Fair Representation for All? A Longitudinal Examination of the California Voting Rights Act

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Introduction

In November 2020, voters in the San Rafael City School District elected their first Latina school board trustee from an electoral district the school board drew to include the city's largest predominantly Latino neighborhoods after the city was threatened with litigation under the California Voting Rights Act in 2019. The California Voting Rights Act of 2001 has reshaped the election systems of hundreds of cities, school boards and special districts, including the San Rafael City School District. Intended to improve minority representation in local government by forcing local governments whose elections are at-large and racially polarized to elect their officials by district, questions have emerged about whether California Voting Rights Act has improved minority representation and the circumstances in which the law has improved representation.

In this paper, I add to the literature examining the California Voting Rights Act and voting rights generally by employing a longitudinal approach to measure the California Voting Rights Act's effects on the descriptive representation of Latinx and Asian voters in Bay Area school boards. I find that while it's likely that CVRA-driven election changes have increased minority representation on school boards, demographic changes and the growth in the Bay Area's Latinx and Asian populations may have also played a role in increasing descriptive representation.

Voting Rules and the California Voting Rights Act

The California Voting Rights Act prohibits at-large block voting in areas with racially polarized voting. At-large election rules, which gained popularity during the Progressive Era of the early 1900's, allow all voters in the jurisdiction to vote in all the jurisdictions' elections.

Different election rules can be applied to determine how at-large voting translates into election outcomes. Common election rules in Bay Area jurisdictions include at-large plurality block voting, at-large plurality/majority voting, and at-large voting with residency districts.

n **seats, *n* votes, single district:** Block voting is the most common election method for jurisdictions that elect members at-large. Under block voting, a number of seats are up for election on the same ballot and voters can vote for a number of candidates equal to the number of seats being elected, with the top vote getters being elected into office. At-large elections can dilute minority votes if white voters compose a majority and vote as a bloc for a slate of candidates, electing all the white-backed candidates and none of the minority-backed candidates. While minority voters can employ "single shot voting" to potentially elect candidates of choice by casting their ballots for a single candidate while white voters split their votes between a full slate of candidates, at-large elections can pose a barrier to the representation of racial minorities (U.S. Commission on Civil Rights, 1975, p. 207). School districts that use at-large elections, for example, have been shown to underrepresent Latinos, which, in turn, has ramifications for hiring teachers and administrators, as well as educational outcomes (Leal et al., 2004). The Huntington Beach, Calif., City Council elects its city councilmembers using at-large block voting. In its 2022 municipal elections, four seats were up for election; all Huntington Beach voters could vote for up to four candidates and the top four vote-getters were elected to the Council.

n **seats, one vote for each seat:** Other jurisdictions have used a single member plurality/majority variation of at-large election rules where all voters in the jurisdiction could vote on each seat up for election but candidates ran for one of several individual seats up for election. A hallmark of this system is that it effectively eliminates single-shot voting, a system minority voters have used to elect candidates of choice in jurisdictions using plurality block

voting (U.S. Commission on Civil Rights, 1975, p. 207). The City of Modesto used an at-large single-member majority election rule to elect city council members before the method was overturned in court (*Sanchez v. City of Modesto*, 2006, p. 826). Modesto City Council candidates ran for a single seat on the city council while city voters could vote for all individual seats up for election (*Sanchez v. City of Modesto*, 2006, pp. 826-827). If no candidate received a majority of votes cast for the seat in which they were running, a runoff election between the top two candidates would be held (*Sanchez v. City of Modesto*, 2006, p. 827).

n **districts, one vote per district, restrictions on candidates' location:** A third variant on at-large elections, often referred to as a residency district or a "from-district" model, requires candidates to live in a residential district within the jurisdiction but allows all voters in the jurisdiction to elect all seats up for election. This system can also limit or even eliminate single shot voting (U.S. Commission on Civil Rights, 1975, p. 208). The Shoreline Unified School District, located along the coast in west Marin and Sonoma counties, uses a "from-district" election system; candidates live in one of three trustee areas but all voters in the school district are able to vote for all seats up for election. Similarly, the Travis Unified School District uses a from-district election system to elect its five-member board. One board member must live in a district that consists of the school district's eponymous Air Force base while the remaining four seats on the board must live in a district that includes the rest of the school district's area but all voters in the school district can vote for all seats up for election.

