

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

ALABAMA LEGISLATIVE BLACK \*  
CAUCUS; BOBBY SINGLETON; \*  
ALABAMA ASSOCIATION OF BLACK \*  
COUNTY OFFICIALS; FRED \*  
ARMSTEAD, GEORGE BOWMAN, \*  
RHONDEL RHONE, ALBERT F. \*  
TURNER, JR., and JILES WILLIAMS, JR., \*  
individually and on behalf of others \*  
similarly situated, \*

Plaintiffs,  
v.

THE STATE OF ALABAMA; JOHN H. \*  
MERRILL in his official capacity as \*  
Alabama Secretary of State, \*

Defendants. \*

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ALABAMA DEMOCRATIC \*  
CONFERENCE et al., \*

Plaintiffs, \*  
v. \*

THE STATE OF ALABAMA et al., \*  
Defendants. \*

Civil Action No.  
2:12-CV-691-WKW-MHT-WHP  
(3-judge court)

Civil Action No.  
2:12-cv-1081-WKW-MHT-WHP  
(3-judge court)

**ALBC PLAINTIFFS' EXPLANATORY BRIEF  
IN RESPONSE TO AUGUST 28, 2015, ORDER**

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Plaintiffs Alabama Legislative Black Caucus et al., through undersigned counsel, submit this brief, as required by this Court's order of August 28, 2015, Doc. 283, to explain the demonstrative House and Senate plans filed contemporaneously with this brief (hereafter "ALBC 1% House and Senate plans") and the exhibits prepared in response to this Court's instructions, which are being filed on a CD, with CD and paper copies to each judge. An index of the exhibits is attached to this brief. They can be accessed on Google Drive at <https://goo.gl/EmSqGO>. If the Court wishes us to clarify any exhibit or to provide additional information, we are prepared to do so promptly.

The purpose of the ALBC 1% House and Senate plans is to demonstrate that, even within the constraints of "a more rigorous deviation standard than [the Supreme Court's] precedents have found necessary under the Constitution," *Alabama Legislative Black Caucus v. Alabama*, 135 S.Ct. 1257, 1263 (2015), redistricting plans that satisfy all requirements of federal law could have been drawn without splitting nearly as many county and precinct boundaries as do the Act 2012-602 and Act 2012-603 plans. The ALBC 1% plans have been drawn by redistricting expert William Cooper with instructions from counsel to comply with all requirements of the August 28 order, without any input from counsel or incumbents. We do not contend they are the best or only way to draw 1% plans

that satisfy this Court's requirements. They are not presented as proposed remedial plans, because they have had no input from plaintiff ALBC members or from other members of the Legislature. But, as redistricting exercises, they make it apparent that race was the predominant purpose for so many county and precinct splits in Alabama's plans, specifically, the pursuit of the drafters' mechanical racial targeting policy.

**I. THE REQUIREMENTS OF THE AUGUST 28, 2015, ORDER.**

The ALBC 1% House and Senate plans, APSX 461-76, satisfy all the requirements set out in this Court's August 28 order:

(1) They use the 2010 census.

(2) Each House and Senate district statewide is within  $\pm 1\%$  population deviation.

(3) They comply with the Voting Rights Act of 1965 as amended and *ALBC v. Alabama*, supra. They preserve 27 majority-black voting-age House districts, and an additional ability-to-elect HD 85 at 49.03% black total population and 46.78% any-part-black voting age. They preserve 8 total-population and voting-age black-majority Senate districts. In doing so, the ALBC 1% plans do not subordinate traditional race-neutral districting principles to racial considerations.

(4) They comply with Section 2 of the Voting Rights Act, 52 U.S.C. § 10301. They create majority-black districts where a politically cohesive black population is sufficiently large and geographically compact to constitute a voting-age majority, without either fragmenting or packing the black population. In spite of continuing discrimination and racial bloc voting, the number of districts with effective black voting majorities in the ALBC 1% plans is roughly proportional to blacks' share of Alabama's voting-age population. *Johnson v. De Grandy*, 512 U.S. 997, 1000, 1006-07 (1994) (citations omitted). The ALBC 1% plans have neither the purpose nor the effect of diluting black voting strength.

(5) They comply with Section 5 of the Voting Rights Act, 52 U.S.C. § 10304. They maintain blacks' ability to elect their preferred candidates of choice statewide. Including HD 85 at 49.03% black total pop, there are 28 House districts and 8 Senate districts in which blacks have the ability to elect the candidate of their choice. Black voters have been able to elect candidates of their choice as recently as 2010 in House districts as low as HD 84 (52.36%) and HD 85 (47.863%). Memorandum Opinion and Order, Dec. 20, 2013, Doc. 203 at 43.

(6) They do not subordinate race-neutral traditional districting principles to racial considerations. To the contrary, instead of starting with the majority-black districts and drawing them to meet racial targets, Mr. Cooper began

drawing these plans by trying to restore as many county and precinct boundaries as possible within the constraints of  $\pm 1\%$  deviation and no incumbent conflicts. He started with the ALBC remand House and Senate plans, APSX 26-42, which were modifications of the ALBC whole-county plans, HB 16 and SB 5, APX 20-23.

The ALBC remand plans were aimed primarily at trying to separate the incumbents elected in 2014. Mr. Cooper had drawn the HB 16 and SB 5 plans by starting with the 2001 House and Senate plans and attempting to restore county boundaries within the constraints of  $\pm 5\%$  deviation. Throughout this process Mr. Cooper looked for opportunities to preserve the majority-black districts as compact districts that split as few precincts as possible within county boundaries. In short, race-neutral, traditional districting principles are the predominant factors in the ALBC 1% House and Senate plans.

(7) The ALBC 1% Senate plan has 35 districts, and the ALBC 1% House plan has 105 districts.

(8) As noted above, attempting to compose each district with as few counties as possible was a high priority for the ALBC 1% plans.

(9) Every district in the ALBC 1% plans is contiguous with all its parts.

(10) Primarily because they attempt to follow county and precinct



boundaries, every district in the ALBC 1% plans is reasonably compact.

(11) Next to county boundaries, voting precinct boundaries or voter tabulation districts (VTDs), and compact black populations were the primary communities of interest the ALBC 1% plans sought to respect. Mr. Cooper did not have and did not refer to any partisan performance data.

(12) The ALBC 1% House plan has 27 majority-black districts and an additional ability-to-elect district in HD 85. The ALBC 1% Senate plan has 8 majority-black districts.

(13) The ALBC 1% House plan splits a total of 43 counties, while the Act 602 plan splits a total of 50 counties. APSX 477. The ALBC 1% Senate plan splits a total of 23 counties, while the Act 603 plan splits a total of 33 counties. APSX 478.<sup>1</sup>

But the counts of total split counties tell only part of the story. Some counties must be split to comply with the  $\pm 1\%$  deviation requirement, because their populations are too large to fit whole inside one or more districts. Only Montgomery County and Mobile County can be kept whole when divided into multiple House districts at  $\pm 1\%$  deviation, and only Mobile County can be kept

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<sup>1</sup> By comparison, using  $\pm 5\%$  allowable deviation, the ALBC remand House and Senate plans split only 28 counties in the House and 12 counties in the Senate. APSX 27 and 36A.

whole when divided into multiple Senate districts at  $\pm 1\%$  deviation. So the relevant question is how many House and Senate districts that did not need to be split to comply with  $\pm 1\%$  deviation were split nevertheless.

The Act 602 and 603 plans split counties among multiple districts more than do the ALBC 1% plans. Act 602 has 140 House districts that cross county boundaries, compared with 107 ALBC 1% House districts. APSX 477. Act 603 has 80 Senate districts that cross county boundaries, compared with 49 ALBC 1% Senate districts. APSX 478.<sup>2</sup> See also the extra legislator tables marked as APSX 481 and 482 and the following tables, which use the format in *Sims v. Amos*, 336 F.Supp. 924, 938 n.19 (M.D. Ala. 1972) (three-judge court) to identify unnecessary county splits.

**Comparison of County Splits in the Act 2012-602 House plan and ALBC 1% House plans:**

In Alabama there are 39 counties which have populations of less than 45,976 and which ideally (+1%) should be placed wholly within 1 district. Here is how those 39 counties fare in the House plans:

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<sup>2</sup> By comparison, the ALBC remand plans, using  $\pm 5\%$  allowable deviation, have only 47 House districts that cross county boundaries (involving 28 counties) and 22 Senate districts that cross county boundaries (involving 12 counties). APSX 27 and 36A.

<b>Act 2012-602 plan</b>		<b>ALBC 1% plan</b>	
17	are whole within 1 district (43.59%)	21	are whole within 1 district (53.85%)
17	are divided into 2 districts (43.59%)	14	are divided into 2 districts (35.90%)
3	are divided among 3 districts (7.69%)	4	are divided among 3 districts (10.26%)
2	are divided among 4 districts (5.13%)	0	are divided among 4 districts

There are 14 counties which have populations between 45,976 and 91,952 and which ideally (+1%) should be divided between 2 districts. Here is how those 14 counties fare in the House plans:

<b>Act 2012-602 plan</b>		<b>ALBC 1% plan</b>	
4	are divided between 2 districts (28.57%)	6	are divided between 2 districts (42.86%)
5	are divided among 3 districts (35.71%)	5	are divided among 3 districts (35.71%)
3	are divided among 4 districts (21.43%)	3	are divided among 4 districts (21.43%)
1	is divided among 5 districts (7.14%)	0	are divided among 5 districts
1	(DeKalb) is divided among six districts (7.14%)	0	are divided among six districts

There are 6 counties which have populations between 91,952 and 137,928 and which ideally (+1%) should be divided among 3 districts. Here is how those 6 counties fare in the House plans:

<b>Act 2012-602 plan</b>	<b>ALBC 1% House plan</b>
1 is divided among 3 districts (16.67%)	2 are divided among 3 districts (33.33%)
2 are divided among 4 districts (33.33%)	3 are divided among 4 districts (50%)
2 are divided among 5 districts (33.33%)	1 is divided among 5 districts (16.67%)
1 is divided among 6 districts (16.67%)	0 are divided among 6 districts

There are 2 counties which have a population between 137,928 and 183,904 and which ideally (+1%) should be divided among 4 districts. Here is how those counties (Baldwin and Lee) fared in the House plans:

<b>Act 2012-602 plan</b>	<b>ALBC 1% House plan</b>
0 are divided among 4 districts (0.0%)	2 are divided among 4 districts (100%)
1 is divided among 5 districts (50.00%)	0 are divided among 5 districts
1 is divided among 6 districts (50.00%)	0 are divided among 6 districts

There are 3 counties which have a population between 183,904 and 229,881 and which ideally (+1%) should be divided among 5 districts. Here is how those counties fared in the House plans:

<b>Act 2012-602 plan</b>	<b>ALBC 1% House plan</b>
0 are divided among 5 districts (0.0%)	1 is divided among 5 districts (33.33%)
1 is divided among 6 districts (33.33%)	1 is divided among 6 districts (33.33%)

2	are divided among 7 districts (66.67%)	1	is divided among 7 districts (33.33%)
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There is 1 county which has a population between 321,833 and 367,809 and which ideally (+1%) should be divided among 8 districts. Here is how that county (Madison) fared in the House plans:

<b>Act 2012-602 plan</b>		<b>ALBC 1% House plan</b>	
1	is divided among 8 districts (100%)	0	is divided among 8 districts
0	is divided among 9 districts	1	is divided among 9 districts (100%)

There is 1 county which has a population between 367,809 and 413,785 and which ideally (+1%) should be divided among 9 districts. Here is how that county (Mobile) fared in the House plans:

<b>Act 2012-602 plan</b>		<b>ALBC 1% House plan</b>	
0	is divided among 9 districts	1	is divided among 9 districts (100%)
1	is divided among 10 districts (100%)	0	is divided among 10 districts

There is 1 county which has a population between 643,666 and 689,643 and which ideally (+1%) should be divided among 15 districts. Here is how that county (Jefferson) fared in the House plans:

<b>Act 2012-602 plan</b>		<b>ALBC 1% House plan</b>	
0	is divided among 15 districts	0	is divided among 15 districts
0	is divided among 16 districts	1	is divided among 16 districts (100%)

1 is divided among 18 districts (100%)	0 is divided among 18 districts
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Overall, in 32.84% of the cases (22) a county is divided among the ideal number of House districts	Overall, in 49.25% of the cases (33) a county is divided among the ideal number of House districts
Overall, in 40.30% of the cases (27) a county is divided among 1 more than the ideal number of House districts	Overall, in 37.31% of the cases (25) a county is divided among 1 more than the ideal number of House districts
Overall, in 17.91% of the cases (12) a county is divided among 2 more than the ideal number of House districts	Overall, in 13.43% of the cases (9) a county is divided among 2 more than the ideal number of House districts
Overall, in 7.46% of the cases (5) a county is divided among 3 more than the ideal number of House districts	Overall, in 0.0% of the cases (0) a county is divided among 3 more than the ideal number of House districts
Overall, in 1.49% of the cases (1) a county is divided among 4 more than the ideal number of House districts	Overall, in 0.0% of the cases (0) a county is divided among 4 more than the ideal number of House districts

### **Comparison of County Splits in the Act 2012-603 Senate plan and ALBC 1% Senate plan**

In Alabama there are 59 counties which have populations of less than 137,929 and which ideally (+1%) should be placed wholly within 1 district. Here is how those 59 counties fare in the Senate plans:

<b>Act 2012-603 plan</b>	<b>ALBC 1% plan</b>
34 are whole within 1 district (57.63%)	43 are whole within 1 district (72.88%)
20 are divided into 2 districts (33.90%)	13 are divided into 2 districts (22.03%)

4	are divided among 3 districts (6.78%)	3	are divided among 3 districts (5.08%)
1	is divided among 4 districts (1.69%)	0	are divided among 4 districts

There are 5 counties which have populations between 137,929 and 275,859 and which ideally (+1%) should be divided between 2 districts. Here is how those 5 counties fare in the Senate plans:

<b>Act 2012-603 plan</b>		<b>ALBC 1% plan</b>	
2	are divided between 2 districts (40%)	2	are divided between 2 districts (40%)
2	are divided among 3 districts (40%)	3	are divided among 3 districts (60%)
1	is divided among 4 districts (20%)	0	are divided among 4 districts (0.0%)

There are 2 counties which have populations between 275,859 and 413,788 and which ideally (+1%) should be divided among 3 districts. Here is how those 2 counties fare in the Senate plans:

<b>Act 2012-603 plan</b>		<b>ALBC 1% Senate plan</b>	
0	are divided among 3 districts (0.0%)	2	are divided among 3 districts (100%)
1	(Mobile) is divided among 4 districts (50%)	0	are divided among 4 districts (0.0%)
1	(Madison) is divided among 6 districts (50%)	0	are divided among 6 districts (0.0%)

There is 1 county (Jefferson) which has a population between 551,718 and 683,508 and which ideally (+1%) should be divided among 5 districts. Here is how that county fared in the Senate plans:

<b>Act 2012-603 plan</b>	<b>ALBC 1% Senate plan</b>
0 are divided among 5 districts (0.0%)	0 are divided among 5 districts (0.0%)
0 are divided among 6 districts (0.0%)	1 is divided among 6 districts (100%)
1 is divided among 8 districts (100%)	0 are divided among 8 districts (0.0%)

Overall, in 53.73% of the cases (36) a county is divided among the ideal number of Senate districts	Overall, in 70.15% of the cases (47) a county is divided among the ideal number of Senate districts
Overall, in 35.82% of the cases (24) a county is divided among 1 more than the ideal number of Senate districts	Overall, in 25.37% of the cases (17) a county is divided among 1 more than the ideal number of Senate districts
Overall, in 5.97% of the cases (4) a county is divided among 2 more than the ideal number of Senate districts	Overall, in 4.48% of the cases (3) a county is divided among 2 more than the ideal number of Senate districts
Overall, in 4.48% of the cases (3) a county is divided among 3 more than the ideal number of Senate districts	Overall, in 0.0% of the cases (0) a county is divided among 3 more than the ideal number of Senate districts

(14) The ALBC 1% House plan splits 82 precincts statewide, compared with 436 precincts split statewide by the Act 2012-602 plan. See APSX 483. The ALBC 1% Senate plan splits only 8 precincts statewide, 2 of which are noncontiguous and have zero population. The Act 2012-603 Senate plan splits



168 precincts statewide. See APSX 487.<sup>3</sup>

(15) The ALBC 1% plans were drawn to separate incumbents who were in office in 2012.<sup>4</sup> Only Representatives John Knight and Joe Hubbard are in the same HD 77. Representative Demetrius Newton's HD 53 has been returned to Jefferson County, where it has been drawn to eliminate the conflict with Representative Juandalynn Givan in HD 60. A second majority-black House district was created in Madison County, HD 6, in which Representative Howard Sanderford was the incumbent in 2012. There are no incumbent conflicts in the ALBC 1% Senate plan.

Comparisons of the precinct splits in the ALBC 1% House and Senate plans with the precinct splits in the Act 602 and 603 plans are being submitted as APSX 483 through 490. These exhibits show the following:

**Statewide precinct splits:**

The ALBC 1% House plan splits 82 precincts statewide, but 5 involve zero-population splits. APSX 483.

The Act 2012-602 House plan splits 436 precincts statewide, but 13 of these involve zero-population blocks. APSX 483.

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<sup>3</sup> By comparison, the ALBC remand plans, using  $\pm 5\%$  allowable deviation, split only 46 precincts in the House plan and 3 precincts in the Senate plan.

<sup>4</sup> In contrast, the ALBC remand House and Senate plans, APSX 20-42, were drawn to separate as many as possible of the incumbents elected in 2014.

The ALBC 1% Senate plan splits just 8 precincts statewide, 2 of which are non-contiguous and have zero population. APSX 487.

The Act 2012-603 Senate plan splits 168 precincts statewide, but 4 of these involve zero-population blocks. APSX 487.

**Precincts currently whole that are split in the ALBC 1% plans:**

31 precincts that are currently whole have been split in the ALBC 1% House plan. APSX 483.

3 precincts that are currently whole have been split in the ALBC 1% Senate plan. APSX 487.

**Precincts currently split that are restored whole in the ALBC 1% plans:**

385 precincts that are split in the Act 602 House plan have been restored whole in the ALBC 1% House plan. APSX 484 and 485.

163 precincts that are split in the Act 603 Senate plan have been restored whole in the ALBC 1% Senate plan. APSX 488 and 489.

**Whole precincts moved to another district in the ALBC 1% plans:<sup>5</sup>**

638 precincts that are currently whole in the Act 602 House plan have been moved whole to another district in the ALBC 1% House plan. APSX 486.

712 precincts that are currently whole in the Act 603 Senate plan have been moved whole to another district in the ALBC 1% Senate plan. APSX 490.

**Split precincts restored whole to same district in the ALBC 1% plans:**

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<sup>5</sup> These totals include all the precincts in whole counties moved to another district.

262 precincts that are split between two or more districts in the Act 602 House plan have been restored whole by the ALBC 1% House plan and placed in one of the districts between which they had been split. APSX 484.

135 precincts that are split between two or more districts in the Act 603 Senate plan have been restored whole by the ALBC 1% Senate plan and placed in one of the districts between which they had been split. APSX 488.

**Split precincts restored whole to different district in the ALBC 1% plans:**

123 precincts that are split between two or more districts in the Act 602 House plan have been restored whole by the ALBC 1% House plan and placed in a different district than the districts between which they had been split. APSX 485.

28 precincts that are split between two or more districts in the Act 603 Senate plan have been restored whole by the ALBC 1% Senate plan and placed in a different district than the districts between which they had been split. APSX 489.

Charts with statistics on (1) the total black population and black population percentage of every proposed district, (2) a comparison of those two figures to the current plan, and (3) the population of each district and its deviation from the ideal are provided for all districts statewide in APSX 491. The following chart, APSX 492, summarizes those data for the majority-black districts only:

**Comparison of Black Percentages and Deviations  
Majority-black Districts (APSX 492)**

**House districts:**

<b>ALBC 1% House plan</b>					<b>Act 2012-602 House plan</b>			
<b>HD</b>	<b>Total pop</b>	<b>Devi- ation %</b>	<b>Total black pop</b>	<b>Total black %</b>	<b>Total pop</b>	<b>Devi- ation %</b>	<b>Total black pop</b>	<b>Total black %</b>
6	45,773	+0.55	25,232	55.12	45,796	+0.60	7,594	16.58
19	45,140	-0.84	24,197	53.60	45,081	-0.97	27,614	61.25
32	45,901	+0.83	24,106	52.52	45,504	-0.04	27,326	60.05
52	45,139	-0.84	25,566	56.64	45,083	-0.96	27,109	60.13
53	45,270	-0.55	25,785	56.96	45,106	-0.91	25,184	55.83
54	45,747	+0.50	27,740	60.64	45,070	-0.99	25,612	56.83
55	45,211	-0.68	26,156	57.85	45,071	-0.99	33,150	73.55
56	45,363	-0.35	28,598	63.04	45,071	-0.99	28,008	62.14
57	45,646	+0.27	33,097	72.51	45,071	-0.99	30,859	68.47
58	45,616	+0.21	29,224	64.07	45,088	-0.95	32,806	72.76
59	45,184	-0.74	26,454	58.55	45,218	-0.67	34,691	76.72
60	45,184	-0.74	24,171	53.49	45,084	-0.96	30,514	67.68
67	45,343	-0.39	30,506	67.28	45,078	-0.97	31,172	69.15
68	45,124	-0.87	23,961	53.10	45,069	-0.99	29,097	64.56
69	45,088	-0.95	24,592	54.54	45,477	-0.10	29,201	64.21
70	45,275	-0.54	26,043	57.52	45,970	+0.99	28,515	62.03
71	45,276	-0.54	26,957	59.54	45,348	-0.38	30,337	66.90
72	45,815	+0.65	27,892	60.88	45,346	-0.38	29,293	64.60

76	45,917	+0.87	29,381	63.99	45,972	+0.99	33,925	73.79
77	45,851	+0.72	30,001	65.43	45,954	+0.95	30,808	67.04
78	45,960	+0.96	30,684	66.76	45,957	+0.96	32,167	69.99
82	45,792	+0.60	27,737	60.57	45,858	+0.74	28,496	62.14
83	45,914	+0.86	17,351	37.79	45,973	+0.99	26,445	57.52
84	45,114	-0.89	24,506	54.32	45,969	+0.98	24,066	52.35
85	45,076	-0.98	22,102	49.03	45,229	-0.64	22,651	50.08
97	45,955	+0.95	25,695	55.91	45,071	-0.99	27,339	60.66
98	45,887	+0.80	27,716	60.40	45,069	-0.99	27,049	60.02
99	45,943	+0.93	26,755	58.24	45,069	-0.99	29,572	65.61
103	45,890	+0.81	28,734	62.61	45,075	-0.98	29,326	65.06

**Senate districts:**

<b>ALBC 1% Senate plan</b>					<b>Act 2012-603 Senate plan</b>			
SD	Total pop	Devi- ation %	Total black pop	Total black %	Total pop	Devi- ation %	Total black pop	Total black %
18	136,454	-0.08	76,359	55.96	135,258	-0.96	79,939	59.10
19	135,775	-0.58	88,173	64.94	135,218	-0.99	88,314	65.31
20	135,669	-0.66	85,910	63.32	135,211	-0.99	85,382	63.15
23	135,527	-0.76	72,907	53.80	135,338	-0.90	87,754	64.84
24	137,759	+0.88	78,944	57.31	137,724	+0.85	87,072	63.22
26	137,419	+0.63	79,142	57.59	136,451	-0.08	102,520	75.13
28	136,523	-0.03	69,143	50.65	137,909	+0.98	82,511	59.83
33	137,922	+0.99	85,893	62.28	136,214	-0.26	97,587	71.64

Overlay maps superimposing the Act 602 and 603 House and Senate plans over the ALBC 1% House and Senate plans in north Alabama and south Alabama, with detailed images of districts in Madison, Jefferson, Montgomery, and Mobile Counties, plus overlay maps for each majority-black district are submitted as APSX 493 through 541.

Overlay maps superimposing the 2001 House and Senate plans over the ALBC 1% House and Senate plans in north Alabama and south Alabama, with detailed images of districts in Madison, Jefferson, Montgomery, and Mobile Counties, plus overlay maps for each majority-black district are submitted as APSX 543 through 590.

The overlay maps show how the ALBC 1% House and Senate plans track more closely the cores of the 2001 plans than do the Act 602 and 603 plans. This is because the ALBC 1% plans are the products of an effort that started with the 2001 districts, restoring county boundaries and avoiding splitting precincts as much as possible, first within  $\pm 5\%$  deviation in the ALBC remand plans, then within the  $\pm 1\%$  requirement of the August 28 order. The much greater divergence of the Act 602 and 603 plans from the 2001 plans was made necessary by the drafters' pursuit of their racial percentage targets in the majority-black districts.

Split precinct maps for the majority-black districts and the urban counties in

the ALBC 1% House plan are submitted as APSX 591 through 623. Split precinct maps for the majority-black districts in the ALBC 1% Senate plan are submitted as APSX 624 through 631. Split precinct maps for the Act 602 and 603 House and Senate districts were previously submitted as APSX 400-447.

