No. 13-895

In The Supreme Court of the United States

ALABAMA LEGISLATIVE BLACK CAUCUS, *et al.*,

Appellants,

v.

ALABAMA, *et al.*,

Appellees.

On Appeal From The United States District Court For The Middle District Of Alabama

REPLY BRIEF FOR APPELLANTS

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I. ALBC PROPERLY CHALLENGED ALL 36 MAJORITY-BLACK DISTRICTS

(1) This action contends that *all* of the majority-black Alabama legislative districts were drawn for an overriding racial purpose.[1] The plaintiffs assert that this same predominant racial purpose drove the fashioning of the boundaries of every one of the 28 majority-black House districts and 8 majority-black Senate districts. The state argues that this lawsuit is thus only a challenge to the districting plan "in its entirety," and not a challenge to any "particular district." That distinction makes no sense. A constitutional challenge to all 36 districts is not different from 36 challenges to individual districts; "the plan" and "all 36 districts" are not entities distinct from the 36 districts themselves, in the way that the United States is a different entity than the 50 states.

The testimony of the drafters relied on by plaintiffs described the purpose which they sought above all to achieve in drawing the lines of "the minority districts." ALBC Br. 22-25. Clearly their testimony referred to the purpose of the district lines of all of those majority-black House and Senate districts, not instead to a distinct purpose of the "plan." See J.S.App. 144 (Legislature maintained "the proportion of black persons in each majority-black district"), 189 (drafters sought to "adopt for each majority-black

[1] "I understand the Caucus to challenge each individual majority-black district...." J.S.App. 209 n.21 (dissenting opinion).

district a particular percentage of black population") (dissenting opinion). Surely plaintiffs were not required, instead of simply asking the drafters a single question about the purpose of the minority "districts," to instead ask the same question 36 times about each particular majority-black district. Hinaman explained that matching the prior racial composition of the existing black district was the purpose and methodology for redrawing any "individual district," ALBC Br. 22, and the state itself characterized this racial goal as pertaining to "each black-majority district." *Id.* at 23. In this Court, the state insists, as it did at trial, that the "strategy to secure preclearance ... [of] the drafters [was to] avoid[] lowering the black population in the preexisting majority-black districts." Br.Appellees 70. That strategy was applicable to every one of those districts, because the state wanted all of them to be precleared.

In addition to evidence regarding the general standard applied in drawing all the majority-black districts, the plaintiffs offered evidence about specific instances in which that racial standard had shaped the boundaries of a number of particular districts; indeed, the documentary record and testimony were replete with references to particular districts. For example, plaintiffs demonstrated that HD 53 was cannibalized to meet that racial standard, an action which was intended to and did determine the shape of

the 8 remaining black districts in Jefferson County.[2] This evidence was not offered to establish a different claim – about specific districts – but to buttress the evidence that race was an overriding purpose of all the districts. The ALBC post-trial brief asserted that "it was the need to maximize the size of black majorities that drove nearly every districting decision." Doc. 194, ¶ 115. The ADC post-trial brief cited numerous examples of particular majority-black districts drawn on the basis of race.[3]

It is not at all clear what the state means when it asserts the plaintiffs were only challenging the plans in their "entirety." The *Shaw* claims obviously did not challenge the 77 majority-white House districts or the 27 majority-white Senate districts. The plaintiffs clearly were not advancing an all-or-nothing argument, insisting that the court was limited to invalidating either every one or none of the majority-black districts. At times the state appears to suggest that *only* "district-specific evidence" could be considered in a *Shaw* case (Br.Appellees 32), as if direct evidence applicable to many districts is inadmissible. But that surely is not the law. The remedial issues posed by a

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[2] The trial testimony, depositions, and documentary evidence are pervaded with information about particular districts.

[3] Doc. 195-1. Those proposed findings were not, as the state argues, limited to ADC's Section 2 and county-splitting claims. Br.Appellees 14. The 90 pages of proposed factual findings are not tied to any particular claim; the brief deals with those distinct claims only in its Conclusions of Law. Doc. 195-1, pp. 91-103 (Section 2 claim), 103-11 (*Shaw* claim).

Shaw challenge to 36 districts are no different from the issues posed by a challenge to a single district; a court would declare unconstitutional the district or districts in question, and order the state to adopt district lines that do not violate *Shaw*.

The state objects that courts would find it impossible to conduct a strict scrutiny analysis of a race-based practice that had been applied to multiple districts, insisting that such an analysis could only be made on a district-specific basis. Br.Appellees 16, 24-25. But the state then sets out on pages 71-84 of its brief an intelligible, although incorrect, strict scrutiny defense of its statewide "strategy," a defense which never mentions a single specific district. And at the end of its brief the state objects to ADC's contention that a defendant must offer separate district-specific justifications for a practice used in multiple districts. "The court should not require legislators to conduct a 'functional analysis' for every majority-black district." Br.Appellees 22. The proper analysis, the state argues, would be based on the justification for the entire plan. "Allowing the states to compare, based on current census data, the ... population of majority-minority districts in the benchmark *plan* and the proposed *plan* simplifies the process." Br.Appellees 84 (emphasis added).

The state asserts that "[o]n appeal, the plaintiffs have renewed their statewide claims against the redistricting plans 'as a whole.'" Br.Appellees 15. But the phrase "as a whole" is not a quote from our opening brief. Rather, that brief repeatedly refers to *Shaw*

violations as having occurred in "*each* majority-black district." ALBC Br. 5, 11, 12, 13, 14, 15, 21, 25, 27, 29, 31 (emphasis added). Our challenge to the "district-specific racial ratios" obviously encompassed a challenge to each specific district racial ratio. ALBC Br. 15, 27, 38, 40, 41. We objected to "[t]he drafters' determination to maintain the existing black percentage in *all* of the majority-black districts." ALBC Br. 29 (emphasis added); see Br.Appellees 16 ("The plaintiffs do not argue that all the majority-black ... districts are problematic.").

(2) The United States does not question the propriety of a single action asserting that multiple districts violate *Shaw*. It argues, however, that in such a case there must always be separate individualized findings with regard to each challenged district.

While district-specific findings would often be appropriate, that is not invariably the case. *Shaw* is a case about motive, and a single overriding motive could animate the creation of multiple districts. Of course, if a plaintiff seeks to establish the existence of an overriding racial purpose by pointing to district-specific circumstantial evidence, such as the unusual shape of a particular district, or a state offered district-specific justifications, that evidence would have to be evaluated on a district-specific basis. But where a plaintiff offers non-district-specific evidence which establishes that a state acted with an overriding racial purpose in drawing multiple challenged districts, such as testimony by the framers of those districts, and a state offers in response only a justification that

applies equally to all of those districts, district-specific findings would serve no purpose. In this case the undisputed purpose common to all the districts constituted an overriding racial motive, and the state has never claimed that in any district that racial purpose was subordinated to some other state policy (other than one-person, one-vote).

The government contends that "[t]his Court has performed these district-by-district assessments even in the presence of evidence that the plan drafters had overarching statewide goals relating to race." U.S.Br. 16. That is not correct. In *Miller v. Johnson,* 515 U.S. 900, 917 (1995),[4] *Shaw v. Hunt*, 517 U.S. 899, 906 (1966),[5] and *Hunt v. Cromartie*, 516 U.S. 541, 547 (1999)[6] there was no evidence of "overarching statewide goals," only evidence about the purpose of the single specific district in question. *Bush v. Vera,* 517

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[4] "[E]vidence show[ed] that the General Assembly was motivated by a predominant overriding desire to ... permit the creation of a third majority-black district...."

[5] The state deliberately drew "District 12" to have a black majority. After the Attorney General rejected a plan creating only a single majority-black district, there was evidence that the state intended "to create two congressional districts with effective black voting majorities" (quoting Section 5 submission). The state conceded it intend to "create[ ] two districts in a way as to assure black-voter majorities." (Quoting *Shaw v. Barr*, 808 F.Supp. 461, 470 (E.D.N.C. 1992)).

[6] There was evidence based on "maps of District 12," "the district's low scores with respect to ... compactness" and the fact that "the State had ignored traditional districting criteria in crafting the new Twelfth Congressional district."

U.S. 952 (1996) did not rest on "direct evidence of statewide race-related objectives" (U.S.Br. 17), but only on evidence about the purpose of the three specific districts being challenged. Although there was direct evidence in that case about the purpose of each challenged district, the Court looked to the actual design of the districts in question because the testifying officials had made "inconsistent statements." 517 U.S. at 970. In the instant case the drafters' testimony about their racial purpose is entirely consistent.

The government argues that "[a]n analysis of whether race predominates in a plan 'as a whole' is overbroad, ... because it enables plaintiffs to challenge districts in which they do not themselves reside." U.S.Br. 17. In a *Shaw* case challenging multiple districts, the plaintiffs must establish standing to challenge each district in question; the court below held that ALBC had done so. J.S.App. 134-37. But that standing requirement has no bearing on the manner in which the merits of such a case should be analyzed.

II. The Undisputed Facts Demonstrate That Achieving The District-Specific Racial Ratios Was The Overriding Purpose of The Redrawn Majority-Black Districts

(1) The linchpin of the claims in this case is the insistence by state officials that they acted in the belief that Section 5 of the Voting Rights Act required them to repopulate each of the majority-black districts

in a manner which would match as precisely as possible the racial composition of the original district. The state argues that a mere commitment to complying with the Voting Rights Act does not, without more, establish a *Shaw* violation. "The plaintiffs' theories rest on the notion that whenever a non-lawyer state legislator testifies that he prioritized compliance with the Voting Rights Act as a general matter, race is *per se* the driving factor.... But.... a drafter must always.... prioritize compliance with the Voting Rights Act." Br.Appellees 23. But the claim in this case does not rest on the drafters' mere determination to comply with the Voting Rights Act "as a general matter." Rather, there was specific, consistent and undisputed testimony by those drafters that they had drawn the district lines based on the belief that "compliance with the Voting Rights Act" required achieving wherever possible the district-specific racial ratios.[7] The state does not contend that this was mere loose talk,[8] or the ill-chosen words of laymen untutored in the law; to the contrary, in his brief in this Court, Alabama's highest legal official steadfastly insists (albeit mistakenly) that Section 5 imposes precisely the rigid requirement which the drafters testified they were compelled to satisfy. Br.Appellees 79-82.

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[7] ALBC Br. 22-25.

[8] See Br.Appellees 7 ("the drafters decided to avoid reducing the black population of preexisting majority-black districts where possible"), 20 ("The drafters tried to avoid reducing the black population in preexisting majority-black districts as a strategy to comply with Section 5.").

The state does not defend the actual reasoning of the district court. The court below asserted that race could not be the predominant motive for the challenged districts because the drafters had attached priority to population equality. See ALBC Br. 27-28, U.S.Br. 8, 12, 18-20. In this Court, the state does not contend that compliance with one-person one-vote would defeat a *Shaw* claim, and insists the lower court must have meant something else. Br.Appellees 32. The district court argued that achieving the district-specific racial ratios could not have been a predominant motive, because the 2012 plan actually lowered the black proportion of most districts, comparing that plan with the population of the 2001 districts under the 2000 census. See ALBC Br. 35-37. In this Court, the state does not contend that the effect of the changes made by the 2012 plan should be measured against decade-old census figures, and suggests the lower court must have been making some other point. Br.Appellees 41. The district court opinion rested on several other arguments that the state neither reiterates nor defends: that achievement of the district-specific racial ratios was subordinated to some other never-identified goal (ALBC Br. 35), that the drafters permissibly balanced below-ratio districts with above-ratio districts (ALBC Br. 33), and that the division of precincts on racial lines is irrelevant so long as a larger number of other precincts are divided for non-racial reasons. ALBC Br. 47-48.

