U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General

Washington, D.C. 20035

February 22, 1993

G. Kenner Ellis, Jr., Esq.
City Attorney
P.O. Box 452
Greenville, Mississippi 38702-0452

Dear Mr. Ellis:

This refers to the city council redistricting plan for the City of Greenville in Washington County, Mississippi, submitted to the Attorney General pursuant to Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. 1973c. We received the information necessary to complete your submission on December 24, 1992.

We have considered carefully the information you have provided, as well as data obtained from the 1990 Census and comments and information received from other interested parties. According to 1990 Census data, black persons comprise 59.4 percent of the total population of the City of Greenville and 53.7 percent of the city's voting age population, with black population concentrations in the northern and western areas of the city. Information provided by the city indicates that 51.7 percent of the city's current registered voters are black. The city council is comprised of seven members: four of whom are elected from single-member wards; two elected from two superdistricts created from a combination of two of the four wards, and Greenville's mayor, elected at-large, who votes only in case of ties.

Under both the existing and proposed redistricting plans, the city's two northernmost wards (Wards 2 and 4) have total black population percentages in excess of 85 percent. Superdistrict 6, which combines Wards 3 and 4, is 69.4 percent black in total population and 64.5 percent black in voting age population. Under the proposed redistricting plan, the boundary between Wards 3 and 4 has been adjusted to satisfy constitutional

one person, one vote requirements. Other than this, the demographer made only minimal boundary adjustments to the existing plan. Both plans divide the black residents of Greenville into east-west superdistricts and fragments areas of black population concentration in the northern portion of the city. We note that although the city adopted the redistricting plan in August 1991, the city chose not to submit the plan for Section 5 review until more than one year later.

We are mindful of the fact that we granted Section 5 preclearance to this method of election and essentially the same district configurations in February 1990. In reviewing the submitted redistricting plan, we have taken into account new information, particularly the 1990 and 1991 elections under the existing plan, the 1990 census data showing an increased black share of the population in the city, and the 1991 redistricting process.

Our review of the recent city elections reveals that the city electorate was polarized along racial lines, a condition exacerbated by the significantly higher rate at which white voters turned out to vote compared to black voters. Depressed participation by minority voters is based in a history of racial discrimination such as that found in the City of Greenville, and continues to be reflected in the disparate socio-economic conditions between the city's black and white residents. Consequently, under the existing districting plan only in Wards 2 and 4, the two heavily-black northern wards, have black voters been able to elect candidates of their choice. The two black incumbent councilmembers are elected from Wards 2 and 4.

The design of Superdistrict 6, which combines some of the poorest and least politically active black voters in the city with voters from one of the city's most affluent and politically active white areas, was the factor that prompted our initial Section 5 objection to the election plan in 1989. While we withdrew that objection based upon the city's showing that blacks would comprise a substantial majority of that district's registered voters, we are now aware of the subsequent election results, as well as other factors, that suggest that the apparent opportunity of black voters to elect a candidate of their choice in that district is not a realistic one. We must assume that in drafting these changes, the city council was aware of this likely result.

The redistricting process in 1991 occurred against the backdrop of the 1990 elections. Members of the black community repeatedly advised the council that the western superdistrict, as configured, did not afford black voters an opportunity to elect a candidate of choice. These black leaders tried unsuccessfully to persuade the council to adopt a redistricting plan that would provide black voters meaningful electoral opportunities either by

uniting black population concentrations in northern Greenville into one superdistrict or by redrawing the city's wards in a manner that would have avoided the packing of black population into two majority-black wards. It appears that alternatives were presented during the redistricting process by the black community that would have accomplished both of these objectives and thus, would have more fairly recognized the existing black population in the city. Although the city council held formal public hearings during the redistricting process, the alternatives presented seem to have received little serious consideration. Indeed, it is reported that several of the white councilmembers actually walked out of a meeting at which the black community was raising its concerns about redistricting.

In light of these considerations, the city has offered no compelling, nondiscriminatory justification for its decision essentially to leave in place a districting scheme that has had the effect of minimizing black voting strength. Moreover, the plan appears to have been designed to foster the advantage of incumbent white councilmembers. While we recognize that the desire to protect incumbents may not in and of itself be an inappropriate consideration, it may not be accomplished at the expense of minority voting potential. See Garza v. Los Angeles County, 918 F.2d 763, 771 (9th Cir. 1990), cert. denied, 111 S.Ct. 681 (1991); Ketchum v. Byrne, 740 F.2d 1398, 1408-09 (7th Cir. 1984), cert. denied, 471 U.S. 1135 (1985).