Any variant of at-large elections can dilute the votes of voters who are in the minority in a given election. Because all voters get to vote for all seats in an at-large election, a bare majority of voters can elect 100 percent of the seats up for election. In jurisdictions with racially polarized voting, at-large elections can prevent racial and ethnic minorities from influencing election

outcomes or electing their candidates of choice. Variants of at-large voting that eliminate single-shot voting can be particularly harmful to minority representation under at-large elections (U.S. Commission on Civil Rights, 1975, pp. 207-208). In Modesto, Latino plaintiffs challenging the city's at-large election system argued that only one Latino had ever been elected to the city council under at-large elections despite Latinos comprising over a quarter of the city's population (*Sanchez v. City of Modesto*, 2006, p. 827). To address minority vote dilution caused by at-large elections, opponents of at-large elections have pushed for electing members by single-member districts, which could allow minority groups that are concentrated in certain parts of the jurisdiction to be able to elect candidates of choice.

Section 2 of the Voting Rights Act, which prohibits election rules that dilute minority votes, provided an avenue for challenging at-large elections in court. In *Thornburg v. Gingles*, the Court held that plaintiffs could show at-large election systems violated Section 2 of the federal Voting Rights Act by proving three elements: (1) the voters of a protected class are large and geographically concentrated enough to constitute a majority in at least one district, (2) that voters of a protected class vote cohesively in "racially polarized" elections and (3) voters not of the protected class vote consistently enough as a bloc to defeat the protected class' preferred candidate(s) (*Thornburg v. Gingles*, 1986). The first requirement proved a particularly burdensome barrier to challenging at-large elections in jurisdictions with racially polarized voting.

The California Voting Rights Act of 2001 modified the *Gingles* racial vote dilution test by explicitly removing the requirement that plaintiffs show the protected class is "geographically compact or concentrated" to prevail in a vote dilution lawsuit (Calif. Elections Code, §14028). Instead, plaintiffs must simply prove the last two elements of the Gingles test: that racially

polarized voting exists and disadvantaged protected class voters, a lower burden of proof. Plaintiffs who prevail in CVRA-related litigation are also entitled to attorneys fees from the defendant jurisdictions. Because of this financial consideration, oftentimes the mere threat of a lawsuit is enough to convince jurisdictions to change their election system to single-member districts.

The effects of converting to district elections have been disputed in the literature. An analysis of southern cities revealed that converting municipal elections from at-large to by-district increased the number of Black officeholders, particularly in majority-white cities with districts where Black voters composed 40 to 60 percent of the electorate (Grofman and Davidson, 1994). Some analyses have found little difference in minority officeholding between cities using at-large election systems and other systems (Bullock and McManus, 1987). Other analyses found that converting to district elections could increase minority representation in cities where the minority population is not a majority but is sufficiently large and concentrated (Trounstine and Valdini, 2008).

Reviews of the California Voting Rights Act's effects have been similarly contradictory. One review of city councils found that converting to districts increased Latino descriptive representation by around 10 percent (or half a seat) (Collingwood and Long, 2019). A review of school districts that adopted district elections as a result of the CVRA found that many school districts experienced little changes in Latinx officeholding but school districts where the minority population was large and segregated were more likely to see increases in minority descriptive representation (Abott and Magazinnik, 2020). School districts that were less segregated or had smaller minority populations were more likely to see null or even negative changes to minority representation on their school boards (Abott and Magazinnik, 2020).

Nevertheless, in the decades following the CVRA's enactment, a flurry of cities, school districts and special districts have switched from at-large elections to district-based elections because of the CVRA. This paper aims to examine spatial trends in CVRA-driven election rule changes, and add to the literature regarding the effectiveness of the CVRA at increasing Latinx and Asian descriptive representation on Bay Area school boards.

Temporal and Spatial Distribution of School District Transitions

In 2005, Hanford Joint Union High School District became the first California school district to transition from an at-large to single-member district election system after the CVRA took effect in 2003. The following year, the California Appeals Court upheld the CVRA in *Sanchez v. City of Modesto* and found that the Modesto City Council's at-large election system violated the CVRA. Following the *Sanchez v. City of Modesto* ruling upholding the law, the number of school districts transitioning to district elections has increased significantly as litigation activity increased.

