



REYNOLDS v. SIMS (1964)

ORIGINS OF THE CASE In 1901, seats in the Alabama state legislature were apportioned, or assigned to districts, based on population. By the early 1960s, each Alabama county still had the same number of representatives as it did in 1901, even though the populations of the counties had changed. A group of voters sued to make representation proportional to the changed populations. When the suit succeeded, state legislators who were threatened with losing their seats appealed to the Supreme Court.

THE RULING The Supreme Court upheld the principle of “one person, one vote” and ruled that the equal protection clause required representation in state legislatures to be based on population.

LEGAL REASONING

Prior to *Reynolds*, the Court had already applied the “one person, one vote” principle to federal congressional elections (see Legal Sources). In *Reynolds*, Chief Justice Earl Warren extended this principle to state legislatures. He argued that when representation does not reflect population, some people’s votes are worth more than others’.

“The fundamental principle of representative government in this country is one of equal representation for equal numbers of people, without regard to . . . place of residence within a State. . . . Legislators represent people, not trees or acres. Legislators are elected by voters, not farms or cities or economic interests.”

Warren concluded that Alabama’s apportionment scheme discriminated against people because of where they live.

For these reasons, the Court ruled that any acceptable apportionment plan must provide an equal number of legislative seats for equally populated areas. A plan that does not is unconstitutional because it denies some voters the equal protection of the laws.

LEGAL SOURCES

U.S. CONSTITUTION

U.S. CONSTITUTION, FOURTEENTH AMENDMENT (1868)

“No state shall . . . deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.”

RELATED CASES

BAKER v. CARR (1962)

The Court decided that federal courts could settle issues of apportionment. Previously, federal courts had refused to address such issues on the grounds that they were political issues.

GRAY v. SANDERS (1963)

The Court ruled that states must follow the principle of “one person, one vote” in primary elections.

WESBERRY v. SANDERS (1964)

The Court applied the “one person, one vote” rule to congressional districts.



◀ Chief Justice Warren (*front, center*) and members of the 1964 Supreme Court.

WHY IT MATTERED

The voters who initiated the suit against Alabama's apportionment were part of America's tremendous urban growth in the 20th century. During and after World War II, tens of thousands of Americans—including large numbers of African Americans—moved from rural areas to cities and suburbs. Voters in Alabama's more urban areas found that they were underrepresented. Likewise, before *Reynolds*, urban residents as a whole paid far more in taxes than they received in benefits. A great deal was at stake.

The “one person, one vote” principle increased the influence of urban residents by forcing legislatures to create new election districts in the cities to reflect their large populations. As more legislators representing urban and suburban needs were elected, they were able to change funding formulas, funneling more money into their districts. In addition, minorities, immigrants, and professionals, who tend to make up a large proportion of urban populations, gained better representation.

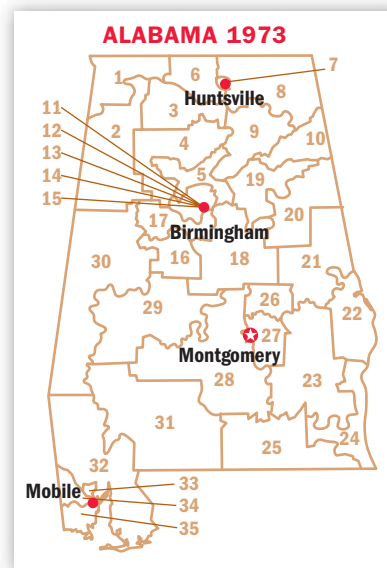
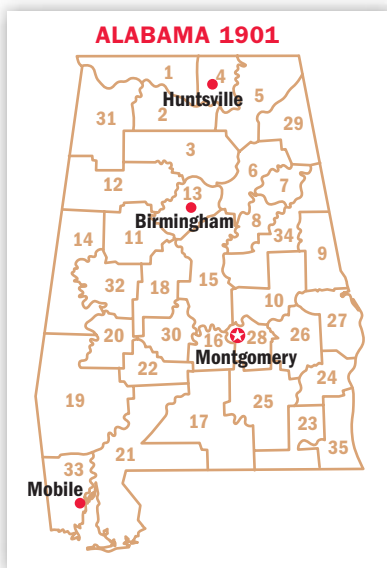
On the other hand, the power of farmers was eroded as election districts in rural areas were combined and incumbents had to campaign against each other for a single seat.

HISTORICAL IMPACT

The Warren Court's reapportionment decisions in *Baker v. Carr*, *Gray v. Sanders*, *Wesberry v. Sanders*, and *Reynolds* were a revolution in U.S. politics. The lawsuit that culminated in the *Reynolds* decision was also part of a broader movement in the 1960s to protect voting rights. Largely because of the Voting Rights Act of 1965, voter registration among African Americans in Mississippi, for instance, climbed from 6.7 percent to 59.8 percent. Viewed together, the combination of increased protection of voting rights and acceptance of the “one person, one vote” principle brought the United States several steps closer to fulfilling its democratic ideals.

In the 1990s, the Court revisited reapportionment. A 1982 act of Congress had required states to create districts with “minority majorities” in order to increase the number of nonwhite representatives. As a result, following the 1990 census, a record number of African Americans were elected to Congress. But opponents contended that defining districts by race violated equal protection and “one person, one vote.” In a series of decisions, the Court agreed and abolished minority districting.

These two apportionment maps show Alabama's 35 state senatorial districts in 1901 (left) and 1973 (right). The 1973 map shows how the districts were redrawn after the *Reynolds* decision, based on the 1970 census. Notice how the 1973 map reflects the growth of Alabama cities.



THINKING CRITICALLY

CONNECT TO TODAY

- Analyzing Maps** Obtain a map of the state legislative districts in your state. Then compare the map created following the 2000 census with the map based on the 1990 census. Study the differences in the size and location of the districts. Write a paragraph explaining which regions of the state gained representatives and which lost representatives.



SEE SKILLBUILDER HANDBOOK, PAGE R26.

CONNECT TO HISTORY

-  **INTERNET ACTIVITY** CLASSZONE.COM

Visit the links for Historic Decisions of the Supreme Court to research minority redistricting decisions such as *Shaw v. Hunt* (1996). Write a summary of the rulings and how they have affected elections.