Under Section 5 of the Voting Rights Act, the submitting authority has the burden of showing that a submitted change has neither a discriminatory purpose nor a discriminatory effect. See Georgia v. United States, 411 U.S. 526 (1973); see also the Procedures for the Administration of Section 5 (28 C.F.R. 51.52). In light of the considerations discussed above, I cannot conclude, as I must under the Voting Rights Act, that your burden has been sustained in this instance. Therefore, on behalf of the Attorney General, I must object to the proposed redistricting plan.

We note that under Section 5 you have the right to seek a declaratory judgment from the United States District Court for the District of Columbia that the proposed change has neither the purpose nor will have the effect of denying or abridging the right to vote on account of race or color. In addition, you may request that the Attorney General reconsider the objection. However, until the objection is withdrawn or a judgment from the District of Columbia Court is obtained, the redistricting plan continues to be legally unenforceable. Clark v. Roemer, 111 S. Ct. 2096 (1991); 28 C.F.R. 51.10 and 51.45.

To enable us to meet our responsibility to enforce the Voting Rights Act, please inform us of the action the City of Greenville plans to take concerning this matter. If you have any questions, you should call Donna M. Murphy (202-514-6153), an attorney in the Voting Section.

Sincerely,

James P. Turner
Acting Assistant Attorney General
Civil Rights Division

JUN 29 1993

G. Kenner Ellis, Jr., Esq.
City Attorney
P.O. Box 452
Greenville, Mississippi 38702-0452

Dear Mr. Ellis:

This refers to your request that the Attorney General reconsider the February 22, 1993, objection under Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. 1973c, to the 1992 city council redistricting plan for the City of Greenville in Washington County, Mississippi. We received your request on March 5, 1993; supplemental information was received on April 30 and May 27, 1993.

We have reconsidered our earlier determination in this matter based on the information and arguments you have advanced in support of your request, along with other information in our files and comments from other interested persons. According to the 1990 Census, black residents constitute 59.4 percent of the city's total population and 53.7 percent of its voting age population. As your reconsideration request points out, these percentages are essentially the same as shown by the 1980 Census, taking into account the annexation precleared in 1990.

The Greenville City Council is comprised of seven members: four are elected from single-member wards; two are elected from two superdistricts created from a combination of two of the four wards; and the mayor is elected at large but votes only to break a tie vote. The city obtained Section 5 preclearance for this election system in 1990 and does not seek to change the system now. What the city submitted for Section 5 review, and what we reviewed, was the 1992 redistricting plan. Your reconsideration request appears to argue that our Section 5 review should have been limited to whether the adjustments to the district lines were "within acceptable balance under Baker v. Carr." That surely is not the case. Section 5 requires Greenville to establish that its 1992 redistricting plan is not discriminatory

in purpose or effect on the basis of race or color, and the factors we consider in making that analysis are identified in the Procedures for the Administration of Section 5, 28 C.F.R Part 51.

Our analysis of those factors led us to object to the 1992 redistricting plan. We noted particular concerns about the city's choices with regard to Superdistrict 6 in light of the recent elections, which had been characterized by racially polarized voting and the defeat of candidates supported by black voters. Against this backdrop, we concluded that the city had failed adequately to explain its "least-change" approach to redistricting, which would leave in place a districting scheme that appears unnecessarily to fragment black population concentrations and minimize black voting strength. See Garza v. Los Angeles County, 918 F.2d 763 (9th Cir. 1990), cert. denied, 111 S.Ct. 681 (1991).

Your request for reconsideration relies upon voter turnout data for 1990 and 1991 municipal elections to show that black registered voters turn out to vote in numbers almost proportional to white registered voters in Superdistrict 6 and, on the basis of this analysis, you argue that black political participation in Superdistrict 6 is not depressed. Your letter states that these data confirm the city's position that black voters do have an equal opportunity to elect their candidates of choice depending on the "viability" of that candidate.