(2) One of the most striking examples of the overriding importance the drafters attached to achieving the district-specific racial ratios was the cannibalization of majority-black HD 53, a step avowedly taken so that the black population of that district could be divided up among the remaining majority-black House districts in Jefferson County. ALBC Br. 38-41. The state's only comment on that action is to call attention to the age and health of the black incumbent in HD 53. "The drafters chose to eliminate HD 53 because they believed that the incumbent from that district intended to retire because of his age." Br.Appellees 12-13; see *id*. at 46 ("[T]he drafters intentionally chose to consume the district of an older representative, who was in poor health and who they believed would not run again."). But Hinaman was absolutely clear in explaining that he was determined to cannibalize a majority-*black* district in order to preserve the black percentages in the other majority-black districts. Tr. v. 3, pp. 132, 155. In selecting which of the majority-black districts would be dismembered, Hinaman may have considered the comparative ages and health of the incumbents from those districts, but it is undisputed that Hinaman would not have repopulated the majority-black districts with the population of a majority-white district, even if the incumbent Representative from the majority-white district was deceased.

Although preserving existing precincts is a traditionally important districting criterion in Alabama, in the court below it was undisputed that the

drafters had divided precincts along racial lines in order to achieve the district-specific racial ratios. By placing in a majority-black district only the portion of a precinct in which blacks were more concentrated, and putting the rest in an adjoining majority-white district, the drafters were able to meet or come as close as possible to the district-specific racial ratio. Hinaman candidly acknowledged having done this. ALBC Br. 47-48. The district court found that precincts were divided to achieve those ratios. J.S.App. 104. The plaintiffs offered expert testimony about the race-based division of precincts,[9] and the record contained a detailed racial breakdown of every precinct in the state which had been divided between or among several districts. Docs. 140-1, 140-2; SDX 405, 475. The state's post-trial brief did not deny that precincts had been divided along racial lines,[10] presumably because the record contained the racial composition and allocation of every divided district.

In this Court, the state does not exactly deny that race-based precinct splitting occurred;[11] it nonetheless objects that "plaintiffs have never identified any specific precinct that they allege was split because of

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[9] NPX 323 (Arrington Report) at 35-38.

[10] Doc. 196.

[11] See Br.Appellees 55 ("We concede that the political consultant who drew the maps testified that he *may* have split *some* precincts ... *somewhere* on the basis of race.") (emphasis in original).

race." Br.Appellees 54.[12] That is not correct; one of the plaintiffs' post-trial briefs repeatedly identified precincts that had been divided on racial lines.[13] We set out in an appendix to this brief the record evidence regarding the racial composition of each of the precincts that was divided between a majority-black and majority-white district. Brief Appendix ("Br.App.") 9a-21a. The race-based nature of those divisions is stark. There are 84 precincts that were divided between majority-black and majority-white Senate districts. In 83 of those precincts a disproportionate part of the black residents was placed in the majority-black district, and in 6 instances *all* of the black residents of the precinct were placed in a majority-black district.[14] Of the 154 precincts divided between majority-black and majority-white House districts, blacks are disproportionately placed in the majority-black district in 147 precincts, including 15 precincts in which *all* the black residents were put in the majority-black district.

The redistricting of SD 26 also illustrated the overriding importance of the drafters' racial goals. First, although the state argues that "[c]hanging all the districts 'as little as possible' was an express goal" (Br.Appellees 42), SD 26 was geographically dismembered. Most of the land area of the old SD 26 was

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[12] See Br.Appellees 54 ("plaintiffs ... have never pointed to one [district] and said, 'this precinct was split because of race.' ").

[13] Doc. 195-1, ¶¶ 50, 191, 205, 211, 218, 219, 251.

[14] The sole exception, Birmingham Botanical Gardens in Jefferson County, had only 12 black residents.

transferred to SD 25, including the entire southern half of Montgomery County and parts of the northwestern part of the County; that removed 12,000 of the original residents of SD 26, even though SD 26 was already under-populated. Br.Appellees 59. Second, the drafters systematically divided on racial lines the precincts that were made part of both SD 25 and SD 26. The state asserts that "[t]he plaintiffs say that the drafters split precincts between SD 25 and SD 26 along racial lines, but they have never identified any precinct that they allege was split because of race." Br.Appellees 60. That is incorrect; one of the plaintiffs' post-trial briefs pointed out that "the Senate plan raised the black percentage in Senate district 26 ... by splitting precincts 1A, 1B, 1C, 1D, 3F, 3G and 5M along racial lines...." Doc. 195-1, ¶ 54. Those seven precincts were demonstrably divided on racial lines. See Br.App. 11a.

	SD 25		SD 26	
Precinct	White	Black	White	Black
1A	5444	1120	248	689
1B	2787	992	2273	3322
1C	2085	1335	941	2651
1D	1441	319	1345	3054
3F	5319	1206	344	435
3G	709	609	336	1755
5M	5463	2213	251	532
Total	23,248	7794	5738	12,438

80.20% of the whites in the seven precincts were placed in majority-white SD 25, while 61.48% of the blacks were districted in majority-black SD 26.

Hinaman was extensively questioned at trial about the redistricting of SD 26, and he gave three reasons: he would not "retrogress" SD 26, SD 25 was underpopulated, and he transferred part of SD 26 to SD 25 to build a land bridge so he could add majority-white Crenshaw County to SD 25. Tr. v. 3, 174-82. As we noted in our opening brief, and the state does not appear to deny, SD 25 was actually *over*populated. ALBC Br. 50-51 n.93; see Br.Appellees 59 ("overpopulated SD 25"), Doc. 195-1, p. 190. That leaves only Hinaman's race-based account to explain the redistricting of SD 26. The district court correctly concluded that this districting scheme was racially motivated. J.S.App. 152.

In this Court, counsel for the state proposes an entirely new set of explanations for the redrawing of SD 26, reasons never advanced by Hinaman at trial, and insists that the redistricting of SD 26 had nothing to do with race. Br.Appellees 59-62. But this Court has made clear that non-racial explanations cannot be adduced by "argument of counsel." *Texas Dept. of Community Affairs v. Burdine,* 450 U.S. 248, 255 n.9 (1981). The speculative contentions of a defendant's attorney are no substitute for sworn testimony. If the state thought Hinaman had other reasons for refashioning SD 26, it had every incentive and opportunity to elicit those reasons at trial, a point in the proceedings at which Hinaman (unlike the state's counsel) could have been cross-examined, and at which the plaintiffs could adduce responsive evidence.

The newly proffered explanations of SD 26 make little sense. In one passage the state explains that the rural areas outside the city of Montgomery were removed from SD 26 so it would "*become* a[n] ... urban district." Br.Appellees 26 (emphasis added). Changing a district from a combination of urban and rural areas into an "urban district" is certainly not consistent with altering the district "as little as possible." Br.Appellees 42. In another passage the state argues that excising the large rural areas from SD 26 "*preserved* [SD 26] as an urban district" (Br.Appellees 19) (emphasis added), as if SD 26 had really been an "urban" district all along, and the large rural areas it previously included were compromising its urban essence. The state argues that it would have made no sense to add rural Crenshaw County to SD 26, because SD 26 was "a district centered on the urban core of the City of Montgomery" (Br.Appellees 61), even though a majority of geographic area of the original SD 26 was actually rural. Swapping more urban areas of SD 25 for more rural areas of SD 26, the state explains, "preserved ... SD 25 as a rural and suburban district" (Br.Appellees 19), as if the previous inclusion of urban areas in SD 25 was somehow a threat to its inherently rural and suburban nature. This is all fairly implausible.

(3) Although the drafters insisted they believed that the Voting Rights Act required them to add areas to each majority-black district that would match or exceed the district's existing black population percentage, the state repeatedly argues that requirement

had no actual effect on how the district lines were drawn. Rather, the state seems to contend, the district lines were all actually drawn based entirely on race-neutral considerations, which just happened to result in the very districts the drafters would have drawn if they had acted on the perceived racial requirements. If the drafters never acted on any racial motives at all, racial purposes could not have predominated. This contention, which the state did not advance in the trial court, is inconsistent with the findings of the district court and wholly belied by the record.

The state asserts that "[t]he district court ... explained that, when the drafters changed majority-black districts, they did so based on race-neutral redistricting criteria. J.S.App. 142-43." Br.Appellees 46. The cited portion of the district court opinion actually says the opposite. "[R]ace was a factor in the creation of the districts." J.S.App. 143. "[T]he consistent testimony of Senator Dial, Representative McClendon, and Hinaman established that the Legislature ... considered race...." J.S.App. 142. "The record does not reflect a history of *purely* race-based districting revisions." J.S.App. 143 (quoting *Vera,* 517 U.S. at 959) (emphasis in *Vera*). The district court explained that satisfying the perceived requirements of the Voting Rights Act was the Legislature's priority; "neutral redistricting principles" were only applied "when feasible." J.S.App. 142.

Alabama argues that asserted close similarities between its plan and the plans proposed by black

legislators and ADC demonstrate that the composition of the majority-black districts in the state plan were simply the result of demographics. "If the drafters had the 'predominant' statewide goal of 'packing' districts with 'supermajority percentages' of black persons, then we would expect to see stark differences between their plans and the plaintiffs' plans, which do not share that goal. But we do not. In the House plan, the Legislature's plan has 23 districts that are over 59%; Rep. McClammy's plan has 22." Br.Appellees 36-37. This passage somewhat misstates the issue. The *Shaw* claim before the Court is that the state's predominant purpose was to meet varying district-specific racial ratios, whether or not they might be labeled "supermajorities," and the record does not reveal the basis on which the McClammy and ADC plans were drafted. But the Knight and Sanders plans were based largely on race-neutral principles, and sought to achieve only the far more modest goal of preserving the existing number of majority-black districts.[15] So if the districts in the

[15] The Knight and Sanders plans, HB16 and SB5, were drawn to comply with *Shaw* standards by following Alabama's traditional districting principles while observing opportunities to provide black voters equal opportunities to elect candidates of their choice. These plans rebut the state's argument that plaintiffs failed to suggest any remedial standard. Br.Appellees 27-30. They split significantly fewer counties than do the enacted House and Senate plans, split no precincts in the Sanders Senate plan, and only 11 precincts in the Knight House plan. APX 20-21; APX 69; Tr. v. 1 at 218-21. They stay within, but do not attempt to manipulate, the plus or minus 5% deviation that

(Continued on following page)

Knight plan had the same racial composition as those in the state plan, the state's argument would have some cogency.

