IN THE CIRCUIT COURT OF
MONTGOMERY COUNTY, ALABAMA

LORI J. OWENS,	)	
	)	
Plaintiff	)	
	)	
v.	)	CV NO.: _____
	)	
PHILLIP W. JORDAN, in his official capacity as Probate Judge of Cherokee County, Alabama, RYAN ROBERTSON, in his official capacity as Probate Judge of Cleburne County, Alabama, GEORGE INGRAM, in his official capacity as Probate Judge of Clay County, Alabama, MACK DIAMOND in his official capacity as Probate Judge of Randolph County, Alabama, JOHN T. CROWDER, in his official capacity as Probate Judge of Chambers County, Alabama, BILL ENGLISH, in his official capacity as Probate Judge of Lee County, Alabama, JAMES BENNETT, in his official capacity as Secretary of State of Alabama,	)	
	)	
Defendants.	)	

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

I. Nature of Action.

1. This is an action challenging as unconstitutional, under the Alabama Constitution, Act No. 2001-727, 2001 Ala. Acts, which became law on July 3,

EXHIBIT
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PENGAD-Bayonne,N.J

2001 and was precleared by the Attorney General of the United States on or around October 15, 2001. This legislation reapportions the population of Alabama, as reflected in the 2000 census, into thirty-five (35) State Senate districts for elections to occur in the years 2002, 2006, and 2010.

2. Act 2001-727 divides thirty (30) of Alabama's sixty-seven (67) counties between State Senate districts.[1]

3. Act No. 2001-727 violates Art. I, § 33 and Art. IX, § 200 of the Alabama Constitution by unnecessarily dividing counties between State Senate districts, including Cherokee County, in which Plaintiff Owens resides.

4. This division of counties violates Ala. Const. art. IX, § 200, which "prohibits a districting plan that divides a county between two districts." *See Rice v. English*, --- So.2d --- (2002), 2002 WL 1052048*1.

5. The division of Cherokee County by Act 2001-727 was not necessary to comply with federal law.

6. Relief is sought pursuant to Ala. Code § 6-6-220, *et seq.* and Art. I, § 33 and Art. IX, § 200 of the Alabama Constitution.

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[1] A map reflecting the State Senate districts created by Act No. 2001-727 and data reflecting counties that have been divided between State Senate districts at issue are attached hereto as Exhibit "A." An asterisk by a county indicates that a county has been divided between two or more State Senate districts. The state-wide map of the State Senate districts established in Act 2001-727 also shows which counties have been divided. Said information was received from the office of the Alabama Legislature's Permanent Legislative Committee on Reapportionment.

7. In creating the thirty-five (35) State Senate districts, Act 2001-727 divides thirty (30) of Alabama's sixty-seven (67) counties by placing them in two or more State Senate districts. Several counties are divided between Senate districts three or more times. Cherokee County is divided between two State Senate districts. [2]

8. However, pursuant to Ala. Const. art. IX, § 200, no county shall be divided between two districts; and "county lines must be preserved in any redistricting plan." *Rice v. English*, --- So.2d --- (2002), 2002 WL 1052048*1.

9. Under Act No. 2001-727, Plaintiff Owens has been assigned to Senate District 13.

10. Plaintiff Owens resides in Cherokee County, Alabama.

11. Cherokee County has been unnecessarily divided between two Senate districts, Senate District 10 and Senate District 13.[3]

12. This division of Cherokee County into two Senate districts violates the Alabama Constitution.

13. The unconstitutional division of Cherokee County and other counties between State Senate districts and the violations of state law contained within Act. No. 2001-727 necessitate the filing of this action and the exercise of the Court's

[2] See Exhibit "A" hereto.
[3] See Exhibit "A" hereto.

jurisdiction.

14. This Court should implement the necessary remedies to redraw the Plaintiff's and other State Senate districts to remedy the State constitutional violations in time for the elections scheduled for 2002.

15. This Court should also implement the appropriate remedies to insure that the unconstitutional State Senate districts not be used in future elections, including the 2002, 2006, and 2010 elections.

16. The Court should, if necessary due to time constraints, order a special election after State Senate districts are redrawn to remedy the State constitutional violations that exist within Act 2001-727.

17. Additionally, Alabama citizens must be informed of the constitutionally drawn state senate districts to evaluate their votes and residency requirements, should they desire to seek office in any future election for the State Senate.

II. Jurisdiction and Venue.

18. This Court has jurisdiction over this matter as the issues presented in this case involve the validity of a state statute under the Alabama Constitution. State court authority "to review challenges to acts of the Legislature on constitutional grounds is a bedrock principle of our State's legal heritage." *Rice v. English*, --- So.2d --- (2002), 2002 WL 1052048*5.

19. Venue is proper in this circuit under Ala. Code § 6-3-2 and pursuant to Acts No. 2001-727 and 2001-728.

III. Parties

20. Plaintiff Lori J. Owens is an adult resident citizen and registered voter of the State of Alabama residing in Cherokee County, Alabama.

21. Plaintiff Owens currently resides in Alabama Senate District 13 as configured under Act No. 2001-727. At all times since the enactment of Act No. 2001-727, Plaintiff Owens has resided in Cherokee County, Alabama.

22. Senate District 13 is partially located in Cherokee County, Alabama, which has been divided between State Senate Districts 10 and 13.[4]

23. The division of Cherokee County between two State Senate districts violates Ala. Const. art. IX, § 200.

24. Plaintiff Owens brings this action on behalf of herself and all other citizens of the State of Alabama similarly situated to enjoin the use of the unconstitutional State Senate districts established in Act No. 2001-727 in the 2002 elections or in any election thereafter.

25. Defendant Phillip W. Jordan is sued in his official capacity as the Probate Judge of Cherokee County, Alabama and in his representative capacity on behalf of a class of probate judges across Alabama, each of whom serves as the

[4] See Exhibit "A" hereto.

chief elections officer in each county. At all times referred to herein, he is acting under color of state law.

26. Defendant Ryan Robertson is sued in his official capacity as the Probate Judge of Cleburne County, Alabama and in his representative capacity on behalf of a class of probate judges across Alabama, each of whom serves as the chief elections officer in each county. At all times referred to herein, he is acting under color of state law.

