

ENDNOTES

- ¹ See Matt Friedman, *New Jersey Legislature Passes Vote-by-mail Bill to Undermine Trump Lawsuit*, POLITICO (Aug. 27, 2020, 4:10 PM), <https://www.politico.com/states/new-jersey/story/2020/08/27/new-jersey-legislature-passes-vote-by-mail-bill-to-undermine-trump-lawsuit-1313141>; see also Governor Murphy Signs Voting Reform Package to Strengthen New Jersey Elections, OFF. OF THE GOVERNOR (July 28, 2022), <https://www.nj.gov/governor/news/news/562022/20220728c.shtml>.
- ² *Voting and Registration in the Election of November 2020*, U.S. CENSUS BUREAU (Apr. 2021), <https://www.census.gov/data/tables/time-series/demo/voting-and-registration/p20-585.html> (Table 4b, Reported Voting and Registration, by Sex, Race and Hispanic Origin, for States: November 2020).
- ³ See N.J. INST. FOR SOC. JUST., *THE TWO NEW JERSEYS BY THE NUMBERS: RACIAL WEALTH DISPARITIES IN THE GARDEN STATE* (March 2023), <https://njisj.org/wp-content/uploads/2023/07/Two-New-Jerseys-By-the-Numbers-Data-Brief-3.23.23-compressed.pdf>.
- ⁴ *QuickFacts New Jersey*, U.S. CENSUS BUREAU, <https://www.census.gov/quickfacts/NJ> (last visited July 21, 2023).
- ⁵ *Milestone Documents: Voting Rights Act (1965)*, NAT'L ARCHIVES (Feb. 8, 2022), <https://www.archives.gov/milestone-documents/voting-rights-act#>.
- ⁶ See *Bloody Sunday: Civil Rights Activist Brutally Attacked in Selma*, EQUAL JUST. INITIATIVE, <https://calendar.eji.org/racial-injustice/mar/07> (last visited July 17, 2023).
- ⁷ *Milestone Documents: Voting Rights Act (1965)*, *supra* note 5.
- ⁸ 52 U.S.C. §§ 10305, 10306, 10307.
- ⁹ 52 U.S.C. § 10304.
- ¹⁰ See Sandhya Bathija, *5 Reasons Why Section 5 of the Voting Rights Act Enhances Our Democracy*, CTR. AM. PROGRESS (Feb. 19, 2013), <https://www.americanprogress.org/article/5-reasons-why-section-5-of-the-voting-rights-act-enhances-our-democracy/>; see also Luis Ricardo Fraga & Maria Lizet Ocampo, *More Information Requests and the Deterrent Effect of Section 5 of the Voting Rights Act* 49 (2006), https://www.law.berkeley.edu/files/ch_3_fraga_ocampo_3-9-07.pdf; Myrna Pérez & Vishal Agraharkar, *If Section 5 Falls: New Voting Implications*, BRENNAN CTR. FOR JUST. (June 12, 2013), <https://www.brennancenter.org/our-work/research-reports/if-section-5-falls-new-voting-implications>.
- ¹¹ 52 U.S.C. § 10303.
- ¹² 52 U.S.C.A. § 10503.
- ¹³ 52 U.S.C. § 10301.
- ¹⁴ *Section 2 of the Voting Rights Act*, U.S. DEP'T OF JUSTICE, <https://www.justice.gov/crt/section-2-voting-rights-act> (last updated April 5, 2023).
- ¹⁵ See *One Wis. Inst. Inc. v. Nichol*, No. 15-cv-324-jdp (W.D. Wis. July 29, 2016).
- ¹⁶ See *Veasey v. Abbott*, 830 F.3d 216 (5th Cir. 2016) (en banc) (affirming the district court's ruling that Texas's voter identification law violated Section 2 of the VRA).
- ¹⁷ See *N.C. State Conference of NAACP v. McCrory*, 831 F.3d 204, 214 (4th Cir. 2016) (holding that the law's provisions "target African Americans with almost surgical precision . . . constitute inapt remedies for the problems assertedly justifying them, and, in fact, impose cures for problems that did not exist").
- ¹⁸ See *At-Large Voting Frequently Asked Questions*, NAACP LEGAL DEF. & EDUC. FUND, <https://www.naacpldf.org/wp-content/uploads/At-Large-Voting-Frequently-Asked-Questions-1.pdf> (last visited August 11, 2023).
- ¹⁹ See *A Primer on Sections 2 and 3(c) of the Voting Rights Act*, NAACP LEGAL DEF. & EDUC. FUND 1 (Jan. 5, 2021), <https://bit.ly/39csLUt>.
- ²⁰ See *Section 2 of the Voting Rights Act: Vote Dilution and Vote Deprivation*, SCOTUSBLOG, <https://www.scotusblog.com/election-law-explainers/section-2-of-the-voting-rights-act-vote-dilution-and-vote-deprivation/> (last visited August 11, 2023).
- ²¹ 52 U.S.C. § 10304.
- ²² U.S. Congress, House, Committee on the Judiciary Voting Rights, 89th Cong., 1st sess., 1965, Mar. 18-20, 23-25, 20 Apr. 1, 1965.
- ²³ *Shelby Cnty. v. Holder*, 570 U.S. 529 (2013).
- ²⁴ *Id.*
- ²⁵ Jurisdictions may be "bailed in" to coverage by a court following a finding of certain violations, per 52 U.S.C. § 10302(c), but currently no jurisdictions are so covered.
- ²⁶ See NAACP LEGAL DEF. & EDUC. FUND, *DEMOCRACY DIMINISHED: STATE AND LOCAL THREATS TO VOTING POST SHELBY CTY, ALA. V. HOLDER 1-2* (June 21, 2021), https://www.naacpldf.org/wp-content/uploads/LDF_01192021_DemocracyDiminished-4b_06.24.21.pdf.