**II. THE ALBC 1% HOUSE AND SENATE PLANS DEMONSTRATE THAT THE DRAFTERS OF ACTS 2012-602 AND 2012-603 WERE CLASSIFYING VOTERS BY RACE IN AN ATTEMPT TO REACH AND EXCEED THEIR MECHANICAL RACIAL TARGETS IN EACH MAJORITY-BLACK DISTRICT.**

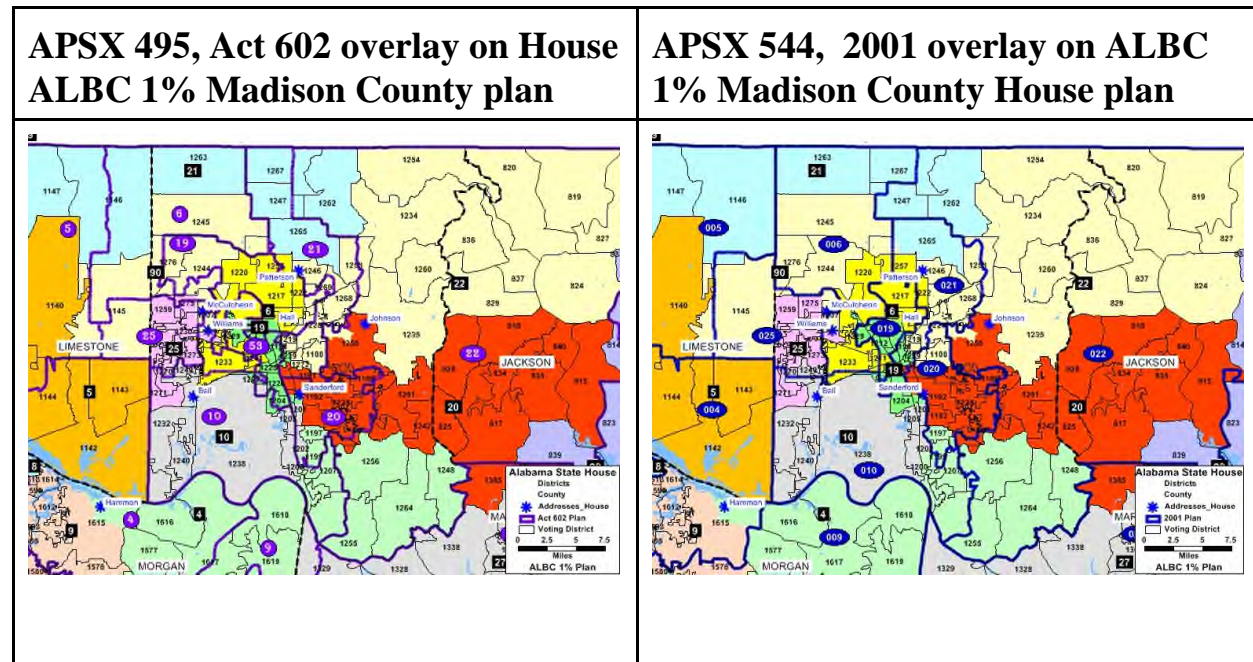
Even within the constraints of the Reapportionment Committee's inflexible  $\pm 1\%$  deviation rule and avoiding incumbent conflicts, there was no need for the drafters of the 2012 House and Senate plans to split so many county and precinct boundaries to comply with their own Guidelines. It is clear they did so solely in pursuit of their unwritten policy of reaching and exceeding the black percentage in each majority-black district as of the 2010 census, as the following district-by-district discussion shows:

**House Districts:**

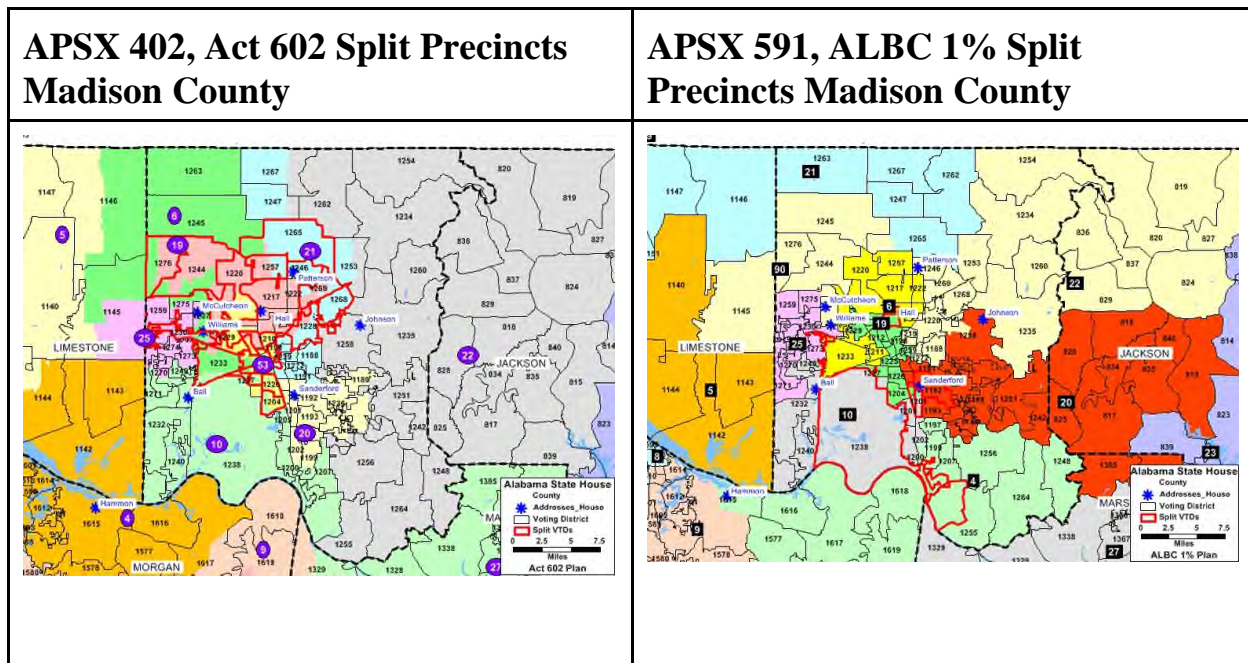
**Madison County House Districts:**

The drafters of Act 2012-602 moved HD 53 from Jefferson County to create a second majority-black district in Madison County. The ALBC 1% House plan

demonstrates how HD 53 should have been left in Jefferson County and how a second majority-black Madison County district should have been drawn in the 2001 plan's HD 6.



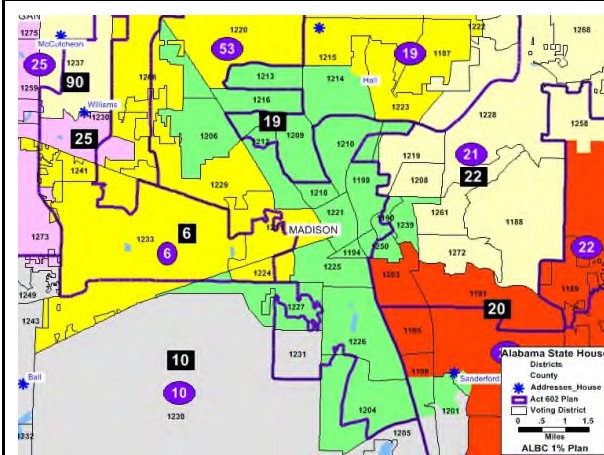
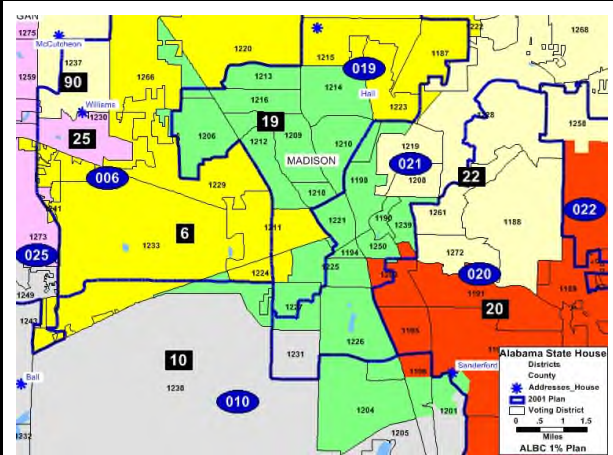
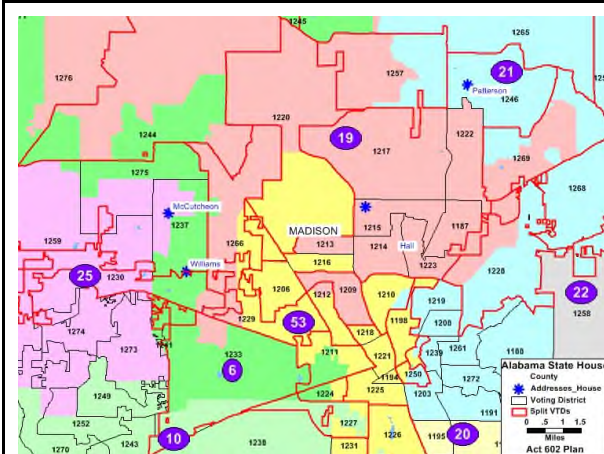
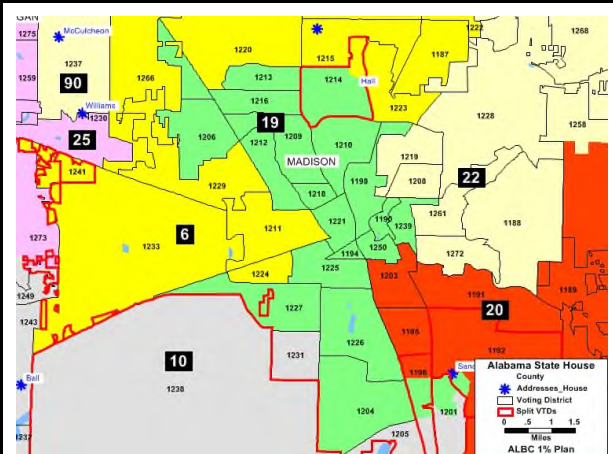




The ALBC 1% plan splits Madison County into one more House districts than does the Act 602 plan. APSX 477. But over the northern tier of Alabama counties (Lauderdale, Colbert, Franklin, Lawrence, Limestone, Morgan, Madison, Marshall, Jackson, and Dekalb) the ALBC 1% House plan has 9 fewer districts splitting county boundaries (23) than does the Act 602 House plan (32). APSX 477.

The Act 602 House plan splits 48 precincts in Madison County. APSX 483. The ALBC 1% House plan demonstrates how 1% deviation House districts with no incumbent conflicts and two majority-black districts could have been drawn in Madison County by splitting no more than 14 precincts. APSX 483. The

following comparisons of the two majority-black districts show that the Act 602 drafters split 34 more precincts in order to reach, at 55.83%, their 55.7% black target for HD 53, and to come as close as possible, at 61.25%, to their 69.82% black target for HD 19. APSX 398.

**House District 19:****APSX 506, Act 602 HD 19 overlay  
on ALBC 1% HD 19****APSX 555, 2001 HD 19 overlay on  
ALBC 1% HD 19****APSX 400, Act 602 Split Precincts  
HD 19****APSX 596, ALBC 1% HD 19 Split  
Precincts**

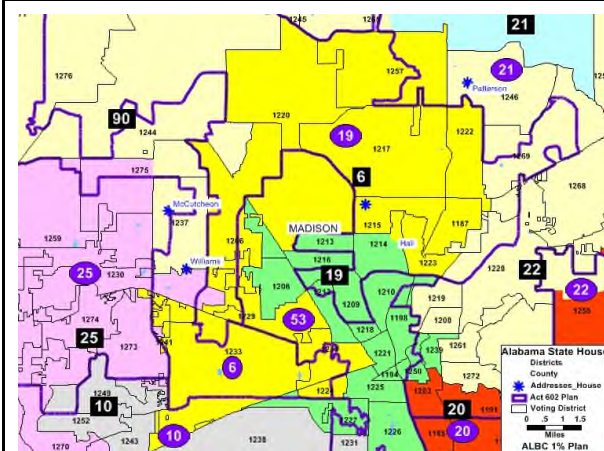
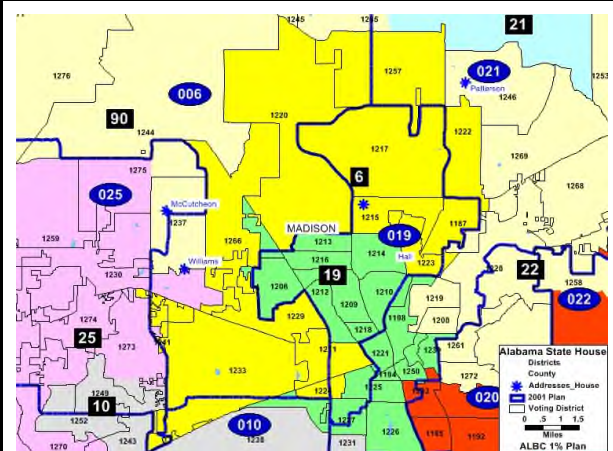
The Act 602 drafters fell short of their 69.82% black target for HD 19, reaching 61.25% black at a deviation of -0.97%. APSX 398. HD 19 in the ALBC

1% plan is 53.60% black at a deviation of -0.84%. APSX 492.

The 14 precincts split in Act 602 HD 19 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 22a-23a.

The 5 precinct splits in ALBC 1% HD 19 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 1. All 5 precincts, 1214, 1192, 1201, 1238, and 1196, have been split to get within 1% deviation, not to separate incumbents or to create a black majority district.

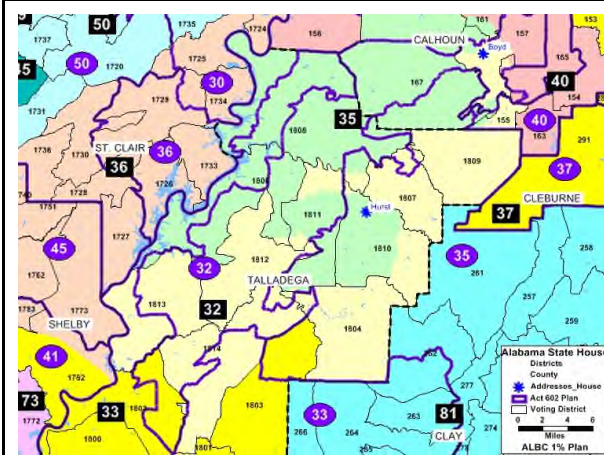
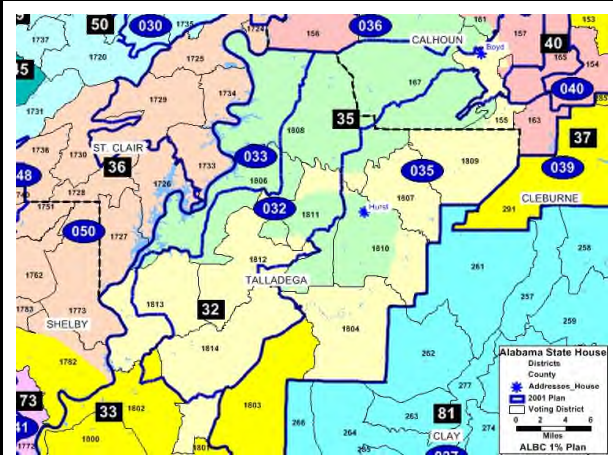
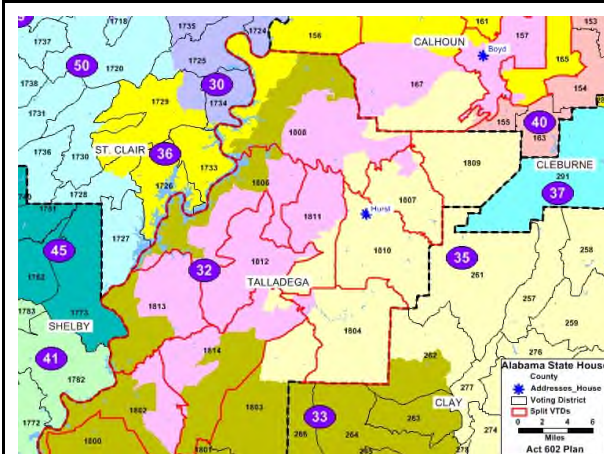
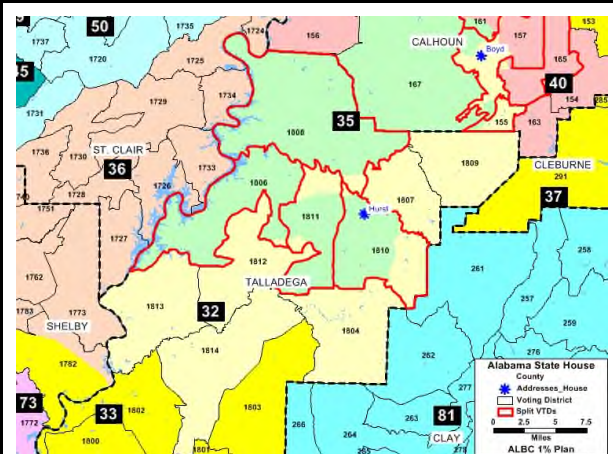


**House District 6/53:****APSX 505, Act 602 HD 53 overlay  
on ALBC 1% HD 6****APSX 554, 2001 HD 6 overlay on  
ALBC 1% HD 6**

HD 6 in the ALBC 1% plan is 55.12% black at a deviation of +0.55%. APSX 492.

The 13 precincts split in Act 602 HD 53 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 26a-27a.

The 2 precinct splits in ALBC 1% HD 6 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 1. Both precincts 1214 and 1241 have been split to get within 1% deviation, not to separate incumbents or to create a black majority district.

**House District 32:****APSX 507, Act 602 HD 32 overlay  
on ALBC 1% HD 32****APSX 556, 2001 HD 32 overlay on  
ALBC 1% HD 32****APSX 403, Act 602 Split Precincts  
HD 32****APSX 597, ALBC 1% Split  
Precincts HD 32**

The Act 602 drafters reached and exceeded their 59.34% black target for HD 32 by only 0.71%, reaching 60.05% black at a deviation of -0.04%. APSX

398. HD 32 in the ALBC 1% plan is 52.52% black at a deviation of +0.83%.

APSX 492.

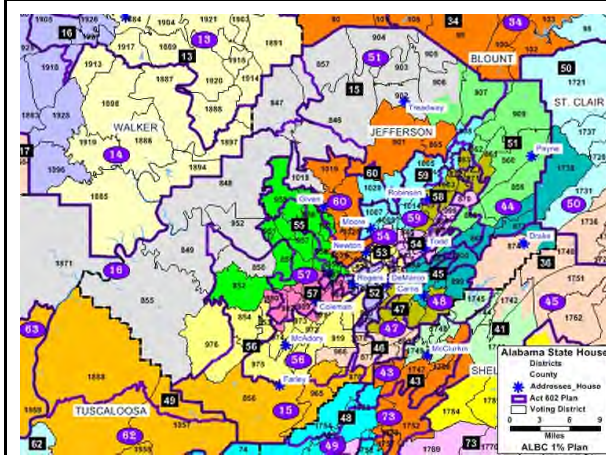
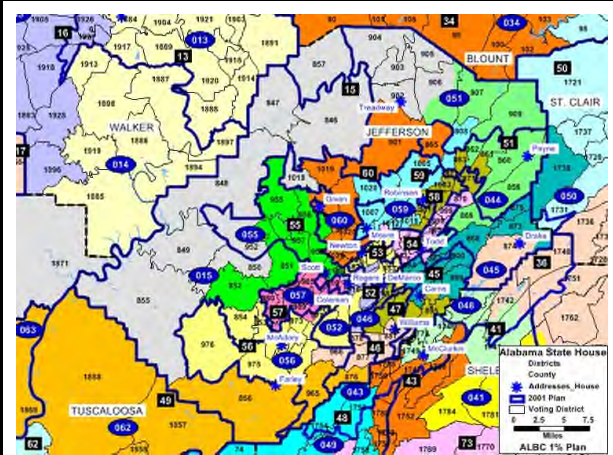
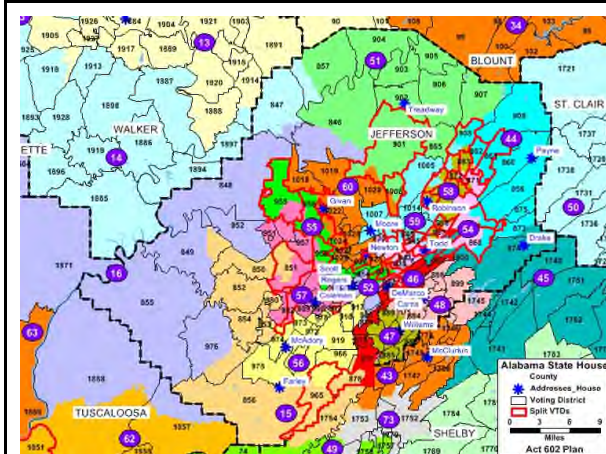
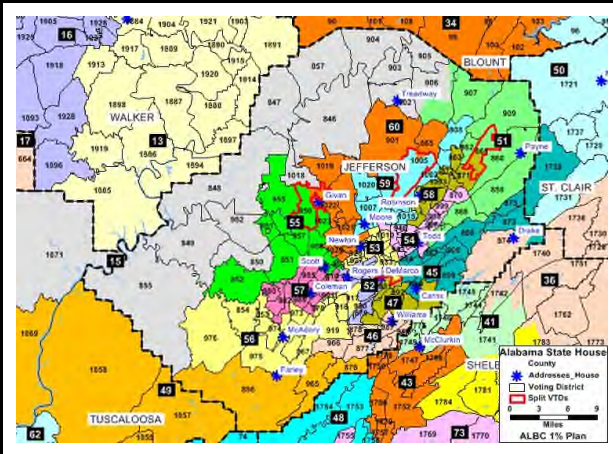
The Act 602 House plan has 5 districts that split the Calhoun County boundary and 4 districts that split the Talladega County boundary. APSX 477.

The ALBC 1% House plan has 4 districts that split the Calhoun County boundary and 3 districts that split the Talladega County boundary. APSX 477.

The 13 precincts split in Act 602 HD 32 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 23a-25a.

The 8 precinct splits in ALBC 1% HD 32 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 2-3. Precincts 155, 161, 1808, and 1810 have been split to get within 1% deviation. Precincts 165 and 1811 have been split to create a black majority district.



**Jefferson County House Districts:****APSX 496, Act 602 Jefferson County overlay on ALBC 1% House plan****APSX 551, 2001 Jefferson County overlay on ALBC 1% House plan****APSX 412, Act 602 Split Precincts Jefferson County****APSX 592, ALBC 1% Split Precincts Jefferson County**

Jefferson County at 658,466 total population can be drawn whole with 14 House districts averaging +3.32% deviation or with 15 House districts averaging -

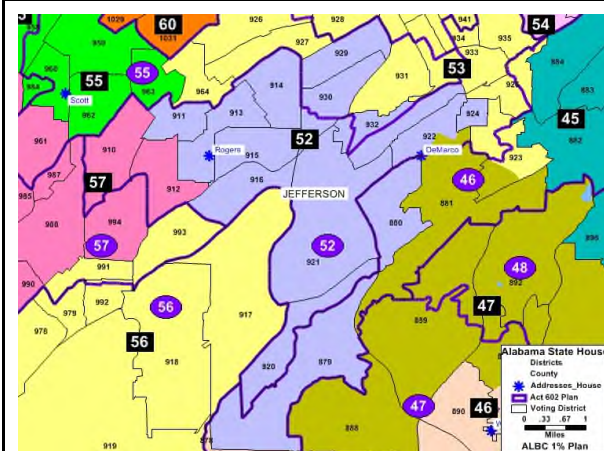
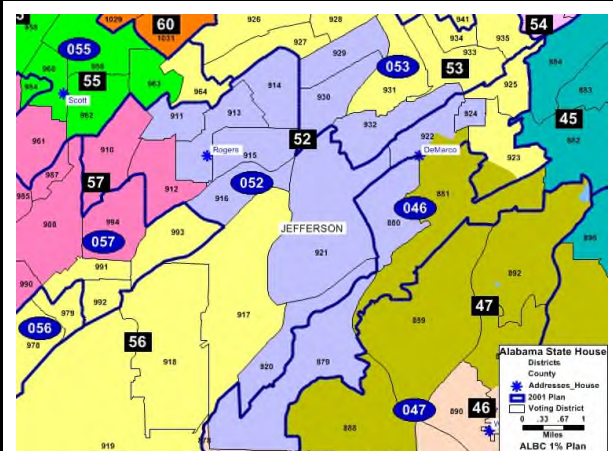
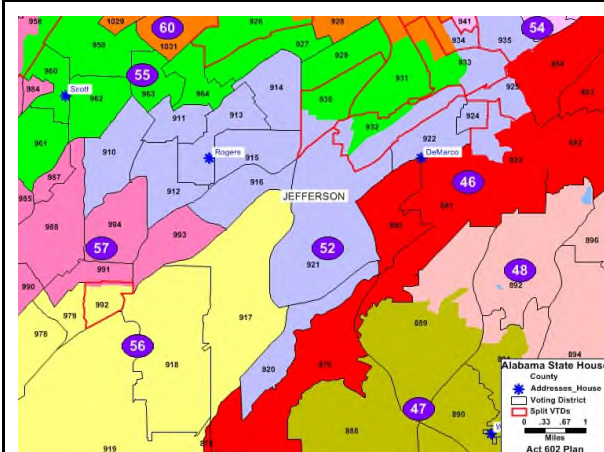
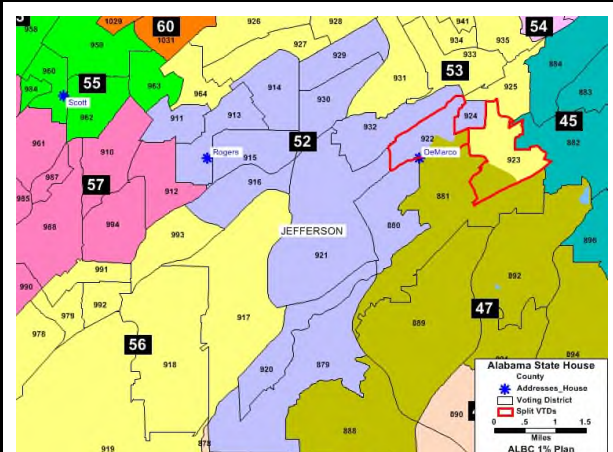
3.57% deviation. Jefferson County's boundary must be split at least once to satisfy the  $\pm 1\%$  requirement.

The ALBC 1% plan draws 16 House districts in Jefferson County, one more than is required by  $\pm 1\%$ , but 4 of which cross the Jefferson County boundary in order to separate all the 2012 incumbents in majority-white House Districts 15, 49, 36, and 45. APSX 466 and 477. By comparison, the Act 602 House plan drew 18 House districts in Jefferson County, and 5 of them cross the Jefferson County boundary in majority-white House Districts. APX 41 and APSX 477.