The state asserts that "Rep. Knight's majority-black districts ... are similar to those in the drafters' plan in many of the majority-black House districts." Br.Appellees 38. But the Knight plan and the state plan are actually quite different. See Br.App. 1a-2a. In the Knight plan there are only 13 districts over 59%, compared to 23 in the state plan. Conversely, under the Knight plan there are 15 House districts under 60%, compared to only 5 under the state plan. 18 of the Knight House districts have a smaller proportion of black voters than in the state plan. Alabama contends that "demographic reality explains why the black populations of some of the *plaintiffs'* proposed districts are similar to the drafter's purported 'quota[ ]'... only one percentage point away from the 'quota' .... " Br.Appellees 4 (emphasis in original). In fact, however, only two Knight House districts[16] are within one percent of its racial composition of the 2001 plan under the 2010 census, compared to 13 of the House districts under the state plan. See App. 3a-6a. The state asserts that "[t]he only real difference in the House is in the Birmingham districts (HD 52-60) because the plaintiffs' plans

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constitutes substantial population equality. In fact, 18 of the 27 majority-black House districts and 4 of the 8 majority-black Senate districts are overpopulated. APX 21, 23.

[16] The similar percentage for the two iterations of HD 53 is entirely coincidental; the two versions are located 100 miles apart.

manipulate the area's black population to create a new 30% black district that could be won by a white Democrat (HD 54), eliminating a majority-black district from the statewide plan." Br.Appellees 37. Actually the Knight plan has 9 majority-black districts in Birmingham (Jefferson County), compared to 8 in the state plan.

The state insists that the black proportion of each district in its plan changed little because "[i]f the Legislature draws a new district in the same geographical area as the old one, it will contain the same or *similar* people." Br.Appellees 45 (emphasis added). But as the state elsewhere notes, generally "the drafters repopulated the[ ] [underpopulated] majority-black districts by removing contiguous population from majority-white districts." Br.Appellees 4-5. The majority-white districts adjoining those underpopulated majority-black districts typically had few concentrations of black residents. In Jefferson County, for example, the area of the county outside of the majority-black House districts (as they existed under the 2001 lines) was only 18.06% black;[17] as Hinaman pointed out, indeed complained, repopulating the black districts from the contiguous majority-white districts was certain to lower significantly the black population percentage in those majority-black districts. Tr. v. 3, 131-33.

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[17] That area contained 325,204 residents, of whom only 58,726 were black. SDX 401, 404.

A review of the specific manner in which the drafters constructed the districts makes clear the pervasive importance of race. The lines of the eleven majority-black Jefferson County and Montgomery County House districts were shaped by the race-based cannibalization of HD 53 and HD 73. In any district in which the minority percentage declined under the 2012 plan, Hinaman by his own account would have taken whatever race-conscious measures which could limit that decline, so that the district would be as close as possible to the percentage under the 2001 lines. Tr. v. 3 at 143. In almost half the House districts the minority population was within 1% above the 2001 plan. ALBC Br. 30, 6a-7a. That surely was not coincidental; these are the districts where the racial strategy was used with particular success and precision. Even in a district where the black population percentage rose, that could still be the result of a race-based decision, as was the case in SD 26. Throughout the state, the precincts that were divided between black and white districts were drawn to separate residents along racial lines. At best, Hinaman would have been content with district lines produced purely by applying race-neutral criteria only if they happened to result in a district with just the right black population percentage, or higher. Drawing district lines on such a basis is not a race-neutral system.

(4) The state argues that achieving the district-specific racial ratios could not have been the predominant purpose in the redrawing of the majority-black

districts because "the racial percentages of many of the *majority-white* districts are substantially the same between the old and new plans." Br.Appellees 44 (emphasis in original). It points to a group of "selected majority-white House districts" whose black population percentage did not change significantly under the 2012 plan. Br.Appellees 44-45. It is not clear how this diminishes the importance of achieving the district-specific racial ratios. There is no dispute that the 2012 plan added 121,000 blacks to the majority-black House districts, and 105,000 blacks to the majority-black Senate districts, and all of that net addition had to come from somewhere outside the majority-black districts to which they were added. See App. 7a-8a. Similarly, the state argues that in at least some instances the blacks added to the majority-black districts did not come from so-called "influence districts." Br.Appellees 48-52. But that argument in no way diminishes the significance of the state's overriding intent to repopulate the majority-black districts in a race-conscious manner that would achieve a particular racial composition. None of this Court's post-*Shaw* decisions turned on, or even discussed, the districts *from which* minorities had been taken to construct a challenged minority district.

(5) The decision of the Department of Justice to preclear the state's plan is of no relevance to the *Shaw* claims in this case. The Department has no authority to reject a submission because it is unconstitutional. U.S.Br. 7 n.1. The Department considers the extent to which black voters are over-concentrated in minority districts only to the extent that

it may bear on whether a plan reduced the ability of blacks to elect candidates of their choice. The Department had precleared the plans found to violate *Shaw* in *Shaw II*, *Miller*, and *Vera*. The objections voiced by plaintiffs to the Section 5 submission, that Alabama had packed blacks into majority-black districts for the purpose of diluting their political influence, is not "the same.... claims ... that they are making here." Br.Appellees 19. As the district court correctly understood, a claim of invidiously motivated packing is distinct from a *Shaw* claim, which does not require proof of such a discriminatory purpose. *Compare* J.S.App. 129-33 (claim of invidious discriminatory purpose) *with* J.S.App. 140-86 (*Shaw* claim).

III. REMAND IS NOT WARRANTED ON THE GROUNDS SUGGESTED BY THE UNITED STATES

The government suggests that "[a]nalysis of the evidence concerning each district is ... required because some majority-black districts deviated significantly from the goal of maintaining the same percentage of black residents...." U.S.Br. 20-21. But the drafters testified consistently and emphatically that a district only "deviated significantly" from that goal when they could not find sufficient concentrations of black voters in the adjacent districts. ALBC Br. 33-34. The state has never contended that this occurred because the drafters decided in drawing a particular district to subordinate that racial goal to some race-neutral purpose, other than one-person,

one-vote. Doing so would have made no sense, on the state's own account, because the drafters insisted that meeting that goal (where possible) was required by the Voting Rights Act. There simply is no contested issue of fact regarding this question.

The United States also argues that "[a]nalysis of the evidence concerning each district is ... required because in some districts the percentage of black residents may have remained relatively constant based on boundaries drawn in a manner consistent with traditional districting principles." U.S.Br. 21. But the controlling issue under *Shaw* is the *purpose* for which the state acted – whether "race was the predominant factor motivating the legislature's decision to place a significant number of voters within ... a particular district." *Miller*, 515 U.S. at 916. Here there is an abundance of evidence that the drafters attached that unusual degree of importance to their racial goal, including the variety of ways in which they repeatedly overrode traditional districting principles to achieve it. In light of the palpable determination of the drafters to override traditional districting principles whenever necessary to achieve the district-specific racial ratio, it does not matter whether there might have been a district where they did not need to do so. The state does not contend that the drafters cared less about meeting that goal – or about obtaining preclearance – when they "plac[ed] ... voters within a particular district" than they did when they placed voters in other districts.

The government urges that the case be remanded to "resolv[e] disputed questions concerning the population levels needed to preserve black voters' ability to elect candidates of choice. See J.S. App. 106-07, 164-65 (describing conflicting evidence regarding necessary population levels in Alabama before the district court)." U.S.Br. 34. But the conflicting evidence before the district court would be relevant only if "the institution that ma[de] the racial distinction ... had a 'strong basis in evidence' to conclude that remedial action was necessary, '*before* it embark[ed] on an affirmative-action program.'" *Shaw v. Hunt,* 517 U.S. 899, 910 (1996) (quoting *Wygant v. Jackson Bd. of Ed.,* 476 U.S. 267, 277 (1985) (plurality opinion) (emphasis in *Wygant*). When Alabama enacted the challenged plan, however, it assuredly lacked such a strong basis in evidence. The state relies primarily on a single statement by Senator Sanders,[18] who at one point suggested that majority-black districts be at least 62% black, but who later submitted a districting plan under which half the Senate districts were clearly below that level. Br.App. 5a. The defendants cannot make up for that wholly inadequate foundation at the time when the plan was enacted by adducing more probative evidence at trial years after the fact. Indeed, the drafters never

[18] The state describes Representative Jackson as saying that a minority district "should be" 62% or 65%. Br.Appellees 7. What he actually said was only that a district "could" be 62% or 65% without being packed. J.A. 178-79.

testified that they had ever reached, or acted on, any conclusion at all about the black population level needed to "preserve black voters' ability to elect candidates of choice." Hinaman denied ever having considered what size majority was needed to make the black vote effective. Tr. v.3 at 179-80. The state, without ever attempting to assess that black population level, simply assigned to each district a racial ratio based on whatever the ratio happened to have been under the earlier 2001 plan. That can no more satisfy strict scrutiny than assigning a racial ratio to each district based on the age of the incumbent.

CONCLUSION

For the above reasons, the decision of the district court should be reversed.

Respectfully submitted,

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Appendix A

Comparison of Black Population Percentages in Majority-Black Districts

HOUSE DISTRICTS

House District	Plan as Passed	Rep. Knight Plan	Difference (Knight-Passed)
19	61.25%	75.39%	14.14%
32	60.05%		
49		62.65%	
52	60.13%	54.07%	-6.06%
53	55.83%	55.86%	0.03%
54	56.83%	58.72%	1.89%
55	73.55%	64.03%	-9.52%
56	62.14%	54.02%	-8.12%
57	68.47%	60.27%	-8.20%
58	72.76%	61.09%	-11.67%
59	76.72%	61.27%	-15.45%
60	67.68%	59.55%	-8.13%
67	69.15%	69.43%	0.28%
68	64.56%	56.29%	-8.27%
69	64.21%	57.62%	-6.59%
70	62.03%	57.21%	-4.82%
71	66.90%	54.45%	-12.45%
72	64.60%	56.25%	-8.35%
76	73.79%	83.58%	9.79%
77	67.04%	59.38%	-7.66%
78	69.99%	58.70%	-11.29%
82	62.14%	53.63%	-8.51%
83	57.52%		

84	52.35%	71.97%	19.62%
85	50.08%	54.21%	4.13%
97	60.66%	57.19%	-3.47%
98	60.02%	63.75%	3.73%
99	65.61%	57.98%	-7.63%
103	65.06%	62.45%	-2.61%

SENATE DISTRICTS

Senate District	Plan as Passed	Senator Sanders Plan	Difference (Sanders-Passed)
18	59.10	58.49	-0.61%
19	65.31	65.30	-0.01%
20	63.15	62.82	-0.33%
23	64.84	57.75	-7.09%
24	63.22	56.90	-6.32%
26	75.13	71.28	-3.85%
28	59.83	51.55	-8.28%
33	71.64	71.83	0.19%

Source: Brief of Appellees 1a-6a.