To enumerate the number of transitions to CVRA-compliant elections, we turn to school district reorganization waivers granted by the California State Board of Education (SBE). Under California law, changes to a school district's election systems, including transitioning to trustee areas, must be approved by school district voters in a district-wide referendum. School districts can, however, petition the SBE to waive this requirement. Many school districts, fearful of litigation that could arise if voters rejected the change to their election rules, have successfully petitioned the state board for waivers. The SBE typically approves several waivers at each of its bimonthly meetings.

A review of SBE meeting agendas and minutes shows that the SBE has heard requests from 230 school districts for election requirement waivers to transition to trustee area elections from January 2003 to May 2020, the last meeting before candidate filing opened in the 2020 General Election. The data also confirms that the CVRA has resulted in an increase in school districts seeking SBE waivers and that the temporal and spatial distribution of waiver requests is not uniform. While few school districts requested waivers in the first few years after the CVRA was enacted (due in part to uncertainty surrounding the law, especially while the law was challenged in *Sanchez v. City of Modesto*), the number of waivers increased significantly after the California appeals court upheld CVRA in its *Sanchez* ruling. The waiver requests after *Sanchez* have been clustered around the release of Census data, when redistricting activity is greatest.

Figure 1: School Districts Requesting SBE Waivers to Transition from At-Large to Trustee Area Elections vs. Year
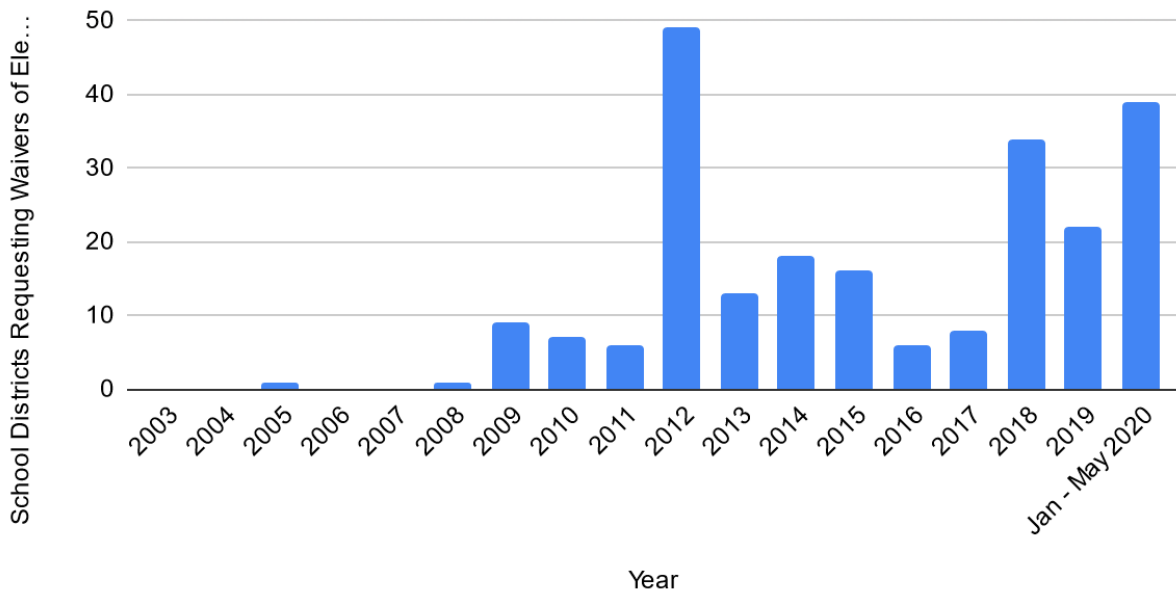
A significant share of districts are located in the San Joaquin Valley, which includes the counties of Fresno, Kern, Kings, Madera, Merced, San Joaquin, Stanislaus, and Tulare. As of May 2020, 35.3 percent of the state's waiver requests involved school districts based in the San Joaquin Valley while the region only comprised 10.9 percent of the state's population. Early CVRA litigation was particularly focused on the San Joaquin Valley. Of the 24 school districts that requested waivers from the SBE from 2005 to 2011, 21 of them were located in the San Joaquin Valley.

Since 2013, however, most SBE waiver requests have originated outside the Central Valley. A plurality of SBE waiver requests since 2013 have come from school districts in the Southern California counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino, San Diego and Ventura, owing perhaps to the region's large population and number of school districts.