27. Defendant George Ingram is sued in his official capacity as the Probate Judge of Clay County, Alabama and in his representative capacity on behalf of a class of probate judges across Alabama, each of whom serves as the chief elections officer in each county. At all times referred to herein, he is acting under color of state law.

28. Defendant Mack Diamond is sued in his official capacity as the Probate Judge of Randolph County, Alabama and in his representative capacity on behalf of a class of probate judges across Alabama, each of whom serves as the chief elections officer in each county. At all times referred to herein, he is acting under color of state law.

29. Defendant John T. Crowder is sued in his official capacity as the Probate Judge of Chambers County, Alabama and in his representative capacity on behalf of a class of probate judges across Alabama, each of whom serves as the

chief elections officer in each county. At all times referred to herein, he is acting under color of state law.

30. Defendant Bill English is sued in his official capacity as the Probate Judge of Lee County, Alabama and in his representative capacity on behalf of a class of probate judges across Alabama, each of whom serves as the chief elections officer in each county. At all times referred to herein, he is acting under color of state law.

31. Defendant James Bennett is sued in his official capacity as Secretary of State for the State of Alabama, chief state elections officer in Alabama. At all times referred to herein, he is acting under color of state law.

IV. Class Action Averments.

32. Plaintiff Owens avers, with regard to a class of all citizens of the State of Alabama which reside in Cherokee County, Alabama, similarly situated and with regard to a defendant class of all probate judges in the State of Alabama, that:

a. the classes are so numerous that joinder of all members is impracticable;

b. there are questions of law or fact common to the classes;

c. the claims or defenses of the respective class representatives are typical of the claims or defenses of the classes; and

d. the representative parties will fairly and adequately protect the interests of the classes.

33. Plaintiff Owens avers, with regard to a class of all citizens of the State of Alabama which reside in Cherokee County, Alabama, similarly situated and with regard to a defendant class of all probate judges in the State of Alabama, that separate actions by or against individual members of the classes would create a risk of inconsistent adjudications with respect to the individual members of the classes.

34. Plaintiff Owens avers, with regard to a class of all citizens of the State of Alabama residing in Cherokee County, Alabama, similarly situated and with regard to a defendant class of all probate judges in the State of Alabama, that the questions of law or fact common to the members of the classes predominate over any questions affecting only individual members and that a class action is superior to other available methods for the fair and efficient adjudication of the controversy should the Court enter the relief sought by Plaintiff Owens with regard to a class of all citizens of Cherokee County, Alabama similarly situated.

V. Statement of Facts.

35. Alabama is a covered jurisdiction within the meaning of Section 5 of the Voting Rights Act of 1965, 42 U.S.C. § 1973 (c).

36. Therefore, legislation involving redistricting of the Alabama Senate must be either submitted to the United States Attorney General for preclearance

approval by the Department of Justice or approved through a declaratory judgment action filed in the United States District Court for the District of Columbia.

37. Act 2001-727 was precleared by the Attorney General of the United States on or around October 15, 2001.

38. The Alabama Legislature passed Act No. 2001-727 in a special session of the Legislature held between June 25, 2001 and July 2, 2001.

39. The Governor signed this legislation into law on July 3, 2001.

40. Act No. 2001-727 reapportions the population of Alabama, as reflected in the 2000 census, into thirty-five (35) State Senate districts for elections to occur in the years 2002, 2006, and 2010.

41. Act 2001-727 divides thirty (30) of Alabama's sixty-seven (67) counties between State Senate districts. [5]

42. Article IX, § 200 of the Alabama Constitution reads as follows:

> It shall be the duty of the legislature at its first session after taking of the decennial census of the United States in the year nineteen hundred and ten, and after each subsequent decennial census, to fix by law the number of senators, and to divide the state into as many senatorial districts as there are senators, which districts shall be as nearly equal to each other in the number of inhabitants as may be, and each shall be entitled to one senator, and no more; and such districts, when formed, shall not be changed until the next apportioning session of the legislature, after the next decennial census of the United States shall have been taken; provided, that counties

[5]See Exhibit "A" hereto.

> created after the next preceding apportioning session of the legislature may be attached to senatorial districts. **No county shall be divided between two districts, and no district shall be made up of two or more counties not contiguous to each other**.

Ala. Const. art. IX, § 200 (emphasis added).

43. Plaintiff Owens resides in Cherokee County, Alabama.

44. Cherokee County has been divided into two State Senate districts by Act 2001-727.[6]

45. Plaintiff Owens lives in the divided part of Cherokee County, Alabama that has been assigned to Senate District 13 in Act 2001-727.

46. The other parts of Cherokee County, Alabama that have been divided by Act 2001-727 have been assigned to Senate District 10 in Act 2001-727.[7]

47. Article IX, § 200 of the Alabama Constitution requires that the Alabama Legislature divide the State into senatorial districts and that "no county shall be divided between two districts, and no district shall be made up of two or more counties not contiguous to each other."

48. The division of Cherokee County by Act 2001-727 was not necessary to comply with federal law.

49. Act No. 2001-727 violates the requirements of Ala. Const. art. IX, §

[6] See Exhibit "A" hereto.
[7] See Exhibit "A" hereto.

200 and, therefore, should be enjoined from use in the 2002 elections or thereafter.

50. The division of Cherokee County, Alabama violates the requirements of Ala. Const. art. IX, § 200 that "prohibits a districting plan that divides a county between two districts." *Rice v. English*, --- So.2d --- (2002), 2002 WL 1052048*1.

51. If State Senate elections are permitted to be held in the state senate districts established by Act No. 2001-727, the constitutional rights of Plaintiff Owens and other citizens of Cherokee County, Alabama will be irreparably harmed.

52. Plaintiff Owens seeks immediate relief from the Court to remedy the violations of Ala. Const. art. IX, § 200, including an order enjoining the Defendants from conducting the 2002 elections pursuant to the State Senate districts created in Act No. 2001-727.

53. Action by this Court is necessary to ensure that Alabama's State Senate elections scheduled for 2002, and future elections in 2006 and 2010, are conducted in compliance with state law.

