

Title: Grovey v. Townsend

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Source: *Encyclopedia of Civil Rights in America*. Ed. David Bradley and Shelley Fisher Fishkin. Vol. 2. Armonk, NY: Sharpe Reference, 1998. p413-414.

Document Type: Topic overview

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1935: Unanimous U.S. SUPREME COURT decision upholding the Texas Democratic Party's resolution adopted in 1932 that only white Democrats were qualified to vote in primary elections.

William Grovey was a black Democrat of Houston, Texas, who was barred from voting in a primary election, despite Supreme Court decisions in NIXON V. HERNDON (1927) and NIXON V. CONDON (1932) that had overturned Texas statutes prohibiting African Americans from voting in DemocraticPage 414 | [Top of Article](#) primaries. Even though NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE presented an overwhelming amount of evidence proving the state's integral involvement in Texas' party primaries, the Supreme Court unanimously ruled in favor of the Democratic Party in Texas. The Court held that barring African Americans from the primaries was done in accordance with the party's rules restricting membership to whites, not because of any law of the state of Texas. Nine years after the *Grovey* decision, the Court reversed itself in SMITH V. ALLWRIGHT.

—*Angelyque P. Campbell*

Source Citation

Campbell, Angelyque P. "Grovey v. Townsend." *Encyclopedia of Civil Rights in America*. Ed. David Bradley and Shelley Fisher Fishkin. Vol. 2. Armonk, NY: Sharpe Reference, 1998. 413-414. *Gale Virtual Reference Library*. Web. 24 Aug. 2010.

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Gale Document Number: GALE|CX3459600300