The Act 602 House plan splits 56 precincts in Jefferson County with 8 majority-black districts and 10 majority-white districts. APSX 483 and 492. The ALBC 1% House plan demonstrates how 1% deviation House districts with no incumbent conflicts and 9 majority-black House districts can be drawn in Jefferson County while splitting no more than 8 precincts. APSX 483 and 492.

As the following House district comparisons will show, the only reason Act 602 split so many precincts in Jefferson County was to reach and exceed the drafters' racial targets in 7 of the 8 majority-black districts. APSX 398.



**House District 52:****APSX 508, Act 602 HD 52 overlay on ALBC 1% HD 52****APSX 557, 2001 HD 52 overlay on ALBC 1% HD 52****APSX 404, Act 602 Split Precincts HD 52****APSX 598, ALBC 1% Split Precincts HD 52**

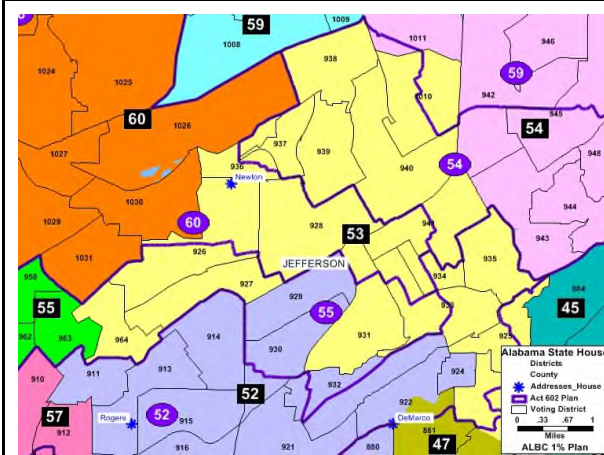
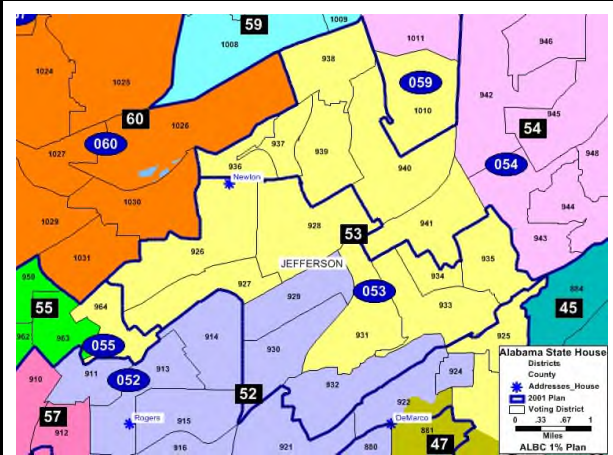
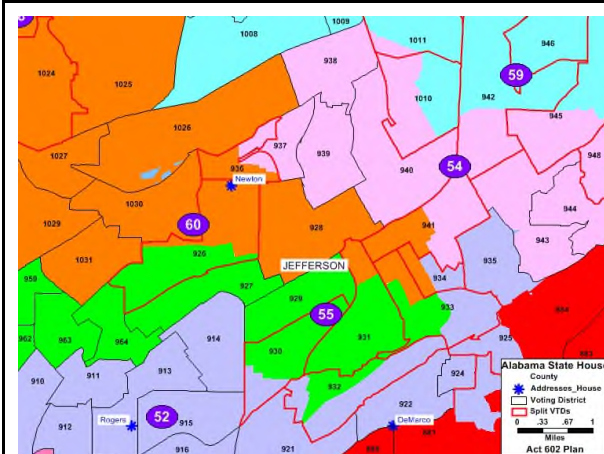
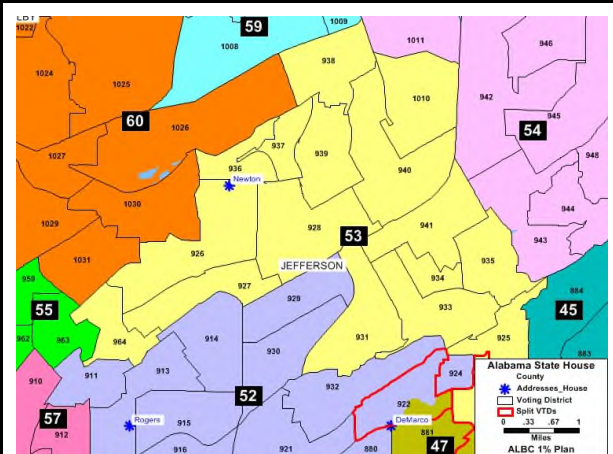
The Act 602 drafters reached and exceeded their 60.11% black target for HD 52 by only 0.02%, reaching 60.13% black at a deviation of -0.96%. APSX

398. HD 52 in the ALBC 1% plan is 56.64% black at a deviation of -0.84%.

APSX 492.

The 6 precincts split in Act 602 HD 52 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 25a-26a.

The single precinct split in ALBC 1% HD 52 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 3. Precinct 922 has been split to get within 1% deviation. No precinct has been split to separate incumbents or to create a black majority district.

**House District 53:****APSX 509, Act 602 HD 54 and 60  
overlay on ALBC 1% HD 53****APSX 558, 2001 HD 53 overlay on  
ALBC 1% HD 53****APSX 401, Act 602 HD 54 and 60  
Split Precincts****APSX 599, ALBC 1% Split  
Precincts HD 53**

The Act 602 drafters reached and exceeded their 55.7% black target for HD 53 (in Madison County) by only 0.13%, reaching 55.83% black at a deviation of -

0.91%. APSX 398. HD 53 in the ALBC 1% plan (in Jefferson County) is 56.96% black at a deviation of -0.55%. APSX 492.

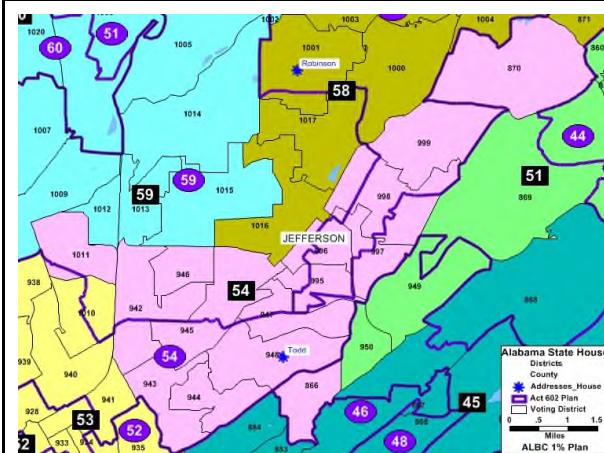
The 19 precincts split in Act 602 HD 54 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 27a-29a, and the 11 precinct splits in Act 602 HD 60 are listed in APSX 632 at 34a-35a.

The single precinct split in ALBC 1% HD 53 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 3. Precinct 923 has been split to get within 1% deviation. No precinct has been split to separate incumbents or to create a black majority district.

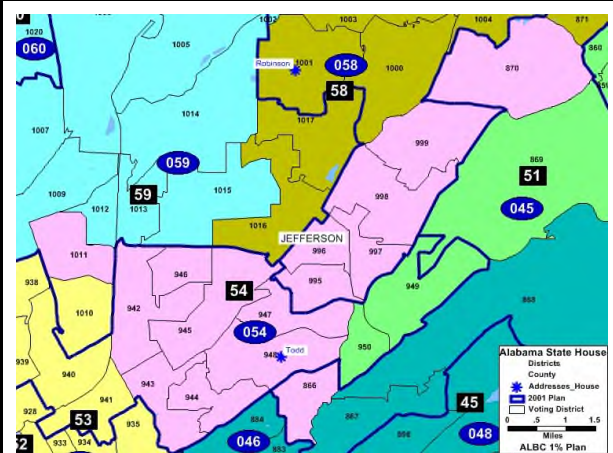


## House District 54:

**APSX 510, Act 602 HD 54 overlay  
on ALBC 1% HD 54**

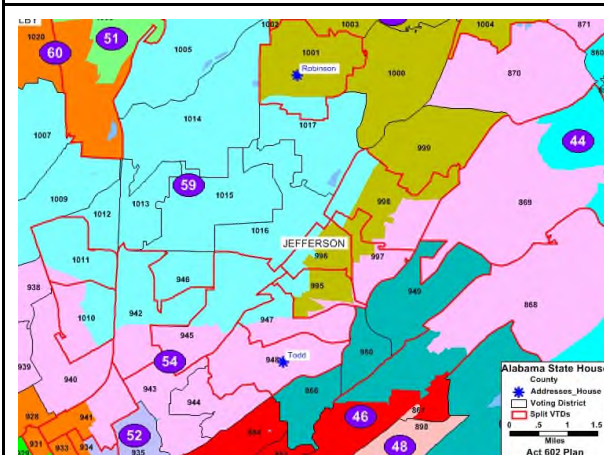


**APSX 559, 2001 HD 54 overlay on  
ALBC 1% HD 54**

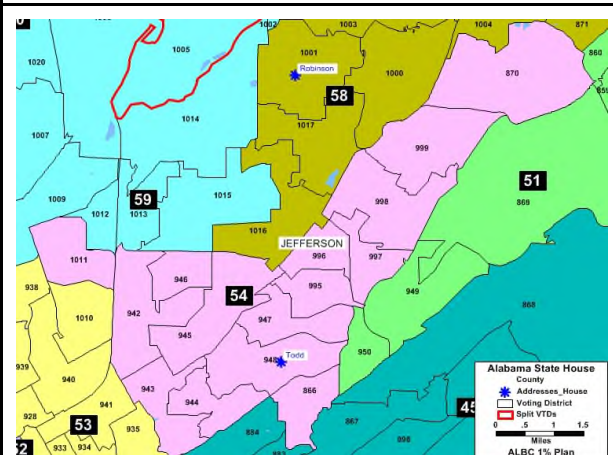


# APSX 405, Act 602 Split Precincts

## HD 54



## APSX 600, ALBC 1% Split Precincts HD 54



The Act 602 drafters reached and exceeded their 56.73% black target for HD 54 by only 0.10%, reaching 56.83% black at a deviation of -0.99%. APSX

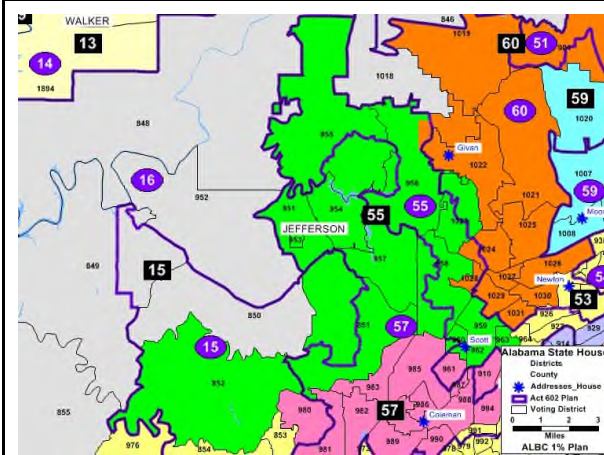
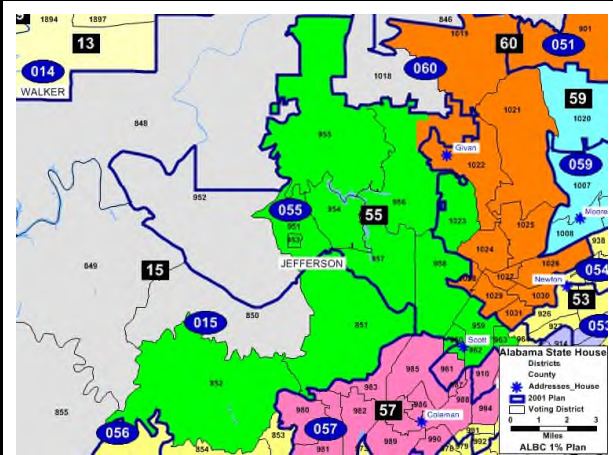
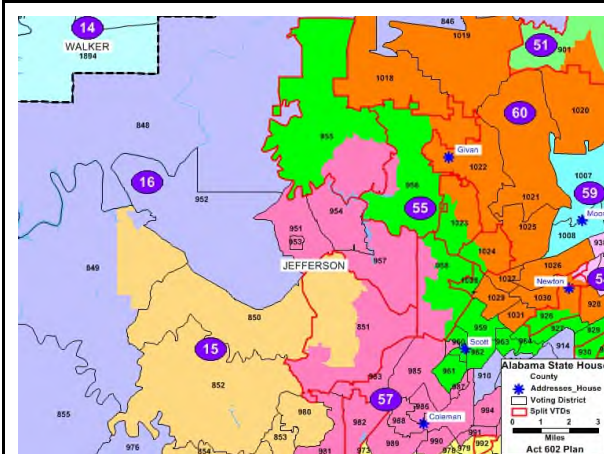
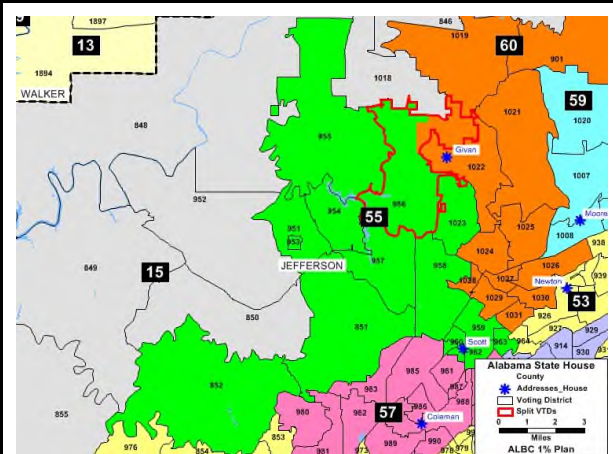
398. HD 54 in the ALBC 1% plan is 60.64% black at a deviation of +0.50%.

APSX 492.

The 19 precincts split in Act 602 HD 54 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 27a-29a.

No precincts have been split in ALBC 1% HD 54.



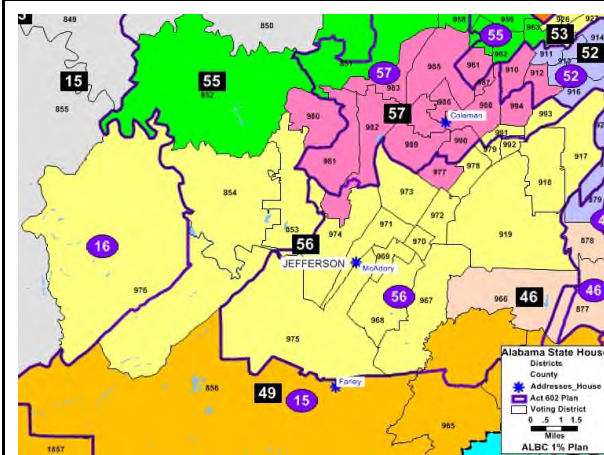
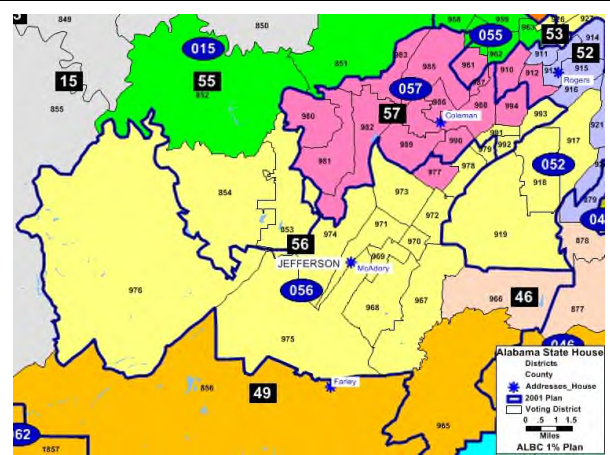
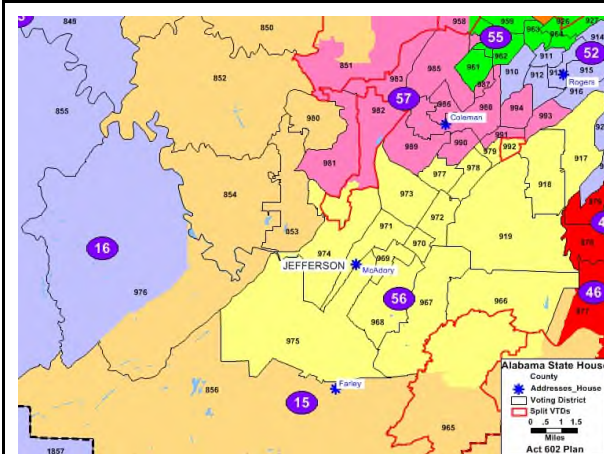
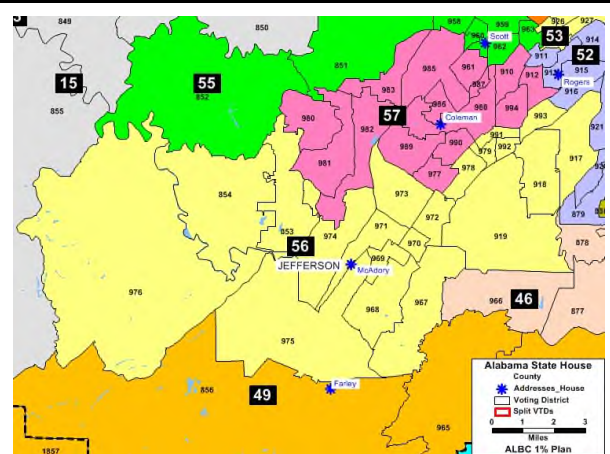
**House District 55:****APSX 511, Act 602 HD 55 overlay  
on ALBC 1% HD 55****APSX 560, 2001 HD 55 overlay on  
ALBC 1% HD 55****APSX 406, Act 602 Split Precincts  
HD 55****APSX 601, ALBC 1% Split  
Precincts HD 55**

The Act 602 drafters hit their 73.55% black target for HD 55 on the nose at exactly 73.55% and a deviation of -0.99%. APSX 398. HD 55 in the ALBC 1%

plan is 57.85% black at a deviation of -0.68%. APSX 492.

The 10 precincts split in Act 602 HD 55 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 29a-30a.

The single precinct split in ALBC 1% HD 55 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 4. Precinct 956 has been split to get within 1% deviation. No precinct has been split to separate incumbents or to create a black majority district.

**House District 56:****APSX 512, Act 602 HD 56 overlay  
on ALBC 1% HD 56****APSX 561, 2001 HD 56 overlay on  
ALBC 1% HD 56****APSX 407, Act 602 Split Precincts  
HD 56****APSX 602, ALBC 1% Split  
Precincts HD 56**

The Act 602 drafters reached and exceeded their 62.13% black target for HD 56 by only 0.01%, reaching 62.14% black at a deviation of -0.99%. APSX

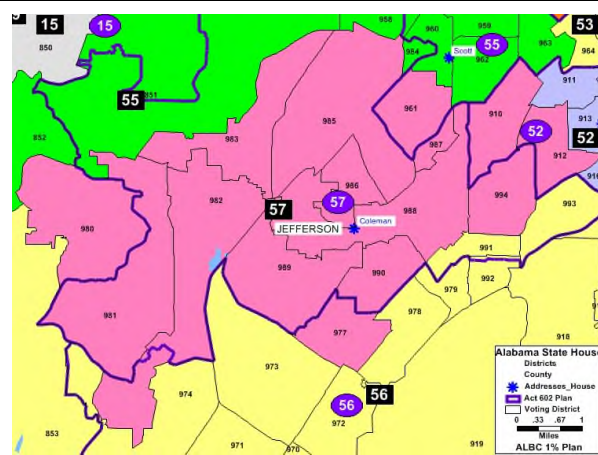
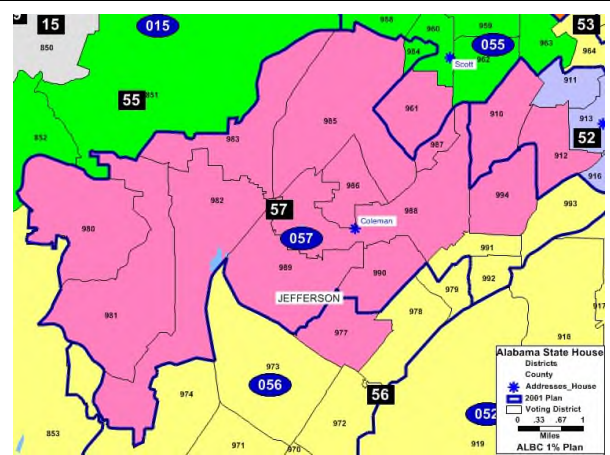
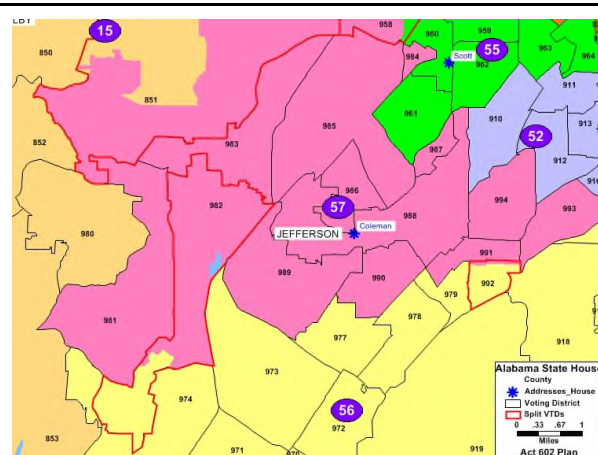
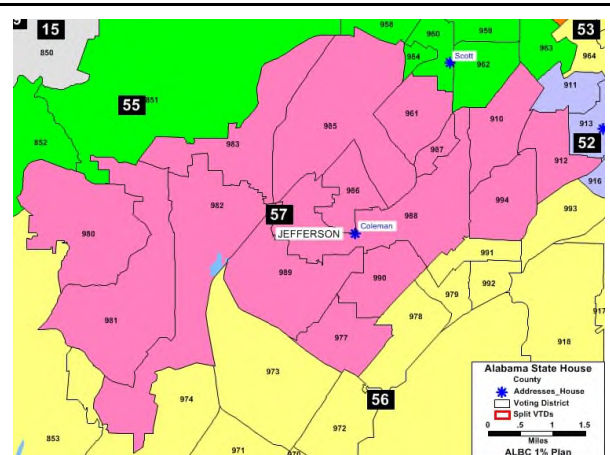
398. HD 56 in the ALBC 1% plan is 63.04% black at a deviation of -0.35%.

APSX 492.

The 4 precincts split in Act 602 HD 56 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 30a.

No precinct has been split in ALBC 1% HD 56.



**House District 57:****APSX 513, Act 602 HD 57 overlay  
on ALBC 1% HD 57****APSX 562, 2001 HD 57 overlay on  
ALBC 1% HD 57****APSX 408, Act 602 Split Precincts  
HD 57****APSX 603, ALBC 1% Split  
Precincts HD 57**

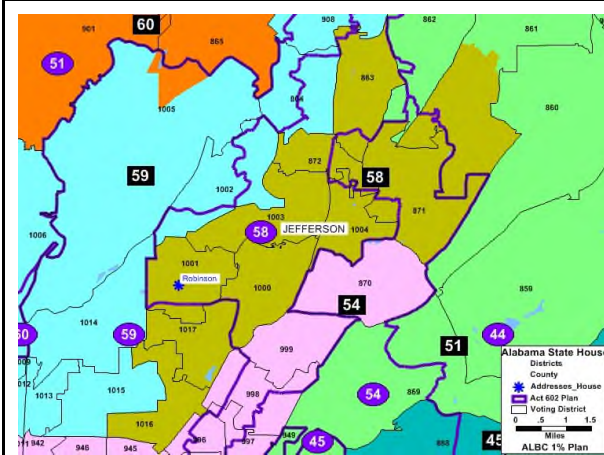
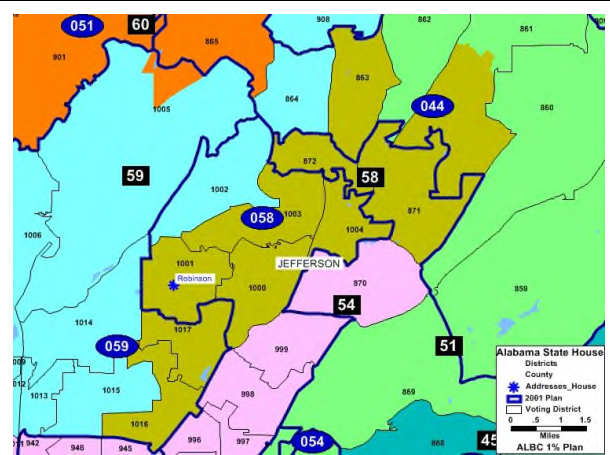
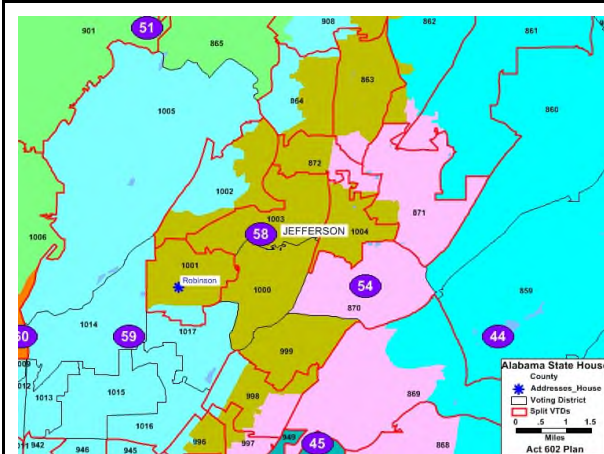
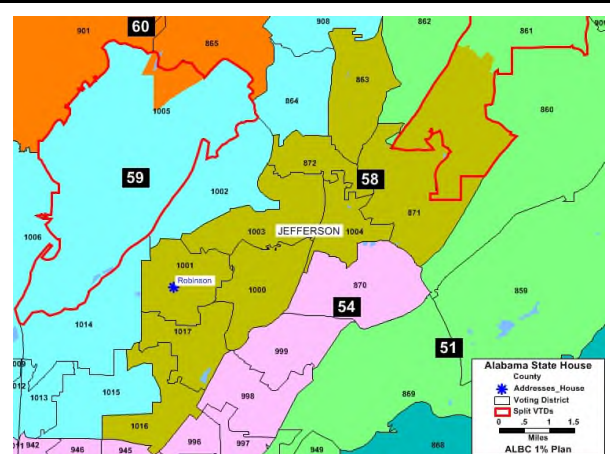
The Act 602 drafters reached and exceeded their 68.42% black target for HD 57 by only 0.05%, reaching 68.47% black at a deviation of -0.99%. APSX

398. HD 57 in the ALBC 1% plan is 72.51% black at a deviation of +0.27%.

APSX 492.