54. The Plaintiff and other citizens of Cherokee County, Alabama must become immediately informed of the lawful boundaries of the their State Senate districts to be used in these upcoming and future elections to contemplate their votes and whether to seek office to the Alabama Senate. Residency requirements

of state law necessitate this determination. Ala. Const., art. IV, § 47; *Butler v. Amos*, 292 So.2d 645 (1974); *Knight v. Gray*, 420 So.2d 247 (Ala. 1982).

55. There is a judiciable controversy regarding the legality of Act No. 2001-727 and whether it violates the Alabama Constitution. *See Rice v. English*, --- So.2d --- (2002), 2002 WL 1052048*5 ("We conclude that the authority of this Court to review challenges to acts of the Legislature on constitutional grounds is a bedrock principle of our State's legal heritage.")

56. The Defendants' scheduled conduct of the 2002 elections, and future elections in 2006 and 2010, pursuant to the districts created by Act No. 2001-727, necessitates resolution of this Complaint.

57. This litigation will benefit thousands of Alabama citizens residing in unconstitutional State Senate districts created by Act No. 2001-727. This litigation involves an effort to avoid improper future State Senate elections and constitutes public service litigation benefiting thousands of Alabama citizens, in addition to the Plaintiff. Alabama's common benefit doctrine, therefore, requires an award of litigation costs, expenses, and attorneys' fees to the Plaintiff. *Brown v. State*, 565 So.2d 585 (Ala. 1990); *Ex Parte Horn*, 718 So.2d 694, 706 (Ala. 1998).[8]

[8] Also see a discussion of Alabama's common benefit doctrine by the Eleventh Circuit Court of Appeals in *Smith v. GTE Corporation*, 236 F.3d 1291 (11th Cir. 2001).

VI. Violations of Law.

58. Plaintiff Owens incorporates paragraphs 1 through 57 herein by reference as though fully set out hereinafter.

59. Act No. 2001-727 violates the provisions and requirements of Ala. Const. art. IX, § 200 that prohibits the division of a county between districts.

60. Specifically, State Senate District 13, in which Plaintiff Owens resides, and State Senate District 10, where other Cherokee County citizens reside, do not comply with the requirement of Ala. Const. art. IX, § 200 that "prohibits a districting plan that divides a county between two districts." *Rice v. English*, --- So.2d --- (2002), 2002 WL 1052048*1.

61. If State Senate elections are permitted to be held in 2002, 2006 and 2010 pursuant to the districts created by Act No. 2001-727, the Plaintiff's rights under Ala. Const. art IX, § 200 will be violated.

62. Plaintiff requests that the Court enter a judgment in her favor declaring Act No. 2001-727 unconstitutional under state law and order the Defendants be enjoined from using Act No. 2001-727 in the 2002 elections or thereafter.

63. Plaintiff further requests an award of litigation costs, expenses, and attorneys' fees pursuant to the equitable common benefit doctrine established by Alabama law.

VII. Relief Requested.

WHEREFORE, PREMISES CONSIDERED, the Plaintiff prays that this Court will render judgment against the Defendants and provide the following relief:

A. Certify a plaintiff class of all citizens of the State of Alabama residing in Cherokee County, Alabama, naming Plaintiff Owens as class representative, or alternatively, assume jurisdiction over the Plaintiff's individual claims;

B. Certify a defendant class of all Probate Judges in the State of Alabama naming Defendant Phillip W. Jordan as class representative;

C. Enter declaratory relief that this Court has jurisdiction over the issues presented in this Complaint and to issue appropriate orders and grant relief caused by the enactment of Act No. 2001-727, which established state senate districts for use in the 2002, 2006, and 2010 Alabama elections;

D. Enter declaratory relief that the division of counties between State Senate districts in Act No. 2001-727 violates state law;

E. Enter declaratory relief that this Court shall exercise jurisdiction over the redistricting of the Alabama Senate because of the important rights at stake and the need for relief for violations of the Alabama

Constitution that have occurred, are occurring, and which may occur in the future;

F. Enter injunctive relief prohibiting the Defendants from conducting elections for the Alabama Senate pursuant to unconstitutional State Senate districts created by Act No. 2001-727;

G. Enter injunctive relief establishing a timetable and appropriate deadlines for establishment of Alabama Senate Districts to be used in the 2002 elections and thereafter, that comply with the requirements of the Alabama Constitution;

H. Advance this matter forward for a hearing on the merits on this Complaint;

I. Issue an Order awarding to the Plaintiff court costs, litigation costs, and expenses of this action, including reasonable attorneys' fees and all expenses pursuant to Alabama law;