The Bay Area has emerged as a new hotspot of CVRA activity. The first school district in the nine-county Bay Area region requested a SBE waiver in 2010 and has seen increased numbers of CVRA-driven election changes in the past five years. Between 2010 and May 2020, 28 Bay Area school districts requested waivers from SBE to transition to district-based elections and a court ordered a 29th district, the West Contra Costa Unified School District, to transition in 2019 after successful litigation. Nine additional Bay Area school districts held their first trustee area elections during the 2022 elections and will be fully transitioned to district elections after their school board elections in 2024.
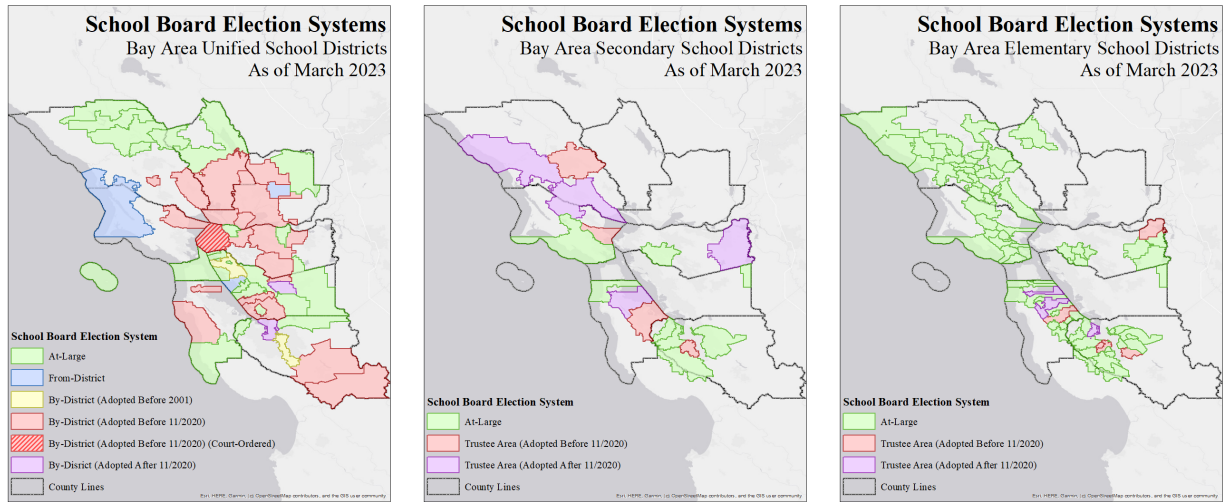
Figure 2. Election systems used in Bay Area school districts as of March 2023.

During this time, the Bay Area has also grown more diverse. As Table 1 shows, the Bay Area's voting-eligible population has grown increasingly diverse. Between 2010 and 2019, Asian and Latinx communities grew by over 40 percent and thus became a larger share of the electorate while black communities grew at much slower rate of 3.6% and white communities slightly decreased in size by and thus became a smaller share of the electorate.

Table 1: Demographic changes in the Bay Area's voting eligible population (thousands)

	2010	2019	% Change
Total Eligible Voters (% of total)	4,464	5,105	14.36%
Hispanic or Latinx	611	886	45.01%
	(13.7)	(0.173)	(26.28%)
Non-Hispanic White	2,509	2,456	-2.11%
	(0.562)	(0.481)	(-14.41%)
Non-Hispanic Black	359	372	3.62%
	(0.080)	(0.073)	(-8.75%)
Non-Hispanic Asian	904	1,294	43.14%

(0.207)   (0.253)   (22.22%)

CVRA-related election system changes have affected school districts of varying

demographics. Nineteen school districts that transitioned to district-based elections were

majority-white both in 2010 and 2023 (65.5%); seven school districts were majority-minority in

both 2010 and 2023 (24.1%) and three school districts—the South San Francisco, Dublin and

Antioch unified school districts—were majority-white in 2010 and became majority-minority by

2023 (10.3%). By comparison, in the 105 Bay Area school districts whose elections have

remained at-large, 78 school districts (74.3%) were not majority-minority in either 2010 or 2023;

18 school districts (17.1%) were majority-minority in both, nine school districts (8.6%) were not

majority-minority in 2010 and became majority-minority by 2023.

This paper focuses on CRVA-related activity in the Bay Area, an emerging area of CVRA

activity, and seeks to assess the impact CVRA-related election changes have had on minority

representation on Bay Area school boards and identify demographic characteristics of the school

districts and trustee areas that facilitated increases in minority representation.