The 6 precincts split in Act 602 HD 57 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 30a-31a.

No precinct has been split in ALBC 1% HD 57.

**House District 58:****APSX 514, Act 602 HD 58 overlay on ALBC 1% HD 58****APSX 563, 2001 HD 58 overlay on ALBC 1% HD 58****APSX 409, Act 602 Split Precincts HD 58****APSX 604, ALBC 1% Split Precincts HD 58**

The Act 602 drafters fell short of their highest of all 77.86% black target for HD 58 by -5.10%, still reaching 72.76% black at a deviation of -0.95%. APSX

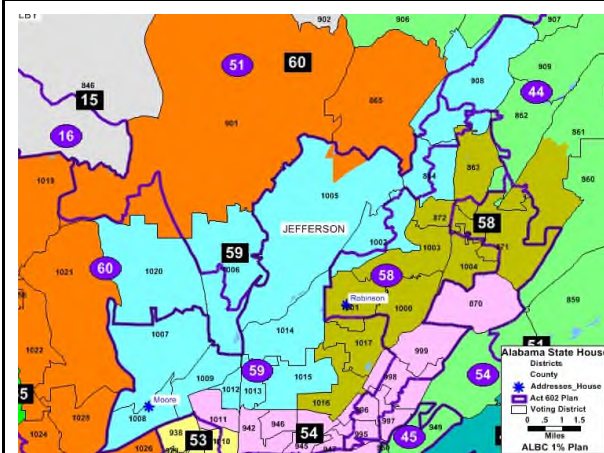
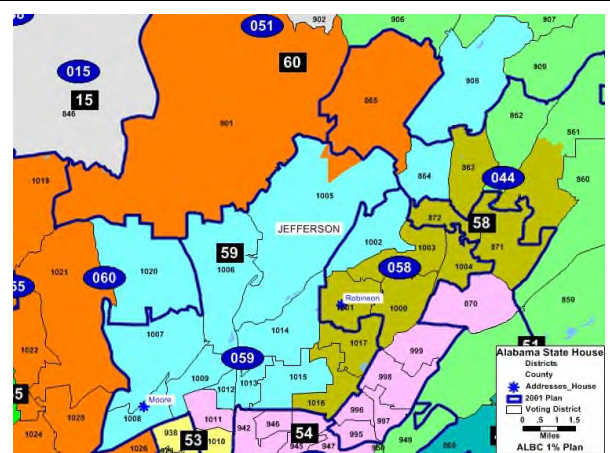
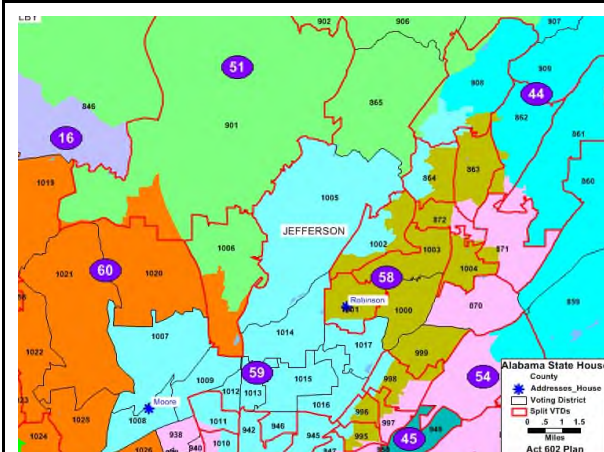
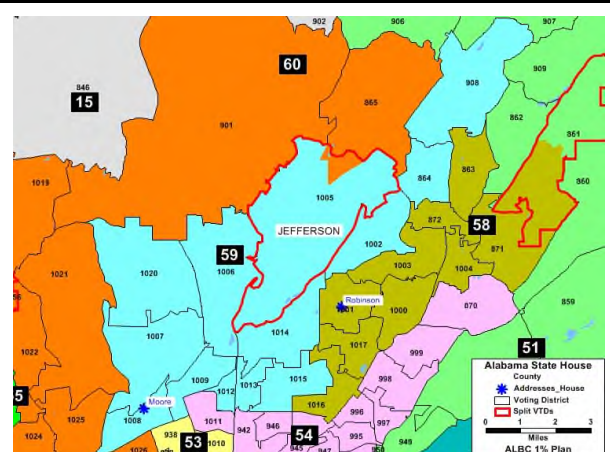


398. HD 58 in the ALBC 1% plan is 64.07% black at a deviation of +0.21%.

APSX 492.

The 12 precincts split in Act 602 HD 58 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 31a-32a.

The single precinct split in ALBC 1% HD 58 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 4. Precinct 861 has been split to get within 1% deviation. No precinct has been split to separate incumbents or to create a black majority district.

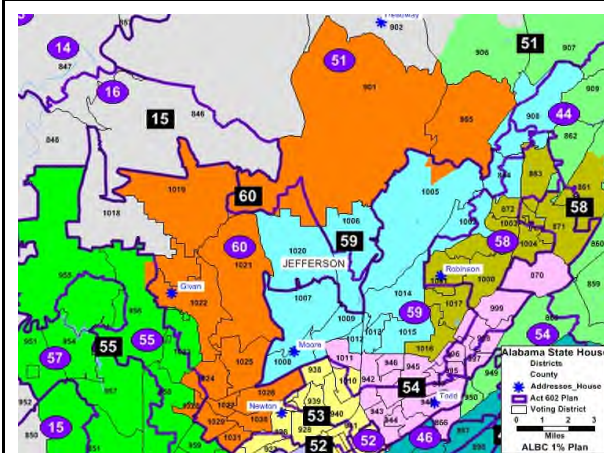
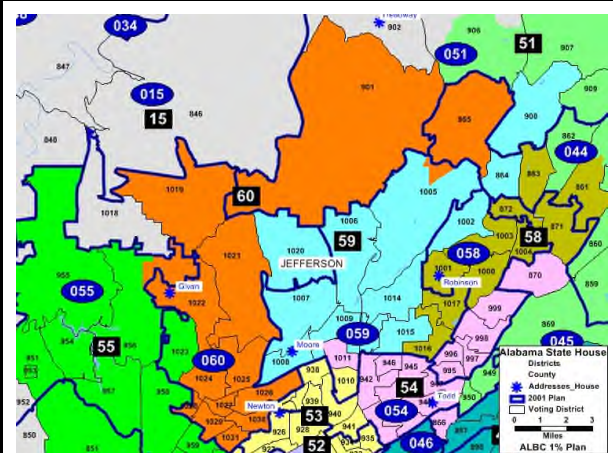
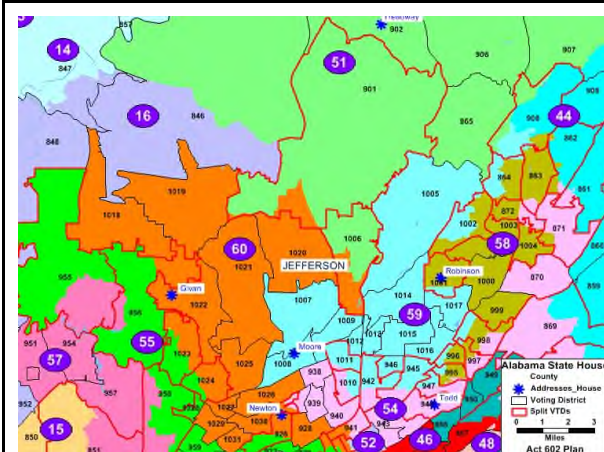
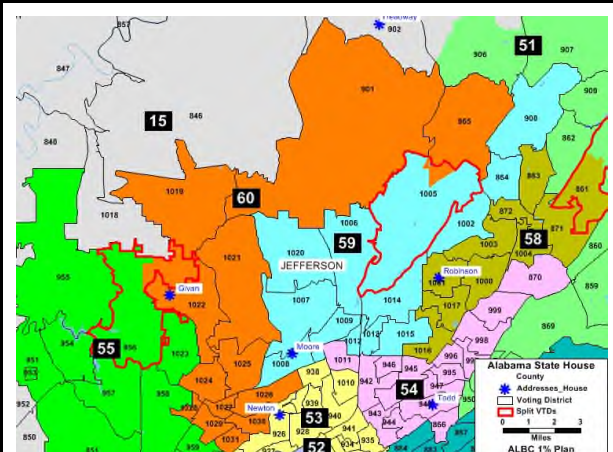
**House District 59:****APSX 515, Act 602 HD 59 overlay  
on ALBC 1% HD 59****APSX 564, 2001 HD 59 overlay on  
ALBC 1% HD 59****APSX 410, Act 602 Split Precincts  
HD 59****APSX 605, ALBC 1% Split  
Precincts HD 59**

The Act 602 drafters reached and exceeded their 67.03% black target for HD 59 by 9.69%, reaching 76.72% black at a deviation of -0.67%. APSX 398.

HD 59 in the ALBC 1% plan is 58.55% black at a deviation of -0.74%. APSX 492.

The 15 precincts split in Act 602 HD 59 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 32a-33a.

The single precinct split in ALBC 1% HD 59 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 4. Precinct 1005 has been split to get within 1% deviation. No precinct has been split to separate incumbents or to create a black majority district.

**House District 60:****APSX 516, Act 602 HD 60 overlay  
on ALBC 1% HD 60****APSX 565, 2001 HD 60 overlay on  
ALBC 1% HD 60****APSX 411, Act 602 Split Precincts  
HD 60****APSX 606, ALBC 1% Split  
Precincts HD 60**

The Act 602 drafters reached and exceeded their 67.41% black target for HD 60 by only 0.27%, reaching 67.68% black at a deviation of -0.96%. APSX

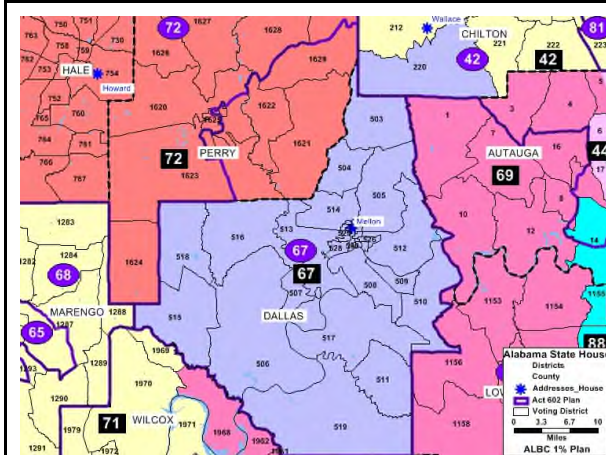
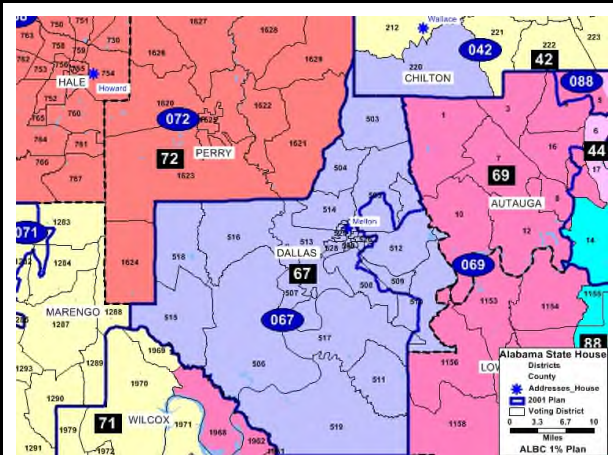
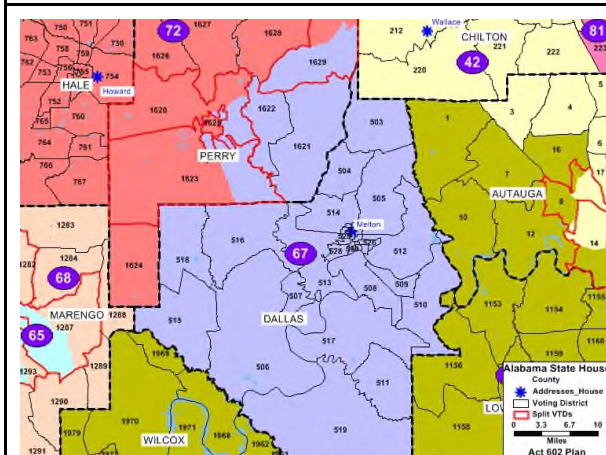
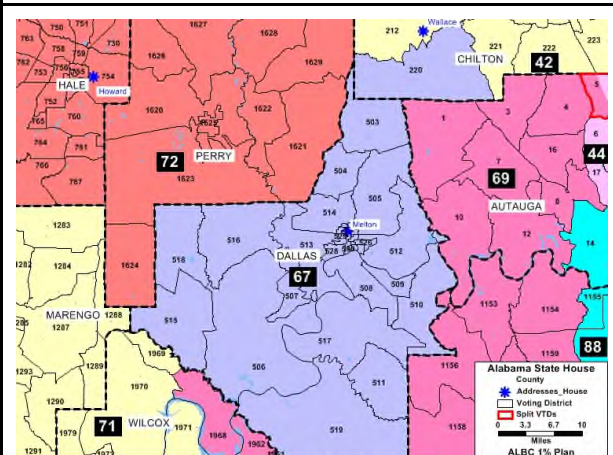
398. HD 60 in the ALBC 1% plan is 55.49% black at a deviation of -0.74%.

APSX 492.

The 11 precincts split in Act 602 HD 60 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 34a-35a.

The 2 precincts split in ALBC 1% HD 60 are listed by name and number, and the supplemental exhibit number of their split precinct maps are listed, in APSX 633 at 4. Precincts 956 and 1005 have been split to get within 1% deviation. No precinct has been split to separate incumbents or to create a black majority district.



**House District 67:****APSX 517, Act 602 HD 67 overlay  
on ALBC 1% HD 67****APSX 566, 2001 HD 67 overlay on  
ALBC 1% HD 67****APSX 413, Act 602 Split Precincts  
HD 67****APSX 607, ALBC 1% Split  
Precincts HD 67**

The Act 602 drafters reached and exceeded their 69.14% black target for HD 67 by only 0.01%, reaching 69.15% black at a deviation of -0.97%. APSX

398. HD 67 in the ALBC 1% plan is 67.28% black at a deviation of -0.39%.

APSX 492.

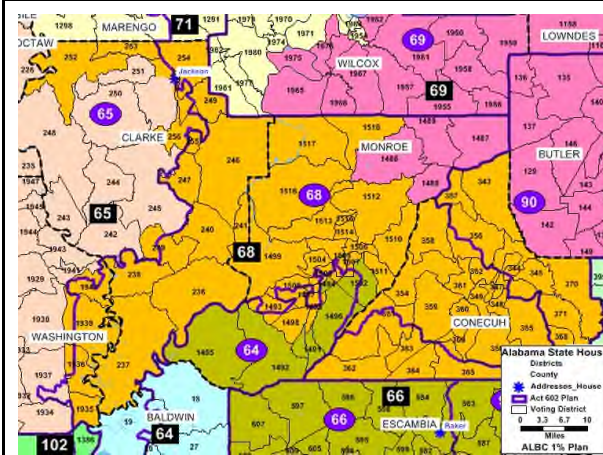
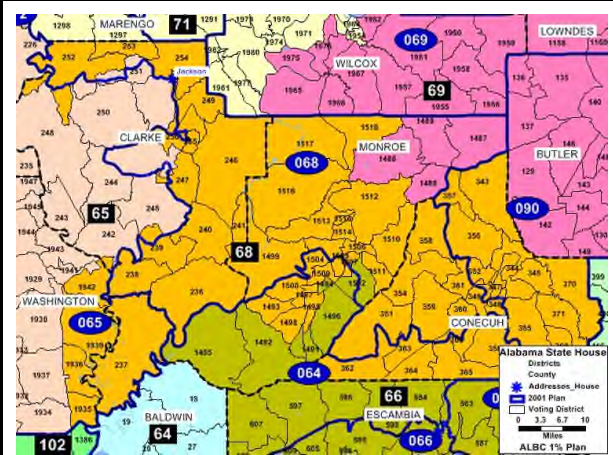
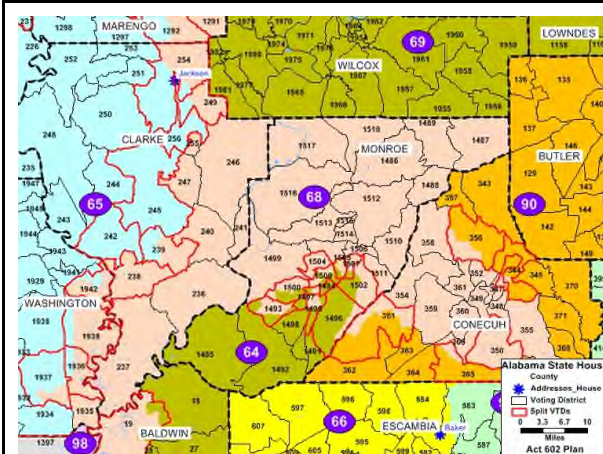
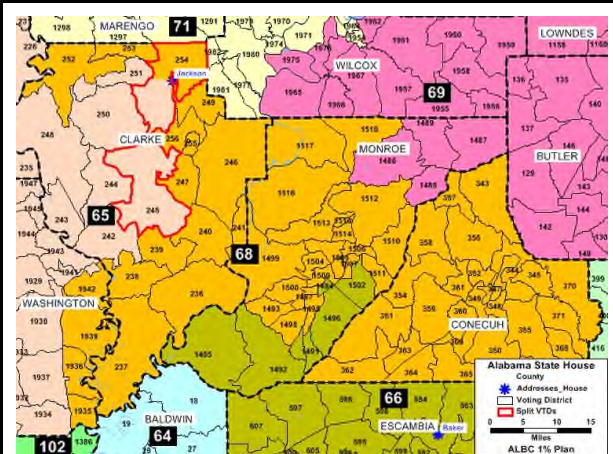
The Act 602 House plan has 2 districts that split the Perry County boundary.

APSX 477. The ALBC 1% House plan has 2 districts that split the Chilton County boundary. APSX 477.

The 4 precincts split in Act 602 HD 67 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 35a.

No precinct has been split in ALBC 1% HD 67.



**House District 68:****APSX 518, Act 602 HD 68 overlay  
on ALBC 1% HD 68****APSX 567, 2001 HD 68 overlay on  
ALBC 1% HD 68****APSX 414, Act 602 Split Precincts  
HD 68****APSX 608, ALBC 1% Split  
Precincts HD 68**

The Act 602 drafters reached and exceeded their 62.55% black target for HD 68 by 2.01%, reaching 64.56% black at a deviation of -0.99%. APSX 398.

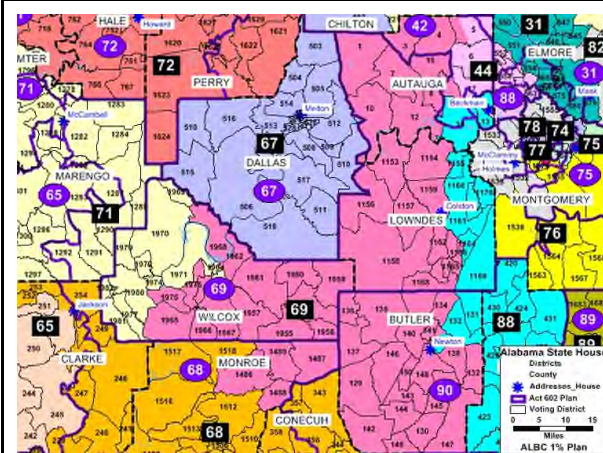
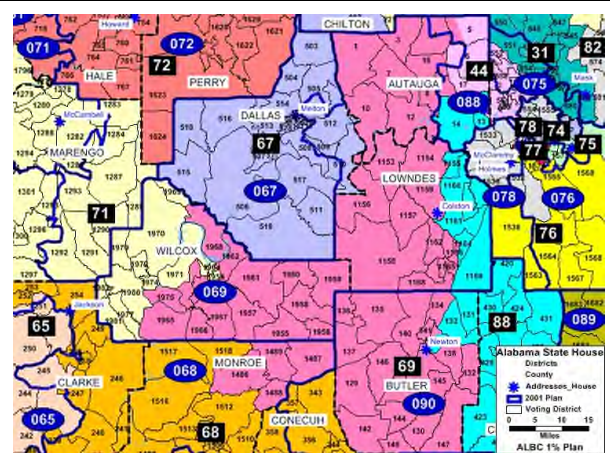
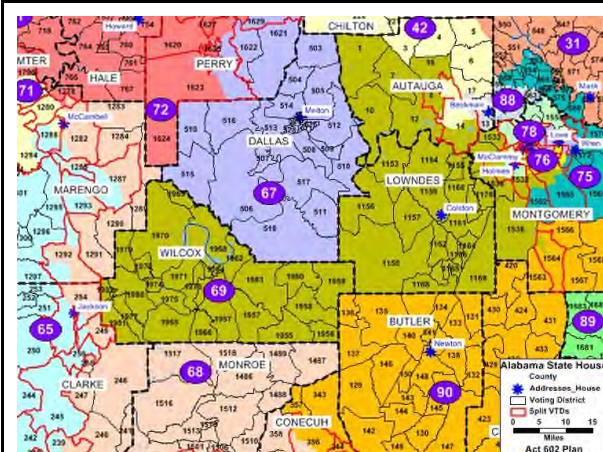
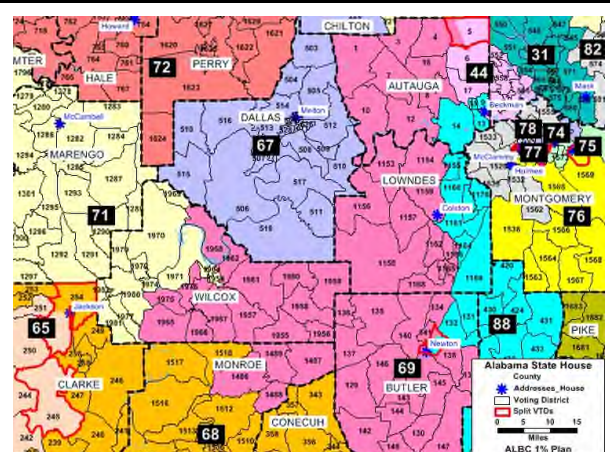
HD 68 in the ALBC 1% plan is 53.10% black at a deviation of -0.87%. APSX 492.

The Act 602 HD 68 splits Washington, Clark, Monroe and Conecuh Counties into 2 districts, and it splits Marengo County into 4 districts, when they are small enough to be whole in a single district. No county is kept whole. APX 38 and APSX 477. The ALBC 1% HD 68 splits Washington and Clarke Counties into 2 districts and Monroe County into 3 districts, when they are small enough to be whole in a single district, but it keeps Marengo and Conecuh Counties whole. APSX 461 and 477.

The 37 precincts split in Act 602 HD 68 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 35a-38a.

The 2 precincts split in ALBC 1% HD 68 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 5. Precinct 254 has been split to separate incumbents. Precinct 245 has been split to get within  $\pm 1\%$  deviation. No precinct has been split to create a black majority district.



**House District 69:****APSX 519, Act 602 HD 69 overlay  
on ALBC 1% HD 69****APSX 568, 2001 HD 69 overlay on  
ALBC 1% HD 69****APSX 415, Act 602 Split Precincts  
HD 69****APSX 609, ALBC 1% Split  
Precincts HD 69**

The Act 602 drafters reached and exceeded their 64.16% black target for HD 69 by only 0.05%, reaching 64.21% black at a deviation of -0.10%. APSX

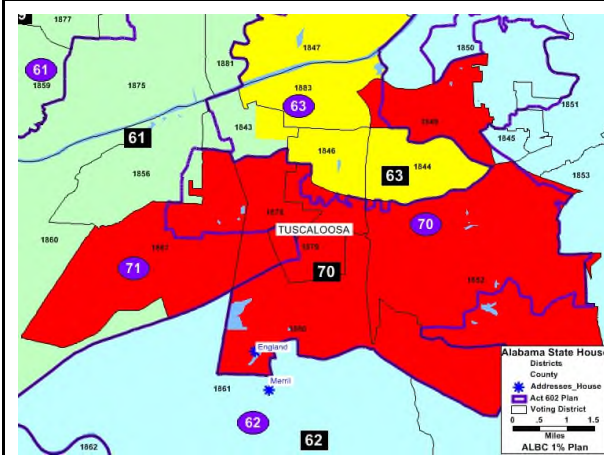
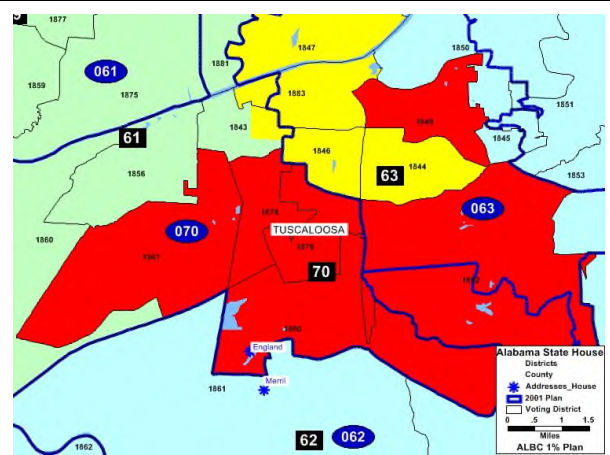
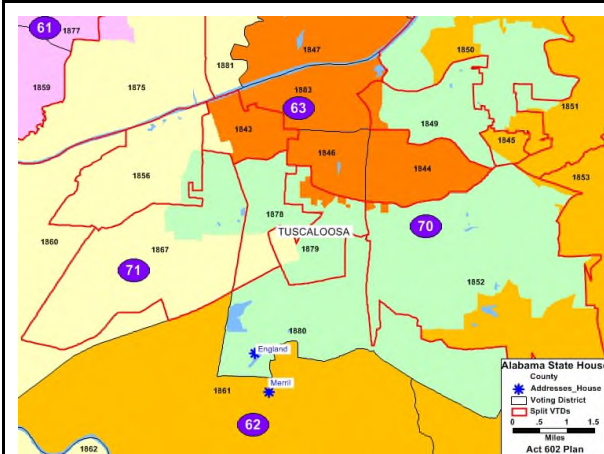
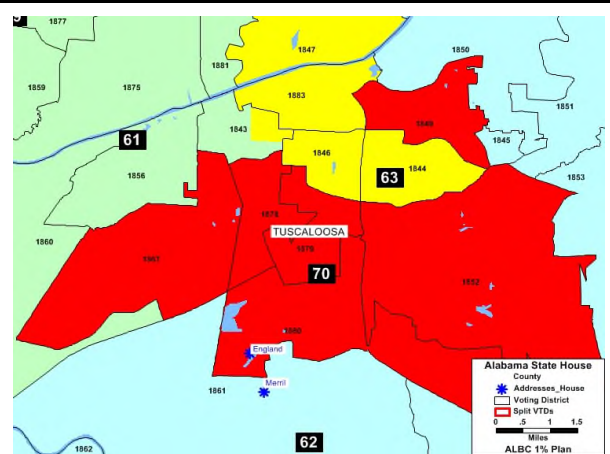
398. HD 69 in the ALBC 1% plan is 54.54% black at a deviation of -0.95%.