- ²⁷ Ryan P. Haygood, *Hurricane SCOTUS: The Hubris of Striking Our Democracy's Discrimination Checkpoint in Shelby County & the Resulting Thunderstorm Assault on Voting Rights*, 10 HAR. L. & POL'Y REV. ONLINE S11, S35–49 (2015).
- ²⁸ See NAACP LEGAL DEF. & EDUC. FUND, *supra* note 26, at 7.
- ²⁹ The federal John R. Lewis Act, which Congress refuses to pass, would update the formula. *Strengthening the Voting Rights Act*, BRENNAN CENTER, (2021), <https://www.brennancenter.org/issues/ensure-every-american-can-vote/voting-reform/strengthening-voting-rights-act>.
- ³⁰ See *Brnovich v. Democratic Nat'l Comm.*, 141 S. Ct. 2321 (2021).
- ³¹ See NAACP LEGAL DEF. & EDUC. FUND, THE COST (IN TIME, MONEY, AND BURDEN) OF SECTION 2 OF THE VOTING RIGHTS ACT, 2–3 (2017), available at https://www.naacpldf.org/wp-content/uploads/Section-2-costs-08.13.18_1.pdf. While vote denial claims do not require plaintiffs to satisfy the *Gingles* test, the “totality of the circumstances” test for vote denial claims similarly requires expert witnesses who can testify to the history of the jurisdiction, the effects of the practice, the extent of racially polarized voting, ongoing racial discrimination in education, employment, and health, and more.
- ³² In June of this year, the Supreme Court reaffirmed the constitutionality of Section 2 and the longstanding framework for addressing vote dilution under the law. See generally *Allen v. Milligan*, 143 S. Ct. 1487 (2023). That ruling also underscores that state voting rights acts such as the NJVRA are on solid constitutional ground.
- ³³ See *About Language Minority Voting Rights*, U.S. DEP'T OF JUST. (updated Apr. 5, 2023), <https://www.justice.gov/crt/about-language-minority-voting-rights>.
- ³⁴ See *id.* (“Covered language minorities are limited to American Indians, Asian Americans, Alaskan Natives, and Spanish-heritage citizens - the groups that Congress found to have faced barriers in the political process,” as of the latest determination made on December 8, 2021).
- ³⁵ See *Milligan*, 143 S. Ct. at 1498.
- ³⁶ California Voting Rights Act of 2001, CAL. ELEC. CODE, § 14025 et. seq. (West 2002).
- ³⁷ See CAL. ELEC. CODE § 14028(c). For more information on the *Gingles* test, see *supra* note 31.
- ³⁸ See WASH. REV. CODE ANN. § 29A.92.900 et seq. (2018); ORE. REV. STAT. § 255.400 et seq. (2019).
- ³⁹ Virginia Voting Rights Act, VA. CODE ANN., § 24.2-126,-128 et seq. (2021).
- ⁴⁰ John R. Lewis Voting Rights Act of New York, N.Y. ELEC. LAW § 17-208 (language-minority protections), 210 (pre-clearance), 212 (voter intimidation) (McKinney 2022); Jaden Edison, *Gov. Ned Lamont Signs CT Voting Rights Act into Law*, CT MIRROR (June 12, 2023, 7:35 PM), <https://ctmirror.org/2023/06/12/ct-voting-rights-act-law-elections/>.
- ⁴¹ Edison, *supra* note 40.
- ⁴² H.B. 1104, 2023 Leg., 445th Sess. (Md. 2023); S.B. 0878, 2023 Leg., 445th Sess. (Md. 2023); *Michigan Voting Rights Act Introduced, Latest in a Wave of State VRAs*, CAMPAIGN LEGAL CTR. (June 28, 2023), <https://campaignlegal.org/press-releases/michigan-voting-rights-act-introduced-latest-wave-state-vras>.
- ⁴³ *Did You Know: Women and African Americans Could Vote in NJ before the 15th and 19th Amendments?*, NAT'L PARK SERV. (updated July 3, 2018), <https://www.nps.gov/articles/voting-rights-in-nj-before-the-15th-and-19th.htm#:~:text=New%20Jersey's%20first%20constitution%20in,and%20women%20had%20voting%20rights> (emphasis added) (omission in original) (quoting N.J. CONST. of 1776).
- ⁴⁴ *Id.*
- ⁴⁵ See *id.*
- ⁴⁶ ALEXANDER KEYSAR, THE RIGHT TO VOTE: THE CONTESTED HISTORY OF DEMOCRACY IN THE UNITED STATES 354 tbl. A5 (1st ed. 2000); *Part 2: How Did the Vote Expand? New Jersey's Revolutionary Decade*, MUSEUM OF AM. REVOLUTION, <https://www.amrevmuseum.org/virtualexhibits/when-women-lost-the-vote-a-revolutionary-story/pages/how-did-the-vote-expand-new-jersey-s-revolutionary-decade> (last visited July 21, 2023); *No Racial Requirement*, MUSEUM OF AM. REVOLUTION, <https://www.amrevmuseum.org/virtualexhibits/when-women-lost-the-vote-a-revolutionary-story/pages/no-racial-requirement-2> (last visited July 21, 2023).
- ⁴⁷ MUSEUM OF THE AM. REVOLUTION, *How Did the Vote Expand?*, *supra* note 46; MUSEUM OF THE AM. REVOLUTION, *No Racial Requirement*, *supra* note 46; see also N.J. INST. SOC. JUST., *1844 No More*, *supra* note 46; ALEXANDER KEYSAR, *supra* note 46, at 354 tbl. A5.
- ⁴⁸ N.J. INST. SOC. JUST., *1844 No More*, *supra* note 46.
- ⁴⁹ *Id.*
- ⁵⁰ *Id.*; GILES R. WRIGHT, AFRO-AMERICANS IN NEW JERSEY: A SHORT HISTORY 29 (N.J. Hist. Comm'n 1988).
- ⁵¹ See *Stephens v. Yeomans*, 327 F. Supp. 1182, 1188 (D. N.J. 1970).
- ⁵² *Id.*
- ⁵³ *Id.*
- ⁵⁴ N.J. DEP'T OF CORR., INCARCERATED PERSONS IN NEW JERSEY CORRECTIONAL INSTITUTIONS ON JANUARY 3, 2023, BY RACE/ETHNIC IDENTIFICATION (2023), available at https://www.state.nj.us/corrections/pdf/offender_statistics/2023/By_Race-Ethnicity_2023.pdf.

