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POSC 325

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Reno v. Shaw
509 U.S. 630 (1993)

Parties

Petitioners: Ruth O. Shaw and five additional white residents of North Carolina.

Respondents: James Reno, U.S. Attorney General, and others involved in the redistricting.

Procedure

This case was originally heard in the U.S. District Court for the Eastern District of North Carolina, whom moved to dismiss the complaint. The petitioners then moved to appeal the lower court's verdict, presenting the case in front of the U.S. Supreme Court. Primarily, the Supreme Court was focused on evaluating whether the plaintiffs had stated a valid constitutional claim.

Issue

Does the proposed congressional redistricting plan, which finds itself primarily based on race, violate that Equal Protection Clause of the Fourteenth Amendment?

Facts

In 1990, following the annual population census, the state of North Carolina was granted an additional congressional seat, leading to members of the state's administration submitting a proposed redistricting plan. The plan focused on redistricting one selected district, which was previously identified as a majority-black region. Upon the plan's initial review, the Department of Justice opted to reject the plan, citing its inability to adhere to standards set forth by the Voting Rights Act. In response to this decision, the state drafted up a revised plan, one that included a second majority-black district, which many contested to be "oddly-shaped" and "unusually narrow". Five white residents living in the newly-redistricted area moved to sue the state, contesting the district was drawn solely on the merit of race alone, which they claimed violated the Equal Protection Clause. The North Carolina district court moved to dismiss the case, and the plaintiffs opted to pursue a different verdict from a higher court.

Rule

Under the Equal Protections Clause, racial classifications, even for seemingly un-important reasons, are forbidden unless specifically designed to serve in the best interest of the government.

Analysis/Application

The Supreme Court contested that race cannot be the predominant and over-lying variable in the process of redistricting. The court also highlighted how the “odd shape” of the newly-drawn districts almost certainly suggested that race was the deciding factor in the planning of the redistricting. Through their assessment of the case, the court emphasized how relying on hurtful and harmful strategies such as race in acts such as redistricting is not only morally wrong, but unconstitutional as well.

Holding

In their presentation to the court, the plaintiffs stated that through race-based redistricting, the state administrators could be violating the Equal Protections Clause.

Judgement

After completing their evaluation of the case, the U.S. Supreme Court made the move to reverse and remand the lower court’s decision, holding that the case should have never been dismissed originally.

Policy (Optional)

When handing over their verdict, the U.S. Supreme Court highlighted their concern over using race as a leading factor in voting matters such as redistricting, implying doing such could lead to the re-iterating of harmful incorrect racial stereotypes and go against basic aspects of the Constitution.

Dicta (Optional)

Upon review, a majority of the court’s justices pointed out that while the Constitution does not specifically require race to be a non-factor when redistricting, doing so should not be done without absolute, unequivocal compelling justification.

Dissent (Optional)

In this case, two of the U.S. Supreme Court’s justices offered up dissenting opinions. First was Justice White, who held the opinion that the plaintiff had failed to show any actual harm as a result of the redistricting, citing the move as a “remedy” of sorts for past discrimination. The second dissenting opinion came from Justice Stevens, who felt it was important to uplift and empathize the idea of minority representation and it’s positive effects. Justice Stevens also

offered up a bit of criticism for the remaining majority of justices, chastising them for interfering in what he considered to be “a political decision”.