Methods

I employ a cohort-based approach to assess the California Voting Rights Act's overall

effectiveness at increasing minority representation on Bay Area school boards. I obtained the

names of school board trustees serving on Bay Area school boards in 2010 and 2023 from

official statements of the vote and candidate rosters from each county Registrar of Voters for the

2006, 2007, 2008, 2009 (the four most recent elections in which School Board candidates were

elected before 2010)[1] and the 2020 and 2022 elections (the two most recent elections). In Contra

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[1] One school district held elections in 2005 and 2008.

Costa and Napa counties, where the County Registrars' Offices did not supply the necessary

information, I obtained information on school board members from archived copies of school

district websites and contemporary news accounts. I used surname-matching to identify Latinx

and Asian school board trustees serving on the school boards of the 29 school districts that

transitioned from at-large to by-district elections before May 2020 and 72 school districts that

remained at-large in 2009, before the first Bay Area school district transitioned to by-district

elections and 2023, after school board's most recent elections; 23 school districts that remained

at-large were excluded from the cohort because of school district boundary changes, over ⅓ of

seats had no filed candidates or missing data.[2] The nine school districts that transitioned from

at-large to district elections after May 2020 were also excluded from both cohorts because they

have only held one election in 2022 using by-district voting and only a portion of their board has

been elected using by-district elections because of trustees' staggered terms.

Table 2: Sample sizes of treatment and control cohorts as well as excluded school districts

	School Districts Transitioned From At-Large to	School Districts with Unchanged At-Large Elections	School Districts excluded from At-large cohort

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[2] Two school districts were excluded due to significant changes to their boundaries and the size

of their board: the Lammersville Unified School District separated from the Tracy Union High

School District in 2011 and the Laguna Union School District absorbed two rural school districts,

the Lincoln School District and the Union Joint School District since 2010 and enlarged its board

from three members to five. Ten school districts, primarily rural school districts in Sonoma

County, were excluded because at least ⅓ of board seats on the board had no filed candidates.

Ten school districts, located primarily in the counties of Contra Costa and Napa, were excluded

because of missing data

By-District Elections

Number of school districts	29	73	22
Number of seats	159	477	104

In the event an incumbent was appointed to fill a vacancy that occurred mid-term, I exclude appointed incumbents who have not been elected by voters in a special election as appointed incumbents reflect the decisions of other members of their respective school board and may not be the candidate of choice of the voters. I instead use the school board trustee who resigned and created the vacancy, as they are the last person directly elected by voters and thus provide a better standard for assessing whether the California Voting Rights Act's electoral forms result in more Latinx and Asian candidates getting *elected* to Bay Area school boards.

I compare minority representation on school boards that have transitioned to by-district elections to a control cohort of school districts whose election systems remained at-large using the Gallagher and Loosemore-Hanby disproportionality indices, two indices that Taagepera and Grofman found to have the fewest paradoxes compared to other disproportionality indices (Taagepera and Grofman, 2003). To calculate these indices, I use the number of Latinx and Asian trustees as the seats and the racial groups' percent of the voting eligible population in the cohort as the votes, using five-year citizen voting age population estimates from the 2010 and 2019 American Community Surveys for the 2010 and 2023 cohorts respectively. Using census data from the same time period as each cohort should allow us to remove the effects that demographic change would have on the indices. I also separated the treatment and control cohorts into three subsets—districts that were majority-minority in both 2010 and 2023, districts that were majority-white in 2010 but became majority-minority by 2023 and districts that were

consistently majority-white in order to further assess the role changing demographics may play in changing descriptive representation in addition to CVRA-related election changes..

Results

As Table 3 shows, the Bay Area has grown more diverse. Latinx and Asian communities have become a larger share of the voting eligible population in the cohort, increasing by 28.6 percent and 24.8 percent respectively. School districts that were and were not majority-minority in 2010 have both seen an increase in both groups since 2010. School districts in the cohort and all three subsets saw increases in Latinx descriptive representation.

Table 3: Trustee demographics, voting eligible populations and dissimilarity index values for treatment and control groups.