For our analysis, we assumed that the estimates of turnout by race for the 1990 and 1991 elections provided by the city are accurate. But, contrary to your suggestion, these data support our conclusion that black voter turnout in Superdistrict 6, as a whole, is depressed. The data show that in the 1990 special runoff election the proportion of black registered voters who voted was 20 percentage points lower than the proportion of white registered voters who voted in Superdistrict 6; in the 1991 general election the black voter turnout rate was 10 percentage points lower than the white turnout rate in Superdistrict 6. As a result of these turnout differentials, black voters are estimated to be about 50 percent of the voters in each of these elections. Thus, the new data you have provided confirm what appears to have been the common understanding about turnout in Superdistrict 6.

In addition, your reconsideration request appears to argue that any turnout differentials between blacks and whites are not tied to socioeconomic disparities traceable to a history of racial discrimination. You point to 1990 Census data showing

that black persons are in a better position economically than they were according to the 1980 Census. But our review of 1990 Census data shows that black residents in Greenville continue to lag significantly behind white residents in such areas as high school graduation and median household income, and that the gap between black persons and white persons within Superdistrict 6 appears to be even greater than it is in the rest of the city.

You also have provided the results of the April 1993 special election for the 2nd Congressional district to support your contention that a "viable" black candidate can win in Superdistrict 6. But, even assuming the relevance of a partisan contest for federal office to that inquiry, the submitted data do not allow one to determine the votes cast within the area comprising Superdistrict 6 in that election.

In sum, the city's reconsideration request does not provide an adequate, non-racial explanation for the city's "least change" approach to redistricting in light of the factors that prompted our objection. Indeed, the submitted data we have analyzed support our concerns that the 1992 redistricting plan does not fairly reflect black voting strength in the city and that the city council may have adopted the plan, in part, for that very reason.

In light of the considerations discussed above, I remain unable to conclude that the City of Greenville has carried its burden of showing the submitted change has neither a discriminatory purpose nor a discriminatory effect. See _Georgia_ v. _United States_, 411 U.S. 526 (1973); see also the Procedures for the Administration of Section 5 (28 C.F.R. 51.52). Therefore, on behalf of the Attorney General, I must decline to withdraw the objection to the proposed redistricting plan.

As we previously advised, you may seek a declaratory judgment from the United States District Court for the District of Columbia that the proposed change has neither the purpose nor will have the effect of denying or abridging the right to vote on account of race or color. We remind you that until such a judgment is rendered by that court, the objection by the Attorney General remains in effect and the proposed change continues to be legally unenforceable. _Clark_ v. _Roemer_, 111 S. Ct. 2096 (1991); 28 C.F.R. 51.10 and 51.45.

To enable us to meet our responsibility to enforce the Voting Rights Act, please inform us of the action the City of Greenville plans to take concerning this matter. If you have any questions, you should call Donna M. Murphy (202-514-6153), an attorney in the Voting Section.

Sincerely,

James P. Turner
Acting Assistant Attorney General
Civil Rights Division

U.S. Department of Justice

Civil Rights Division

Office of the Assistant Attorney General *Washington, D.C. 20035*

September 21, 1993

G. Kenner Ellis, Jr., Esq.
City Attorney
P.O. Box 452
Greenville, Mississippi 38702-0452

Dear Mr. Ellis:

This refers to your second request that the Attorney General reconsider the February 22, 1993, objection under Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. 1973c, to the 1992 city council redistricting plan for the City of Greenville in Washington County, Mississippi. We declined to withdraw the objection in response to your first request for reconsideration on June 29, 1993. We received your second request for reconsideration on July 23, 1993; supplemental information was received on August 13, 19 and 25, 1993, and on September 3, 9 and 10, 1993.

We have reconsidered our earlier determination in this matter based on the information and arguments that you have advanced in support of your request, along with other information in our files and comments from other interested persons. According to the 1990 Census, black residents constitute 59.4 percent of the city's total population and 53.7 percent of its voting age population. The Greenville City Council is comprised of seven members: four are elected from single-member wards; two are elected from two superdistricts created from a combination of two of the four wards; and the mayor is elected at large but votes only to break a tie vote. As we have noted in our February 22 and June 29, 1993 correspondence, our Section 5 objection to the 1992 redistricting plan focused upon the city's failure adequately to explain its "least-change" approach to redistricting, particularly with regard to Superdistrict 6 in which recent elections had been characterized by racially polarized voting and the defeat of candidates supported by black voters.