Appendix B

Comparison of Black Population Percentages in Majority-Black Districts, 2001 Plan vs. Knight and Sanders Plans

House

House District	2001 Plan (2010 Census)	Rep. Knight Plan	Difference (Knight-2010)
19	69.82%	75.39%	5.57%
32	59.34%		
49		62.65%	
52	60.11%	54.07%	-6.04%
53	55.70%	55.86%	0.16%
54	56.73%	58.72%	1.99%
55	73.55%	64.03%	-9.52%
56	62.13%	54.02%	-8.11%
57	68.42%	60.27%	-8.15%
58	77.86%	61.09%	-16.77%
59	67.03%	61.27%	-5.76%
60	67.41%	59.55%	-7.86%
67	69.14%	69.43%	0.29%

68	62.55%	56.29%	-6.26%
69	64.16%	57.62%	-6.54%
70	61.83%	57.21%	-4.62%
71	64.28%	54.45%	-9.83%
72	60.20%	56.25%	-3.95%
76	69.54%	83.58%	14.04%
77	73.52%	59.38%	-14.14%
78	74.26%	58.70%	-15.56%
82	57.13%	53.63%	-3.50%
83	56.92%		
84	50.61%	71.97%	21.36%
85		54.21%	
97	60.66%	57.19%	-3.47%
98	65.22%	63.75%	-1.47%
99	73.35%	57.98%	-15.37%
103	69.64%	62.45%	-7.19%
Mean Difference			**-4.43%**
Median Difference			**-6.04%**

Rep. Knight renumbered HD 68 as HD 90, HD 76 as HD 73, HD 84 as HD 88, HD 103 as HD 101.

Blank cells indicate districts which are not comparable in the two plans.

Senate

Senate District	2001 Plan (2010 Census)	Senator Sanders Plan	Difference (Sanders-2010
18	59.92 %	58.49%	-1.43%
19	71.59 %	65.30%	-6.29%
20	77.82 %	62.82%	-15.00%
23	64.76 %	57.75%	-7.01%
24	62.78 %	56.90%	-5.88%
26	72.69 %	71.28%	-1.41%
28	50.98 %	51.55%	0.57%
33	64.85 %	71.83%	6.98%
Mean Difference			**-3.68%**

Median Difference	**-3.66%**

Sources: Defendants' Proposed Findings of Fact and Conclusions of Law, Doc. 196, at 13-14; Exhibits CE-46 and CE-47.

Appendix C

Selected Majority-White House Districts That Lost Black Population:

House District	2010 Black Percentage in Old Districts	2010 Black Percentage in New Districts
44	29.66%	11.7%
45	36.01%	15.5%
61	30.58%	19.1%
62	23.56%	15.8%
63	23.99%	13.6%
64	25.90%	14.5%
73	48.55%	10.5%
74	30.55%	24.7%
80	23.77%	17.6%

81	26.45%	20.1%
101	25.09%	17.2%

Appendix D

Precincts Divided Between Majority-Black And Majority-White Districts

SENATE DISTRICTS

County & Precinct	Black % of total pop. of part placed in black district	Black % of total pop. of part placed in white district
Choctaw Co.		
Bogueloosa	26.1%	6.8%
Branch-Bladon Springs	83.8%	18.9%
Butler-Lavaca-Mt. Sterling	36.8%	4.7%
Lusk-Pleasant Valley	74.5%	3.9%
Riderwood-Rock Springs	49.5%	0.0%
Silas-Souwilpa-Isney	50.8%	0.0%
Toxey-Gilbertown-Melvin	46.7%	8.5%
Clarke Co.		
Bashi Methodist Ch	48.3%	11.8%
Fulton City Hall	65.6%	33.3%
Jackson City Hall	73.1%	17.1%
Old Engineers Building	55.1%	25.0%
Overstreet Grocery	78.0%	17.5%
Skipper Fire Station	59.4%	20.2%
Thomasville Amory	84.0%	10.4%
Conecuh Co.		
Belleville Bapt Ch	78.1%	0.0%
Bermuda Comm House	53.5%	19.5%
Castleberry Fire Dept. -1	84.9%	7.3%

Herbert FD	36.0%	5.1%
Paul Fire Dept.	57.7%	1.6%
Hale Co.		
Havanna-A	42.6%	11.3%
Valley B	58.6%	19.4%
Valley C	63.6%	22.8%
Houston Co.		
Doug Tew Comm Ctr	50.9%	14.9%
Farm Ctr	71.8%	25.1%
Johnson Homes	91.7%	20.5%
Kinsey	53.6%	9.8%
Library	77.9%	11.8%
Lincoln Comm Ctr	82.0%	15.3%
Vaughn Blumberg Ctr	50.3%	24.4%
Wiregrass Park	64.1%	23.2%
Jefferson Co.		
B'ham Botanical Gardens	0.0%	1.2%
Fultondale First Bapt	39.4%	5.7%
Gardendale Civic Ctr	33.2%	4.9%
Hillview Fire Station #1	75.9%	2.9%
Homewood Public Library	41.4%	2.7%
Johns Comm Ctr	16.1%	4.2%
Maurice L West Comm Ctr	31.2%	5.2%
Mountain Brook City Hall	6.5%	0.2%
Mountain View Bapt Ch	25.2%	0.8%
Pinson UMC	65.4%	10.3%
Trussville First Bapt Ch	43.6%	3.9%
Valley Creek Bapt Ch	28.2%	11.0%
Lee Co.		
Auburn	70.7%	13.0%
Beuaregard School	35.2%	22.1%
Loachapoka	81.3%	16.4%
Marvyn	57.3%	19.7%
Waverly	84.9%	20.6%

Mobile Co.		
Chickasaw Auditorium	43.2%	18.8%
Morningside Elem School	77.1%	20.9%
Riverside Ch of Nazarene	57.3%	8.2%
St. Andrews Episcopal Ch	48.9%	5.2%
Monroe Co.		
Bethel Bapt House	81.0%	0.0%
Chrysler/Eliska/McGill	79.2%	15.2%
Days Inn/ Ollie	79.8%	29.1%
Mexia Fire Station	100.0%	12.1%
Monroe Beulah Ch	71.8%	13.5%
Monroeville Armory	51.4%	23.5%
Monroeville Housing Auth	72.3%	0.0%
Perdue Hill Masonic Lodge	78.3%	21.2%
Purdue Hill	44.2%	11.7%
Shiloh/Grimes	72.5%	4.5%
Montgomery Co.		
1A Cloverdale Comm Ctr	68.0%	16.6%
1B Vaughn Park Ch	55.6%	25.5%
1C Montgomery Museum	69.2%	37.1%
1D Whitfield Memorial Ch	66.9%	17.9%
3F Goodwyn Comm Ctr	54.2%	17.9%
3G Alcazar Shrine Temple	79.7%	43.2%
5M Bell Road YMCA	65.4%	24.7%
Pickens Co.		
Carrollton 4 Service Ctr	78.3%	28.1%
Russell Co.		
Austin Sumbry Park	47.1%	14.0%
Ladonia Fire Dept	85.9%	12.5%
National Guard Armory	60.9%	17.0%
Roy Martin Ctr	38.4%	14.2%
Seale Courthouse	42.8%	16.2%
Tuscaloosa Co.		
Fosters-Ralph Fire Dept	35.6%	16.1%
Hillcrest High School	31.9%	26.0%

Holt Armory	55.0%	23.2%
Jayces Park	61.7%	19.3%
McFaland Mall	52.9%	24.1%
Peterson Methodist Ch	50.4%	7.0%
Washington Co.		
Carson/Preswick	85.9%	17.0%
Cortelyou	66.0%	0.0%
Malcolm Voting House	75.0%	61.5%
McIntosh Voting House	73.4%	4.0%

HOUSE DISTRICTS

Autauga Co.		
Booth Vol Fire Dept	28.3%	17.0%
Safe Harbor Ministries	48.0%	12.1%
Baldwin Co.		
Tensaw Volunteer Fire Dept	76.9%	16.7%
Vaughn Comm Ctr	78.8%	14.1%
Bibb Co.		
Brent City Hall-14	68.2%	6.0%
Brent Nat Guard Armory	40.9%	17.3%
Eoline Fire Dept.-13	46.0%	7.3%
Eoline Fire Dept-4	2.2%	0.0%
Rock Bldg -15	54.0%	37.5%

Rock Bldg-6	18.6%	7.8%
Calhoun Co.		
2nd Presby Ch	44.3%	13.5%
Anniston	65.9%	10.2%
Eulaton/Bynum	14.1%	6.8%
Choctaw Co.		
Butler-Lavaca-Mt. Sterling	91.6%	32.9%
Crossroads-Intersection	81.1%	0.0%
Lisman-Pushmataha	89.0%	56.0%
Riderwood-Rock Springs	87.0%	34.9%
Clarke Co.		
Bashi Meth Ch	43.3%	11.6%
Fulton City Hall	61.6%	5.0%
Jackson City Hall	73.2%	17.6%
Old Engineers Bldg	56.4%	25.3%
Overstreet Grocery	78.0%	17.5%
Skipper Fire Station	61.0%	20.2%
Thomasville Nat Guard Amory	79.7%	7.7%
Conecuh Co.		

Brownville Fire Dept.	55.0%	40.4%
Castleberry Fire Dept. -2	84.9%	7.3%
Lyeffion Fire Dept.	36.4%	21.6%
Nazarene Bapt Ch	68.7%	88.7%
Repton City Hall	61.7%	13.0%
Second Mount Zion Ch	72.9%	71.4%
Greene Co.		
W Greene Fire Dept.	50.3%	8.3%
Houston Co.		
Doug Tew Comm Ctr	45.9%	8.0%
Farm Ctr	58.2%	25.1%
Johnson Homes	91.0%	5.8%
Kinsey	68.0%	10.3%
Library	68.4%	7.4%
Lincoln Comm Ctr	80.5%	14.8%
Vaughn Blumberg Ctr	46.8%	17.1%
Westgate Rec Ctr	57.6%	8.2%
Wiregrass Park	57.3%	15.1%
Jefferson Co.		

B'ham Botanical Gardens	1.0%	1.3%
Shades Cahaba Elem Sch	5.8%	3.6%
Airport Road Fire Station #8	46.9%	13.6%
Charles Stone Agr Ctr	66.9%	0.0%
Eastside Comm Ctr	54.5%	12.6%
Fire and Rescue Academy	64.0%	11.4%
Ridgecrest School	37.8%	12.4%
Sr Ctr	33.2%	4.7%
University Place School	42.4%	12.8%
Westlawn Mid Sch	18.6%	24.5%
Clearview Bapt Ch	48.3%	0.0%
Irondale Sr Cit Bldg	22.1%	59.9%
Mountain View Bapt Ch	39.5%	22.4%
Canaan Bapt Ch	12.6%	21.3%
Hunter Street Bapt Ch	20.0%	8.8%
Pleasant Grove First Bapt Ch	51.0%	21.6%
Pinson United Meth Ch	75.0%	16.3%
Fultondale Sr Citizen's Ctr	16.2%	8.0%
Gardendale Civic Ctr	47.3%	6.1%

Lee Co.		
Auburn	42.2%	11.8%
Beuaregard School	26.2%	7.5%
Opelika B	53.0%	10.6%
Lee County Snacks	34.8%	2.8%
Old Salem School	42.3%	8.9%
Smiths Station Sr. Ctr	36.7%	16.6%
Madison Co.		
Blackburn Chapel CP Ch	40.7%	14.9%
Chapman Mid Sch	93.4%	5.2%
Chase Valley United Meth	36.3%	7.7%
Ch of Christ Meridianville	65.5%	11.9%
Grace United Meth Ch	36.3%	28.5%
Harvest Bapt Ch	35.5%	31.2%
Mad Co Teacher Resource Ctr	19.2%	14.4%
Meridianville 1st Bapt Ch	47.0%	22.4%
Pineview Bapt Ch	33.3%	21.7%
Sherwood Bapt Ch	52.4%	20.1%
Marengo Co.		