APSX 492.

The 11 precincts split in Act 602 HD 69 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 38a-39a.

The splits of all four counties in ALBC 1% HD 69, Autauga, Lowndes, Wilcox, and Butler, are made necessary by the requirement of the August 28 order that all incumbent conflicts be eliminated. See APSX 609, showing 2012 incumbents Colston residing in Lowndes County and Newton residing in Butler County. The ALBC remand plan ( $\pm$  5% deviation), keeps Lowndes and Butler Counties whole, splitting only Autauga County in HD 69, but it puts the new incumbents, Lawrence and Sells, who also reside in Lowndes and Butler, in the same district. See APSX 37.

The 2 precinct splits in ALBC 1% HD 69 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 5. Precinct 139 has been split to get within 1% deviation. Precinct 5 has been split to separate incumbents. No precincts have been split to create a black majority district.

**House District 70:****APSX 520, Act 602 HD 70 overlay  
on ALBC 1% HD 70****APSX 569, 2001 HD 70 overlay on  
ALBC 1% HD 70****APSX 416, Act 602 Split Precincts  
HD 70****APSX 610, ALBC 1% Split  
Precincts HD 70**

The Act 602 drafters reached and exceeded their 61.83% black target for HD 70 by only 0.20%, reaching 62.03% black at a deviation of +0.99%. APSX

398. HD 70 in the ALBC 1% plan is 57.52% black at a deviation of -0.54%.

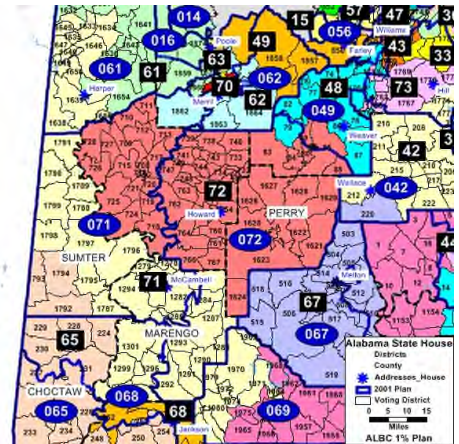
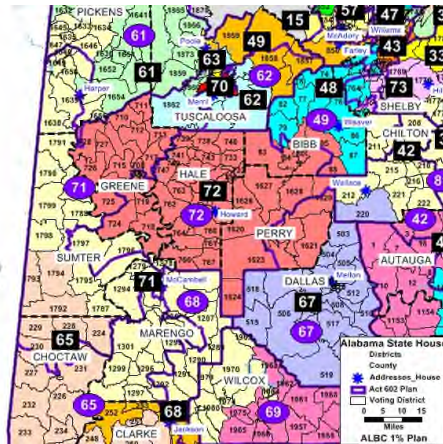
APSX 492.

The 9 precincts split in Act 602 HD 70 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 40a.

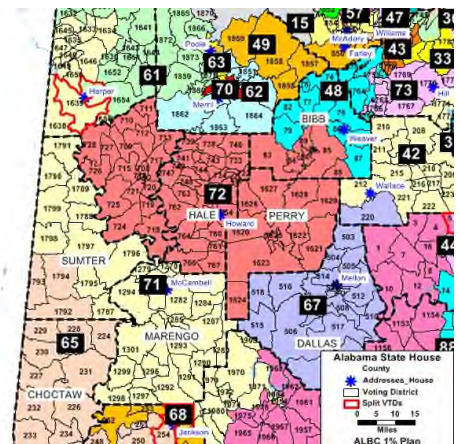
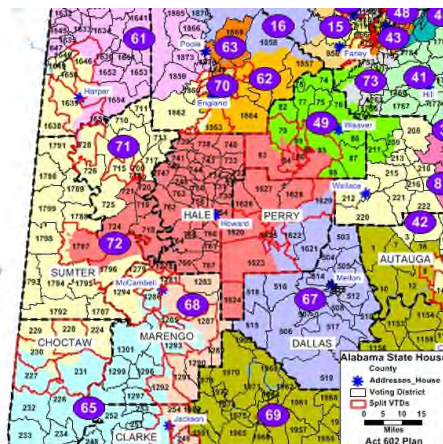
No precinct has been split in ALBC 1% HD 70.



**APSX 570, 2001 HD 71 overlay on  
ALBC 1% HD 71**



# APSX 611, ALBC 1% Split Precincts HD 71



The Act 602 drafters reached and exceeded their 64.28% black target for HD 71 by 2.62%, reaching 66.90% black at a deviation of -0.38%. APSX 398.

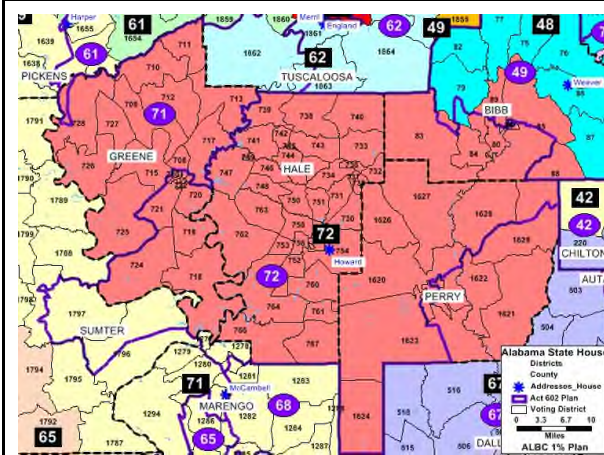
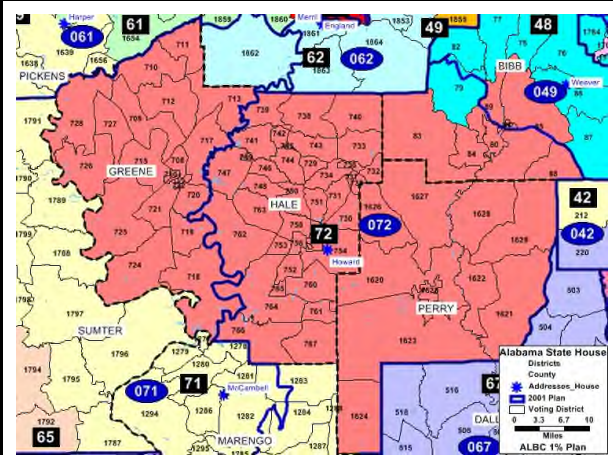
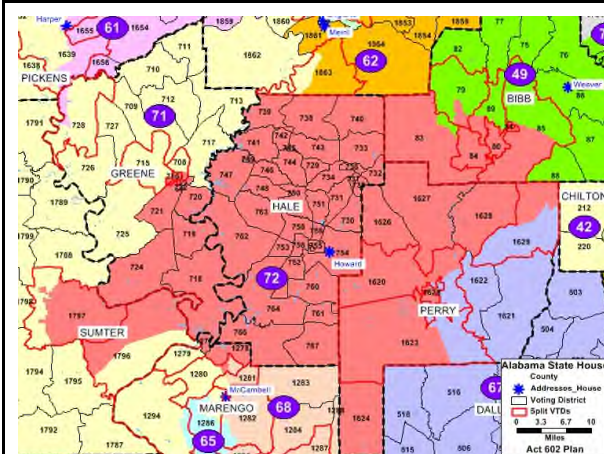
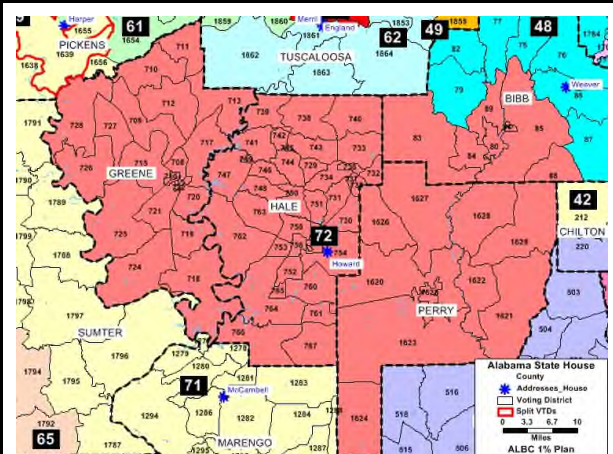


HD 71 in the ALBC 1% plan is 59.54% black at a deviation of -0.54%. APSX 492.

The Act 602 House plan splits Pickens, Sumter, and Choctaw Counties into 2 districts, Greene County into 3 districts, and Marengo County into 4 districts, when they are each small enough to be whole inside a single district, and it has 3 districts that split the Tuscaloosa County boundary, leaving none of these counties whole. APX 38 and 477. The ALBC 1% HD 71 plan splits Pickens, Sumter, and Wilcox Counties into 2 districts, leaving Marengo County whole. APSX 461 and 477.

The 23 precincts split in Act 602 HD 71 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 40a-43a.

The 2 precinct splits in ALBC 1% HD 71 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 5. Precincts 1639 and 1655 have been split to get within 1% deviation. No precincts have been split to separate incumbents or to create a black majority district.

**House District 72:****APSX 522, Act 602 HD 72 overlay  
on ALBC 1% HD 72****APSX 571, 2001 HD 72 overlay on  
ALBC 1% HD 72****APSX 419, Act 602 Split Precincts  
HD 72****APSX 612, ALBC 1% Split  
Precincts HD 72**

The Act 602 drafters reached and exceeded their 60.2% black target for HD 72 by 4.40%, reaching 64.60% black at a deviation of -0.38%. APSX 398. HD 72

in the ALBC 1% plan is 60.88% black at a deviation of +0.65%. APSX 492.

The Act 602 House plan splits Sumter, Perry, and Bibb Counties into 2 districts, Greene County into 3 districts, and Marengo County into 4 districts, when they are each small enough to be whole inside a single district, and it has 3 districts that split the Tuscaloosa County boundary, leaving no county whole in HD 72. APX 38 and 477. The ALBC 1% House plan splits only Bibb County into 2 districts, when it is small enough to be whole in a single district, leaving Greene, Hale, and Perry Counties whole. APSX 461 and 477.

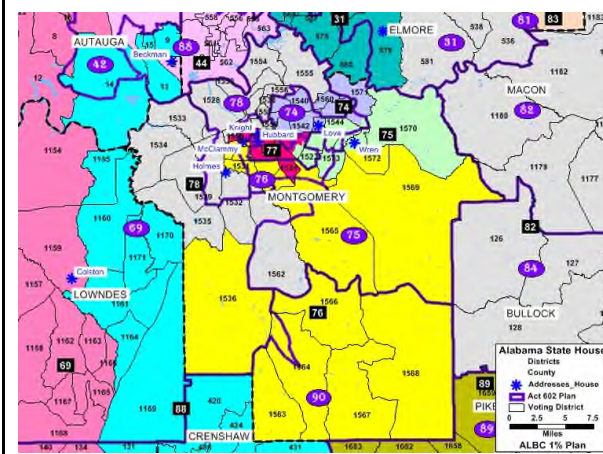
The 15 precincts split in Act 602 HD 72 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 43a-44a.

No precinct has been split in ALBC 1% HD 72.

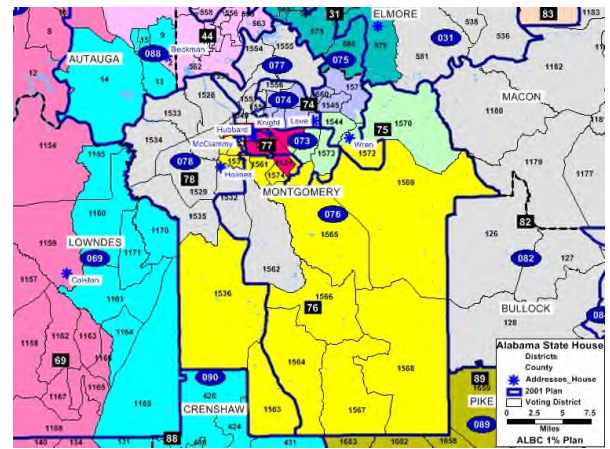


## Montgomery County House Districts:

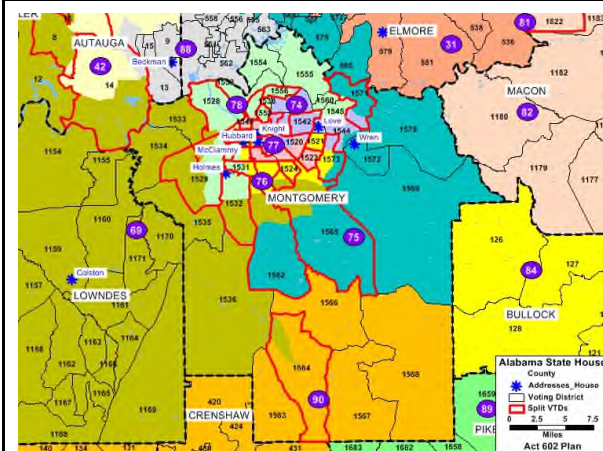
**APSX 497, Act 602 Montgomery County overlay on ALBC 1% House plan**



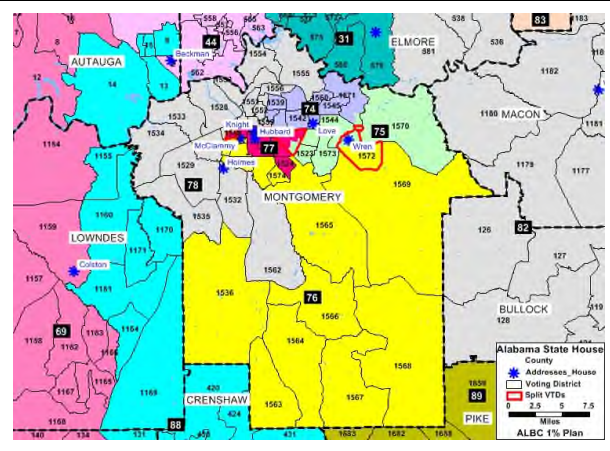
**APSX 546, 2001 Montgomery County overlay on ALBC 1% House plan**



**APSX 423, Act 602 Split Precincts Montgomery County**



**APSX 593, ALBC 1% Split Precincts Montgomery County**



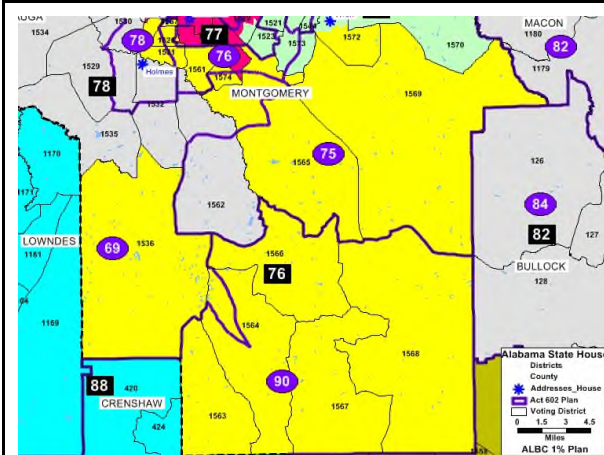
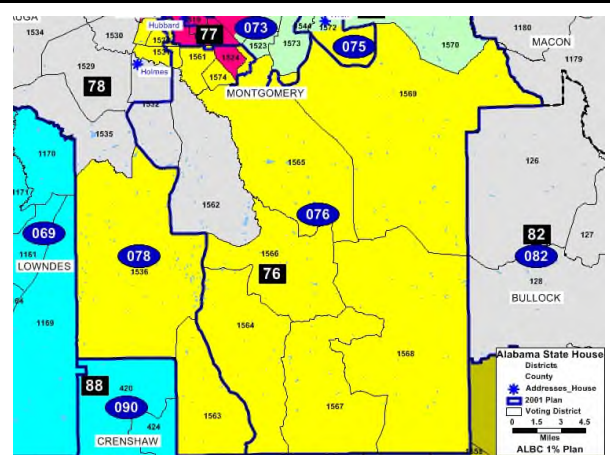
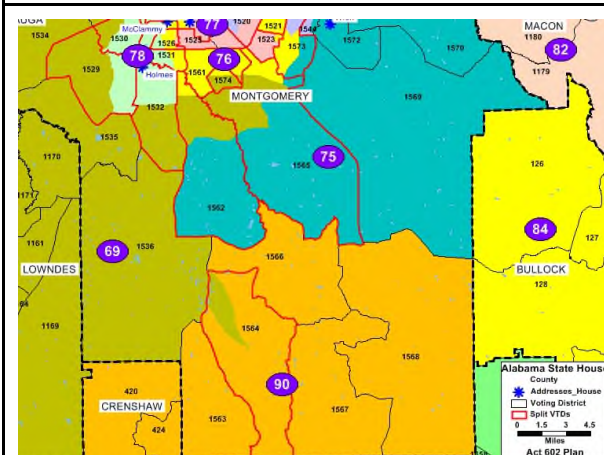
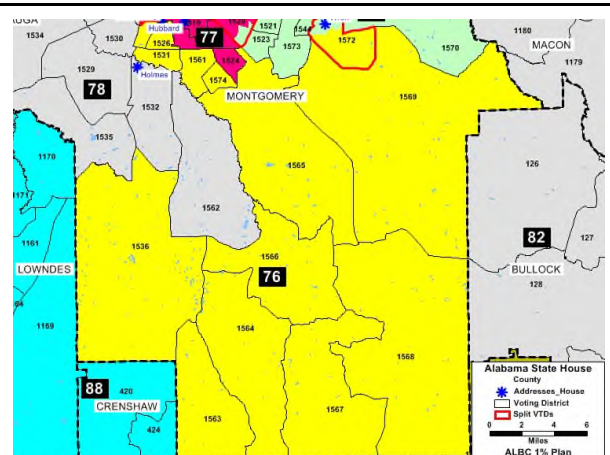
Montgomery County at 229,363 total population can be drawn whole with 5

House districts averaging +0.77% deviation. Montgomery County, like Mobile County, can be drawn whole in a House plan without exceeding  $\pm 1\%$ .

The ALBC 1% plan draws 5 House districts in Montgomery County, all with less than  $\pm 1\%$  deviation, none of which crosses the Montgomery County boundary, but still separating all the 2012 incumbents except for Representatives John Knight and Joe Hubbard. APSX 467. By contrast, the Act 602 House plan drew 7 districts in Montgomery County, 3 of which split the county boundary. APX 51 and APSX 477. Of the 7 Act 602 districts, 4 were majority-black and 3 were majority-white.

The Act 602 House plan splits 26 precincts in Montgomery County. APSX 483 and 492. The ALBC 1% House plan demonstrates how 1% deviation House districts with no incumbent conflicts and 3 majority-black and 2 majority-white districts can be drawn in Montgomery County while splitting no more than 4 precincts. APSX 483 and 492.

As the following House district comparisons will show, the only reason Act 602 split so many precincts in Montgomery County was to reach and exceed the drafters' racial targets in HD 69 and HD 76 and to come as close as possible to their racial targets in HD 77 and HD 78. APSX 398.

**House District 76:****APSX 523, Act 602 HD 76 overlay on ALBC 1% HD 76****APSX 572, 2001 HD 76 overlay on ALBC 1% HD 76****APSX 420, Act 602 Split Precincts HD 76****APSX 613, ALBC 1% Split Precincts HD 76**

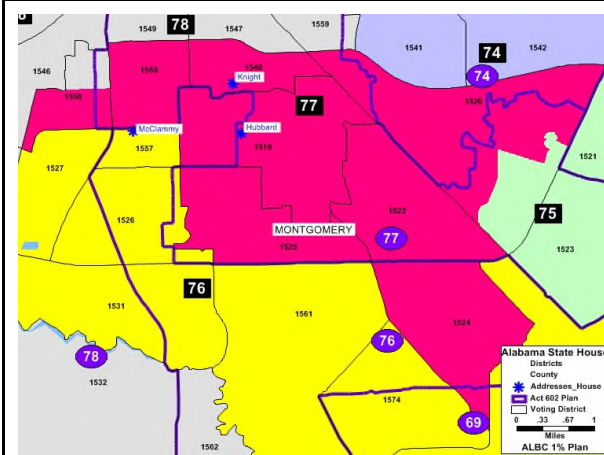
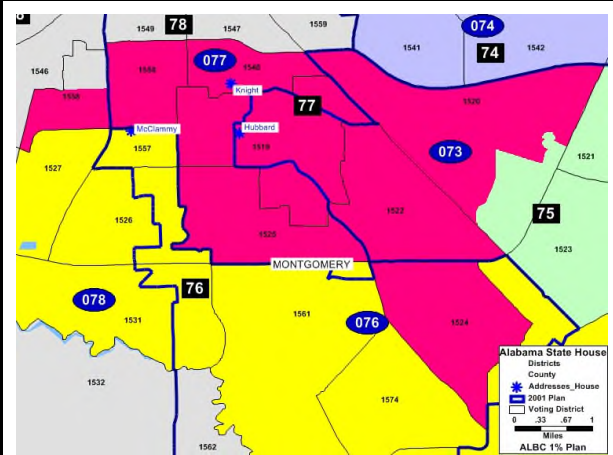
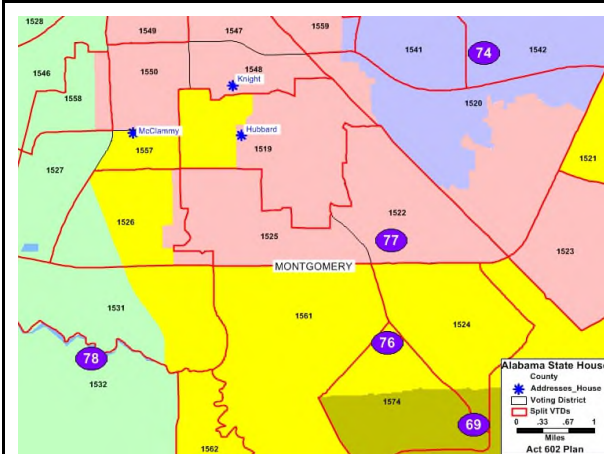
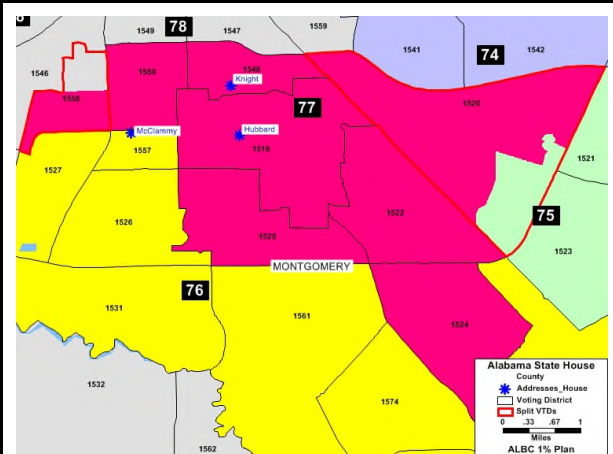
The Act 602 drafters reached and exceeded their 69.54% black target for HD 76 by 4.25%, reaching 73.79% black at a deviation of +0.99%. APSX 398.



HD 76 in the ALBC 1% plan is 63.99% black at a deviation of +0.87%. APSX 492.

The 10 precincts split in Act 602 HD 76 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 44a-45a.

The single precinct split in ALBC 1% HD 76 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 6. Precinct 1572 has been split to get within 1% deviation. No precinct has been split to separate incumbents or to create a black majority district.