- ⁵⁵ Vanessa Romo, *New Jersey Governor Signs Bills Restoring Voting Rights to More than 80,000 People*, NPR (Dec. 19, 2019, 6:29 PM), <https://www.npr.org/2019/12/18/789538148/new-jersey-governor-signs-bills-restoring-voting-rights-to-more-than-80-000-peo>; see also generally N.J. INST. SOC. JUST., VALUE TO THE SOUL: PEOPLE WITH CRIMINAL CONVICTIONS ON THE POWER OF THE VOTE (2019), available at https://d3n8a8pro7vhmx.cloudfront.net/njisj/pages/1360/attachments/original/1570569487/Value_to_the_Soul_10-08-19_FIN_WEB.pdf?1570569487.
- ⁵⁶ See Sophie Nieto-Munoz, *Annual Prison Count Shows Racial Disparities Persist Behind Bars*, NEW JERSEY MONITOR (Apr. 10, 2023, 7:20 AM), <https://newjerseymonitor.com/2023/04/10/annual-prison-count-shows-racial-disparities-persist-behind-bars/>.
- ⁵⁷ See Compl. ¶¶ 13, 33, 36, *United States v. Passaic City, N.J.*, No. 99-2544 (D.N.J. 1999), available at <https://www.justice.gov/crt/united-states-district-court-district-new-jersey-4>.
- ⁵⁸ See Compl. ¶¶ 13, 33, 36, *United States v. Passaic City, N.J.*, No. 99-2544 (D.N.J. 1999), available at <https://www.justice.gov/crt/united-states-district-court-district-new-jersey-4>.
- ⁵⁹ *Id.* ¶¶ 15-16.
- ⁶⁰ Settlement Agreement & Prop. Order ¶ 1, *United States v. Salem Cnty., N.J.*, No. 1:08-cv-032760-JHR-AMD (D.N.J. 2008), available at <https://www.justice.gov/crt/united-states-district-court-district-new-jersey-1>.
- ⁶¹ See e.g., Jake Girard, *Institute's New Report Proposes Bold Reforms to Increase Voter Turnout*, N.J. INST. FOR SOC. JUST. (Feb. 03, 2020), https://www.njisj.org/institute_s_new_report_proposes_bold_reforms_to_increase_voter_turnout.
- ⁶² Elise Young, *New Jersey Adopts Automatic Voter Registration*, BLOOMBERG, (Apr. 17, 2018, 1:38 P.M.), <https://www.bloomberg.com/news/articles/2018-04-17/new-jersey-adopts-automatic-voter-registration-democrats-cause#xj4y7vzkg>.
- ⁶³ Blake Nelson & Brent Johnson, *N.J. Changes How Inmates Are Counted in Census as Murphy Ends "Prison Gerrymandering"*, NJ.COM (updated Jan. 23, 2020, 1:45 P.M.) <https://www.nj.com/politics/2020/01/nj-changes-how-in-mates-are-counted-in-census-as-murphy-ends-prison-gerrymandering.html>.
- ⁶⁴ Jane C. Timm, *New Jersey's Democratic Governor Signs Early Voting Expansion, Calls Out Georgia*, NBC NEWS (March 30, 2021, 3:27 PM), <https://www.nbcnews.com/politics/elections/new-jersey-s-democratic-governor-signs-early-voting-expansion-calls-n1262464>.
- ⁶⁵ Brittany Gibson, *How New Jersey Became a Vote-by-Mail State*, AM. PROSPECT, (July 8, 2020), <https://prospect.org/civil-rights/how-new-jersey-became-a-vote-by-mail-state/>.
- ⁶⁶ Romo, *supra* note 55.