Cornerstone Ch	86.7%	26.6%
Dixon's Mill	88.9%	7.3%
Octagon	90.9%	22.0%
Thomaston	69.0%	15.7%
VFW	62.9%	8.5%
Jefferson	85.4%	3.8%
Rangeline	5.9%	22.6%
Monroe Co.		
Days Inn/ Ollie	56.1%	10.7%
Excel/Coleman	48.0%	7.8%
Frisco City FD	49.4%	0.0%
Mexia Fire Dept	41.4%	6.6%
Monroeville Armory	45.4%	8.4%
Monroeville Housing Auth	72.3%	0.0%
Oak Grove Bapt	40.9%	0.0%
Purdue Hill	34.7%	0.0%
Shiloh/Grimes	75.9%	3.8%
Mobile Co.		
Chickasaw Auditorium	33.8%	28.8%

Saraland Civic Ctr	12.6%	0.0%
College Park Bapt Ch	32.1%	0.0%
First Bapt Ch of Axis	20.5%	1.6%
Havenwood Bapt Ch	39.4%	1.9%
Little Welcome Bapt Ch	71.9%	0.0%
Mt. Vernon Civic Ctr	64.6%	5.9%
Satsuma City Hall	50.6%	4.9%
Shelton Beach Rd. Bapt Ch	19.9%	3.5%
Turnerville Comm	7.5%	2.7%
Azalea City Ch of Christ	46.5%	15.2%
Friendship Missionary Bapt	77.9%	3.9%
Moffett Road Assembly of God	68.2%	30.2%
Semmes First Bapt	50.2%	11.8%
St. John United Meth Ch	60.4%	28.3%
University Ch of Christ	62.4%	28.5%
Bay of the Holy Spirit Ch	48.8%	28.9%
Dodge School	96.9%	20.6%
First Independent Meth	98.3%	21.7%
Hollingers Island School	5.6%	3.8%

Kate Shepard School	46.1%	7.6%
St Philip Neri Ch	74.4%	5.1%
The Mug Cafe	84.0%	31.0%
Montgomery Co.		
5M Bell Road YMCA	43.0%	15.5%
1B Vaughn Park Ch of Christ	56.6%	16.2%
3A Capitol Hts Bapt Ch	48.0%	28.5%
4N Highland Avenue Bapt Ch	56.4%	0.0%
3F Goodwyn Comm Ctr	60.6%	17.6%
4K Chisholm Comm Ctr	61.1%	0.0%
5B Snowdoun Womens Club	5.2%	0.0%
5D Ramer Library	96.8%	36.1%
5E Fitzpatrick Elem Schric	69.8%	0.0%
Pickens Co.		
Aliceville 2 Armory	81.9%	78.0%
Carrollton 4 Service Ctr	61.1%	31.9%
Russell Co.		
Austin Sumbry Park	34.4%	38.4%
Crawford Fire Dept	26.4%	15.0%

CVCC	64.4%	33.3%
Ladonia Fire Dept	85.9%	12.5%
Nat Guard Armory	66.2%	28.7%
Talladega Co.		
Bethel Bapt	75.8%	62.1%
Eastaboga Comm Ctr	33.8%	13.5%
Mabra-Kingston Bapt	71.6%	13.1%
Old Mumford High	74.1%	11.5%
Renfroe Fire Hall	49.1%	7.7%
Talladega Nat Guard Armory	60.7%	18.4%
Waldo City Hall	49.2%	13.2%
Winterboro Vol Fire	73.0%	14.5%
Tallapoosa Co.		
Dadeville Nat Guard Armory	60.9%	15.1%
Mary's Cross Road Voting House	65.1%	44.5%
Wall Street Comm Ctr	60.3%	17.8%
Tuscaloosa Co.		
Bama Mall	52.7%	5.0%

Holt Armory	64.9%	17.4%
Jayces Park	56.3%	0.0%
McFaland Mall	53.2%	20.0%
Peterson Meth Ch	91.8%	7.6%
University Mall	32.6%	31.8%
County Cthse	71.2%	12.9%
Frierson-Big Sandy Bapt Ch	39.4%	31.1%
Northport Comm Ctr	40.8%	21.7%
Washington Co.		
Carson/Preswick	85.9%	17.0%
Cortelyou	93.1%	31.1%
McIntosh Comm Ctr	96.4%	30.8%
McIntosh Voting House	77.1%	5.5%

Source documents: SDX 475 (Senate) and SDX 405 (House); the same documents are in Docs. 140-1 (Senate) and 140-2 (House).

Appendix E

These tables show the precincts split among two or more districts, at least one of which has a black majority (shown with shading). Source documents: SDX 475 (Senate) and SDX 405 (House); the same documents are in Docs. 140-1 (Senate) and 140-2 (House).

HD 19	HD	White	Black
Madison Co.			
Blackburn Chapel CP Ch	19	1068	781
Blackburn Chapel CP	6	122	23
Blackburn Chapel CP	53	138	169
Chapman Mid Sch	19	6	113
Chapman Mid Sch	21	3379	197
Chase Valley United Meth	19	1528	949
Chase Valley United Meth	21	979	87
Ch of Christ Meridianville	19	30	72
Ch of Christ Meridianville	21	3147	448
Ed White Mid Sch	19	1061	2653
Ed White Mid Sch	53	0	17
Grace United Meth Ch	19	569	372
Grace United Meth Ch	6	1039	559
Grace United Meth Ch	25	2102	877
Harvest Bapt Ch	19	2093	1292
Harvest Bapt Ch	6	755	373

Highlands School	19	199	358
Highlands School	53	666	1074
Lewis Chapel CP Ch	19	93	99
Lewis Chapel CP Ch	53	113	562
Mad Co Teacher Resource Ctr	19	145	37
Mad Co Teacher Resource Ctr	21	4184	747
Meridianville 1st Bapt Ch	19	377	378
Meridianville 1st Bapt Ch	21	1835	574
Pineview Bapt Ch	19	3643	2010
Pineview Bapt Ch	6	2738	805
Sherwood Bapt Ch	19	515	801
Sherwood Bapt Ch	25	2	0
Sherwood Bapt Ch	6	2523	716
St.Luke Missionary Bapt Ch	19	54	107
St.Luke Missionary Bapt Ch	53	1968	5037
HD 32	**HD**	**White**	**Black**
Calhoun Co			
2nd Presby/Mental Health/	32	1647	1436
2nd Presby/Mental Health/	36	6255	1027

Anniston	32	5257	11672
Anniston	36	1634	223
Anniston	40	320	21
Eulaton/Bynum/W Park Hts Bapt.	32	1929	328
Eulaton/Bynum/W Park Hts Bapt.	35	10584	827
Eulaton/Bynum/W Park Hts Bapt.	36	458	40
Eulaton/Bynum/W Park Hts Bapt.	40	866	59
Bethel Bapt	32	323	1041
Bethel Bapt	33	227	390
Eastaboga Comm Ctr/Old Lincoln High Gym	32	1908	1022
Eastaboga Comm Ctr/Old Lincoln High Gym	35	419	23
Eastaboga Comm Ctr/Old Lincoln High Gym	33	2875	671
Eastaboga Comm Ctr/Old Lincoln High Gym	36	1338	60
Limbaugh Comm Ctr-Bon Air- Oak Grove	32	682	1187
Limbaugh Comm Ctr-Bon Air- Oak Grove	33	6694	2263
Mabra-Kingston Bapt-Talla Co Central High	32	2082	6064
Mabra-Kingston Bapt-Talla Co Central High	35	310	48

Old Mumford High	32	133	409
Old Mumford High	35	2475	329
Renfroe Fire Hall - Stemley Fire Hall	32	950	966
Renfroe Fire Hall - Stemley Fire Hall	33	2429	210
Talladega Nat Guard Armory	32	1162	1958
Talladega Nat Guard Armory	35	5458	1278
Waldo City Hall	32	28	29
Waldo City Hall	35	835	128
Winterboro Vol Fire-	32	422	1214
Winterboro Vol Fire-	33	1468	260
Winterboro Vol Fire-	35	179	25
Bethel Bapt	33	227	390
Bethel Bapt	32	323	1041
HD 52	**HD**	**White**	**Black**
Jefferson Co			
Birmingham Botanical	52	380	4
Birmingham Botanical	46	590	8
Ctr Street Mid Sch	52	7	656
Ctr Street Mid Sch	55	48	2432
Green Springs Bapt Ch	52	984	1765
Green Springs Bapt Ch	55	452	103
Ramsey HS	52	958	63
Ramsey HS	55	2646	1131
Ramsey HS	60	147	72

Shades Cahaba Elem Sch	52	1078	69
Shades Cahaba Elem Sch	46	2583	100
Southside Branch Pub Lib	52	551	184
Southside Branch Pub Lib	60	162	48
Madison Co			
Airport Road Fire Station #8	53	999	1219
Airport Road Fire Station #7	10	485	119
Blackburn Chapel CP	53	138	169
Blackburn Chapel CP	6	122	23
Blackburn Chapel CP	19	1068	781
Blackburn Chapel CP	53	138	169
Charles Stone Agr Ctr	53	779	1815
Charles Stone Agr Ctr	21	2	0

HD 53	**HD**	**White**	**Black**
Madison Co			
Eastside Comm Ctr	53	52	84
Eastside Comm Ctr	21	419	63
Ed White Mid Sch	53	0	17
Ed White Mid Sch	19	1061	2653
Fire and Rescue Acad	53	837	1710
Fire and Rescue Acad	21	506	68
Highlands School	53	666	1074
Highlands School	19	199	358
Lewis Chapel CP Ch	53	113	562
Lewis Chapel CP Ch	19	93	99

Ridgecrest School	53	1289	1079
Ridgecrest School	10	1744	288
Sr Ctr	53	1353	1032
Sr Ctr	10	155	15
St.Luke Missionary Bapt Ch	53	1968	5037
St.Luke Missionary Bapt Ch	19	54	107
University Place School	53	1603	1780
University Place School	6	1312	221
Westlawn Mid Sch	53	440	116
Westlawn Mid Sch	6	794	363
HD 54	**HD**	**White**	**Black**
Jefferson Co			
Brewster Road Bapt C	54	2562	3482
Brewster Road Bapt C	58	191	512
Ctr Point Cthse Annex	54	278	1118
Ctr Point Cthse Annex	58	2295	3779
Ctr Point Cthse Annex	59	82	132
Clearview Bapt Ch	54	155	396
Clearview Bapt Ch	58	487	232
Clearview Bapt Ch	44	3496	801
Crestwood Comm Educ	54	3175	1016
Crestwood Comm Educ	59	1	5

First United Meth Ch of Ctr Point	54	387	648
First United Meth Ch of Ctr Point	58	676	2165
Gate City Elem Sch	54	0	14
Gate City Elem Sch	58	38	1894
Gate City Elem Sch	59	19	277
Irondale Sr Cit Bldg	54	1667	621
Irondale Sr Cit Bldg	44	310	9
Irondale Sr Cit Bldg	45	1222	2587
Morton Simpson Comm Ctr	54	77	59
Morton Simpson Comm Ctr	59	33	1506
Mountain View Bapt Ch	54	584	410
Mountain View Bapt Ch	44	4759	1440
Norwood Comm Ctr	54	51	1169
Norwood Comm Ctr	59	57	874
Oporto Armory	54	14	291
Oporto Armory	58	131	1251
Oporto Armory	59	24	380
Our Lady of Lourdes Cath Ch	54	64	87
Our Lady of Lourdes Cath Ch	58	1079	3604
Robinson Elem Sch	54	79	338
Robinson Elem Sch	58	600	2541
Robinson Elem Sch	59	503	1390