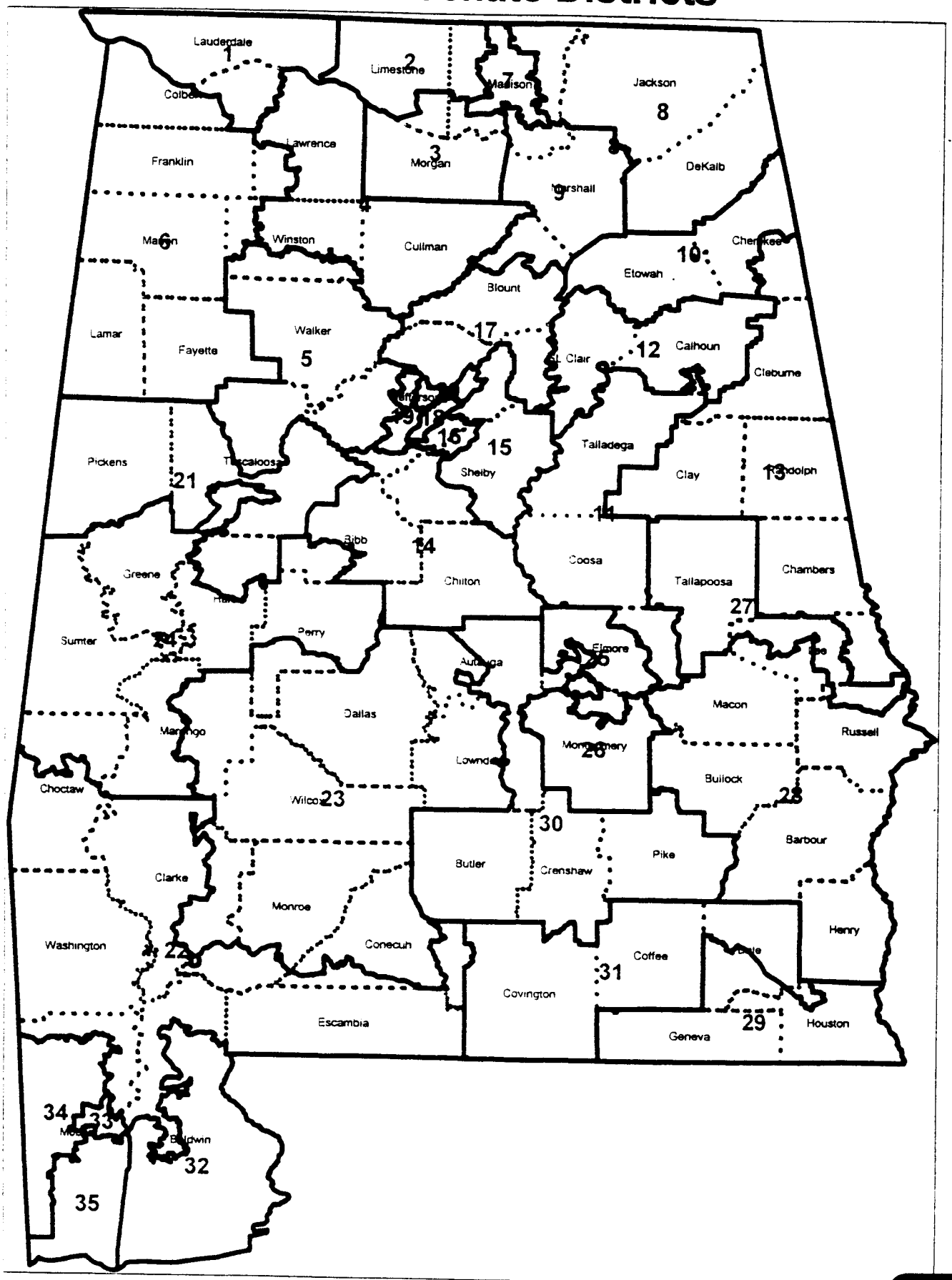
J. Grant further and different relief as this Court may deem appropriate.

Respectfully submitted this the 29th day of May 2002.

Mark G. Montiel
Attorney Identification # ASB-9485-T68M
Attorney for the Plaintiff, Lori J. Owens

OF COUNSEL:
MARK G. MONTIEL, P.C.
6752 Taylor Circle
Montgomery, AL 36117
(334) 396-3331
(334) 396-4465 Fax

2001 Senate Districts



2001 Senate Districts
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PLAINTIFF'S EXHIBIT A

Date: Jul 02, 2001
Time: 10:48 AM

DB: GEO_AL_2000
Plan Type: Senate

Plan Statistics

Plan: 2001 Senate Districts 6-28-01

Districts:	# of Members	Actual Population	Ideal Population	Absolute Deviation	Relative Deviation
District 1	1	129,916	127,060	2,856	2.248%
District 2	1	132,936	127,060	5,876	4.625%
District 3	1	133,270	127,060	6,210	4.887%
District 4	1	120,975	127,060	-6,085	-4.789%
District 5	1	132,211	127,060	5,151	4.054%
District 6	1	120,942	127,060	-6,118	-4.815%
District 7	1	132,662	127,060	5,602	4.409%
District 8	1	133,302	127,060	6,242	4.913%
District 9	1	133,237	127,060	6,177	4.861%
District 10	1	122,383	127,060	-4,677	-3.681%
District 11	1	125,386	127,060	-1,674	-1.317%
District 12	1	128,590	127,060	1,530	1.204%
District 13	1	123,328	127,060	-3,732	-2.937%
District 14	1	132,910	127,060	5,850	4.604%
District 15	1	127,771	127,060	711	0.560%
District 16	1	132,155	127,060	5,095	4.010%
District 17	1	131,440	127,060	4,380	3.447%
District 18	1	123,786	127,060	-3,274	-2.577%
District 19	1	121,797	127,060	-5,263	-4.142%
District 20	1	121,886	127,060	-5,174	-4.072%
District 21	1	121,552	127,060	-5,508	-4.335%
District 22	1	132,304	127,060	5,244	4.127%
District 23	1	120,985	127,060	-6,075	-4.781%
District 24	1	121,009	127,060	-6,051	-4.762%
District 25	1	132,011	127,060	4,951	3.897%
District 26	1	129,339	127,060	2,279	1.794%
District 27	1	129,653	127,060	2,593	2.041%
District 28	1	126,913	127,060	-147	-0.116%
District 29	1	122,176	127,060	-4,884	-3.844%
District 30	1	124,498	127,060	-2,562	-2.016%
District 31	1	122,750	127,060	-4,310	-3.392%
District 32	1	122,031	127,060	-5,029	-3.958%
District 33	1	127,288	127,060	228	0.179%
District 34	1	129,570	127,060	2,510	1.975%
District 35	1	124,138	127,060	-2,922	-2.300%

Date: Jul 02, 2001
Time: 10:48 AM

DB: GEO_AL_2000
Plan Type: Senate

Plan Statistics

Plan: 2001 Senate Districts 6-28-01

Districts:	# of Members	Actual Population	Ideal Population	Absolute Deviation	Relative Deviation
Grand Total:	35	4,447,100	4,447,100		

Ideal Population Per Member:	**127,060**		
Number of Districts for Plan Type:	35		
Range of District Populations:	120,942	to	133,302
Absolute Mean Deviation	353		
Absolute Range:	-6,118	to	6,242
Absolute Overall Range:	**12,360**		
Relative Mean Deviation:	0.00%		
Relative Range:	-4.82%	to	4.91%
Relative Overall Range:	**9.73%**		