The city's second request for reconsideration essentially repackages arguments that the city made in support of its initial submission and its first request for reconsideration, which we previously have fully considered and found insufficient to meet the city's burden under Section 5. In this regard, the city acknowledges the lower voter turnout rates for black voters compared to white voters in recent city elections, as well as the socio-economic disparities between black residents and white residents, as reflected by census data. The city contends, however, that black voters would be able to elect candidates of their choice in Superdistrict 6 if they were sufficiently cohesive. The city also argues that the socio-economic disparities do not adversely affect black political participation and, in any event, are not attributable to a history of discrimination against black residents of Greenville. Thus, the city argues that because the redistricting plan provides black citizens an equal opportunity to participate in the political process and elect candidates of their choice, the plan complies with Section 2 of the Voting Rights Act and the city was not motivated by a racially discriminatory purpose in adopting the redistricting plan.

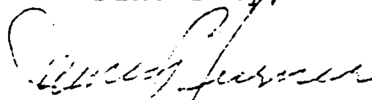
The limited, new information provided in support of the city's contentions does not reveal a basis for altering our conclusions about the apparent patterns of racially polarized voting in city elections and the disabling effects of the acknowledged socioeconomic disparities on black political participation. With regard to black political cohesion, there appears to be overwhelming black voter support for black candidates; that conclusion is not undermined by showing that the level of support falls short of unanimity. Nor does the city's information rebut the inference that the lower socio-economic status of black residents may properly be traced to a history of racial discrimination. Moreover, the city once again has failed to explain the reasons for the apparent fragmentation of black population concentrations by the redistricting plan.

In light of the considerations discussed above, I remain unable to conclude that the City of Greenville has carried its burden of showing the submitted change has neither a discriminatory purpose nor a discriminatory effect. See Georgia v. United States, 411 U.S. 526 (1973); see also the Procedures for the Administration of Section 5 (28 C.F.R. 51.52). Therefore, on behalf of the Attorney General, I must decline to withdraw the objection to the proposed redistricting plan.

As we previously advised, you may seek a declaratory judgment from the United States District Court for the District of Columbia that the proposed change has neither the purpose nor will have the effect of denying or abridging the right to vote on account of race or color. We remind you that until such a judgment is rendered by that court, the objection by the Attorney General remains in effect and the proposed change continues to be legally unenforceable. Clark v. Roemer, 111 S. Ct. 2096 (1991); 28 C.F.R. 51.10 and 51.45.

To enable us to meet our responsibility to enforce the Voting Rights Act, please inform us of the action the City of Greenville plans to take concerning this matter. If you have any questions, you should call Donna M. Murphy (202-514-6153), an attorney in the Voting Section.

Sincerely,



James P. Turner
Acting Assistant Attorney General
Civil Rights Division

November 17, 1995

Guy Kenner Ellis, Jr., Esq.
City Attorney
P.O. Box 452
Greenville, Mississippi 38702-0452

Dear Mr. Ellis:

This refers to your third request that the Attorney General reconsider and withdraw the February 22, 1993, objection interposed under Section 5 of the Voting Rights Act, 42 U.S.C. 1973c, to the city council redistricting plan for the City of Greenville in Washington County, Mississippi. We received your request on August 7, 1995; supplemental information was received on September 18 and October 26, 1995.

We have reconsidered our earlier determination in this matter based on the information and arguments you have advanced in support of your request, along with the other information in our files and comments received from other interested persons. According to the 1990 Census, black residents constitute 59.4 percent of the city's population and 53.7 percent of the voting age population. As noted in your reconsideration request, these percentages represent an increase of several percentage points over the black percentage of the city's population, according to pre-1990 Census estimates, following the city's annexation of a majority-white area in early 1990.

The City of Greenville elects its mayor (who votes on the city council only in the case of a tie) at large and elects the remaining six councilmembers from a combination of four single-member districts and two superdistricts that are created by pairing two of the four single-member districts ("4-2-1 plan"). Under both the existing and the objected-to redistricting plans, the northern single-member districts have voting age populations that are more than 83 percent black (Districts 2 and 4); the southernmost single-member districts have voting age populations that are majority-white (Districts 1 and 3). Superdistrict 6, which pairs Districts 3 and 4 in the western part of the city, is 69.4 percent black in population and 64.5 percent black in voting

age population, and Superdistrict 5 pairs Districts 1 and 2 in the eastern part of the city and is majority white in voting age population. As noted in our initial review of this matter, the objected-to plan makes only minimal changes to the existing plan, for which the city obtained preclearance in 1990.