Southtown Housing Comm Ctr	54	48	939
Southtown Housing Comm Ctr	60	204	37
Wilkerson Mid Sch	54	8	631
Wilkerson Mid Sch	60	50	475
Willow Wood Rec Ctr	54	183	1714
Willow Wood Rec Ctr	59	529	1714

HD 55	**HD**	**White**	**Black**
Jefferson Co			
Adamsville Bapt Ch	55	2287	780
Adamsville Bapt Ch	57	215	462
Adamsville Sr Cit Bldg	55	957	1253
Adamsville Sr Cit Bldg	57	285	346
Adamsville Sr Cit Bldg	60	40	8
Ctr Street Mid Sch	55	48	2432
Ctr Street Mid Sch	52	7	656
Glen Iris Elem Sch	55	2099	886
Glen Iris Elem Sch	60	466	233
Green Springs Bapt Ch	55	452	103
Green Springs Bapt Ch	52	984	1765
Legion Field Lobby	55	49	2069
Legion Field Lobby	60	40	2608
Ramsey HS	55	2646	1131
Ramsey HS	52	958	63
Ramsey HS	60	147	72

Sandusky Comm Sr Citizen's Park	55	76	17
Sandusky Comm Sr Citizen's Park	60	996	925
South Hampton Elem	55	11	75
South Hampton Elem	60	173	2768

HD 56	HD	White	Black
Jefferson Co			
Brooklane Comm Ctr	56	896	592
Brooklane Comm Ctr	57	1303	1377
Canaan Bapt Ch	56	1088	180
Canaan Bapt Ch	15	2728	779
Hunter Street Bapt Ch	56	1142	337
Hunter Street Bapt Ch	15	6482	753
Hunter Street Bapt Ch	46	1538	77
Mount Olive Bapt Ch	56	20	528
Mount Olive Bapt Ch	57	1	106

HD 57	HD	White	Black
Jefferson Co			
Adamsville Bapt Ch	57	215	462
Adamsville Bapt Ch	55	2287	780
Adamsville Sr Cit Bldg	57	285	346
Adamsville Sr Cit Bldg	60	40	8
Adamsville Sr Cit Bldg	55	957	1253
Brooklane Comm Ctr	57	1303	1377
Brooklane Comm Ctr	56	896	592

Mount Olive Bapt Ch	57	1	106
Mount Olive Bapt Ch	56	20	528
Pleasant Grove First Bapt Ch	57	3238	3450
Pleasant Grove First Bapt Ch	15	2223	631

HD 58	**HD**	**White**	**Black**
Jefferson Co			
Barrett Elem Sch	58	113	1400
Barrett Elem Sch	59	77	909
Brewster Road Bapt	58	191	512
Brewster Road Bapt	54	2562	3482
Ctr Point Cthse Annex	58	2295	3779
Ctr Point Cthse Annex	59	82	132
Ctr Point Cthse Annex	54	278	1118
Clearview Bapt Ch	58	487	232
Clearview Bapt Ch	44	3496	801
Clearview Bapt Ch	54	155	396
First United Meth Ch of Ctr Point	58	676	2165
First United Meth Ch of Ctr Point	54	387	648
Gate City Elem Sch	58	38	1894
Gate City Elem Sch	59	19	277
Gate City Elem Sch	54	0	14
Hilldale Bapt Ch	58	917	1960
Hilldale Bapt Ch	59	440	2454

Oporto Armory	58	131	1251
Oporto Armory	59	24	380
Oporto Armory	54	14	291
Our Lady of Lourdes Cath Ch	58	1079	3604
Our Lady of Lourdes Cath Ch	54	64	87
Pinson United Meth	58	100	334
Pinson United Meth	44	2571	545
Pinson United Meth	51	123	12
Pinson United Meth	59	616	2148
Robinson Elem Sch	58	600	2541
Robinson Elem Sch	59	503	1390
Robinson Elem Sch	54	79	338
Sun Valley Elem Sch	58	261	2484
Sun Valley Elem Sch	59	184	1394

HD 59	**HD**	**White**	**Black**
Jefferson Co			
Barrett Elem Sch	59	77	909
Barrett Elem Sch	58	113	1400
Ctr Point Cthse Annex	59	82	132
Ctr Point Cthse Annex	58	2295	3779
Ctr Point Cthse Annex	54	278	1118
Crestwood Comm Educ	59	1	5
Crestwood Comm Educ	54	3175	1016
Gate City Elem Sch	59	19	277
Gate City Elem Sch	58	38	1894
Gate City Elem Sch	54	0	14

Hilldale Bapt Ch	59	440	2454
Hilldale Bapt Ch	58	917	1960
Morton Simpson Comm Ctr	59	33	1506
Morton Simpson Comm Ctr	54	77	59
Norwood Comm Ctr	59	57	874
Norwood Comm Ctr	54	51	1169
Oporto Armory	59	24	380
Oporto Armory	58	131	1251
Oporto Armory	54	14	291
Pinson United Meth Ch	59	616	2148
Pinson United Meth Ch	51	123	12
Pinson United Meth Ch	44	2571	545
Pinson United Meth Ch	58	100	334
Robinson Elem Sch	59	503	1390
Robinson Elem Sch	58	600	2541
Robinson Elem Sch	54	79	338
Sun Valley Elem Sch	59	184	1394
Sun Valley Elem Sch	58	261	2484
Willow Wood Rec Ctr	59	529	1714
Willow Wood Rec Ctr	54	183	1714

HD 60	HD	White	Black
Jefferson Co			
Adamsville Sr Cit Bldg	60	40	8
Adamsville Sr Cit Bldg	57	285	346
Adamsville Sr Cit Bldg	55	957	1253
Fultondale Sr Citizen's Ctr	60	663	139
Fultondale Sr Citizen's Ctr	51	3136	316
Gardendale Civic Ctr	60	297	295
Gardendale Civic Ctr	51	12504	838
Glen Iris Elem Sch	60	466	233
Glen Iris Elem Sch	55	2099	886
Legion Field Lobby	60	40	2608
Legion Field Lobby	55	49	2069
Ramsey HS	60	147	72
Ramsey HS	55	2646	1131
Ramsey HS	52	958	63
Sandusky Comm Sr Citizen's Park	60	996	925
Sandusky Comm Sr Citizen's Park	55	76	17
South Hampton Elem	60	173	2768
South Hampton Elem	55	11	75
Southside Branch Pub Lib	60	162	48
Southside Branch Pub Lib	52	551	184
Southtown Housing Comm Ctr	60	204	37
Southtown Housing Comm Ctr	54	48	939

Wilkerson Mid Sch	60	50	475
Wilkerson Mid Sch	54	8	631
HD 67	**HD**	**White**	**Black**
Perry Co			
Nat Guard Armory	67	28	180
Nat Guard Armory	72	346	1462
Pinetucky	67	95	82
Pinetucky	72	110	8
UCH-Airport-Armory	67	37	69
UCH-Airport-Armory	72	1029	1124
Uniontown City Hall-Airport	67	41	112
Uniontown City Hall-Airport	72	330	1833
HD 68	**HD**	**White**	**Black**
Baldwin Co			
Tensaw Volunteer Fire Dept	68	**75**	**269**
Tensaw Volunteer Fire Dept	64	10	2
Vaughn Comm Ctr	68	**97**	**395**
Vaughn Comm Ctr	64	240	43
Clarke Co			
BASHI Meth Ch	68	1339	1056
BASHI Meth Ch	65	1671	226
Fulton City Hall	68	28	45
Fulton City Hall	65	865	47

Jackson City Hall	68	629	1816
Jackson City Hall	65	209	47
Old Engineers Bldg	68	210	279
Old Engineers Bldg	65	2281	786
Overstreet Grocery	68	79	287
Overstreet Grocery	65	228	50
Skipper Fire Station-Jackson Nat Guard	68	112	180
Skipper Fire Station-Jackson Nat Guard	65	3050	797
Thomasville Nat Guard Amory	68	264	1146
Thomasville Nat Guard Amory	65	131	11
Conecuh Co			
Brownville Fire Dept.	68	18	22
Brownville Fire Dept.	90	218	159
Castleberry Fire Dept. -2	68	32	191
Castleberry Fire Dept. -3	90	665	54
Lyeffion Fire Dept.	68	88	51
Lyeffion Fire Dept.	90	312	88
Nazarene Bapt Ch	68	128	283
Nazarene Bapt Ch	90	6	47
Repton City Hall	68	176	300
Repton City Hall	90	289	45
Second Mount Zion Ch	68	18	51
Second Mount Zion Ch	90	26	70

Marengo Co			
Cornerstone Ch	68	74	606
Cornerstone Ch	65	806	298
Demopolis HS	68	14	15
Demopolis HS	72	5	19
Demopolis HS	71	386	145
Dixon's Mill	68	133	1224
Dixon's Mill	65	215	17
Octagon	68	3	30
Octagon	65	169	48
Springhill Voting Booth	68	76	20
Springhill Voting Booth	71	205	49
Thomaston	68	168	400
Thomaston	65	156	30
VFW	68	341	589
VFW	65	280	28
Monroe Co			
Days Inn/ Ollie	68	177	244
Days Inn/ Ollie	64	331	42
Excel/Coleman	68	84	83
Excel/Coleman	64	3006	263
Frisco City FD	68	597	652
Frisco City FD	64	91	0
Mexia Fire Dept	68	291	223
Mexia Fire Dept	64	164	12
Monroeville Armory	68	1191	1036
Monroeville Armory	64	439	41

Monroeville Housing Auth	68	446	1243
Monroeville Housing Auth	64	46	0
Oak Grove Bapt	68	13	9
Oak Grove Bapt	64	64	0
Purdue Hill	68	67	41
Purdue Hill	64	18	0
Shiloh/Grimes	68	20	66
Shiloh/Grimes	64	25	1
Washington Co			
Carson/Preswick	68	25	207
Carson/Preswick	65	270	56
Cortelyou	68	9	176
Cortelyou	65	203	96
McIntosh Comm Ctr	68	12	747
McIntosh Comm Ctr	65	18	8
McIntosh Voting House	68	91	360
McIntosh Voting House	65	401	82

HD 69	**HD**	**White**	**Black**
Autauga Co			
Booth Vol Fire Dept	69	566	229
Booth Vol Fire Dept	42	630	133
Safe Harbor Ministries	69	263	245
Safe Harbor Ministries	42	2880	318
Safe Harbor Ministries	88	2775	503

Montgomery Co			
1F Al. Ind Dev Training	69	0	4
1F Al. Ind Dev Training	76	401	8528
2D Montgomery Boys Club	69	397	422
2D Montgomery Boys Club	78	1567	1668
2F Fire Station No. 14	69	243	1758
2F Fire Station No. 14	78	31	687
2G Hayneville Road Comm Ctr	69	118	693
2G Hayneville Road Comm Ctr	78	27	1713
2I Southlawn Elem Sch	69	82	354
2I Southlawn Elem Sch	78	54	3915
5B Snowdoun Womens Club	69	51	3
5B Snowdoun Womens Club	76	3	0
5B Snowdoun Womens Club	75	493	202
5D Ramer Library	69	2	61
5D Ramer Library	90	437	269
5E Fitzpatrick Elem	69	331	2276
5E Fitzpatrick Elem	76	943	4248
5E Fitzpatrick Elem	75	627	592
5N Peter Crump Sch	69	57	1624
5N Peter Crump Sch	76	117	1898