- ⁶⁷ While there were issues “throughout the [s]tate” during the 2020 general election, complaints about long lines and late poll openings were concentrated in Essex County and particularly Newark while whiter counties reported fewer issues. N.J. ELECTION PROT. COAL., ELECTION PROTECTION REPORT: ISSUES NEW JERSEY VOTERS ENCOUNTERED FROM OCTOBER 15 THROUGH NOVEMBER 3, 2020, at 21 tbl. 4, 22 & tbl. 5 (2021), available at https://www.aclu-nj.org/sites/default/files/2020_election_protection_report.pdf; see also Genesis Obando, *Election Day Problems, Newark: Delayed Openings, Confusion Forced Potential Voters Away From Polls*, NJ SPOTLIGHT NEWS (Nov. 13, 2020), <https://www.njspotlightnews.org/2020/11/nj-election-2020-newark-in-person-voting-problems-delayed-opening>. Wait times to vote in predominantly Black communities is significantly higher than in predominantly white communities nationwide. M. Keith Chen et al., *Racial Disparities in Voting Wait Times: Evidence from Smartphone Data* 12 (2020), available at <https://arxiv.org/pdf/1909.00024.pdf>.
- ⁶⁸ See, e.g., Steve Strunsky, *Polling Places Aren't Handicapped-Accessible and Need to Be, Newark Says in Lawsuit*, NJ.COM (updated Feb. 15, 2023, 9:45 PM), <https://www.nj.com/essex/2022/05/polling-places-arent-handicapped-accessible-and-need-to-be-newark-says-in-lawsuit.html>; N.J. ELECTION PROT. COAL., *supra* note 67, at 26 (“Based on the data, the most common issue affecting voters with disabilities on Election Day was the denial of access to ADA-accessible voting machines”).
- ⁶⁹ N.J. ELECTION PROT. COAL., *supra* note 67, at 28–29 (documenting polling locations throughout the state of New Jersey that lacked interpretation services).
- ⁷⁰ See David Wildstein, *33 Voting Machines, Mostly for Black Districts in Newark, Didn't Arrive Until After Polls Opened*, N.J. GLOBE (June 8, 2021, 11:48 AM), <https://newjerseyglobe.com/local/33-voting-machines-mostly-for-black-districts-in-newark-didnt-arrive-until-after-polls-opened/>; Eric Kiefer, *Some Election Day Snags in Newark, But Not at "Super Poll Site"*, PATCH (Nov. 3, 2020, 4:45 PM), <https://patch.com/new-jersey/newarknj/some-election-day-snags-newark-not-super-poll-site>.
- ⁷¹ Colleen O'Dea, *The Election So Far: Some Glitches with In-Person and Mail-In Voting, Some Voter Confusion*, NJ SPOTLIGHT NEWS (Nov. 3, 2020), <https://www.njspotlightnews.org/2020/11/nj-election-2020-mail-in-in-person-voting-election-day-some-glitches-voter-confusion/>.
- ⁷² See Letter from Abbott Leadership Inst., et al., to Patty Spango, Essex Cnty. Supervisor of Elections (June 11, 2021), available at https://tapinto-production.s3.amazonaws.com/documents/25298/Ltr_to_Patty_Spango_re_Newark_June_2021_Primary_Election.pdf.