Ideal - Actual:	*0*
Remainder:	*0*
Unassigned Population:	*0*

Date: Jul 03, 2001
Time: 11:15 AM

DB: GEO_AL_2000
Plan Type: Senate

All Districts - Pop by Geo

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

Districts	Tot Pop	Tot White	Tot Black	Tot Native Amer	Tot Asian	Tot Other
District 1	129,916	110,581	17,269	380	540	1,146
District 1	**129,916**	**110,581**	**17,269**	**380**	**540**	**1,146**
	100.000%	**85.117%**	**13.292%**	**0.292%**	**0.416%**	**0.882%**
District 2	132,936	104,510	23,335	843	1,991	2,257
District 2	**132,936**	**104,510**	**23,335**	**843**	**1,991**	**2,257**
	100.000%	**78.617%**	**17.554%**	**0.634%**	**1.498%**	**1.698%**
District 3	133,270	111,439	16,750	905	1,458	2,718
District 3	**133,270**	**111,439**	**16,750**	**905**	**1,458**	**2,718**
	100.000%	**83.619%**	**12.568%**	**0.679%**	**1.094%**	**2.039%**
District 4	120,975	110,855	5,475	2,094	284	2,267
District 4	**120,975**	**110,855**	**5,475**	**2,094**	**284**	**2,267**
	100.000%	**91.635%**	**4.526%**	**1.731%**	**0.235%**	**1.874%**
District 5	132,211	121,439	8,704	395	601	1,072
District 5	**132,211**	**121,439**	**8,704**	**395**	**601**	**1,072**
	100.000%	**91.852%**	**6.583%**	**0.299%**	**0.455%**	**0.811%**
District 6	120,942	109,839	7,804	454	242	2,603
District 6	**120,942**	**109,839**	**7,804**	**454**	**242**	**2,603**
	100.000%	**90.820%**	**6.453%**	**0.375%**	**0.200%**	**2.152%**
District 7	132,662	83,271	44,496	899	1,915	2,081
District 7	**132,662**	**83,271**	**44,496**	**899**	**1,915**	**2,081**
	100.000%	**62.769%**	**33.541%**	**0.678%**	**1.444%**	**1.569%**
District 8	133,302	122,546	4,213	1,718	395	4,430
District 8	**133,302**	**122,546**	**4,213**	**1,718**	**395**	**4,430**
	100.000%	**91.931%**	**3.160%**	**1.289%**	**0.296%**	**3.323%**
District 9	133,237	124,036	2,230	753	1,927	4,291
District 9	**133,237**	**124,036**	**2,230**	**753**	**1,927**	**4,291**
	100.000%	**93.094%**	**1.674%**	**0.565%**	**1.446%**	**3.221%**
District 10	122,383	103,366	16,489	409	596	1,523
District 10	**122,383**	**103,366**	**16,489**	**409**	**596**	**1,523**
	100.000%	**84.461%**	**13.473%**	**0.334%**	**0.487%**	**1.244%**
District 11	125,386	79,621	43,994	329	354	1,088
District 11	**125,386**	**79,621**	**43,994**	**329**	**354**	**1,088**
	100.000%	**63.501%**	**35.087%**	**0.262%**	**0.282%**	**0.868%**
District 12	128,590	113,606	12,281	524	811	1,368
District 12	**128,590**	**113,606**	**12,281**	**524**	**811**	**1,368**
	100.000%	**88.347%**	**9.551%**	**0.407%**	**0.631%**	**1.064%**
District 13	123,328	95,444	26,199	288	397	1,000

Date: Jul 03, 2001
Time: 11:15 AM

DB: GEO_AL_2000
Plan Type: Senate

All Districts - Pop by Geo

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

Districts	Tot Pop	Tot White	Tot Black	Tot Native Amer	Tot Asian	Tot Other
District 13	123,328	95,444	26,199	288	397	1,000
	100.000%	77.390%	21.243%	0.234%	0.322%	0.811%
District 14	132,910	118,145	11,725	383	908	1,749
District 14	132,910	118,145	11,725	383	908	1,749
	100.000%	88.891%	8.822%	0.288%	0.683%	1.316%
District 15	127,771	114,566	10,718	362	934	1,191
District 15	127,771	114,566	10,718	362	934	1,191
	100.000%	89.665%	8.388%	0.283%	0.731%	0.932%
District 16	132,155	119,678	6,741	224	3,672	1,840
District 16	132,155	119,678	6,741	224	3,672	1,840
	100.000%	90.559%	5.101%	0.169%	2.779%	1.392%
District 17	131,440	122,678	5,803	508	437	2,014
District 17	131,440	122,678	5,803	508	437	2,014
	100.000%	93.334%	4.415%	0.386%	0.332%	1.532%
District 18	123,786	36,980	82,769	226	2,146	1,665
District 18	123,786	36,980	82,769	226	2,146	1,665
	100.000%	29.874%	66.865%	0.183%	1.734%	1.345%
District 19	121,797	40,019	80,662	227	276	613
District 19	121,797	40,019	80,662	227	276	613
	100.000%	32.857%	66.227%	0.186%	0.227%	0.503%
District 20	121,886	40,001	80,075	267	486	1,057
District 20	121,886	40,001	80,075	267	486	1,057
	100.000%	32.818%	65.697%	0.219%	0.399%	0.867%
District 21	121,552	88,128	30,675	328	1,129	1,292
District 21	121,552	88,128	30,675	328	1,129	1,292
	100.000%	72.502%	25.236%	0.270%	0.929%	1.063%
District 22	132,304	87,135	39,894	3,829	350	1,096
District 22	132,304	87,135	39,894	3,829	350	1,096
	100.000%	65.860%	30.153%	2.894%	0.265%	0.828%
District 23	120,985	44,631	75,380	259	331	384
District 23	120,985	44,631	75,380	259	331	384
	100.000%	36.890%	62.305%	0.214%	0.274%	0.317%
District 24	121,009	44,284	75,520	136	434	635
District 24	121,009	44,284	75,520	136	434	635
	100.000%	36.596%	62.409%	0.112%	0.359%	0.525%
District 25	132,011	106,112	22,145	426	2,012	1,316

