IN THE UNITED STATES DISTRICT COURT FOR THE

DISTRICT OF SOUTH CAROLINA

ANDERSON DIVISION

FILED

SEP 5 - 1969 - 1969

US v. Ashlev

United States of America.

MILLER C. FOSTER, JR., CLERK

Plaintiff,

.

) ANSWER

-vs-

John T. Ashley, Anderson County Supervisor and Chairman of the Anderson County Board of Commissioners; James H. Williams, Sheriff of Anderson County; J. Ed Crenshaw, Adger C. Davis, Fred Fields, W. B. Gray and O. O. Harper, Members of the Anderson County Board of Commissioners, Anderson County, South Carolina, a public body corporate,

JC-8C-00

Civil Action No. 69-739

Defendants.

The Defendants, John T. Ashley, Anderson County Supervisor and Chairman of the Anderson County Board of Commissioners, and the Members of the Anderson County Board of Commissioners, answering the Complaint of the Plaintiff, respectfully show unto the Court:

- Deny each and every allegation of the Plaintiff's
 Complaint not hereinafter specifically admitted.
- 2. These Defendants admit the allegations contained in paragraphs one (1) and two (2) of the Complaint and admit substantially all of the allegations of paragraph three (3) except those allegations alleging that the Anderson County Board is charged with the responsibility of operating the jail and allege that the Sheriff of Anderson County is in charge of operating the Anderson County Jail and the Anderson County Board is in charge of operating the Prison Farm.
- 3. These Defendants allege that for some time in the past and now the Anderson County Prison Farm has been and is being operated on a segregated basis due to the lack of facilities to

(incomplete)