	Total		Treatment group		Control group	
Number of Seats	636		159		477	
	2010	2023	2010	2023	2010	2023
Latinx Trustees	0.095	0.162	0.082	0.197	0.101	0.152
Asian Trustees	0.063	0.132	0.044	0.115	0.071	0.139
Latinx VEP	0.137	0.172	0.147	0.189	0.131	0.162
Asian VEP	0.212	0.262	0.161	0.201	0.235	0.296
Loosemore-Hanby Index	0.184	0.137	0.182	0.087	0.194	0.167
Gallagher Index	0.167	0.131	0.160	0.083	0.181	0.162

Table 3 confirms that the treatment cohort has seen a larger increase in minority representation compared to the control cohort. As a result, the treatment cohort's

disproportionality index values dropped by a much larger percentage than the control cohort. Descriptive representation, however, has improved in both school districts that remained at-large and those that converted to districts, suggesting that additional factors may be influencing descriptive representation on Bay Area school boards beyond CVRA-driven changes to election rules.

While the data above suggest that the CVRA may have increased Asian and Latinx descriptive representation, it may mask important differences and trends between subsets of the sample with different shares of non-white voters. Accordingly, I separated the treatment and control cohorts into three subsets—districts that were majority-minority in both 2010 and 2023, districts that were majority-white in 2010 but became majority-minority by 2023 and districts that were consistently majority-white. Table 4 shows the dissimilarity index values for each subset in 2010 and 2023.

Table 4: Dissimilarity index values for school districts in the treatment and control cohorts that are majority-minority, were majority-white in 2010 but subsequently became majority-minority, and that are majority-white.

	n=	Year	Loosemore-Han by Index	Gallagher Index
Treatment Group, Majority-Minority in both 2010 and 2023	39	2010	0.172	0.155
		2023	0.174	0.156
Control Group, Majority-Minority in both 2010 and 2023	87	2010	0.166	0.152
		2023	0.177	0.154
Treatment Group, Majority-Minority only in 2023	15	2010	0.337	0.292
		2023	0.184	0.174
Control Group,	52	2010	0.126	0.112

Majority-minority only in 2023		2023	0.100	0.098
Experimental group, never majority-minority	105	2010	0.127	0.111
		2023	0.025	0.023
Control group, never majority-minority	333	2010	0.084	0.073
		2023	0.061	0.060

My analysis suggests that converting district elections had little effect on school districts that were already majority-minority in 2010. Majority-minority school districts in both cohorts had an overall slight increase in disproportionality indices, likely a result of minority representation not keeping pace with growing minority populations. I suspect this may be due to effects associated with incumbency. In local elections, incumbents are often favored for re-election if they choose to seek it due to higher name recognition and easier access to endorsements and fundraising. As a result, popular white incumbents may be able to win re-election even as their school district grows more diverse.

The results in school districts that became majority-minority between 2010 and 2023 underscore that demographic changes and growth in minority communities may be a confounding variable. The subsets of both cohorts had decreases in their respective disproportionality indices but the treatment group had a much more pronounced decrease. I suspect that demographic changes have powered the increased descriptive representation in both subsets but that CVRA-related election changes may have accelerated these changes by removing the factor incumbency that may result in a majority-minority trustee area electing a popular white incumbent over a trustee from the minority community. During CVRA-driven districting, incumbents who live near one another may be paired in the same district, resulting in

an open seat trustee area elsewhere in the school district. For example, if several incumbents lived in a majority-white neighborhood in one part of the school district, they could be drawn into a single trustee area, creating an open seat in an area of the school district with a growing minority population, enabling residents there to elect a candidate of choice without having to run against a white incumbent. In the West Contra Costa Unified School District, three white incumbents were drawn into the same trustee area, creating two trustee areas without incumbents that were subsequently won by Black candidates.

The effects of treatment on school districts that are not majority-minority was the most pronounced of all three subsets. While the majority-white subset of the control cohort saw a modest decrease in its disproportionality indices, the subset from the treatment group saw a significant decline and its disproportionality index values nearly reached zero. The majority-white experimental subset also had the lowest disproportionality index scores of all subsets, suggesting that the district elections produced the most proportional results in school districts where Asian and Latino voters were not already a majority of the electorate.

Conclusion

The landmark California Voting Rights Act has dramatically reshaped California's local elections, spurring hundreds of cities, school boards and special districts to transition their election rules from a variant of at-large elections to by-district elections. By removing the first element of the Gingles test, the California Voting Rights Act has facilitated litigation in the state but raised concerns that districts drawn because of the law may not enable minority voters to elect candidates of choice. With the federal Voting Rights Act appearing increasingly threatened, the California Voting Rights Act May provide a framework for other states to enact state-level

voting rights protection. I add to the limited literature studying this landmark voting rights law by examining the impact of the California Voting Rights Act using a longitudinal cohort-based approach for two racial groups.