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Plan Type: Senate

All Districts - Pop by Geo

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

Districts	Tot Pop	Tot White	Tot Black	Tot Native Amer	Tot Asian	Tot Other
District 25	132,011	106,112	22,145	426	2,012	1,316
	100.000%	80.381%	16.775%	0.323%	1.524%	0.997%
District 26	129,339	34,958	92,486	304	956	635
District 26	129,339	34,958	92,486	304	956	635
	100.000%	27.028%	71.507%	0.235%	0.739%	0.491%
District 27	129,653	96,406	29,890	359	1,967	1,031
District 27	129,653	96,406	29,890	359	1,967	1,031
	100.000%	74.357%	23.054%	0.277%	1.517%	0.795%
District 28	126,913	53,160	71,653	357	613	1,130
District 28	126,913	53,160	71,653	357	613	1,130
	100.000%	41.887%	56.458%	0.281%	0.483%	0.890%
District 29	122,176	100,784	17,522	687	1,250	1,933
District 29	122,176	100,784	17,522	687	1,250	1,933
	100.000%	82.491%	14.342%	0.562%	1.023%	1.582%
District 30	124,498	84,646	37,737	556	560	999
District 30	124,498	84,646	37,737	556	560	999
	100.000%	67.990%	30.311%	0.447%	0.450%	0.802%
District 31	122,750	89,152	30,600	713	881	1,404
District 31	122,750	89,152	30,600	713	881	1,404
	100.000%	72.629%	24.929%	0.581%	0.718%	1.144%
District 32	122,031	111,896	7,125	715	643	1,652
District 32	122,031	111,896	7,125	715	643	1,652
	100.000%	91.695%	5.839%	0.586%	0.527%	1.354%
District 33	127,288	45,772	79,492	406	797	821
District 33	127,288	45,772	79,492	406	797	821
	100.000%	35.959%	62.451%	0.319%	0.626%	0.645%
District 34	129,570	113,877	11,456	671	2,120	1,446
District 34	129,570	113,877	11,456	671	2,120	1,446
	100.000%	87.888%	8.842%	0.518%	1.636%	1.116%
District 35	124,138	79,247	39,691	496	3,391	1,313
District 35	124,138	79,247	39,691	496	3,391	1,313
	100.000%	63.838%	31.973%	0.400%	2.732%	1.058%
Grand Total:	4,447,100	3,162,808	1,168,998	22,430	37,804	55,060
	100.000%	71.121%	26.287%	0.504%	0.850%	1.238%

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DB: GEO_AL_2000
Plan Type: Senate

District Summary

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

Name	Vap Total	Vap White	Vap Black Tot	Vap Native Amer	Vap Asian	Vap Other
District 1	99,715	86,245	11,990	285	386	809
	76.753%	86.492%	12.024%	0.286%	0.387%	0.811%
District 2	97,810	77,340	17,035	597	1,388	1,450
	73.577%	79.072%	17.416%	0.610%	1.419%	1.482%
District 3	99,384	84,620	11,223	660	1,047	1,834
	74.573%	85.144%	11.293%	0.664%	1.053%	1.845%
District 4	91,255	84,246	3,826	1,390	206	1,587
	75.433%	92.319%	4.193%	1.523%	0.226%	1.739%
District 5	101,017	93,268	6,259	304	410	776
	76.406%	92.329%	6.196%	0.301%	0.406%	0.768%
District 6	92,242	84,478	5,538	312	175	1,739
	76.270%	91.583%	6.004%	0.338%	0.190%	1.885%
District 7	99,987	65,803	30,620	662	1,472	1,430
	75.370%	65.812%	30.624%	0.662%	1.472%	1.430%
District 8	100,318	92,965	2,883	1,218	271	2,981
	75.256%	92.670%	2.874%	1.214%	0.270%	2.972%
District 9	100,426	94,352	1,436	549	1,341	2,748
	75.374%	93.952%	1.430%	0.547%	1.335%	2.736%
District 10	93,583	80,684	11,111	314	458	1,016
	76.467%	86.217%	11.873%	0.336%	0.489%	1.086%
District 11	94,095	62,125	30,610	268	267	825
	75.044%	66.024%	32.531%	0.285%	0.284%	0.877%
District 12	97,975	87,478	8,499	398	634	966
	76.192%	89.286%	8.675%	0.406%	0.647%	0.986%
District 13	91,568	72,276	18,095	211	294	692
	74.248%	78.932%	19.761%	0.230%	0.321%	0.756%
District 14	97,313	87,301	7,908	277	607	1,220
	73.217%	89.712%	8.126%	0.285%	0.624%	1.254%
District 15	94,698	85,742	7,175	278	652	851
	74.115%	90.543%	7.577%	0.294%	0.689%	0.899%
District 16	101,574	92,673	4,769	176	2,575	1,381
	76.860%	91.237%	4.695%	0.173%	2.535%	1.360%
District 17	98,764	92,682	4,064	369	299	1,350
	75.140%	93.842%	4.115%	0.374%	0.303%	1.367%
District 18	96,078	32,649	60,173	188	1,795	1,273
	77.616%	33.982%	62.629%	0.196%	1.868%	1.325%
District 19	89,221	32,763	55,654	167	202	435
	73.254%	36.721%	62.378%	0.187%	0.226%	0.488%

VOTING AGE POPULATION

Date: Jul 03, 2001
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DB: GEO_AL_2000
Plan Type: Senate

District Summary

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

Name	Vap Total	Vap White	Vap Black Tot	Vap Native Amer	Vap Asian	Vap Other
District 20	88,963	33,563	54,089	214	362	735
	72.989%	37.727%	60.799%	0.241%	0.407%	0.826%
District 21	93,316	70,061	21,120	260	953	922
	76.770%	75.079%	22.633%	0.279%	1.021%	0.988%
District 22	97,237	66,234	27,517	2,508	249	729
	73.495%	68.116%	28.299%	2.579%	0.256%	0.750%
District 23	85,501	34,895	49,927	194	238	247
	70.671%	40.812%	58.393%	0.227%	0.278%	0.289%
District 24	88,385	36,060	51,449	115	334	427
	73.040%	40.799%	58.210%	0.130%	0.378%	0.483%
District 25	100,988	82,426	15,876	315	1,456	915
	76.500%	81.620%	15.721%	0.312%	1.442%	0.906%
District 26	92,746	28,239	63,132	229	722	424
	71.708%	30.448%	68.070%	0.247%	0.778%	0.457%
District 27	100,984	77,925	20,496	293	1,521	749
	77.888%	77.166%	20.296%	0.290%	1.506%	0.742%
District 28	94,219	42,167	50,494	286	442	830
	74.239%	44.754%	53.592%	0.304%	0.469%	0.881%
District 29	90,862	76,922	11,269	507	899	1,265
	74.370%	84.658%	12.402%	0.558%	0.989%	1.392%
District 30	91,826	64,045	26,277	410	429	665
	73.757%	69.746%	28.616%	0.446%	0.467%	0.724%
District 31	92,182	69,274	20,801	516	649	942
	75.097%	75.149%	22.565%	0.560%	0.704%	1.022%
District 32	93,037	86,193	4,668	536	432	1,208
	76.240%	92.644%	5.017%	0.576%	0.464%	1.298%
District 33	92,489	37,483	53,535	294	613	564
	72.661%	40.527%	57.883%	0.318%	0.663%	0.610%
District 34	94,812	84,109	7,717	474	1,560	952
	73.174%	88.711%	8.139%	0.500%	1.645%	1.004%
District 35	89,108	60,890	24,740	370	2,203	905
	71.781%	68.333%	27.764%	0.415%	2.472%	1.016%
Grand Total:	**3,323,678**	**2,440,176**	**801,975**	**16,144**	**27,541**	**37,842**
	74.738%	**73.418%**	**24.129%**	**0.486%**	**0.829%**	**1.139%**