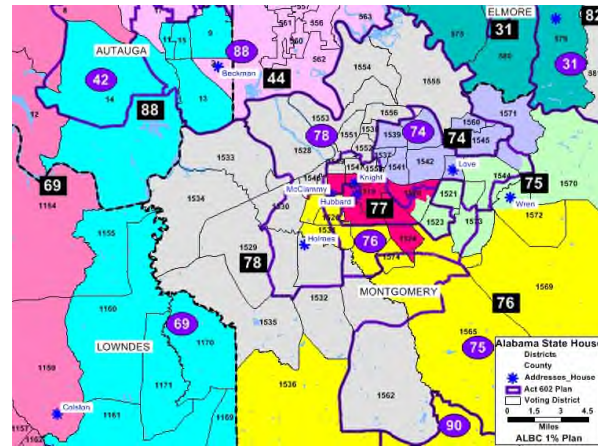
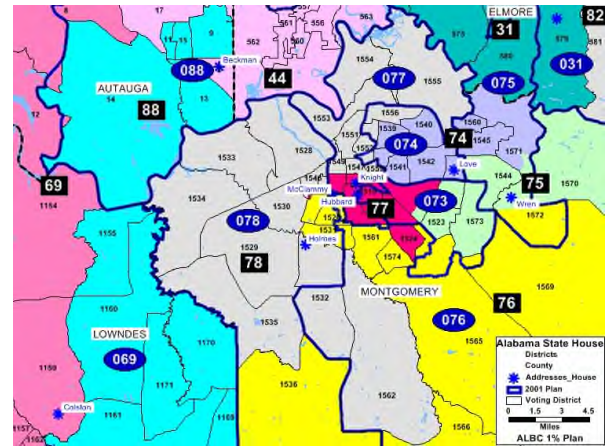
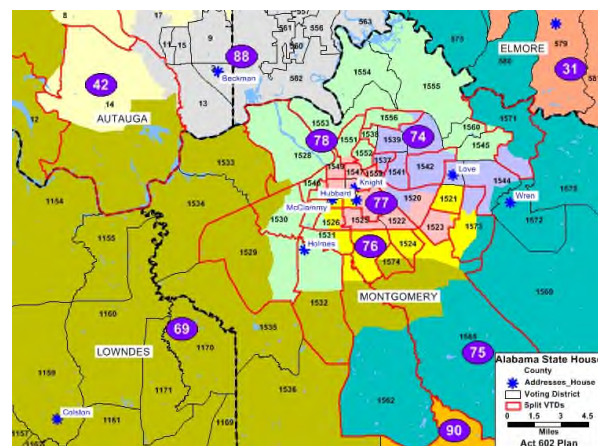
**House District 77:****APSX 524, Act 602 HD 77 overlay  
on ALBC 1% HD 77****APSX 573, 2001 HD 77 overlay on  
ALBC 1% HD 77****APSX 421, Act 602 Split Precincts  
HD 77****APSX 614, ALBC 1% Split  
Precincts HD 77**

The Act 602 drafters fell short of their 73.52% black target for HD 77 by - 6.48%, reaching 67.04% black at a deviation of +0.95%. APSX 398. HD 77 in

the ALBC 1% plan is 65.43% black at a deviation of +0.72%. APSX 492.

The 10 precincts split in Act 602 HD 77 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 45a-46a.

The 2 precinct splits in ALBC 1% HD 77 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 6. Precincts 1520 and 1558 have been split to get within 1% deviation. No precincts have been split to separate incumbents or to create a black majority district.

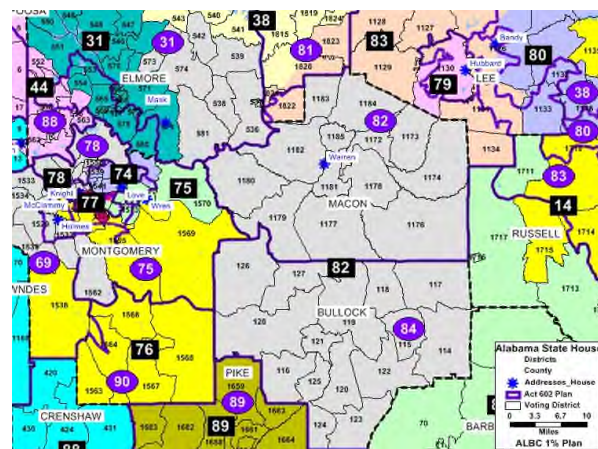
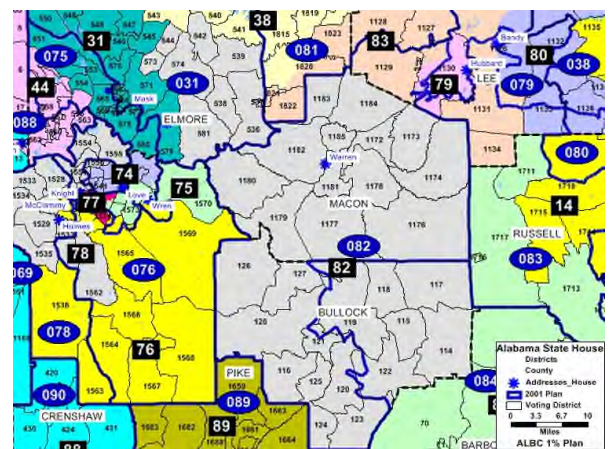
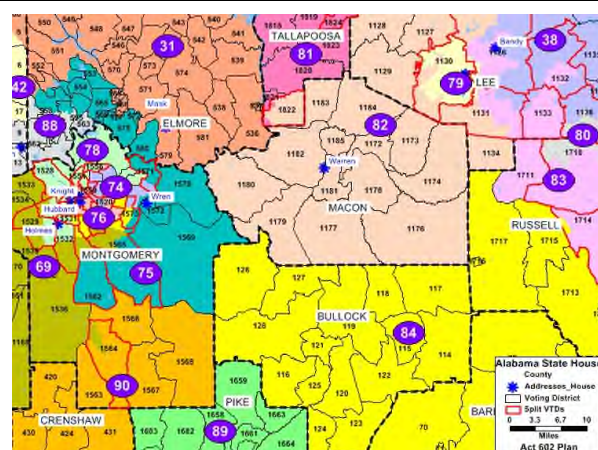
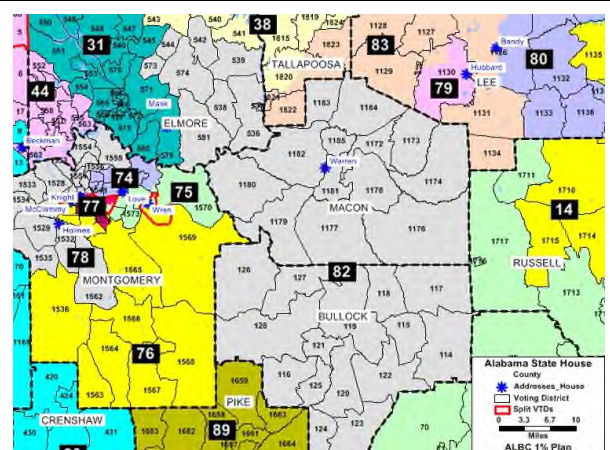
**House District 78:****APSX 525, Act 602 HD 78 overlay  
on ALBC 1% HD 78****APSX 574, 2001 HD 78 overlay on  
ALBC 1% HD 78****APSX 422, Act 602 Split Precincts  
HD 78**

the ALBC 1% plan is 66.76% black at a deviation of +0.96%. APSX 492.

The 13 precincts split in Act 602 HD 78 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 46a-47a.

The single precinct split in ALBC 1% HD 78 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 6. Precinct 1558 has been split to get within 1% deviation. No precinct has been split to separate incumbents or to create a black majority district.



**House District 82:****APSX 526, Act 602 HD 82 overlay  
on ALBC 1% HD 82****APSX 575, 2001 HD 82 overlay on  
ALBC 1% HD 82****APSX 424, Act 602 Split Precincts  
HD 82****APSX 616, ALBC 1% Split  
Precincts HD 82**

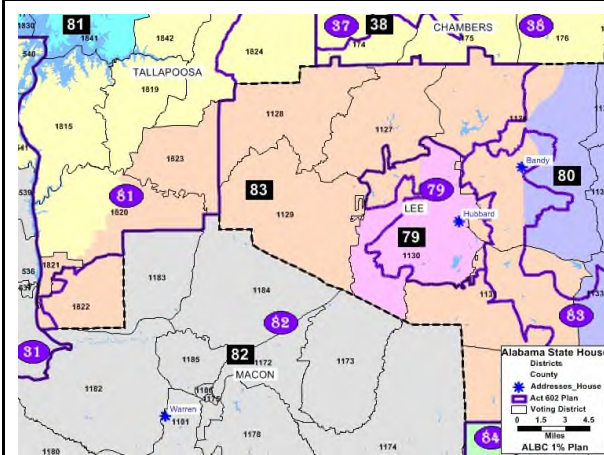
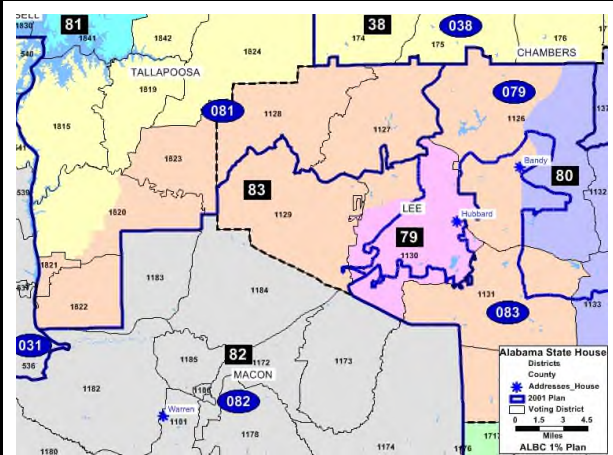
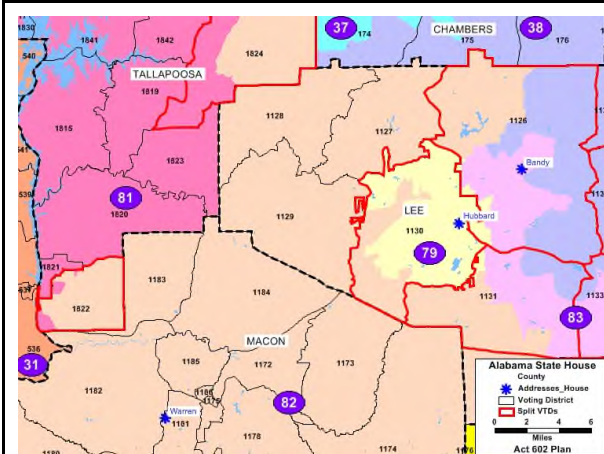
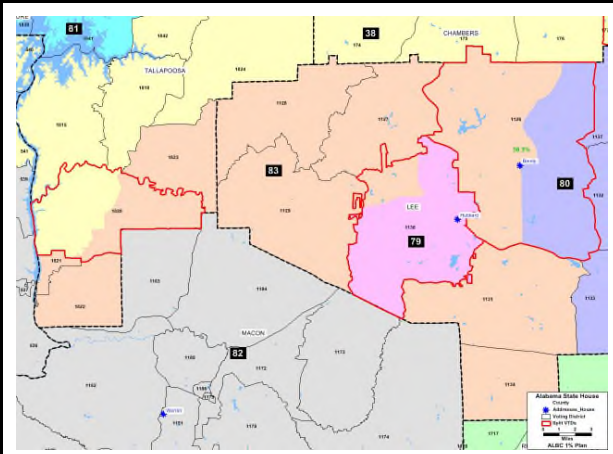
The Act 602 drafters reached and exceeded their 57.13% black target for HD 82 by +5.01%, reaching 62.14% black at a deviation of +0.74%. APSX 398.

HD 82 in the ALBC 1% plan is 60.57% black at a deviation of +0.60%. APSX 492.

The Act 602 House plan splits Tallapoosa County into 2 districts, when it is small enough to be contained in a single district; it splits Russell County into 3 districts, all of which split the county boundary; and it splits Lee County into 5 districts, 4 of which cross the county boundary; leaving only Macon County whole in HD 82. APSX 424 and 477. The ALBC 1% House plan splits Elmore County into 4 districts, all of which cross the county boundary, but it leaves Macon and Bullock Counties whole. APSX 461 and 477.

The 6 precincts split in Act 602 HD 82 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 48a.

No precincts have been split in ALBC 1% HD 82.

**House District 83:****APSX 527, Act 602 HD 83 overlay  
on ALBC 1% HD 83\****APSX 576, 2001 HD 83 overlay on  
ALBC 1% HD 83****APSX 425, Act 602 Split Precincts  
HD 83****APSX 617, ALBC 1% Split  
Precincts HD 83**

The Act 602 drafters reached and exceeded their 56.92% black target for HD 83 by only 0.60%, reaching 57.52% black at a deviation of +0.99%. APSX



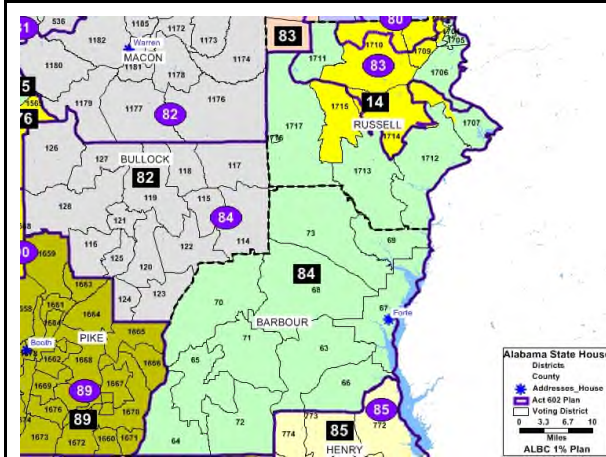
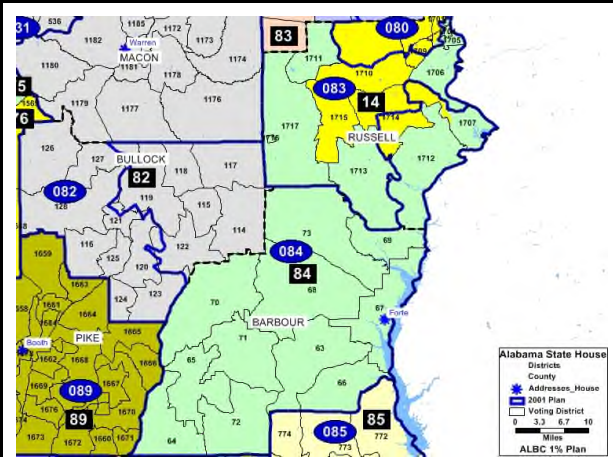
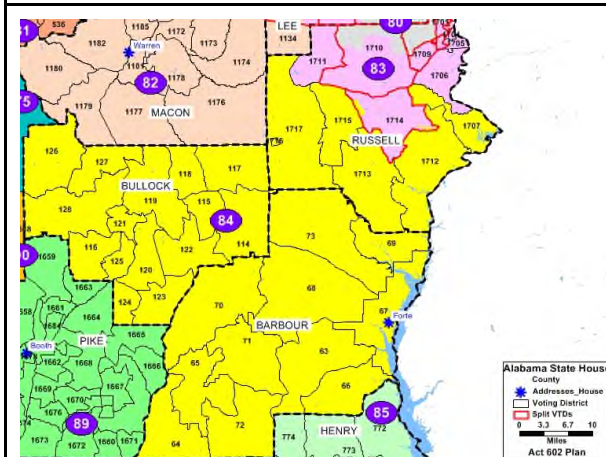
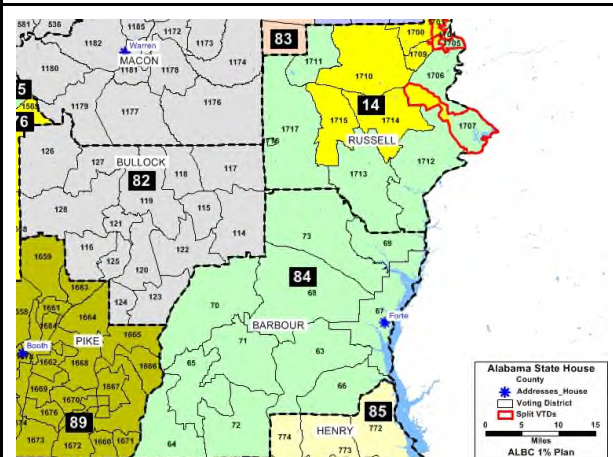
398. HD 83 in the ALBC 1% plan is 37.79% black at a deviation of +0.86%.

APSX 492.

The Act 602 House plan splits Russell County into 3 districts, all of which cross the county boundary and Lee County into 5 districts, 4 of which cross the county boundary, leaving no county whole in HD 83. APSX 425 and 477. The ALBC 1% House plan splits Tallapoosa County into 3 districts, all of which cross the county boundary, and Lee County into 4 districts, 3 of which cross the county boundary, leaving no counties whole. APSX 477.

The 11 precincts split in Act 602 HD 83 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 49a.

The 3 precincts split in ALBC 1% HD 83 are not listed in APSX 633 because it is not a majority-black district. Precincts 1126 and 1130 in Lee County and precinct 1820 in Tallapoosa County can be viewed in APSX 483 at pdf pages 8, 9, and 18, and the split precinct map is APSX 617. All three precincts were split to get within 1% deviation.

**House District 84:****APSX 528, Act 602 HD 84 overlay  
on ALBC 1% HD 84****APSX 577, 2001 HD 84 overlay on  
ALBC 1% HD 84****APSX 426, Act 602 Split Precincts  
HD 84****APSX 618, ALBC 1% Split  
Precincts HD 84**

The Act 602 drafters reached and exceeded their 50.61% black target for HD 84 by 1.74%, reaching 52.35% black at a deviation of +0.98%. APSX 398.

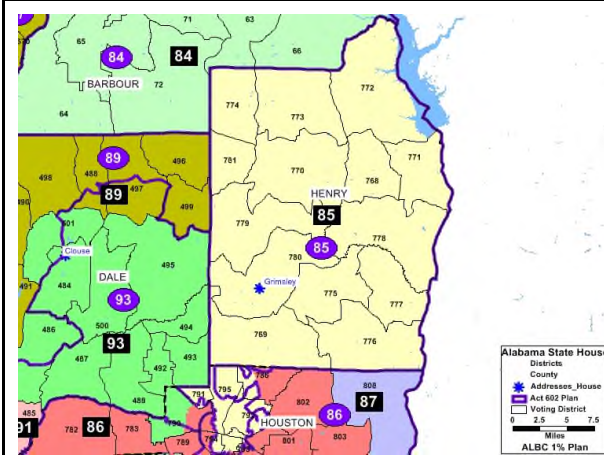
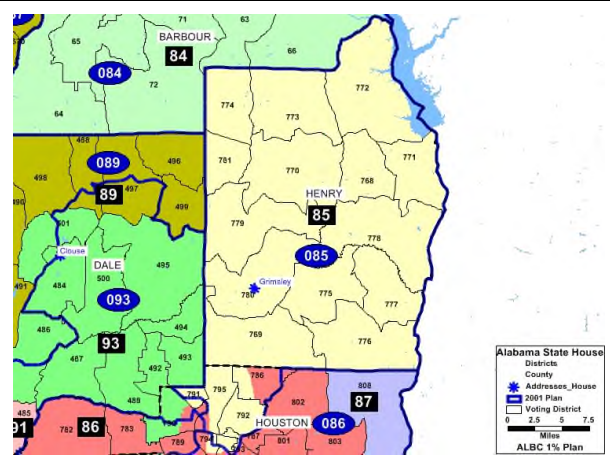
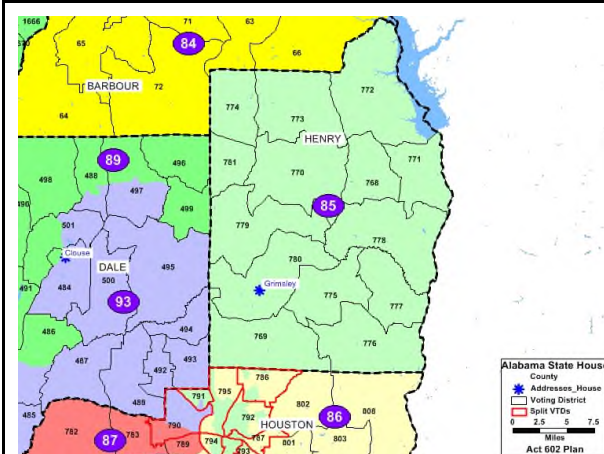
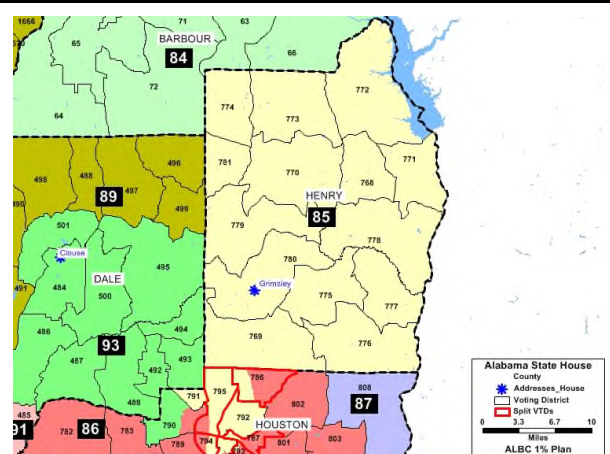


HD 84 in the ALBC 1% plan is 54.32% black at a deviation of -0.89%. APSX 492.

The Act 602 House plan splits Russell County into 3 districts, all of which cross the county boundary, leaving Bullock and Barbour Counties whole in HD 84. APSX 426 and 477. The ALBC 1% House plan splits Russell County into 2 districts, both crossing the county boundary, leaving Barbour County whole. APSX APSX 461 and 477.

The racial split in the 1 precinct split in Act 602 HD 84 is listed by name and number, and the supplemental exhibit number of the split precinct map is listed, in APSX 632 at 50a.

The 4 precinct splits in ALBC 1% HD 84 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 6-7. Precincts 1705, 1707, 1708, and 1701 have been split to get within 1% deviation and to create a black majority district. No precincts have been split to separate incumbents.

**House District 85:****APSX 529, Act 602 HD 85 overlay  
on ALBC 1% HD 85****APSX 578, 2001 HD 85 overlay on  
ALBC 1% HD 85****APSX 427, Act 602 Split Precincts  
HD 85****APSX 619, ALBC 1% Split  
Precincts HD 85**

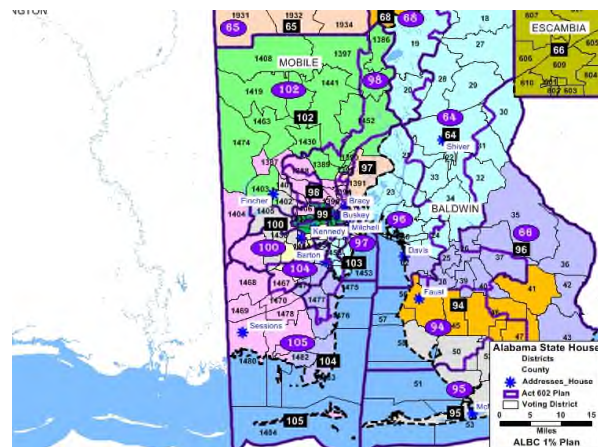
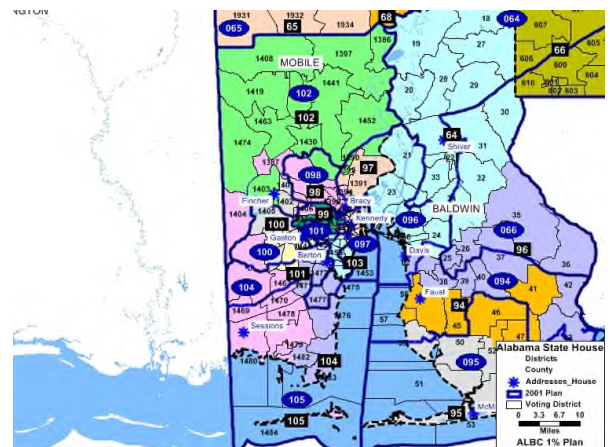
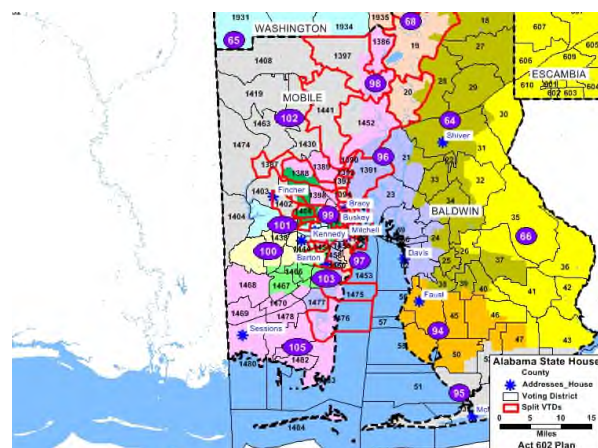
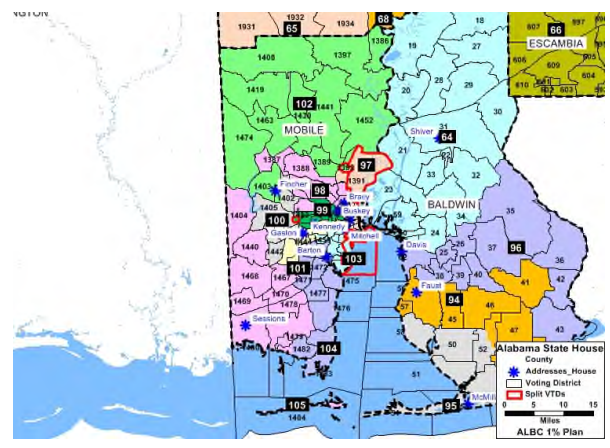
The Act 602 drafters reached and exceeded their 47.94% black target for HD 85 by 2.14%, reaching 50.08% black at a deviation of -0.64%. APSX 398.

HD 85 in the ALBC 1% plan is 49.03% black at a deviation of -0.98%. APSX 492.

The Act 602 House plan splits Houston County into 4 districts, 3 of which cross the county boundary, leaving Henry County whole in HD 85. APSX 427 and 477. The ALBC 1% House plan also splits Houston County into 4 districts, 3 of which cross the county boundary, leaving Henry County whole. APSX 464 and 477.

The 9 precincts split in Act 602 HD 85 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 50a.

The 5 precinct splits in ALBC 1% HD 85 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 7-8. Precinct 793 has been split to get within 1% deviation. No precincts have been split to separate incumbents. Precincts 794, 786, 795, and 788 have been split to come closer to a black majority district.

