

EXHIBIT A

MARK A. FAVORS, et al.)
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 Plaintiffs,)
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 v.) No. 1:11-cv-05632-DLI-RR-GEL
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 ANDREW M. CUOMO, et al.)
)
)
 Defendants.)
)

I, DEBRA A. LEVINE-SCHELLACE, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am the Co-Executive Director of the New York State Legislative Task Force on

2. LATFOR was established by Chapter 45 of the New York State Laws of 1978.

3. LATFOR has the authority to engage in such activities as its Co-Chairs deem

(and does) hold public and private hearings in connection with proposed reapportionment plans for the senate, assembly, and congressional districts in New York. *See id.* § 83-m ¶ 10.

4. The Co-Chairs of LATFOR may also employ such personnel as may be necessary for the performance of LATFOR's work, *see id.* § 83-m ¶ 4, and employees of LATFOR are considered employees of the legislature for all purposes, *see id.* § 83-m ¶ 12.

5. For approximately eight years of every decade, LATFOR functions as a nonpartisan body that collects election data and compiles it in a central computerized database, which is another of its statutorily prescribed functions. *See id.* § 83-m ¶ 1(a) & (c). Following each decennial Census, however, LATFOR creates four separate redistricting offices: one for each of the Senate and Assembly majorities and the Senate and Assembly minorities. The drafters of the Senate plan are employees of LATFOR and work exclusively for the Senate majority redistricting office during the time that they draft the plan of reapportionment for the New York State Senate in light of the decennial Census data.

6. For this redistricting cycle, the U.S. Census Bureau released the 2010 Census Data that LATFOR uses in connection with reapportionment in early 2011, and LATFOR thereafter created four separate redistricting offices, including the Senate majority redistricting office.

7. The 2012 Senate Plan was developed exclusively within the Senate majority redistricting office of LATFOR. The drafters of the 2012 Senate Plan worked exclusively under the direction of Senate Majority Leader Skelos, LATFOR Co-Chair Senator Nozzolio, and Senators Skelos' and Nozzolio's Senate staff; and, in drawing the 2012 Senate Plan, they consulted with various Republican Senators—including Senate Majority Leader Skelos and

Chairman Nozzolio. The drafters' consideration of input from the public and from the Senate minority was also part of their work under the direction of the Senate majority.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed in New York, New York on April 27, 2012


DEBRA A. LEVINE-SCHELLACE