VOTING AGE POPULATION

COUNTY POPULATION BY DISTRICT

Date: Jul 03, 2001
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Plan Type: Senate

Assigned Districts - Splits

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

	Tot Pop	Tot White	Tot Black	Tot Native Amer	Tot Asian	Tot Other
District 1						
* Colbert	41,950	32,838	8,427	157	161	367
Lauderdale	87,966	77,743	8,842	223	379	779
District 1	**129,916**	**110,581**	**17,269**	**380**	**540**	**1,146**
District 2						
* Limestone	63,442	53,659	8,071	295	288	1,129
* Madison	69,494	50,851	15,264	548	1,703	1,128
District 2	**132,936**	**104,510**	**23,335**	**843**	**1,991**	**2,257**
District 3						
* Limestone	2,234	1,370	829	9	4	22
* Madison	19,972	15,584	3,108	149	831	300
Morgan	111,064	94,485	12,813	747	623	2,396
District 3	**133,270**	**111,439**	**16,750**	**905**	**1,458**	**2,718**
District 4						
Cullman	77,483	75,011	829	290	214	1,139
* Lawrence	32,954	25,503	4,622	1,738	59	1,032
* Winston	10,538	10,341	24	66	11	96
District 4	**120,975**	**110,855**	**5,475**	**2,094**	**284**	**2,267**
District 5						
* Jefferson	33,893	30,447	3,051	146	67	182
* Tuscaloosa	22,523	20,810	1,185	29	328	171
Walker	70,713	65,163	4,467	201	196	686
* Winston	5,082	5,019	1	19	10	33
District 5	**132,211**	**121,439**	**8,704**	**395**	**601**	**1,072**
District 6						
* Colbert	13,034	11,987	886	48	6	107
Fayette	18,495	16,075	2,237	38	36	109
Franklin	31,223	28,001	1,368	103	60	1,691
Lamar	15,904	13,816	1,934	18	14	122
* Lawrence	1,849	1,564	114	127	1	43
Marion	31,214	29,579	1,180	91	95	269
* Winston	9,223	8,817	85	29	30	262
District 6	**120,942**	**109,839**	**7,804**	**454**	**242**	**2,603**
District 7						
* Madison	132,662	83,271	44,496	899	1,915	2,081
District 7	**132,662**	**83,271**	**44,496**	**899**	**1,915**	**2,081**
District 8						
DeKalb	64,452	59,652	1,154	518	174	2,954
Jackson	53,926	49,552	2,125	946	174	1,129
* Madison	14,924	13,342	934	254	47	347

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Assigned Districts - Splits

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

	Tot Pop	Tot White	Tot Black	Tot Native Amer	Tot Asian	Tot Other
District 8	**133,302**	**122,546**	**4,213**	**1,718**	**395**	**4,430**
District 9						
* Blount	11,358	10,892	23	41	23	379
* Madison	39,648	36,353	834	279	1,616	566
Marshall	82,231	76,791	1,373	433	288	3,346
District 9	**133,237**	**124,036**	**2,230**	**753**	**1,927**	**4,291**
District 10						
* Cherokee	18,924	17,629	1,025	64	43	163
Etowah	103,459	85,737	15,464	345	553	1,360
District 10	**122,383**	**103,366**	**16,489**	**409**	**596**	**1,523**
District 11						
* Calhoun	20,725	7,979	12,230	62	103	351
Coosa	12,202	7,802	4,197	39	10	154
* Elmore	12,138	10,010	1,989	44	22	73
Talladega	80,321	53,830	25,578	184	219	510
District 11	**125,386**	**79,621**	**43,994**	**329**	**354**	**1,088**
District 12						
* Calhoun	91,524	80,558	8,912	383	717	954
* St. Clair	37,066	33,048	3,369	141	94	414
District 12	**128,590**	**113,606**	**12,281**	**524**	**811**	**1,368**
District 13						
Chambers	36,583	22,271	14,030	49	89	144
* Cherokee	5,064	4,639	356	11	17	41
Clay	14,254	11,776	2,259	45	20	154
Cleburne	14,123	13,380	536	42	33	132
* Lee	30,924	26,284	4,001	96	177	366
Randolph	22,380	17,094	5,017	45	61	163
District 13	**123,328**	**95,444**	**26,199**	**288**	**397**	**1,000**
District 14						
* Bibb	13,363	12,014	1,225	41	15	68
Chilton	39,593	34,330	4,259	111	105	788
* Jefferson	18,801	17,530	936	29	211	95
* Shelby	61,153	54,271	5,305	202	577	798
District 14	**132,910**	**118,145**	**11,725**	**383**	**908**	**1,749**
District 15						
* Jefferson	83,256	75,080	6,755	166	653	602
* Shelby	44,515	39,486	3,963	196	281	589
District 15	**127,771**	**114,566**	**10,718**	**362**	**934**	**1,191**
District 16						
* Jefferson	94,530	84,764	5,211	149	2,789	1,617

