

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION

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CLERK OF DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

CROCKETT COUNTY, TENNESSEE; and  
the CROCKETT COUNTY BOARD OF  
COUNTY COMMISSIONERS,

Defendants.

**1-01-1129**

CIVIL ACTION No.

COMPLAINT

The United States of America, plaintiff herein, alleges:

1. The Attorney General files this action pursuant to Sections 2 and 12(d) of the Voting Rights Act of 1965, as amended, 42 U.S.C. 1973 and 42 U.S.C. 1973j(d).

2. The Court has jurisdiction of this action pursuant to 28 U.S.C. 1345 and 42 U.S.C. 1973j(f).

3. Defendant Crockett County is a political and geographical subdivision of the State of Tennessee.

4. Defendant Crockett County Board of Commissioners is the body established under the laws of the State of Tennessee that is responsible for governing and administering Crockett County. The Board of Commissioners has the power to establish districts for the election of its own members.

5. According to the 2000 Census, the total population of Crockett County is 14,532, of whom 11,910 (82.0%) are white and 2,088 (14.4%) are black.

6. According to the 2000 Census, the voting age population of Crockett County is 10,878, of whom 9,061 (83.3%) are white and 1,496 (13.8%) are black.

7. The Crockett County Board of Commissioners is composed of 24 members elected from twelve multi-member districts to four-year, concurrent terms.

8. Voters in each voting district elect two commissioners to four-year terms from numbered posts called "positions."

9. Voters in each district are entitled to cast two votes for commissioner, one vote for each position. Candidates run for the position of their choice.

10. The black population of Crockett County is sufficiently numerous and geographically compact that a properly apportioned multi-member district plan for electing the defendant Board of Commissioners can be drawn in which black voters would constitute an effective majority in two districts out of twelve.

11. Black voters in Crockett County are politically cohesive. Racially polarized voting patterns often prevail in elections in the county, including elections for the county commission. In contests for county offices between black and white candidates for elected positions in Crockett County, blacks

usually vote for black candidates and whites vote sufficiently as a bloc to usually defeat the black voters' candidate of choice.

12. Only one black candidate has been elected to the Crockett County Board of Commissioners since Reconstruction.

13. Black persons in Crockett County have suffered from a history of official discrimination in voting and other areas, such as education, employment, and housing, as reflected by their depressed socioeconomic status relative to white Crockett County residents.

14. Past discrimination suffered by Crockett County's black citizens has present-day effects on black political participation.

15. The current districting plan for electing the members of the Crockett County Board of Commissioners violates Section 2 of the Voting Rights Act because it results in black citizens of the county having less opportunity than other members of the electorate to participate in the political process and to elect representatives of their choice.

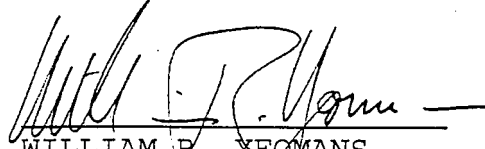
16. Unless enjoined by order of this Court, defendants will continue to violate Section 2 of the Voting Rights Act by administering, implementing, and conducting future elections for the Crockett County Board of Commissioners pursuant to the current districting plan for electing county commissioners.

WHEREFORE, the United States of America prays that this Court enter an order:

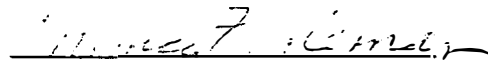
- (1) Declaring that the current districting plan employed by the Crockett County Board of Commissioners violates Section 2 of the Voting Rights Act;
- (2) Enjoining the defendants, their agents and successors in office, and all persons acting in concert with any of them, from administering, implementing, or conducting any future elections for the Crockett County Board of Commissioners under the current districting plan;
- (3) Ordering the defendants promptly to develop and present a districting plan that remedies the Section 2 violation. If the defendants should fail to devise such a plan, the Court should order into effect a new districting plan of its own design in time for implementation in the regularly-scheduled county commission elections in 2002; and
- (4) ordering such additional relief as the interests of justice may require, together with the costs and disbursements in maintaining this action.

Respectfully submitted,


JOHN ASHCROFT  
Attorney General



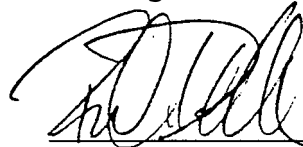
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