HD 70	HD	White	Black
Tuscaloosa Co			
Bama Mall	70	2375	3142
Bama Mall	63	460	25
Bama Mall	71	156	156
Holt Armory	70	1178	2471
Holt Armory	62	1525	354
Jayces Park	70	2536	3857
Jayces Park	63	29	0
McDonald Hughes Ctr	70	29	4010
McDonald Hughes Ctr	71	46	588
McFaland Mall	70	5680	7119
McFaland Mall	63	121	13
McFaland Mall	62	2209	600
Peterson Meth Ch	70	27	301
Peterson Meth Ch	62	2027	173
Southside Comm Ctr	70	1180	2770
Southside Comm Ctr	71	17	19
Stillman College	70	8	1073
Stillman College	71	301	5646
University Mall	70	39	28
University Mall	62	248	153

HD 71	HD	White	Black
Choctaw Co			
Butler-Lavaca	71	11	120
Butler-Lavaca	65	1985	998
Crossroads-Intersection-Halsell	71	108	471
Crossroads-Intersection-Halsell	65	15	0

Lisman-Pushmataha	71	90	817
Lisman-Pushmataha	65	47	61
Riderwood-Rock Spr	71	21	140
Riderwood-Rock Spr	65	361	195
Greene Co			
Eutaw Pre-School	71	50	489
Eutaw Pre-School	72	100	105
Greene County Cthse	71	14	21
Greene County Cthse	72	20	87
W Greene Fire Dept.	71	65	73
W Greene Fire Dept.	61	11	1
Marengo Co			
Demopolis HS	71	386	145
Demopolis HS	72	5	19
Demopolis HS	68	14	15
Jefferson	71	86	544
Jefferson	65	75	3
Rangeline	71	16	1
Rangeline	65	243	74
Springhill Voting Booth	71	205	49
Springhill Voting Booth	68	76	20

Pickens Co			
Aliceville 2 Nat'l Guard Armory	71	217	1155
Aliceville 2 Nat'l Guard Armory	61	345	1337
Carrollton 4 Service Ctr	71	396	677
Carrollton 4 Service Ctr	61	371	176
Sumter Co			
Coatopa Fire Dept	71	45	124
Coatopa Fire Dept	72	127	191
Livingston Comm Ctr	71	143	178
Livingston Comm Ctr	72	1373	2740
Tuscaloosa Co			
Bama Mall	71	156	156
Bama Mall	63	460	25
Bama Mall	70	2375	3142
County Cthse	71	45	116
County Cthse	63	4672	741
Frierson-Big Sandy Bapt Ch	71	1037	706
Frierson-Big Sandy Bapt Ch	62	2239	1031
McDonald Hughes Ctr	71	46	588
McDonald Hughes Ctr	70	29	4010
Northport Comm Ctr	71	2291	1700
Northport Comm Ctr	61	320	112
Southside Comm Ctr	71	17	19
Southside Comm Ctr	70	1180	2770

Stillman College	71	301	5646
Stillman College	70	8	1073
HD 72	**HD**	**White**	**Black**
Bibb Co			
Brent City Hall-14	72	1096	2435
Brent City Hall-15	49	63	4
Brent Nat Guard Armory	72	407	285
Brent Nat Guard Armory	49	1921	422
Eoline Fire Dept.-13	72	97	87
Eoline Fire Dept.-14	49	684	55
Eoline Fire Dept-4	72	390	9
Eoline Fire Dept-5	49	88	0
Rock Bldg -15	72	172	211
Rock Bldg -16	49	49	30
Rock Bldg-6	72	327	81
Rock Bldg-7	49	1278	112
Greene Co			
Eutaw Pre-School	72	100	105
Eutaw Pre-School	71	50	489
Greene County Cthse	72	20	87
Greene County Cthse	71	14	21
Marengo Co			
Demopolis HS	72	5	19
Demopolis HS	71	386	145
Demopolis HS	68	14	15

Perry Co			
Nat Guard Armory	72	346	1462
Nat Guard Armory	67	28	180
Pinetucky	72	110	8
Pinetucky	67	95	82
UCH-Airport-Armory	72	1029	1124
UCH-Airport-Armory	67	37	69
Uniontown City Hall-	72	330	1833
Uniontown City Hall-	67	41	112
Sumter Co			
Coatopa Fire Dept	72	127	191
Coatopa Fire Dept	71	45	124
Livingston Comm Ctr	72	1373	2740
Livingston Comm Ctr	71	143	178

HD 76	HD	White	Black
Montgomery Co			
1A Cloverdale Comm Ctr	76	1743	800
1A Cloverdale Comm Ctr	77	3949	1007
1E Aldersgate UMC	76	192	492
1E Aldersgate UMC	77	1207	5363
1F Al. Ind Dev Training	76	401	8528
1F Al. Ind Dev Training	69	0	4
2B Beulah Bapt Ch	76	54	4180
2B Beulah Bapt Ch	78	2	334
2B Beulah Bapt Ch	77	12	604

2H Harrison Elem Sch	76	21	1180
2H Harrison Elem Sch	78	16	123
5B Snowdoun Womens Club	76	3	0
5B Snowdoun Womens Club	69	51	3
5E Fitzpatrick Elem	76	943	4248
5E Fitzpatrick Elem	69	331	2276
5M Bell Road YMCA	76	1879	1918
5M Bell Road YMCA	75	2098	435
5M Bell Road YMCA	74	1737	392
5N Peter Crump Sch	76	117	1898
5N Peter Crump Sch	69	57	1624

HD 77	**HD**	**White**	**Black**
Montgomery Co			
1A Cloverdale Comm Ctr	77	3949	1007
1A Cloverdale Comm Ctr	76	1743	800
1B Vaughn Park Ch of Christ	77	2482	3802
1B Vaughn Park Ch of Christ	74	2578	512
1E Aldersgate UMC	77	1207	5363
1E Aldersgate UMC	76	192	492
2B Beulah Bapt Ch	77	12	604
2B Beulah Bapt Ch	78	2	334
2B Beulah Bapt Ch	76	54	4180

3A Capitol Hts Bapt Ch	77	222	236
3A Capitol Hts Bapt Ch	74	2013	876
4D Hamner Hall Fire Station	77	359	1192
4D Hamner Hall Fire Station	78	8	4
4F Newtown Comm Ctr	77	63	790
4F Newtown Comm Ctr	78	249	1247
4G King Hill Comm Ctr	77	51	97
4G King Hill Comm Ctr	78	1344	1244
4M McIntyre Comm Ctr	77	0	551
4M McIntyre Comm Ctr	78	52	2178
4N Highland Avenue Bapt Ch	77	834	1347
4N Highland Avenue Bapt Ch	74	4	0

HD 78	**HD**	**White**	**Black**
Montgomery Co			
2B Beulah Bapt Ch	78	2	334
2B Beulah Bapt Ch	76	54	4180
2D Montgomery Boys Club	78	1567	1668
2D Montgomery Boys	69	397	422

2F Fire Station No. 14	78	31	687
2F Fire Station No. 14	69	243	1758
2G Hayneville Road Comm Ctr	78	27	1713
2G Hayneville Road Comm Ctr	69	118	693
2H Harrison Elem Sch	78	16	123
2H Harrison Elem Sch	76	21	1180
2I Southlawn Elem	78	54	3915
2I Southlawn Elem	69	82	354
3F Goodwyn Comm Ctr	78	259	436
3F Goodwyn Comm Ctr	74	5404	1207
4D Hamner Hall Fire Station	78	8	4
4D Hamner Hall Fire Station	77	359	1192
4F Newtown Comm Ctr	78	249	1247
4F Newtown Comm Ctr	77	63	790
4G King Hill Comm Ctr	78	1344	1244
4G King Hill Comm Ctr	77	51	97
4K Chisholm Comm Ctr	78	974	1965
4K Chisholm Comm Ctr	74	10	0
4M McIntyre Comm Ctr	78	52	2178
4M McIntyre Comm	77	0	551

HD 82	HD	White	Black
Lee Co			
Auburn	82	4688	3865
Auburn	79	35614	5261
Beuaregard School	82	1121	418
Beuaregard School	79	128	1
Beuaregard School	83	1554	573
Beuaregard School	38	753	75
Opelika B	82	1663	416
Opelika B	79	928	81
Opelika B	83	6258	10704
Opelika B	38	7237	934
Tallapoosa Co			
Dadeville Nat Guard Armory	82	850	1389
Dadeville Nat Guard Armory	81	920	170
Mary's Cross Road Voting House	82	85	164
Mary's Cross Road Voting House	81	138	118
Wall Street Comm Ctr	82	507	817
Wall Street Comm Ctr	81	229	51

HD 83	HD	White	Black
Lee Co			
Beuaregard School	83	1554	573
Beuaregard School	38	753	75
Beuaregard School	79	128	1
Beuaregard School	82	1121	418
Lee County Snacks	83	1274	696
Lee County Snacks	38	103	3
Old Salem School	83	188	143
Old Salem School	38	1402	142
Opelika B	83	6258	10704
Opelika B	38	7237	934
Opelika B	79	928	81
Opelika B	82	1663	416
Smiths Station Sr. Ctr	83	220	138
Smiths Station Sr. Ctr	80	2665	437
Smiths Station Sr. Ctr	38	2596	643
Russell Co			
Austin Sumbry Park	83	495	271
Austin Sumbry Park	80	81	56
Crawford Fire Dept	83	1292	482
Crawford Fire Dept	80	1716	313
CVCC	83	741	1717
CVCC	80	16	9
Ladonia Fire Dept	83	7	61
Ladonia Fire Dept	80	6139	922
Nat Guard Armory	83	1257	2747
Nat Guard Armory	80	2592	1095
Seale Cthse	83	1455	681
Seale Cthse	84	0	27

HD 84	HD	White	Black
Russell Co			
Seale Cthse	84	0	27
Seale Cthse	83	1455	681

HD 85	HD	White	Black
Houston Co			
Doug Tew Comm Ctr	85	2181	2040
Doug Tew Comm Ctr	86	2908	262
Farm Ctr	85	495	767
Farm Ctr	86	3358	1188
Johnson Homes	85	314	4403
Johnson Homes	86	129	8
Kinsey	85	378	920
Kinsey	86	758	91
Library	85	1098	2840
Library	86	3278	270
Lincoln Comm Ctr	85	223	1037
Lincoln Comm Ctr	86	687	122
Vaughn Blumberg Ctr	85	1503	1493
Vaughn Blumberg Ctr	93	297	68
Westgate Rec Ctr	85	14	19
Westgate Rec Ctr	93	6824	641
Wiregrass Park	85	2813	4190
Wiregrass Park	86	2456	497