⁷³ *Id.* at 1.

⁷⁴ Lisa Schur & Douglas Kruse, *Fact Sheet; Disability and Voter Turnout in the 2020 Elections* 10, RUTGERS UNIVERSITY & U.S. ELECTION ASSISTANCE COMM'N, https://smlr.rutgers.edu/sites/default/files/Documents/Centers/Program_Disability_Research/FactSheet_Disability_Voter_Turnout_2020.pdf (last visited July 18, 2023).

⁷⁵ Steve Strunsky, *Judge Refuses to Order that Newark Polling Places Be Made Handicapped Accessible*, NJ.COM (updated Feb. 16, 2023, 2:40 AM), <https://www.nj.com/essex/2022/05/judge-refuses-to-order-that-newark-polling-places-be-made-handicapped-accessible.html>.

⁷⁶ *Id.* This expectation seems particularly misplaced given that now-Mayor Ras Baraka had challenged similar policies before the May 10 election, yet little had changed by June. *See id.*

⁷⁷ See Ayanna Alexander, *Justice Dept. Settles with New Jersey County over Ballot Languages, Highlighting Widespread Barrier*, SEATTLE TIMES (May 10, 2023, 2:39 PM PST), <https://www.seattletimes.com/nation-world/nation/justice-dept-settles-with-new-jersey-county-over-ballot-languages-highlighting-widespread-barrier/>.

⁷⁸ Press Release, U.S. Att'y's Off., Dist. of N.J., Justice Department Reaches Agreement to Protect Rights of Spanish-Speaking Voters in Union County (May 9, 2023), <https://www.justice.gov/usao-nj/pr/justice-department-reaches-agreement-protect-rights-spanish-speaking-voters-union-county#:~:text=in%20Union%20County-,Justice%20Department%20Reaches%20Agreement%20to%20Protect%20Rights%20of,Speaking%20Voters%20in%20Union%20County&text=NEWARK%2C%20N.J.%20%E2%80%93%20The%20Justice%20Department,seattle%20a%20voting%20rights%20lawsuit>.