Our Section 5 review of the objected-to plan took into account information that became available after the implementation of the existing plan including: a) intervening elections under the existing plan in which black candidates of choice were defeated in all contests except Districts 2 and 4; b) 1990 Census data showing an increase in the black share of the city's population from approximately 54 to 59 percent black; and c) information showing the continued existence of disparate socio-economic conditions and political participation rates for black city residents. Our analysis was informed by the Supreme Court's opinion in Arlington Heights v. Metropolitan Housing Corp., 429 U.S. 252 (1977), which holds that "[d]etermining whether invidious discriminatory purpose was a motivating factor demands a sensitive inquiry into such circumstantial and direct evidence of intent as may be available." Id. at 266.

Guided by the decision in Arlington Heights, 429 U.S. at 266-267, we reviewed the historical background of the decision to adopt the 1991 redistricting plan, taking into account the long history of discrimination in voting and related areas by the State of Mississippi, Washington County and the City of Greenville, as well as the city's six years of resistance to any resolution of the vote dilution case of Greenville Citizens for More Representative Government v. City of Greenville, No. GC77-99-LS-O (N.D. Miss.), and its subsequent refusal to consider any alternative plans for settlement of that case other than a districting plan essentially identical to the objected-to plan. We thoroughly reviewed the sequence of events that led to the adoption of the 1991 "least change" redistricting plan, including: a) the results of the 1990 elections indicating that Superdistrict 6 indeed did not provide black voters with an equal opportunity to elect a city council candidate of choice; b) the apparent decision by white city councilmembers from the outset of the 1991 redistricting process to limit the scope of the changes that would be undertaken in redistricting; c) the refusal by the counsel to consider alternative redistricting plans advocated by members of the black community that would have alleviated the packing and fragmentation of the black population among the council districts; and d) the apparent disregard for the serious concerns expressed by members of the black community concerning the city's "least change" approach to redistricting (including the fact that several white councilmembers walked out of a public meeting where such concerns were being expressed).

These latter two circumstances seem to constitute significant departures from a normal procedural sequence for redistricting, as does the fact that a June 1991 meeting where all alternative redistricting plans were to be discussed lasted only about 10 minutes. See Arlington Heights, 429 U.S. at 266.

Under the standards set forth in Arlington Heights, the impact the objected-to redistricting plan would have on minority electoral opportunity also was relevant to our analysis of the city's purpose in refusing to consider redistricting alternatives other than a "least change" approach. 429 U.S. at 266. Given the totality of relevant circumstances, we found that adopting the "least change" plan served to minimize minority electoral opportunity in the 59 percent black city. Moreover, under this analysis, it appeared that city officials had ignored the concerns of the minority community regarding the plan's impact largely because of, not merely in spite of, the dilutive effect the plan would have on minority electoral opportunity.

Against this backdrop, we concluded that the city had failed to meet its Section 5 burden of demonstrating the absence of a discriminatory purpose in adopting a "least change" approach to redistricting, which would leave in place a districting scheme that appears unnecessarily to fragment black population concentrations and minimize black voting strength. See Garza v. Los Angeles County, 918 F.2d 763 (9th Cir. 1990), cert. denied, 111 S.Ct. 681 (1991); see also the Procedures for the Administration of Section 5, 28 C.F.R. Part 51.

The instant request for reconsideration to a large extent simply repackages arguments the city made in support of its initial submission and its two prior reconsideration requests, which we previously considered and found insufficient to satisfy the city's burden under Section 5. With regard to the new assertions in the instant request, the city argues that the objection should be withdrawn simply because the objected-to plan is not retrogressive, citing in support of this proposition the Supreme Court's recent decision in Miller v. Johnson, 115 S.Ct. 2475 (1995).

