. I served on the Senate Redistricting Committee during the recent Texas legislative session, so I bring first-hand knowledge to the process used and the plan adopted by the Legislature when it redrew Senate districts. Further, as one of only two African American Texas State Senators and one of only 12 Senators who represent minority opportunity districts, I have experience and insight on the attitudes and concerns of minority citizens, not only in my own district but throughout the north Texas region and statewide.

2. All twelve of the Texas Senators who represent minority opportunity districts in Texas objected to the State’s redrawn District 10. We recognized that the reconfiguration of District 10 eliminated the ability of African American and Hispanic voters in the district to elect their candidate of choice. In fact, all twelve minority opportunity district Senators submitted a letter for the Senate record to express our objections to the configuration of Senate District 10 and the process used to adopt the plan.

3. Many Senators who represent Anglo-controlled districts enjoyed ongoing participation in developing the Senate plan. Other Senators – most of whom represent minority opportunity districts – were not allowed to see the final configuration of even their own districts in isolation, much less in the broader context of the map – until less than 2 days before it was presented in committee.

4. The product of this flawed process was a flawed and discriminatory map. State leaders intended to destroy District 10 as a minority opportunity district so went about creating a process to prevent the public or fair-minded Legislators with the tools or opportunity to object. Their actions have left the protection of minority voters in Texas and the enforcement of the Voting Rights Act up to the Federal Courts.

5. In 2008, Senate District 10 minority voters demonstrated their ability to elect their candidate of choice in the election of Wendy Davis. I remain in close contact with many minority leaders in Fort Worth and Tarrant County. The decision by
both African American and Hispanic leaders to make the Senate District 10 race the top priority in 2008 was widely known.

6. In 2008, Minority leaders in Tarrant County and throughout the North Texas region realized that the minority population in Senate District 10 was of sufficient size, possessed the organizational ability and would devote the physical and financial resources to elect their candidate of choice in Senate District 10.

7. Minority leaders had good reason for their confidence and optimism. When the 2001 Texas Senate redistricting plan was submitted to the Department of Justice for preclearance, the State justified its configuration of District 10 by predicting that the minority community in Fort Worth could grow and unite to elect their candidate of choice. Minority leaders throughout our region watched the election returns and demographic changes in District 10 throughout the decade. There was clear recognition that 2008 was the tipping point for minority voters in District 10 to elect a State Senator of their choosing.

8. Wendy Davis was recruited and elected by a coalition of African American and Hispanic voters. Her election in 2008 was a product of near unanimous support from minority voters. Their support overcame the large majority of Anglo voters who opposed Davis.

9. As a result, it is the 2008 State Senate that should be used to determine whether or not District 10 provides minority voters the opportunity to elect their candidate of choice. Using any other race, whether local or the reconstituted results of statewide elections, provides an inaccurate measure of minority voting strength in the District 10.

10. State leaders recognized that minority voters in District 10 could elect their candidate of choice. Rather than recruit and fund a Republican candidate to compete for and win the support of minority voters, State leaders dismantled the district and destroyed the ability of minority voters to elect their candidate of choice.

11. While I represent a Dallas-based district, I am very familiar with the geography, demography and electoral history of our entire region. The careful targeting and separation of minority neighborhoods by State leaders in Senate District 10 discriminates against minority voters.
12. The southeast Fort Worth neighborhoods in Senate District 10 make up the third largest concentration of African American voters in Texas. Under the State’s plan, these voters are cut from Senate District 10 and attached to District 22, which is a rural-based Anglo-controlled district that extends over 100 miles south of Fort Worth.

13. The historic Northside of Fort Worth is a long-established but still growing Hispanic community. It too was cut from Senate District 10 and then attached to District 12, which is based in exurban Denton County and is controlled by Anglo voters.

14. Other growing minority neighborhoods in District 10 such as those in south Arlington and in south Fort Worth were either removed from District 10 and added to an adjacent Anglo controlled district or left stranded and an ineffective community within the deliberately diminished State’s District 10.

15. The State’s proposed District 10 is a deliberate attempt to undermine and destroy the ability of African Americans and Hispanics in Tarrant County to elect their candidate of choice. The district can be redrawn and restored as a majority minority district where African Americans and Hispanics can elect their candidate of choice without negatively impacting the effectiveness of any other minority district or unnecessarily disrupting any other North Texas district.

I declare under penalty of perjury that the foregoing is true and correct.

Dated this 20 day of October, 2011.

[Signature]

ROYCE WEST