HD 97	HD	White	Black
Mobile Co			
100 Black Men of Greater Mobile	97	1	474
100 Black Men of Greater Mobile	98	9	2384
Augusta Evans School	97	1370	153
Augusta Evans School	99	324	426
Chickasaw Auditorium	97	2743	1143
Chickasaw Auditorium	96	163	79
Chickasaw Auditorium	98	942	827
Figures Rec Ctr	97	30	2821
Figures Rec Ctr	99	10	2134
Rock of Faith Bapt Ch	97	78	5319
Rock of Faith Bapt Ch	103	7	1459
Saraland Civic Ctr	97	161	101
Saraland Civic Ctr	98	1246	118
Saraland Civic Ctr	96	1982	237
St. Andrews Episcopal	97	545	567
St. Andrews Episcopal	103	1271	951
Vigor HS	97	38	824
Vigor HS	98	88	2898
Murphy HS Library	97	2550	212
Murphy HS Library	99	340	326

HD 98	HD	White	Black
Mobile Co			
100 Black Men of Greater Mobile	98	9	2384
100 Black Men	97	1	474

Chickasaw Auditorium	98	942	827
Chickasaw Auditorium	96	163	79
Chickasaw Auditorium	97	2743	1143
College Park Bapt Ch	98	1106	878
College Park Bapt Ch	102	156	0
College Park Bapt Ch	99	1103	209
First Bapt Ch of Axis	98	1790	496
First Bapt Ch of Axis	102	661	11
First Bapt Ch of Axis	96	490	8
Havenwood Bapt Ch	98	43	28
Havenwood Bapt Ch	102	3938	80
Joseph Dotch Comm. Ctr	98	24	2317
Joseph Dotch Comm. Ctr	99	5	235
Little Welcome Bapt	98	185	1238
Little Welcome Bapt	99	1059	2264
Little Welcome Bapt	101	87	19
Mt. Vernon Civic Ctr	98	415	859
Mt. Vernon Civic Ctr	102	520	111
Saraland Civic Ctr	98	1246	118
Saraland Civic Ctr	97	161	101
Saraland Civic Ctr	96	1982	237
Satsuma City Hall	98	369	403
Satsuma City Hall	96	3167	168
Shelton Beach Rd. Bapt Ch	98	2234	593
Shelton Beach Rd. Bapt Ch	96	695	27
Turnerville Comm	98	1167	96
Turnerville Comm	102	2994	86

Vigor HS	98	88	2898
Vigor HS	97	38	824
HD 99	**HD**	**White**	**Black**
Mobile Co			
Augusta Evans School	99	324	426
Augusta Evans School	97	1370	153
Azalea City Ch of Christ	99	935	836
Azalea City Ch of Christ	102	694	133
College Park Bapt Ch	99	1103	209
College Park Bapt Ch	102	156	0
College Park Bapt Ch	98	1106	878
Figures Rec Ctr	99	10	2134
Figures Rec Ctr	97	30	2821
Friendship Missionary Bapt Ch	99	208	790
Friendship Missionary Bapt Ch	101	158	7
Joseph Dotch Comm. Ctr	99	5	235
Joseph Dotch Comm. Ctr	98	24	2317
Little Welcome Bapt Ch	99	1059	2264
Little Welcome Bapt Ch	101	87	19
Little Welcome Bapt Ch	98	185	1238
Moffett Road AOG	99	1567	3646
Moffett Road AOG	102	387	181

Murphy HS Library	99	340	326
Murphy HS Library	97	2550	212
Pleasant Valley Meth	99	1548	1072
Pleasant Valley Meth	103	420	475
Semmes First Bapt	99	393	437
Semmes First Bapt	102	5277	746
St. John UMC	99	1571	2572
St. John UMC	101	505	202
University Ch of Christ	99	508	927
University Ch of Christ	101	1323	594

HD 103	**HD**	**White**	**Black**
Mobile Co			
Bay of Holy Spirit Ch	103	2029	2705
Bay of Holy Spirit Ch	101	1626	738
Dodge School	103	1	123
Dodge School	104	5018	1370
First Independent Meth	103	2	119
First Independent Meth	104	3815	1117
Hollingers Island Sch	103	1482	95
Hollingers Island Sch	105	761	31
Kate Shepard School	103	316	304
Kate Shepard School	104	2058	176
Pleasant Valley Meth Ch	103	420	475
Pleasant Valley Meth Ch	99	1548	1072

Rock of Faith Bapt Ch	103	7	1459
Rock of Faith Bapt Ch	97	78	5319
St Philip Neri Ch	103	62	186
St Philip Neri Ch	105	3252	181
St. Andrews Episcopal	103	1271	951
St. Andrews Episcopal	97	545	567
The Mug Cafe	103	14	84
The Mug Cafe	101	2707	1358

SENATE

SD 18	**SD**	**White**	**Black**

Jefferson Co.

Homewood Pub Lib	18	399	399
	16	5,952	170
Mountain Brook City Hall	18	844	60
	15	3,903	9
Birmingham Botanical Gardens	18	37	0
	15	933	12

Muscoda Comm Ctr	18	212	295
	18	439	22
	19	593	256
Robinson Elem	18	635	3,445
	20	547	824

SD 19	**SD**	**White**	**Black**
Jefferson Co.			
Valley Creek Bapt Ch	19	327	130
	5	2,381	300
Pleasant Hill UMC	19	5,989	1,455
	18	2,966	443
Johns Comm Ctr	19	650	130
	5	641	29
Maurice L West Comm	19	1,049	493

Ctr	17	541	30
Hillview Fire Station #1	19	167	177
	17	425	14
	20	314	1,585
SD 20	**SD**	**White**	**Black**
Jefferson Co.			
Trussville First Bapt Ch	20	327	347
	17	8,695	366
Mountain View Bapt Ch	20	5,216	1,849
	17	127	1
Gardendale Civic Ctr	20	914	498
	17	11,887	635
Pinson UMC	20	1,318	2,785
	17	2,092	254

Fultondale First Bapt Ch	20	1,259	894
	17	1,490	94
SD 23	**SD**	**White**	**Black**
Clarke Co.			
Jackson City Hall	23	634	1,819
	22	204	44
Overstreet Grocery	23	79	287
	22	228	50
Skipper Fire Station-Jackson Nat Guard-Jackson Fire Dept.	23	123	184
	22	3,039	793
Old Engineers Building	23	236	297
	22	2,255	768

Thomasville Nat Guard Armory	23	5	76
	22	205	24
	24	185	1,057
Fulton City Hall	22	30	15
	22	811	33
	24	70	244
	23	82	59
Conecuh Co.			
Belleville Bapt Ch	23	145	563
	22	51	0
Castleberry Fire Dept. - 1	23	32	191
	22	665	54
Paul Fire Dept.	23	58	79
	22	120	2

Herbert FD	23	60	36
	22	129	7
Bermuda Comm House	23	79	91
	22	200	51
Marengo Co.			
Cornerstone Ch	23	605	836
	24	275	68
Monroe Co.			
Chrysler/Eliska/McGill	23	5	19
	22	560	110
Perdue Hill Masonic Lodge	23	57	271
	22	141	39
Purdue Hill	23	36	34
	22	49	7

Bethel Bapt House	23	266	1,266
	22	38	0
Days Inn/Ollie	23	18	71
	22	490	215
Monroeville Armory	23	695	784
	22	935	293
Mexia Fire Station	23	0	12
	22	699	99
Monroeville Housing Auth	23	446	1,243
	22	46	0
Monroe Beulah Ch	23	20	51
	22	119	19
Shiloh/Grimes	23	23	66
	22	21	1

Washington Co.			
Malcolm Voting House	23	6	18
	22	176	343
Mcintosh Comm Ctr	23	30	755
	22	0	0
Mcintosh Voting House	23	92	384
	22	400	58
Cortelyou	23	127	272
	22	85	0
Carson/Preswick	23	25	207
	22	270	56

SD 24	SD	White	Black
Choctaw Co.			
Butler-Lavaca-Mt. Sterlin	24	1,855	1,111
	22	141	7
Bogueloosa	24	702	251
	22	391	29
Toxey-Gilbertown-Melvin-Hurricane	24	388	344
	22	385	36
Branch-Bladon Springs-Cullomburg	24	59	326
	22	43	10
Silas-Souwilpalsney-Toomey	24	818	850
	22	237	0
Lusk-Pleasant Valley-Ararat	24	14	41
	22	755	32

Riderwood-Rock Springs	24	339	335
	22	43	0
Clarke Co.			
Bashi Methodist Ch	24	1,041	1,012
	22	1,969	270
Hale Co.			
Havanna-A	24	70	52
	14	47	6
Valley B	24	23	34
	14	29	7
Valley C	24	8	14
	14	44	13

Pickens Co.			
Carrollton 4 Service Ctr	24	155	603
	21	612	250
Tuscaloosa Co.			
Jayces Park	24	1,948	3,681
	21	617	176
Holt Armory	24	1,895	2,543
	21	808	282
Peterson Meth Ch	24	331	340
	21	1,723	134
McFaland Mall	24	5,600	6,923
	21	2,410	809
Hillcrest HS	24	645	311
	21	6,463	2,385

Fosters-Ralph Fire Dept	24	1,730	977
	21	239	47
SD 26	**SD**	**White**	**Black**
Montgomery Co.			
1A Cloverdale Comm Ctr	26	248	687
	25	5,444	1,120
1B Vaughn Park Ch of Christ	26	2,273	3,322
	25	2,787	992
1C Montgomery Museum of Fine Arts	26	941	2,651
	25	2,085	1,335
1D Whitfield Memorial UMC	26	1,345	3,054
	25	1,441	319
3F Goodwyn Comm Ctr	26	344	437
	25	5,319	1,206

3G Alcazar Shrine Temple	26	336	1,755
	25	709	609
5M Bell Road YMCA	26	251	532
	25	5,463	2,213
SD 28	**SD**	**White**	**Black**
Houston Co.			
Kinsey	28	774	969
	29	362	42
Johnson Homes	28	278	4,367
	29	165	44
Farm Ctr	28	223	666
	29	3,630	1,289
Doug Tew Comm Ctr	28	1,385	1,626
	29	3,704	676

Library	28	551	2,595
	29	3,990	556
Lincoln Comm Ctr	28	202	1,027
	29	708	132
Wiregrass Park	28	1,737	3,490
	29	3,532	1,197
Vaughn Blumberg Ctr	28	1,167	1,329
	29	633	232
Lee Co.			
Waverly	28	32	180
	27	198	53
Loachapoka	28	277	1,471
	27	1,148	249

Auburn	28	918	2,578
	27	38,132	6,513
	13	1,252	35
Beuaregard School	28	42	25
	27	3,514	1,042
Marvyn	28	167	240
	27	195	48
Russell Co.			
Roy Martin Ctr	28	1,601	1, 115
	27	4,724	818
Ladonia Fire Dept	28	7	61
	27	6,139	922
Seale Courthouse	28	705	556
	27	750	152

Nat Guard Armory	28	1,997	3,452
	27	1,852	390
Austin Sumbry Park	28	294	279
	27	282	48
SD 33	**SD**	**White**	**Black**
Mobile Co.			
Satsuma City Hall	33	0	0
	34	3,536	571
Chickasaw Auditorium	33	1,942	1,594
	34	1,906	455
Morningside Elem	33	922	3,647
	35	340	92
Riverside Ch of the Nazarene	33	503	709
	35	425	38

St. Andrews Episcopal Ch	33	1,438	1,496
	35	378	22