

means of racial discrimination in state elections,<sup>4</sup> and the Supreme Court held that the poll tax discriminated on the basis of wealth in violation of the Equal Protection Clause.<sup>5</sup>

In *Harman v. Forssenius*,<sup>6</sup> the Court struck down a Virginia statute that eliminated the poll tax as an absolute qualification for voting in federal elections and gave federal voters the choice either of paying the tax or of filing a certificate of residence six months before the election. Viewing the latter requirement as imposing upon voters in federal elections an onerous requirement that was not imposed on those who continued to pay the tax, the Court unanimously held the law to conflict with the new Amendment by penalizing those who chose to exercise a right guaranteed them by the Amendment.

---

<sup>4</sup> Voting Rights Act of 1965, § 10, 79 Stat. 442, 42 U.S.C. § 1973h. For the results of actions instituted by the Attorney General under direction of this section, see *United States v. Texas*, 252 F. Supp. 234 (W.D. Tex.) (three-judge court). *aff'd on other grounds*, 384 U.S. 155 (1966); *United States v. Alabama*, 252 F. Supp. 95 (M.D. Ala. 1966) (three-judge court).

<sup>5</sup> *Harper v. Virginia State Bd. of Elections*, 383 U.S. 663 (1966) (invalid discrimination based on wealth).

<sup>6</sup> 380 U.S. 528 (1965).