to deny equal protection. Voter qualifications [19] But an Alabama constitutional amendment, the legislative history of which disclosed that both its object and its intended administration were to disenfranchise African-Americans, was held to violate the Fifteenth Amendment.[20]

Racial Gerrymandering.—The Court's series of decisions interpreting the Equal Protection Clause as requiring the apportionment and districting of state legislatures solely on the basis of population [21] had its beginning in *Gomillion v. Lightfoot*,[22] in which the Court found a violation of the Fifteenth Amendment in the redrawing of a municipal boundary line into a 28-sided figure that excluded from the city all but four or five of 400 African-Americans but no whites, and that thereby continued white domination of municipal elections. Subsequent decisions, particularly concerning the validity of multi-member districting and alleged dilution of minority voting power, were decided under the Equal Protection Clause,[23] and, in *City of Mobile v. Bolden*,[24] in the course of a considerably divided decision with respect to the requirement of discriminatory motivation in Fifteenth Amendment cases,[25] a plurality of the Court sought to restrict the Fifteenth Amendment to cases in which there is official denial or abridgment of the right to register and vote, and to exclude indirect dilution claims.[26] Congressional amendment of

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[19] Williams v. Mississippi, 170 U.S. 213 (1898); *Cf.* Lassiter v. Northampton County Bd. of Elections, 360 U.S. 45 (1959).

[20] Davis v. Schnell, 81 F. Supp. 872 (M.D. Ala. 1949), *aff'd*, 336 U.S. 933 (1949).

[21] *See* "Apportionment and Districting," *supra*.

[22] 364 U.S. 339 (1960). *See also* Wright v. Rockefeller, 376 U.S. 52 (1964).

[23] *E.g.*, Whitcomb v. Chavis, 403 U.S. 124 (1971); White v. Regester, 412 U.S. 755 (1973).

[24] 446 U.S. 55 (1980).

[25] On the issue of motivation versus impact under the equal protection clause, *see* discussion of "Testing Facially Neutral Classifications Which Impact on Minorities" in the Fourteenth Amendment, *supra*. On the plurality's view, *see* 446 U.S. at 61–65. Justice White appears clearly to agree that purposeful discrimination is a necessary component of equal protection clause violation, and may have agreed as well that the same requirement applies under the Fifteenth Amendment. Id. at 94–103. Only Justice Marshall unambiguously adhered to the view that discriminatory effect is sufficient. Id. at 125. *See also* Beer v. United States, 425 U.S. 130, 146–49 & nn.3–5 (1976) (dissenting).

[26] 446 U.S. at 65. At least three Justices disagreed with this view and would apply the Fifteenth Amendment to vote dilution claims. Id. at 84 n.3 (Justice Stevens concurring), 102 (Justice White dissenting), 125–35 (Justice Marshall dissenting). The issue was reserved in Rogers v. Lodge, 458 U.S. 613, 619 n.6 (1982).