My findings appear to support findings in Grofman and Davidson that adopting district elections had the most significant impact in majority-white jurisdictions. In both school districts that were consistently majority white and that were majority-white in 2010 and became majority-minority before 2023, the cohort treated with district elections had much larger decreases to their disproportionality index scores than the cohort that remained at-large.

While my findings may add to scholarly discussion about the CVRA, significant limitations need to be recognized. First, incumbency may be a confounding variable. In local elections, incumbents are often favored for re-election which could potentially enable white incumbents previously elected at-large to win in district elections drawn to empower a minority community. Due to the fact that most Bay Area school districts that converted to district elections did so within the past five years, many trustee areas have not had an open-seat election yet. A second, somewhat related, limitation is that many school board seats included in the cohort have only had one or two elections since their respective school boards transitioned to district elections. It's possible that descriptive representation improves over time as more seats become open seats.

My research aims to add to the discussion regarding the California Voting Rights Act and voting rights more generally by examining changes to election systems and descriptive representation in Bay Area School Boards. While my findings may help answer questions about the effectiveness of the law, further areas of inquiry remain, including assessing the role of

incumbency in jurisdictions' elections after they have completed a CVRA-driven election change.

References:

Abott, C. and Magazinnik, A. (2020), At-Large Elections and Minority Representation in Local Government. *American Journal of Political Science, 64*(3), 717-733. Retrieved Oct. 20 from

https://www.jstor.org/stable/pdf/45295343.pdf?refreqid=excelsior%3A9e9c377d9de9efad b813994956f218fc&ab_segments=&origin=&acceptTC=1

Bullock, C. S. and McManus, S. A. (1987). Staggered Terms and Black Representation. *The Journal of Politics, 49*(2), 543-552. https://www.jstor.org/stable/2131313

Collingwood, L. and Long, S. (2019). Can States Promote Minority Representation? Assessing the Effects of the California Voting Rights Act. *Urban Affairs Review, 57*(3), 731-762. https://doi.org/10.1177/1078087419896854

Grofman, B. and Davidson, C. (1994). The Effect of Municipal Election Structure on Black Representation in Eight Southern States. In Davidson, C. and Grofman, B., *Quiet revolution in the South: The impact of the Voting Rights Act, 1965-1990* (pp. 302-33). Princeton University Press. Retrieved Nov. 7, 2022 from

https://www.socsci.uci.edu/~bgrofman/81%20BG%20The%20Effects%20of%20Municip al%20Election.pdf

Leal, D. L., Martinez-Ebers, B., and Meier, K. J. (2004). The Politics of Latino Education: The Biases of At-Large Elections. The Journal of Politics, 66(4), pp. 1224-1244. Retrieved Nov. 18, 2022 from

https://www.journals.uchicago.edu/doi/full/10.1111/j.0022-3816.2004.00297.x

Sanchez v. City of Modesto, 51 Cal. Rptr. 3d 821, 145 Cal. App. 4th 660 (Ct. App. 2006).

https://scholar.google.com/scholar_case?case=16733738998824221602&q=sanchez+v.+city+of+modesto+(2006)&hl=en&as_sdt=2006

Taagepera, R. and Grofman, B. (2003). Mapping the Indices of Seats-Votes Disproportionality and Inter-Election Volatility. *Party Politics, 9*(6), 659-677. Retrieved Dec. 16, 2022 from https://journals.sagepub.com/doi/pdf/10.1177/13540688030096001?casa_token=mZN0GxLDWvEAAAAA:8Cj_QGPZUe3-cepY88E2J_WJvzsJAi7rft2kehnKcDpdEAeEqlvSwCsHVgWoQFRGwVjm-fyzVQyu

Thornburg v. Gingles, 478 U.S. 30 (1986). https://supreme.justia.com/cases/federal/us/478/30/

Trounstine, J. and Valdini, M. E. (2008). The Context Matters: Effects of Single-Member versus At-Large Districts on City Council Diversity. American Journal of Political Science, 52(3), pp. 554-569. Retrieved Nov. 18, 2022 from https://faculty.ucmerced.edu/jtrounstine/Troudini_AJPS.pdf

United States Commission on Civil Rights (1975). Voting Rights Act: Ten Years after: Report of the United States Commission on Civil Rights. Washington, The Commission.