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Assigned Districts - Splits

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

	Tot Pop	Tot White	Tot Black	Tot Native Amer	Tot Asian	Tot Other
* Shelby	37,625	34,914	1,530	75	883	223
District 16	**132,155**	**119,678**	**6,741**	**224**	**3,672**	**1,840**
District 17						
* Blount	39,666	37,620	641	209	108	1,088
* Jefferson	64,098	59,818	3,177	198	253	652
* St. Clair	27,676	25,240	1,985	101	76	274
District 17	**131,440**	**122,678**	**5,803**	**508**	**437**	**2,014**
District 18						
* Jefferson	123,786	36,980	82,769	226	2,146	1,665
District 18	**123,786**	**36,980**	**82,769**	**226**	**2,146**	**1,665**
District 19						
* Jefferson	121,797	40,019	80,662	227	276	613
District 19	**121,797**	**40,019**	**80,662**	**227**	**276**	**613**
District 20						
* Jefferson	121,886	40,001	80,075	267	486	1,057
District 20	**121,886**	**40,001**	**80,075**	**267**	**486**	**1,057**
District 21						
* Hale	5,479	3,547	1,846	18	24	44
Pickens	20,949	11,720	9,064	25	36	104
* Tuscaloosa	95,124	72,861	19,765	285	1,069	1,144
District 21	**121,552**	**88,128**	**30,675**	**328**	**1,129**	**1,292**
District 22						
* Baldwin	18,384	10,470	7,597	94	77	146
* Choctaw	10,194	7,409	2,722	19	9	35
* Clarke	22,467	14,406	7,870	56	52	83
* Conecuh	3,241	2,855	346	8	2	30
Escambia	38,440	24,754	11,922	1,157	131	476
* Mobile	18,847	13,303	4,222	1,109	46	167
* Monroe	2,634	2,179	307	97	5	46
Washington	18,097	11,759	4,908	1,289	28	113
District 22	**132,304**	**87,135**	**39,894**	**3,829**	**350**	**1,096**
District 23						
* Autauga	3,017	1,491	1,497	11	3	15
* Clarke	5,400	1,183	4,195	6	3	13
* Conecuh	10,848	4,951	5,814	20	27	36
Dallas	46,365	16,496	29,472	50	175	172
* Lowndes	10,194	1,975	8,181	12	18	8
* Marengo	5,841	2,538	3,272	2	11	18
* Monroe	21,690	11,868	9,512	139	74	97
* Perry	4,447	503	3,943	0	1	0
Wilcox	13,183	3,626	9,494	19	19	25

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Assigned Districts - Splits

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

	Tot Pop	Tot White	Tot Black	Tot Native Amer	Tot Asian	Tot Other
District 23	**120,985**	**44,631**	**75,380**	**259**	**331**	**384**
District 24						
* Bibb	7,463	3,952	3,426	8	10	67
* Choctaw	5,728	1,370	4,344	6	0	8
Greene	9,974	1,904	8,032	12	10	16
* Hale	11,706	3,297	8,347	12	4	46
* Marengo	16,698	8,119	8,440	17	34	88
* Perry	7,414	3,157	4,214	9	5	29
Sumter	14,798	3,836	10,887	14	17	44
* Tuscaloosa	47,228	18,649	27,830	58	354	337
District 24	**121,009**	**44,284**	**75,520**	**136**	**434**	**635**
District 25						
* Elmore	37,840	31,890	5,073	162	254	461
* Montgomery	94,171	74,222	17,072	264	1,758	855
District 25	**132,011**	**106,112**	**22,145**	**426**	**2,012**	**1,316**
District 26						
* Montgomery	129,339	34,958	92,486	304	956	635
District 26	**129,339**	**34,958**	**92,486**	**304**	**956**	**635**
District 27						
* Lee	57,872	44,040	11,523	124	1,667	518
* Russell	30,306	21,892	7,757	126	200	331
Tallapoosa	41,475	30,474	10,610	109	100	182
District 27	**129,653**	**96,406**	**29,890**	**359**	**1,967**	**1,031**
District 28						
Barbour	29,038	14,887	13,550	131	115	355
Bullock	11,714	2,958	8,613	44	21	78
Henry	16,310	10,710	5,308	34	32	226
* Lee	26,296	14,923	10,864	53	272	184
Macon	24,105	3,365	20,550	39	103	48
* Russell	19,450	6,317	12,768	56	70	239
District 28	**126,913**	**53,160**	**71,653**	**357**	**613**	**1,130**
District 29						
* Dale	27,490	20,281	5,344	204	667	994
Geneva	25,764	22,442	2,772	197	49	304
* Houston	68,922	58,061	9,406	286	534	635
District 29	**122,176**	**100,784**	**17,522**	**687**	**1,250**	**1,933**
District 30						
* Autauga	40,654	33,730	6,052	183	285	404
Butler	21,399	12,492	8,773	45	46	43
Crenshaw	13,665	10,088	3,424	51	20	82
* Elmore	15,896	8,837	6,752	80	65	162

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Plan Type: Senate

Assigned Districts - Splits

Total Population Ethnic Breakout
Plan: 2001 Senate Districts 6-28-01

	Tot Pop	Tot White	Tot Black	Tot Native Amer	Tot Asian	Tot Other
* Lowndes	3,279	1,509	1,748	3	3	16
Pike	29,605	17,990	10,988	194	141	292
District 30	**124,498**	**84,646**	**37,737**	**556**	**560**	**999**
District 31						
Coffee	43,615	33,631	8,234	396	543	811
Covington	37,631	32,436	4,688	181	95	231
* Dale	21,639	16,260	4,965	93	105	216
* Houston	19,865	6,825	12,713	43	138	146
District 31	**122,750**	**89,152**	**30,600**	**713**	**881**	**1,404**
District 32						
* Baldwin	122,031	111,896	7,125	715	643	1,652
District 32	**122,031**	**111,896**	**7,125**	**715**	**643**	**1,652**
District 33						
* Mobile	127,288	45,772	79,492	406	797	821
District 33	**127,288**	**45,772**	**79,492**	**406**	**797**	**821**
District 34						
* Mobile	129,570	113,877	11,456	671	2,120	1,446
District 34	**129,570**	**113,877**	**11,456**	**671**	**2,120**	**1,446**
District 35						
* Mobile	124,138	79,247	39,691	496	3,391	1,313
District 35	**124,138**	**79,247**	**39,691**	**496**	**3,391**	**1,313**