The Supreme Court's decision in Miller does not change the burden of proof or the showing that must be made under Section 5 that a change has neither a discriminatory purpose nor effect. The plan at issue in Miller, unlike Greenville's, was ameliorative and did not simply maintain the status quo. The Supreme Court's decision in that case recognized that a jurisdiction adopting a non-retrogressive plan, or even an ameliorative plan, could be denied preclearance under Section 5 if the jurisdiction failed to prove that the plan's adoption was

not motivated by invidious considerations of race. 115 S.Ct. at 2492. As noted above, we concluded in our initial review of the objected-to plan that the city's choice of a "least change" redistricting approach, taking into consideration the totality of relevant circumstances, appeared to have been motivated by a desire on the part of white city councilmembers to retain white control of the city's governing body. The city has presented no new facts that would alter our conclusions in this regard.

In fact, credible information demonstrating that white city officials continue to engage in race-based decisionmaking and to design schemes the purpose of which is to avoid black control of city government was brought to our attention through the detailed notes of an October 20, 1995, meeting between the current mayor and two white mayoral candidates who are also city councilmembers. We understand that these notes have been made public in the City of Greenville.

In addition, the city suggests in its reconsideration request that in order to remedy the concerns expressed in our objection letter that the city would be required to adopt additional majority-black districts and that this would be prohibited under the Miller decision. This argument misses the thrust of our concerns regarding the objected-to plan and misconstrues the Supreme Court's decision. We have never stated that in order to obtain preclearance under Section 5 the city would have to adopt a plan with additional majority-black districts; we have suggested that there are readily available alternative districting configurations under the existing 4-2-1 election scheme that would avoid the concerns we expressed regarding, inter alia, the configuration of Superdistrict 6. Moreover, these alternatives, examples of which were made public during the redistricting process by advocates for the black community, would provide minority voters in Greenville a fair and equal opportunity to elect their candidates of choice to the council, which the existing configuration of districts has not. In light of this, we concluded that the city's failure to give serious consideration to any of these other redistricting alternatives had not been satisfactorily explained on a non-racial basis. In any event, Miller does not prohibit the creation of additional majority-minority districts where such districts do not "subordinate" traditional districting principles or are required under the Voting Rights Act.

The city also suggests in its request the existence of new facts or changed circumstances within the city that support withdrawal of the objection. For instance, the city asserts that since the 1990 Census black residents, who reside mostly in the segregated northern portions of the city, have moved into more middle-class housing in Districts 1 and 3 in the southern part of the city. The city maintains that these changes are a reflection of the upward mobility of black city residents and "a substantial positive change in socio-economic conditions." However, the city has provided no factual support for its assertion of improved socio-economic conditions among black city residents based on a significant migration southward, and we have been unable to corroborate this assertion in a manner that would be sufficient to warrant a withdrawal of our objection. While we have been able to verify a limited number of instances of black families relocating to areas in the southern part of the city, it appears, by and large, that black residents continue to reside in poorer communities, even in those areas located in majority-white districts such as District 3.

Finally, with regard to our concern that the objected-to plan appeared to foster the advantage of incumbent white councilmembers to the detriment of minority voting strength, you have informed us that the white incumbent councilmembers about whom we expressed concern in our 1993 objection letter are no longer running for reelection to their council seats. This concern was only one of many factors that supported our determination that, in 1991, the council appeared to have adopted the objected-to plan at least in part for discriminatory reasons. The circumstances regarding particular incumbents in this year's election cannot alter whatever discriminatory factors motivated the council in 1991.

In light of these considerations, I remain unable to conclude that the City of Greenville has carried its burden of showing that the submitted change has neither a discriminatory purpose nor a discriminatory effect. See Georgia v. United States, 411 U.S. 526 (1973); see also the Procedures for the Administration of Section 5 (28 C.F.R. 51.52). Therefore, on behalf of the Attorney General, I must decline to withdraw the objection to the city's redistricting plan.

As we previously advised, you may seek a declaratory judgment from the United States District Court for the District of Columbia that the proposed change has neither the purpose nor will have the effect of denying or abridging the right to vote on

account of race, color, or membership in a language minority group. We remind you that until such a judgment is rendered by that court, the objection by the Attorney General remains in effect and the proposed change continues to be legally unenforceable. See Clark v. Roemer, 500 U.S. 646 (1991); 28 C.F.R. 51.10.

To enable us to meet our responsibility to enforce the Voting Rights Act, please inform us of the action the City of Greenville plans to take concerning this matter. If you have any questions, you should call Zita Johnson-Betts (202-514-8690), an attorney in the Voting Section.

Sincerely,

Loretta King
Acting Assistant Attorney General
Civil Rights Division