**Mobile County House Districts:****APSX 498, Act 602 Mobile County overlay on ALBC 1% House plan****APSX 547, 2001 Mobile County overlay on ALBC 1% House plan****APSX 432, Act 602 Split Precincts Mobile County****APSX 594, ALBC 1% Split Precincts Mobile County**

Mobile County at 412,992 total population can be drawn whole with 9 House districts (and thus 3 Senate districts) averaging +0.81% deviation. Like

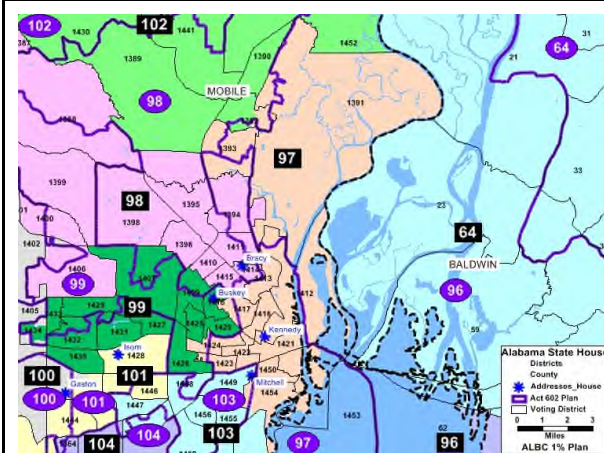
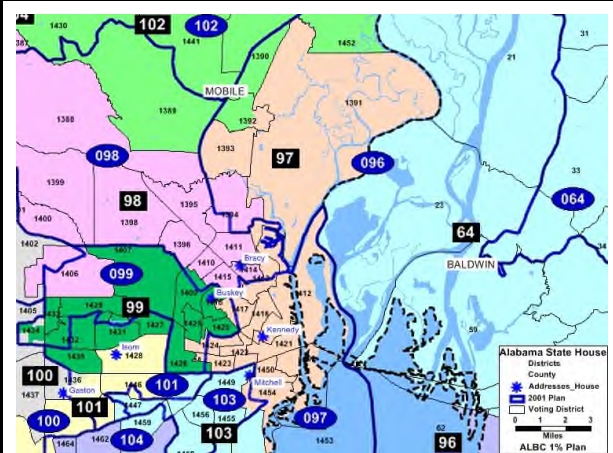
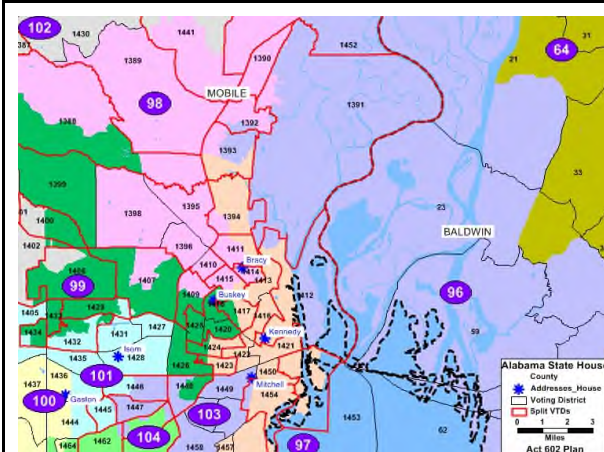
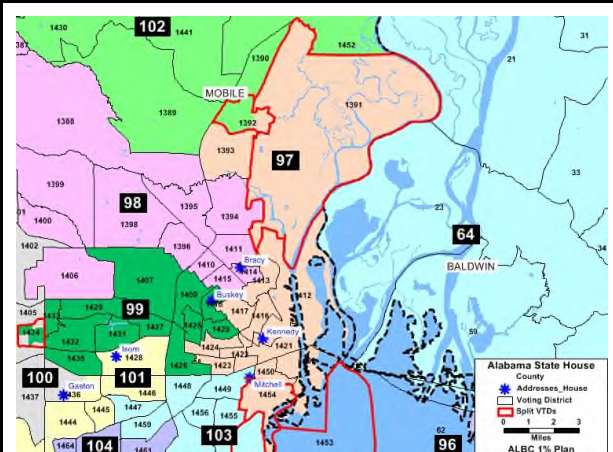
Montgomery County, it can be drawn whole in a House plan without exceeding  $\pm$  1%.

The ALBC 1% plan draws 9 House districts in Mobile County, all with less than  $\pm$  1% deviation, none of which crosses the Mobile County boundary, and it separates all the 2012 incumbents. APSX 462, 468. By contrast, the Act 602 House plan drew 10 districts in Mobile County, 1 of which, HD 96 split the county boundary. APSX 432.

The Act 602 House plan splits 43 precincts in Mobile County with 4 majority-black districts and 6 majority-white districts. APSX 632. The ALBC 1% House plan demonstrates how 1% deviation House districts with no incumbent conflicts and 4 majority-black House districts can be drawn in Mobile County while splitting no more than 8 precincts. APSX 633.

As the following House district comparisons will show, the only reason Act 602 split so many precincts in Mobile County was to reach the drafters' racial target in HD 97 and to come as close as possible to their racial targets in HD 98, HD 99, and HD 103. APSX 398.



**House District 97:****APSX 530, Act 602 HD 97 overlay  
on ALBC 1% HD 97****APSX 579, 2001 HD 97 overlay on  
ALBC 1% HD 97****APSX 428, Act 602 Split Precincts  
HD 97****APSX 620, ALBC 1% Split  
Precincts HD 97**

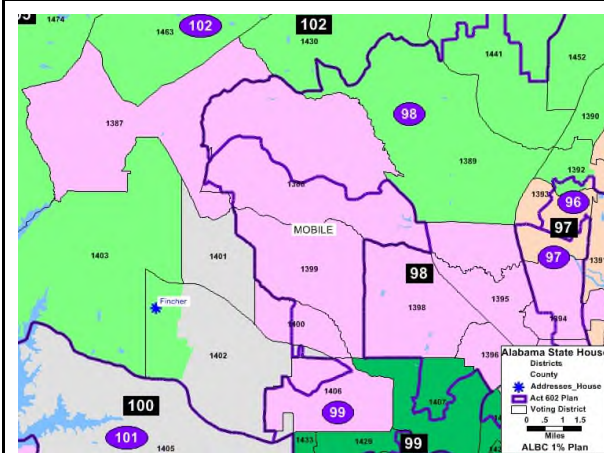
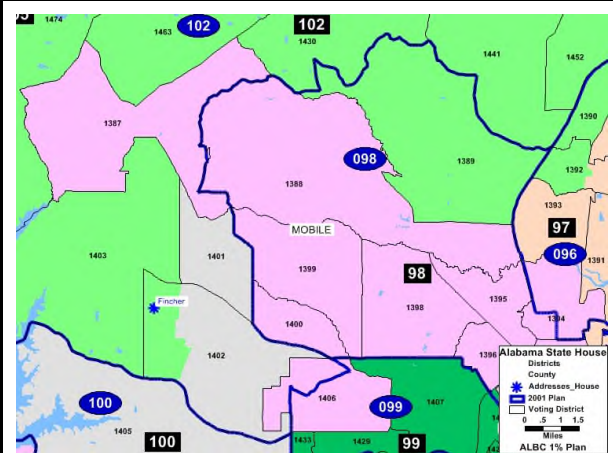
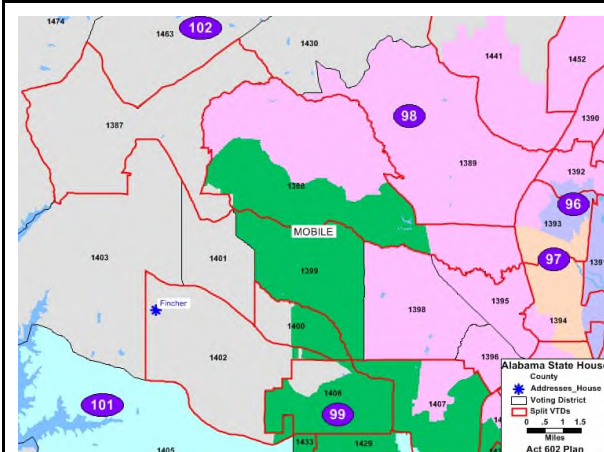
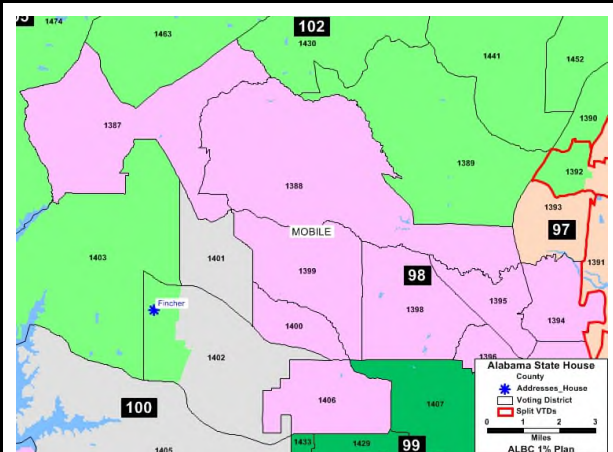
The Act 602 drafters hit their 60.66% black target for HD 97 on the nose reaching 60.66% black at a deviation of -0.99%. APSX 398 and 492. HD 97 in

the ALBC 1% plan is 55.91% black at a deviation of +0.95%. APSX 492.

The Act 602 House plan splits Mobile County into 10 districts, 1 of which, HD 96, crosses the county boundary. APSX 428 and 477. The ALBC 1% House plan keeps Mobile County whole in 9 House districts, all within  $\pm$  1% deviation. APSX 462, 468.

The 12 precincts split in Act 602 HD 97 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 51a.

The 4 precinct splits in ALBC 1% HD 97 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 633 at 8. Precincts 1454, 1391, and 1392 have been split to get within 1% deviation. Precinct 1453 is an inadvertent zero-population split. No precincts have been split to separate incumbents or to create a black majority district.

**House District 98:****APSX 531, Act 602 HD 98 overlay  
on ALBC 1% HD 98****APSX 580, 2001 HD 98 overlay on  
ALBC 1% HD 98****APSX 429, Act 602 Split Precincts  
HD 98****APSX 621, ALBC 1% Split  
Precincts HD 98**

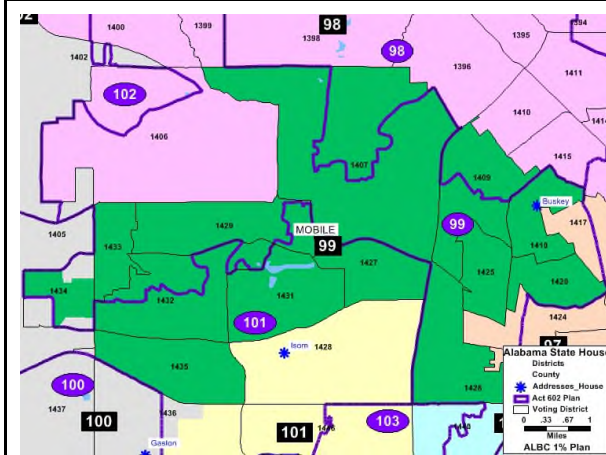
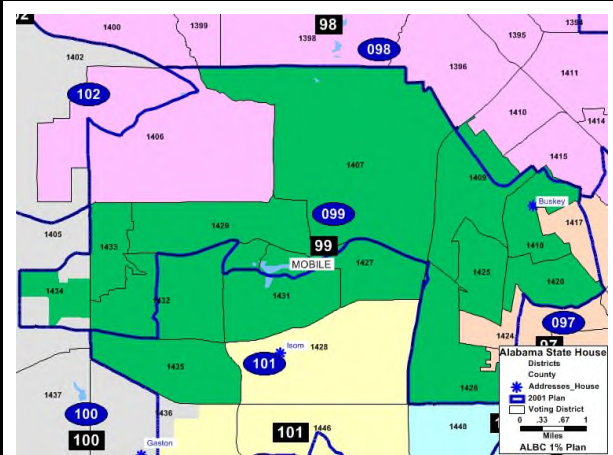
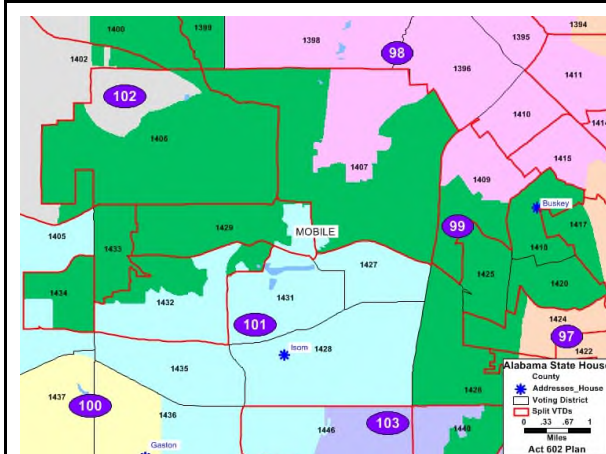
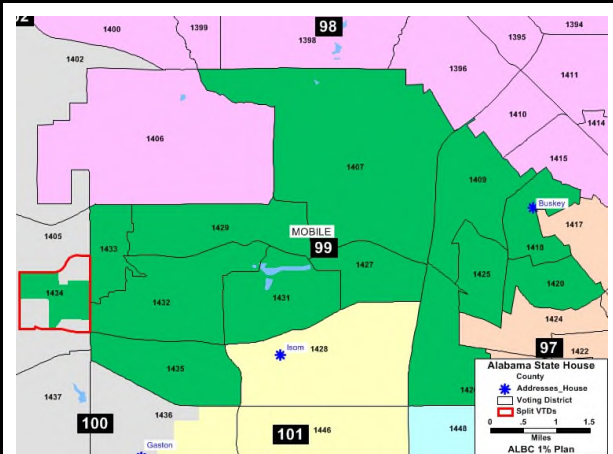
The Act 602 drafters fell short of their 65.22% black target for HD 98 by - 5.20%, reaching 60.02% black at a deviation of -0.99%. APSX 398 and 492. HD

98 in the ALBC 1% plan is 60.40% black at a deviation of +0.80%. APSX 492.

The 13 precincts split in Act 602 HD 98 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 52a-53a.

No precincts are split in ALBC 1% HD 98. APSX 633 at 8.



**House District 99:****APSX 532, Act 602 HD 99 overlay  
on ALBC 1% HD 99****APSX 581, 2001 HD 99 overlay on  
ALBC 1% HD 99****APSX 430, Act 602 Split Precincts  
HD 99****APSX 622, ALBC 1% Split  
Precincts HD 99**

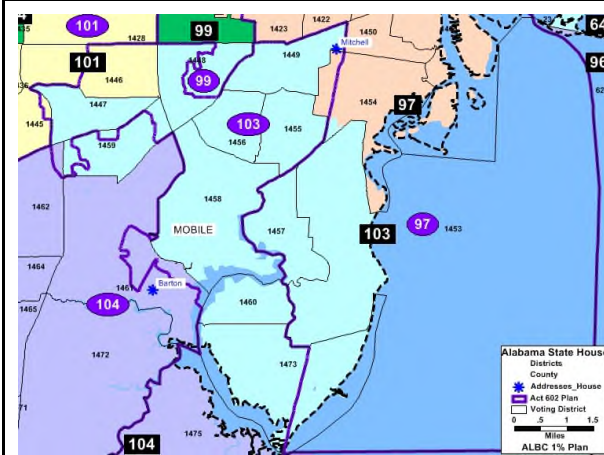
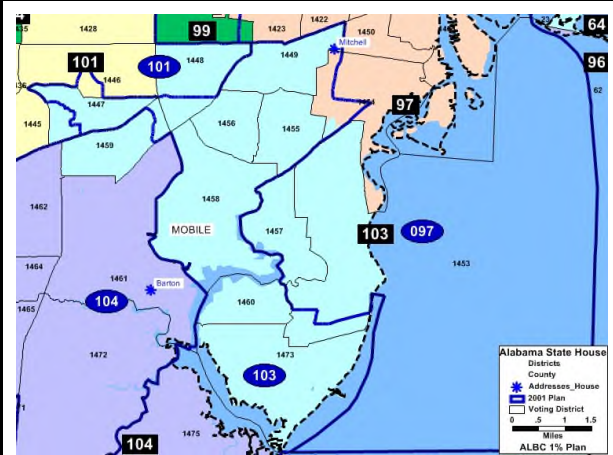
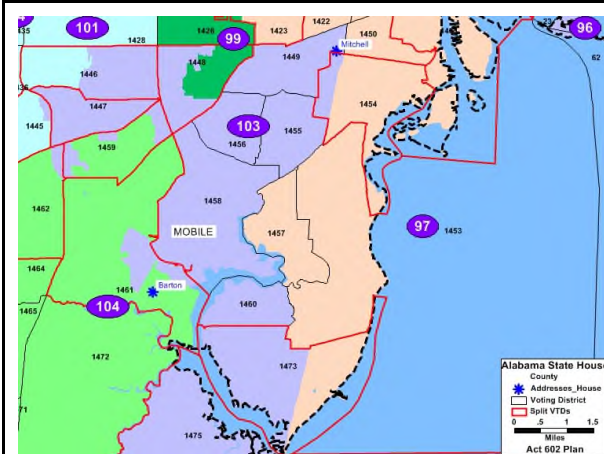
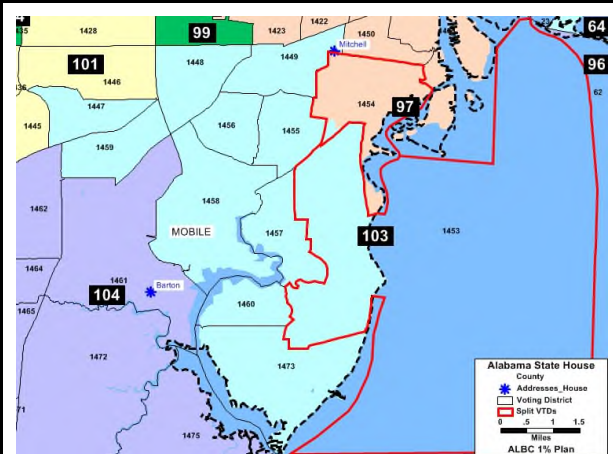
The Act 602 drafters fell short of their 73.35% black target for HD 99 by - 7.74%, reaching 65.61% black at a deviation of -0.99%. APSX 398. HD 99 in the



ALBC 1% plan is 58.24% black at a deviation of +0.93%. APSX 492.

The 13 precincts split in Act 602 HD 99 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 53a-54a.

The single precinct split in ALBC 1% HD 99 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 9. Precinct 1434 has been split to get within 1% deviation. No precinct has been split to separate incumbents or to create a black majority district.

**House District 103:****APSX 533, Act 602 HD 103 overlay on ALBC 1% HD 103****APSX 582, 2001 HD 103 overlay on ALBC 1% HD 103****APSX 431, Act 602 Split Precincts HD 103****APSX 623, ALBC 1% Split Precincts HD 103**

The Act 602 drafters fell short of their 69.64% black target for HD 103 by - 4.58%, reaching 65.06% black at a deviation of -0.98%. APSX 398. HD 103 in

the ALBC 1% plan is 62.61% black at a deviation of +0.81%. APSX 492.

The 10 precincts split in Act 602 HD 103 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 54a-55a.

The 1 precinct split in ALBC 1% HD 103 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 8. Precinct 1454 has been split to get within 1% deviation. No precincts have been split to separate incumbents or to create a black majority district.

#### **Senate Districts:**

The ideal size of a Senate district is 136,564, so the drafters of Act 603 could vary populations by as much as 2,730 and still be within  $\pm 1\%$  deviation. Many precincts (VTDs) are smaller than this, and the ALBC 1% Senate plan splits only 8 precincts statewide while still meeting all the requirements of this Court's August 28 order. The Act 603 Senate plan, however, split 164 precincts statewide in pursuit of the drafters' target black percentages.

The ALBC 1% Senate plan splits 23 counties to satisfy  $\pm 1\%$  deviation. APSX 478. This is 10 splits fewer than the 33 counties split by Act 603. Id.

The ALBC 1% Senate plan demonstrates that the many more counties and

precincts split by Act 603 cannot be justified by the need to keep within  $\pm 1\%$  deviation or to avoid incumbent conflicts. These splits can only be explained by the drafters' successful effort to reach and exceed their target black percentages in all of the majority-black Senate districts except for the three in Jefferson County, where they came as close as possible when there simply was insufficient additional population to do so. APSX 398.

### **Jefferson County Senate Districts:**

Jefferson County at 658,466 total population can be drawn whole with 5 Senate districts averaging -3.57% deviation. Jefferson County's boundary must be split at least once to satisfy the  $\pm 1\%$  requirement.

The Act 603 Senate plan placed 8 districts in Jefferson County, 3 majority-black, all of which were inside Jefferson County, and 5 majority-white, all of which crossed the county boundary. APX 43 and APSX 478, 491. The ALBC 1% Senate plan places 6 districts in Jefferson County, 3 majority-black, all of which are inside Jefferson County, and 3 majority-white, 2 of which cross the county boundary. This was achieved by removing from Jefferson County SD 5 and SD 14, whose incumbents resided in Walker and Shelby Counties, and by pulling all of Sen. Waggoner's SD 16 back inside Jefferson County. APSX 533B.

**Alabama State Senate**

**Map Layers**

- County
- Voting District
- Split VTs

0 1 2 3  
Miles

**Act 603**

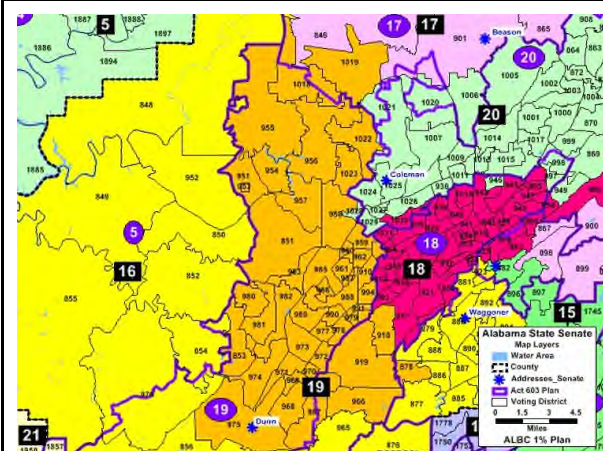
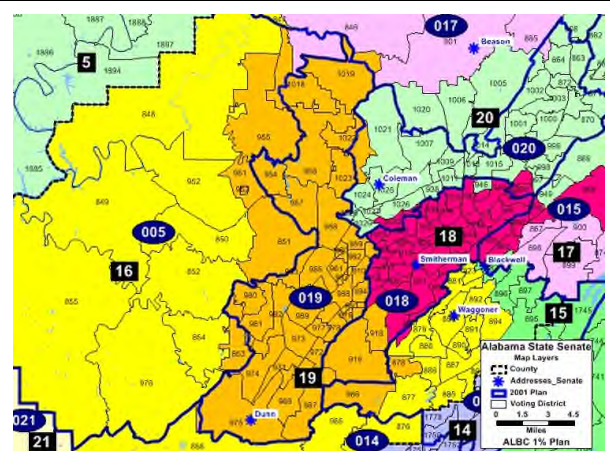
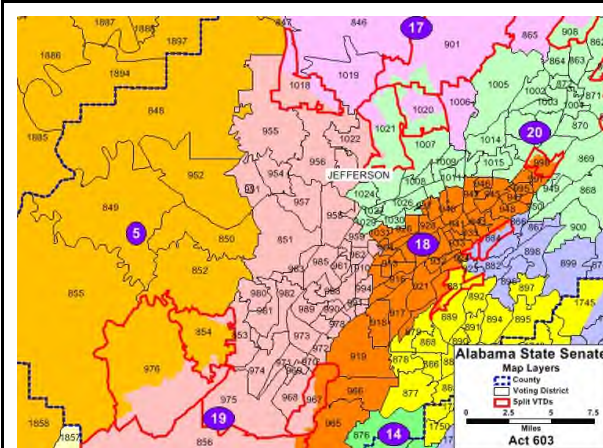
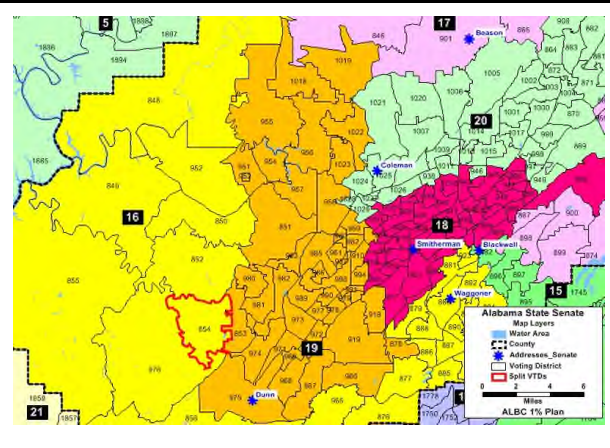
88



in the ALBC 1% plan is 55.96% black at a deviation of -0.08%. APSX 492.

The 6 precincts split in Act 603 SD 18 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 55a-56a.

No precincts have been split in ALBC 1% SD 18. APSX 633 at 9.