⁷⁹ See N.J. DEP'T OF HUMAN SERVS & N.J. DEP'T OF LAB. & WORKFORCE DEV., NEW AMERICANS INTEGRATION REPORT 3 (2020), available at <https://www.nj.gov/humanservices/library/slides/NJ%20ONA%20Report%20-%20Final%2010.14.2020.pdf>.

⁸⁰ *Voting and Registration in the Election of November 2020*, *supra* note 2.

⁸¹ *Id.* These gaps could be much worse than they appear. Recent research indicates that the Census Bureau's statistics on turnout may overestimate the incidence of voting among communities of color. *See* Stephen Ansolabehere et al., *The Current Population Survey Voting and Registration Supplement Overstates Minority Turnout*, 84 J. POL. 1850, 1853–54 (2022).

⁸² See Roman Pabayo et al., *Barriers to Voting and Access to Health Insurance Among US Adults: A Cross-Sectional Study*, LANCET REG'L HEALTH AMS. (2021), available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9904135/>.

⁸³ *Complete Health Indicator Report of Population Demographics*, N.J. DEP'T OF HEALTH, N.J. STATE HEALTH ASSESSMENT DATA (updated Nov. 3, 2022), https://www-doh.state.nj.us/doh-shad/indicator/complete_profile/Demographics.html.

⁸⁴ *Health Indicator Report of Population Demographics*, N.J. DEP'T OF HEALTH, N.J. STATE HEALTH ASSESSMENT DATA (updated Nov. 3, 2022), <https://www-doh.state.nj.us/doh-shad/indicator/view/Demographics.Poverty.html>.

⁸⁵ *S1510: Educational Attainment*, U.S. CENSUS BUREAU, <https://data.census.gov/table?q=Educational+attainment+in+New+jersey+by+race&g=040XX00US34&tid=ACSST1Y2021.S1501> (last visited July 19, 2023).

⁸⁶ *See generally, e.g., Shelby Cnty. v. Holder*, 570 U.S. 529, (2013); *Brnovich v. Democratic Nat'l Comm.*, 141 S. Ct. 2321 (2021).

⁸⁷ Though Section 5 of the federal VRA remains on the books, it is effectively non-operable because of the Supreme Court's decision finding the coverage formula in Section 4 to be unconstitutional. *See Shelby Cnty.*, 570 U.S. at 557.

⁸⁸ At-large voting is understood as a system in which the entire electorate votes for all the candidates in a given jurisdiction. *See City of Rome v. United States*, 446 U.S. 156, 184 & n.19.(1980), *superseded by statute on other grounds*.

⁸⁹ *See* Neil Vigdor & Jon Hurdle, *Election Officials Say Efforts to Intimidate Voters Are Widening*, N.Y. TIMES (Nov. 3, 2022), <https://www.nytimes.com/2022/11/03/us/politics/voting-intimidation-democracy.html>.

⁹⁰ 42 U. S. C. §§ 1983, 1985, 1986.

⁹¹ *See New Jersey*, DELOITTE DATAUSA, <https://datausa.io/profile/geo/new-jersey> (last visited July 19, 2023).

⁹² *See Section 203 of the Voting Rights Act*, U.S. DEP'T OF JUST. (updated Mar. 11, 2020), <https://www.justice.gov/crt/language-minority-citizens>.

⁹³ *See id.*

⁹⁴ *See* Hansi Lo Wang, *A Federal Law Requires Translated Voting Ballots, But Not in Arabic or Haitian Creole*, NPR (June 26, 2022, 3:16 PM), <https://www.npr.org/2022/06/24/1083848846/bilingual-ballots-voting-rights-act-section-203-explained>.

⁹⁵ *See* N.J. DEP'T OF HUMAN SERVS. & N.J. DEP'T OF LAB. & WORKFORCE DEV., *supra* note 79, at 3.

⁹⁶ *See* NAACP LEGAL DEF. FUND, *supra* note 31, at 3–6.

⁹⁷ *See* Richard L. Hasen, *The Democracy Canon*, 62 Stan. L. Rev. 69, 77 (Dec. 2009).

⁹⁸ *See, e.g., NYCLU & NAACP LEGAL DEF. & EDUC. FUND, JOHN R. LEWIS VOTING RIGHTS ACT OF NEW YORK* 18 (2022), available at <https://www.nyclu.org/en/publications/john-r-lewis-voting-rights-act-new-york>.