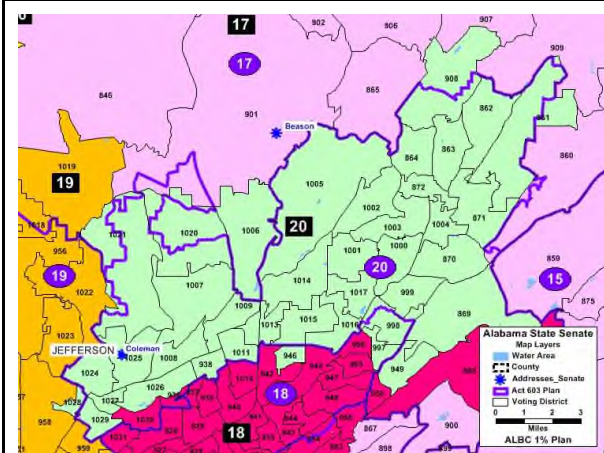
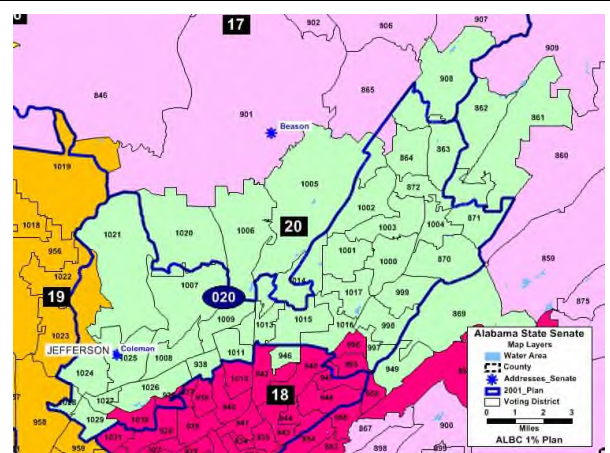
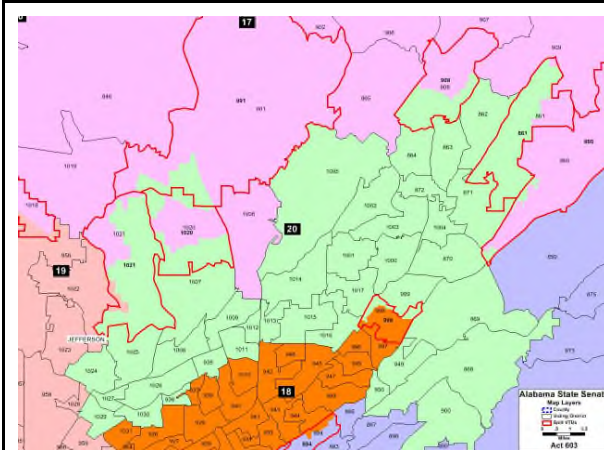
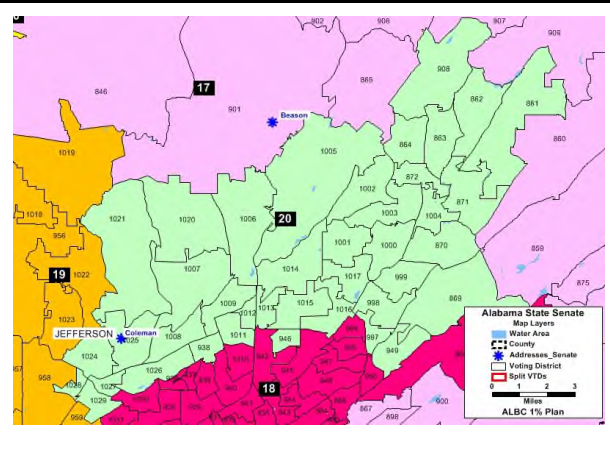
**Senate District 19:****APSX 535, Act 603 SD 19 overlay on  
ALBC 1% SD 19****APSX 584, 2001 SD 19 overlay on  
ALBC 1% SD 19****APSX 434, Act 603 Split Precincts  
SD 19****APSX 625, ALBC 1% Split  
Precincts SD 19**

The Act 603 drafters fell short of their 71.59% black target for SD 19 by - 6.28%, reaching 65.31% black at a deviation of -0.99%. APSX 398. SD 19 in the

ALBC 1% plan is 64.94% black at a deviation of -0.58%. APSX 492.

The 6 precincts split in Act 603 SD 19 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 56a-57a.

The 1 precinct split in ALBC 1% SD 19 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 9. Precinct 854 has been split to get within 1% deviation. No precincts have been split to separate incumbents or to create a black majority district.

**Senate District 20:****APSX 536, Act 603 SD 20 overlay on ALBC 1% SD 20****APSX 585, 2001 SD 20 overlay on ALBC 1% SD 20****APSX 435, Act 603 Split Precincts SD 20****APSX 626, ALBC 1% Split Precincts SD 20**

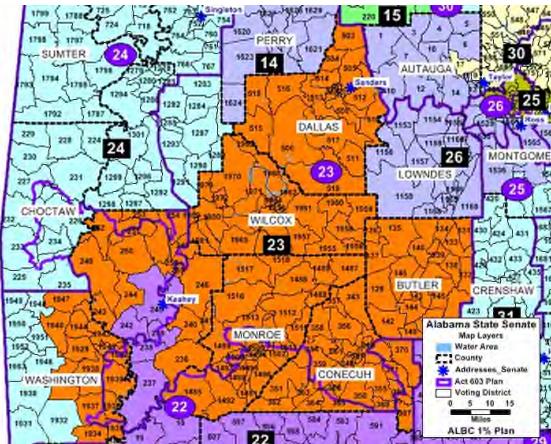
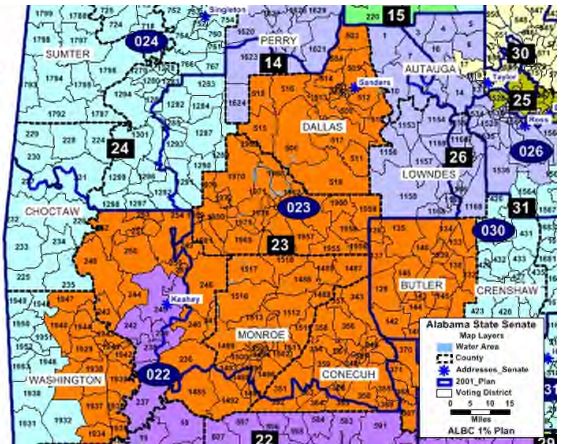
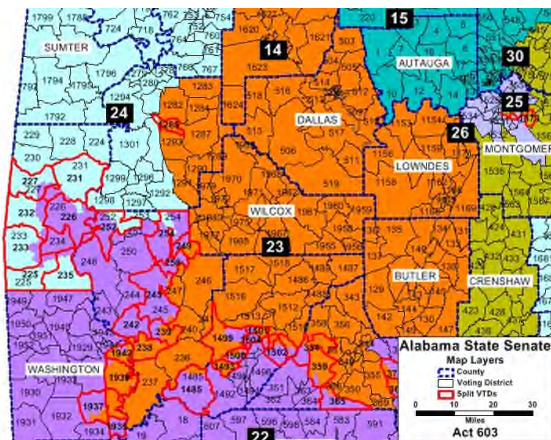
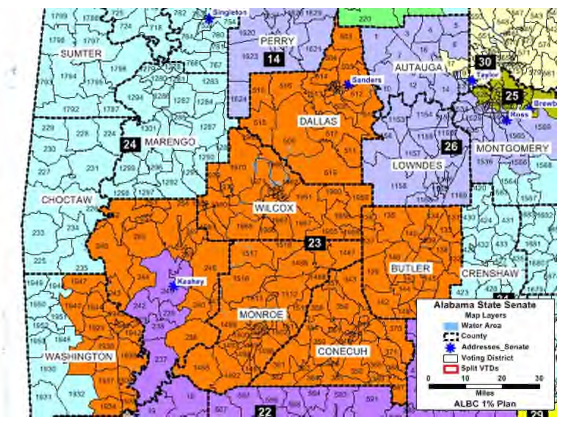
The Act 603 drafters fell short of their 77.82% black target for SD 20 by - 14.67%, reaching 63.15% black at a deviation of -0.99%. APSX 398. SD 20 in

the ALBC 1% plan is 63.32% black at a deviation of -0.66%. APSX 633.

The 7 precincts split in Act 603 SD 20 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 57a-58a.

No precincts have been split in ALBC 1% SD 20. APSX 633 at 9.



**Senate District 23:****APSX 537, Act 603 SD 23 overlay on  
ALBC 1% SD 23****APSX 586, 2001 SD 23 overlay on  
ALBC 1% SD 23****APSX 437, Act 603 Split Precincts  
SD 23****APSX 627, ALBC 1% Split  
Precincts SD 23**

The Act 603 drafters reached and exceeded their 64.76% black target for SD 23 by +0.08%, reaching 64.54% black at a deviation of -0.90%. APSX 398. SD

23 in the ALBC 1% plan is 53.80% black at a deviation of -0.76%. APSX 492.

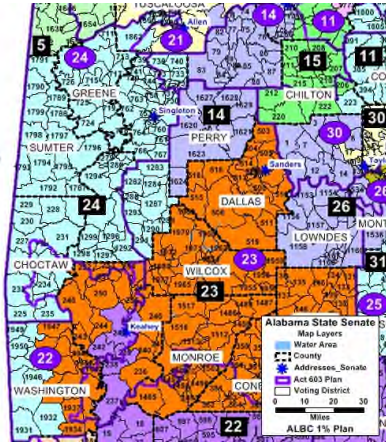
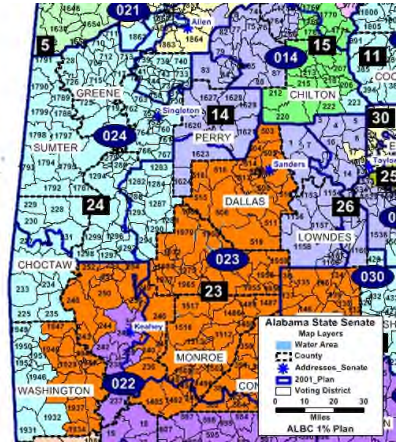
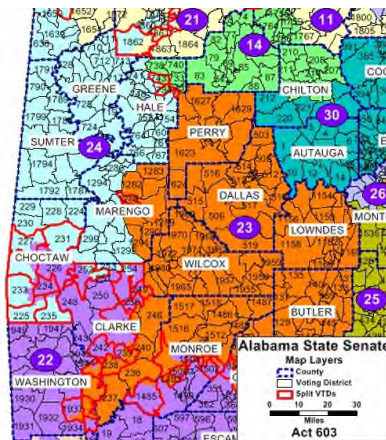
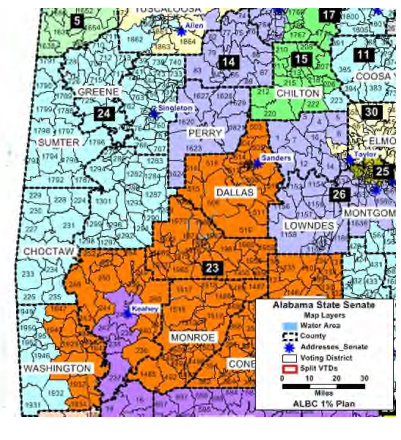
Act 603 splits Marengo, Choctaw, Monroe, and Conecuh Counties into 2 districts and Clarke County into 3 districts, when they are all small enough to be contained whole in a single Senate district. Perry, Dallas, Lowndes, Wilcox, and Butler Counties are kept whole. APX 39, APSX 478.

The ALBC 1% Senate plan splits only Washington and Clarke Counties into 2 districts while keeping Dallas, Wilcox, Monroe, Conecuh, and Butler Counties whole. APSX 478, 537.

The 27 precincts split in Act 603 SD 23 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 58a-62a.

No precincts are split in ALBC 1% SD 23. APSX 633 at 9.



**Senate District 24:****APSX 538, Act 603 SD 24 overlay on ALBC 1% SD 24****APSX 587, 2001 SD 24 overlay on ALBC 1% SD 24****APSX 439, Act 603 Split Precincts SD 24****APSX 628, ALBC 1% Split Precincts SD 24**

The Act 603 drafters reached and exceeded their 62.78% black target for SD 24 by +0.44%, reaching 63.22% black at a deviation of +0.85%. APSX 398. SD

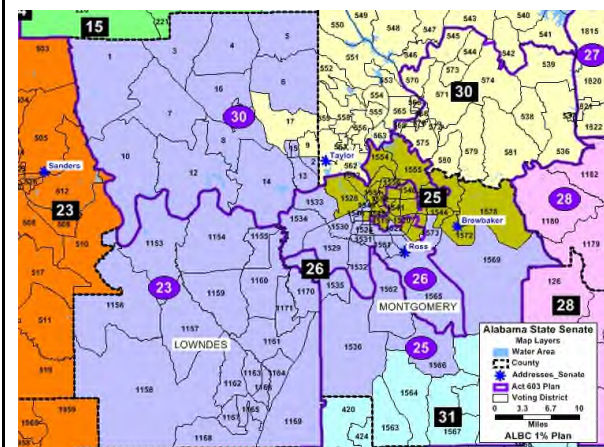
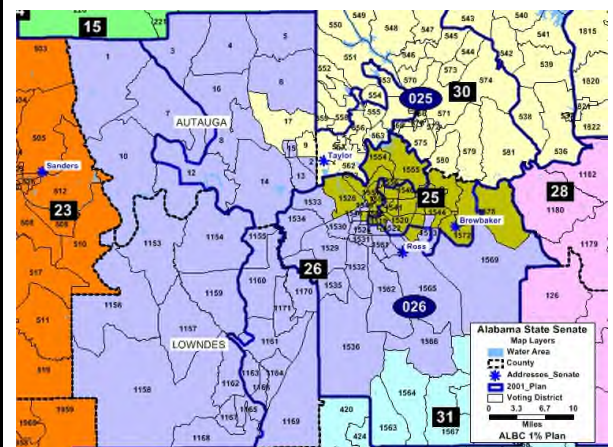
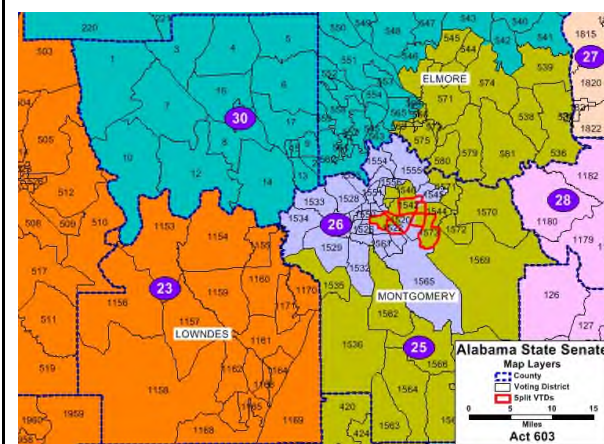
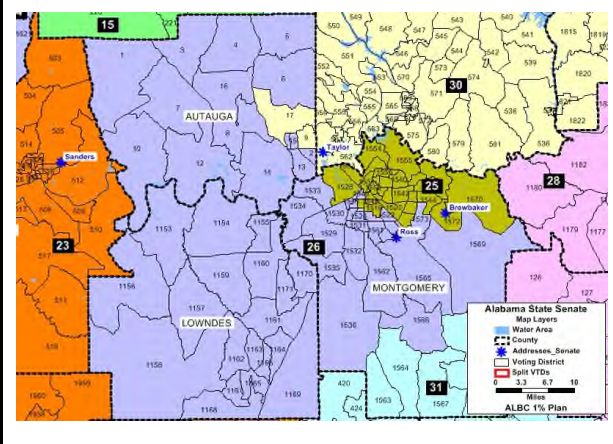
24 in the ALBC 1% plan is 57.31% black at a deviation of +0.88%. APSX 492.

Act 603 Senate plan splits Pickens, Hale, and Marengo Counties into 2 districts and Clarke County into 3 districts, when they are small enough to be contained whole inside a single Senate district, and it splits Tuscaloosa County into 3 districts, when it is small enough to be contained inside 2 Senate districts. It keeps only Sumter and Greene Counties whole. APX 39, APSX 478.

The ALBC 1% Senate plan splits only Washington County into 2 districts, when it is small enough to be contained inside a single Senate district, and Tuscaloosa County into 3 districts, when it is small enough to be contained inside 2 Senate districts. But it keeps Sumter, Greene, Hale, Marengo, and Choctaw Counties whole. APSX 478, 538.

The 21 precincts split in Act 603 SD 24 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 63a-66a.

No precincts are split in ALBC 1% SD 24. APSX 633 at 10.

**Senate District 26:****APSX 539, Act 603 SD 26 overlay on ALBC 1% SD 26****APSX 588, 2001 SD 26 overlay on ALBC 1% SD 26****APSX 441, Act 603 Split Precincts SD 26****APSX 629, ALBC 1% Split Precincts SD 26**

The Act 603 drafters reached and exceeded their 72.69% black target for SD 26 by +2.44%, reaching 75.13% black at a deviation of -0.08%. APSX 398. SD

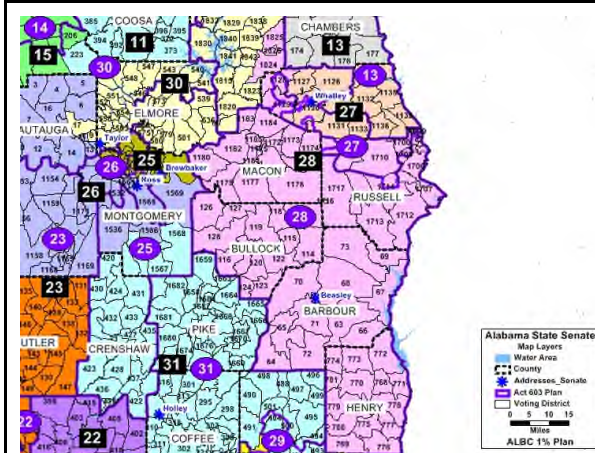
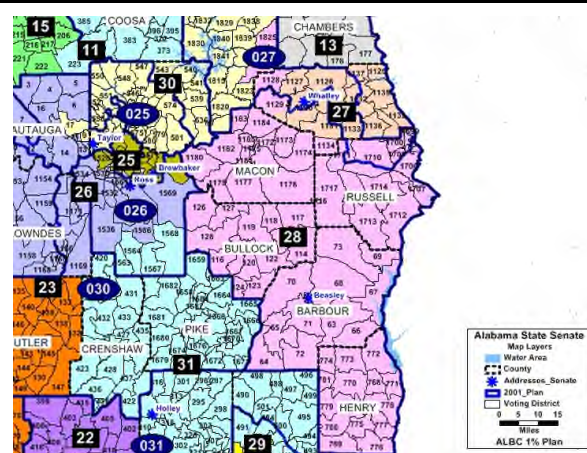
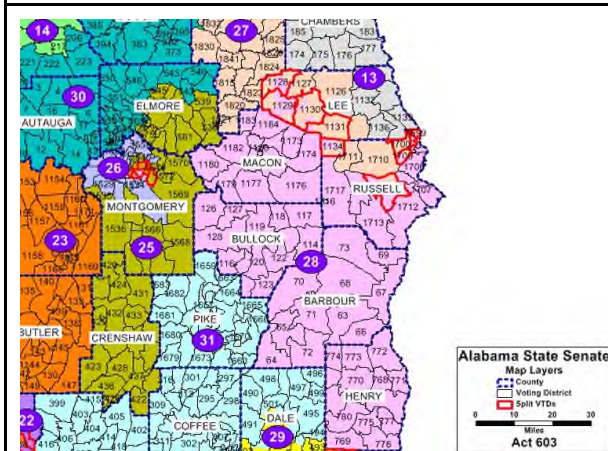
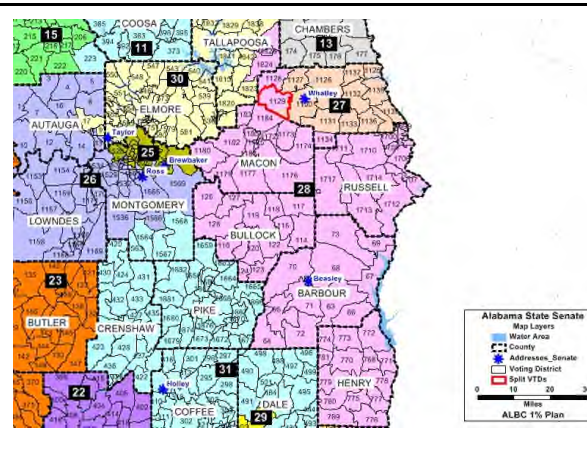


26 in the ALBC 1% plan is 57.59% black at a deviation of +0.63%. APSX 492.

The Act 603 plan split Montgomery County into 2 Senate districts, 1 of which crossed the county boundary, while the ALBC 1% Senate plan splits Montgomery County into 3 districts, 2 of which cross the county boundary. APSX 478, 582C. As shown in APSX 533F, the ALBC 1% Senate plan adds a third district to Montgomery County in order to prevent splitting surrounding smaller counties all across the Black Belt and South Alabama.

The 7 precincts split in Act 603 SD 26 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 66a-67a.

No precincts are split in ALBC 1% SD 26. APSX 633 at 10.

**Senate District 28:****APSX 540, Act 603 SD 28 overlay on ALBC 1% SD 28****APSX 589, 2001 SD 28 overlay on ALBC 1% SD 28****APSX 443, Act 603 Split Precincts SD 28****APSX 630, ALBC 1% Split Precincts SD 28**

The Act 603 drafters reached and exceeded their 50.98% black target for SD 28 by +8.85%, reaching 59.83% black at a deviation of +0.98%. APSX 398. SD

28 in the ALBC 1% plan is 50.65% black at a deviation of -0.03%. APSX 492.

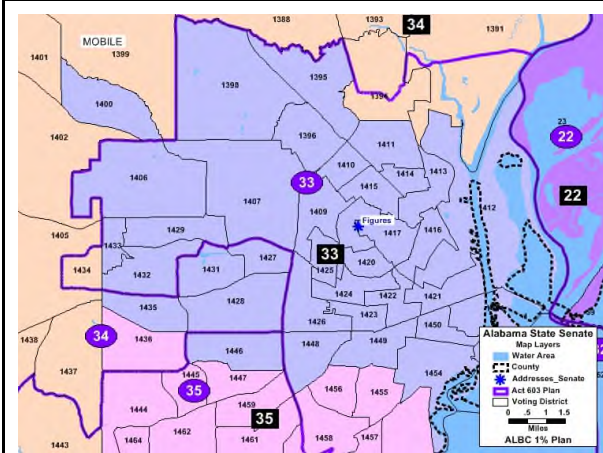
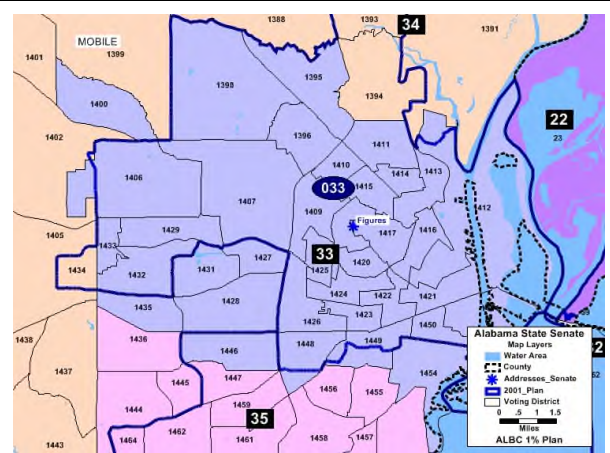
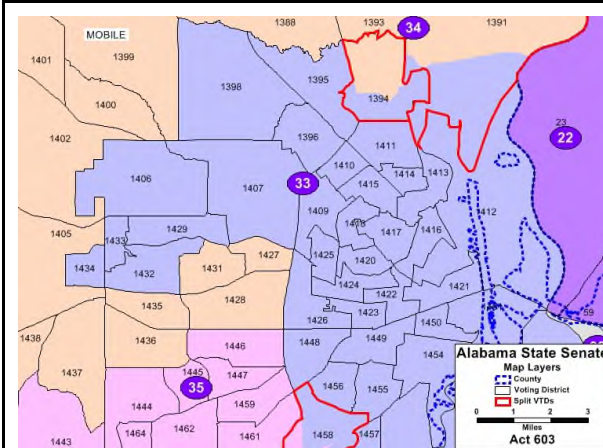
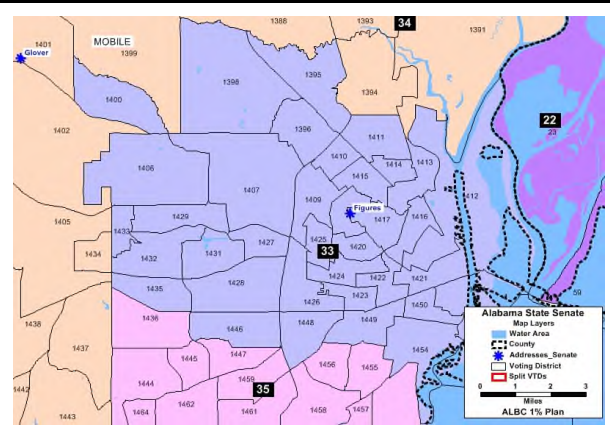
The Act 603 Senate plan splits Russell County into 2 districts, when it is small enough to be contained inside a single Senate district, and it splits Lee County into 3 districts, when it is small enough to be contained inside 2 Senate districts. APX 39 and APSX 478. It keeps Macon, Bullock, Barbour, and Henry Counties whole.

The ALBC 1% Senate plan splits Tallapoosa into 2 districts when it is small enough to be contained inside a single Senate district. It splits Lee County into only the 2 districts required to satisfy  $\pm 1\%$  deviation, and it keeps Macon, Bullock, Russell, Barbour, and Henry Counties whole. APSX 478, 540.

The 18 precincts split in Act 603 SD 28 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 67a-70a.

The 1 precinct split in ALBC 1% SD 28 is listed by name and number, and the supplemental exhibit number of its split precinct map is listed, in APSX 633 at 10. Precinct 1129 has been split to get within 1% deviation and to create a black majority district. No precincts have been split to separate incumbents.



**Senate District 33:****APSX 541, Act 603 SD 33 overlay on ALBC 1% SD 33****APSX 590, 2001 SD 33 overlay on ALBC 1% SD 33****APSX 446, Act 603 Split Precincts SD 33****APSX 631, ALBC 1% Split Precincts SD 33**

The Act 603 drafters reached and exceeded their 64.85% black target for SD 33 by +6.79%, reaching 71.64% black at a deviation of -0.26%. APSX 398. SD



33 in the ALBC 1% plan is 62.28% black at a deviation of +0.99%. APSX 492.

The Act 603 Senate plan splits Mobile into 4 districts, 1 of which crosses the county boundary. The ALBC 1% Senate plan keeps Mobile County whole.

The 5 precincts split in Act 603 SD 33 are listed by name and number, and the supplemental exhibit numbers of their split precinct maps are listed, in APSX 632 at 70a-71a.

No precincts have been split in ALBC 1% SD 33. APSX 633 at 10.

### **CONCLUSION**

The ALBC 1% House and Senate plans demonstrate that each of the challenged majority-black districts in Acts 2012-602 and 2012-603 unconstitutionally classifies voters by race.

Respectfully submitted this 25th day of September, 2015.

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I hereby certify that on September 25, 2015, I served the foregoing on the following electronically by means of the Court's CM/ECF system:

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s/ James U. Blacksher

Attorney for ALBC plaintiffs

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