

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,
Plaintiff,

v.

JAMES C. CLARK, JR., Sheriff of
Dallas County; BLANCHARD McLEOD,
Circuit Solicitor for the Fourth
Judicial Circuit, State of Alabama;))
JAMES HARE, Judge for the Fourth
Judicial Circuit, State of Alabama;))
BERNARD REYNOLDS, Judge of Probate
of Dallas County, Alabama; and))
CITY OF SELMA, ALABAMA,))
Defendants.))

CIVIL ACTION NO. _____

C O M P L A I N T

The United States of America alleges that:

1. This action is brought by the United States pursuant to the provisions of Section 206(a) of the Civil Rights Act of 1964 (78 Stat. 241) and of 42 U.S.C. 1971 to obtain preventive relief against acts and practices of the defendants which deprive Negro citizens in Dallas County, Alabama, on account of their race, of rights secured by the Constitution and laws of the United States,

2. This Court has jurisdiction of this action under 42 U.S.C. 1971(d), Section 207(a) of the Civil Rights Act of 1964, and 28 U.S.C. 1345.

3. The defendants are as follows:

- (a) James G. Clark, Jr., is the Sheriff of Dallas County, Alabama, and as such is authorized to enforce the laws of Alabama within Dallas County. He resides in Dallas County. He has been Sheriff of Dallas County since November 1955. The law enforcement officers (hereinafter referred to as officers) under Clark's command are his eight deputies and the Dallas County Sheriff's Posse; the deputies are full-time, trained law enforcement officers and the posse members are part-time volunteers; all these officers are white.
- (b) Blanchard McLeod is the Circuit Solicitor for the Fourth Judicial Circuit of Alabama, which includes Dallas County. As such, he is authorized to prosecute violations of the laws of Alabama occurring within Dallas County. He resides in Camden, Wilcox County, Alabama. He has been Circuit Solicitor since August 4, 1954.

(c) James Hare is the Circuit Judge for the Fourth Judicial Circuit, State of Alabama, which includes Dallas County, Alabama. As such, he is empowered to issue writs of injunction in Dallas County. He resides in Selma, Alabama. He has been Circuit Judge at all times pertinent to this complaint.

(d) Bernard A. Reynolds is the Judge of Probate of Dallas County, Alabama. As such, he has jurisdiction over cases arising in Dallas County in which juveniles are accused of violating a penal law and cases in which adults are accused of contributing to the delinquency of a minor. He resides in Selma, Alabama. He has been Judge of Probate at all times pertinent to this complaint.

(e) The defendant City of Selma is an incorporated municipality in Dallas County, Alabama. It is the county seat of Dallas County.

The defendants named in subparagraphs (a) through (d) above are among the principal law enforcement officers

and governmental officials in Dallas County and Selma, Alabama.

4. Dallas County, Alabama, is located in central Alabama. U.S. Highway 80, which runs east and west from Savannah, Georgia to San Diego, California, goes directly through Selma. In Dallas County, there are approximately 32,715 Negroes and 23,952 white persons. Of these, about 15,115 Negroes and 14,400 white persons are 21 years of age and older. In Dallas County, about 300 Negroes and 9,200 white persons are registered to vote.

5. Dallas County is a racially segregated community. The public facilities of the State of Alabama, Dallas County, and City of Selma have traditionally been segregated as have the schools, churches, movie theaters, and restaurants in Dallas County. All elected and appointed county and city officials in Dallas County and Selma are, and traditionally have been, white persons.

6. The defendants have used their official positions to maintain and encourage racial segregation in public facilities and accommodations, and to preserve white supremacy. Throughout their respective tenures in office, the defendants have engaged in a pattern of conduct with the purpose and effect of preventing the desegregation of public accommodations and of interfering with the exercise by Negroes of their right to vote without distinction of race.

7. The United States has, since 1961, instituted

three civil actions against the defendants and other officials of Dallas County who have attempted to bar Negroes from an active role in the government of Dallas County and the City of Selma. In these actions the United States has sought to protect the right of Negroes in Dallas County to register and to vote free from discrimination and intimidations:

- (a) United States v. Atkins, Civil Action No. 2584, was brought on April 13, 1961 under 42 U.S.C. §1971(a), seeking to restrain the Registrars of Voters of Dallas County from engaging in racially discriminatory acts and practices. On or about November 1, 1963, the District Court, following reversal by the Court of Appeals, entered an injunction. On March 6, 1964, the United States initiated supplementary proceedings to require the Registrars of Voters to take specific steps which would correct the effects of past discrimination and which would insure the future registration of voters on a nondiscriminatory basis. The hearing in these proceedings is set for October 5, 1964.
- (b) United States v. Dallas County, et al., Civil Action No. 3064-63, was filed by the United States on June 26, 1963. The defendants

are Dallas County' James G. Clark, Jr., Sheriff of Dallas County, Alabama; Blanchard McLeod, Circuit Solicitor of the Fourth Judicial District of Alabama; and Henry Reese, County Solicitor of Dallas County, Alabama. The action seeks to enjoin these defendants from intimidating, threatening, punishing or coercing any person in Dallas County for the purpose of interfering with the right of Negroes to register and to vote. The government's motion for preliminary injunction was denied by the District Court on March 19, 1964. Appeal by the United States is presently pending.

- (c) United States v. McLeod, et al., Civil Action No. 3188-63, was filed by the United States on November 12, 1963. The defendants are Blanchard McLeod; Henry Reese; James G. Clark, Jr.; James Hare, Judge for the Fourth Judicial Circuit, State of Alabama; M.H. Houston, Clerk of the Circuit Court of Appeals of Dallas County; and Robert D. Wilkinson, Jr., foreman of the Grand Jury of the Circuit Court of Dallas County, State of Alabama, Fall Term 1963. This action seeks to enjoin the defendants from compelling the attendance

of attorneys of the Department of Justice before the Dallas County Grand Jury and from intimidating, threatening, or coercing persons for the purpose of interfering with the right of Negroes to register and to vote. The District Court on March 19, 1964, denied the Government's motion for preliminary injunction. Appeal by the United States is presently pending.

8. The Dallas County Voters League, hereafter referred to as the Voters League, is an organization whose officers and members are Negro citizens of Dallas County. The purpose of the Voters League is to encourage and assist Negroes in Dallas County to exercise, through peaceful means, their rights under the Constitutions and laws of the United States and Alabama. The Voters League has been active in Dallas County since at least 1955.

9. The Student Non-Violent Coordinating Committee, hereafter referred to as SNCC, is a national organization, the purpose of which is to encourage and assist Negroes to exercise, through peaceful means, their rights under the Constitution and laws of the United States and of the several states.

10. In November 1962, the Voters League requested SNCC to assist in holding voter registration clinics and teaching Negro citizens how to register to vote in Dallas

County. On about February 10, 1963, a SNCC field representative came to Dallas County and, with the Voters League, set up a program designed to encourage and assist Dallas County Negroes in becoming registered voters. This program included the establishment of classes or voter clinics in which local Negroes are instructed as to the procedures for registering to vote. The program also included the keeping of records on the progress of registration of Negroes in Dallas County, the distribution of leaflets and other materials to Dallas County Negroes announcing voter registration activities and the holding of mass meetings to encourage interest in voter registration.

11. Beginning on about May 14, 1963, the Voters League and SNCC sponsored mass meetings in Negro churches in Dallas County for the purpose of encouraging Negro citizens to exercise their rights, including the right to vote. From June 17, 1963 until July 9, 1964, such meetings were held almost every week. Following the enactment of the Civil Rights Act of 1964, which became law on July 2, 1964, the Voters League and SNCC held mass meetings on July 5, 6, and 9 at which speakers encouraged Negroes to register to vote and to exercise their right to use public accommodations on an equal basis with white persons. Each of these meetings was attended by at least 200 Negroes.

12. The defendants have used and are using various devices under color of law, for the purpose of defeating

the attempts of Negroes to secure or exercise rights guaranteed to all persons by sections 201 and 202 of the Civil Rights Act of 1964 and by 42 U.S.C. 1971. The acts through which these devices have been effectuated are set out more specifically in paragraphs 14 through 36 below. These devices include the following:

- (a) Arresting, detaining under unreasonable bail, prosecuting, convicting and punishing, and threatening to arrest, detain, prosecute, convict, and punish Negroes discriminatorily and without just cause.
- (b) Requesting, issuing, enforcing, and threatening to enforce an injunction that prevents Negroes and those in sympathy with them from effectively organizing, meeting, discussing or advocating for or in connection with the exercise of said rights.
- (c) Using unreasonable force and threatening without just cause to use force against Negroes who exercise such rights.
- (d) Failing to provide ordinary police protection to persons attempting peaceably to exercise said rights.

13. The purpose and effect of the acts referred to in paragraph 12 above and set out more specifically in

paragraphs 14 through 33 below have been to threaten, intimidate, and coerce Negro citizens so as to interfere with the rights of Negroes to register to vote and to use public accommodations on an equal basis with white persons. Said acts constitute a pattern and practice of racial discrimination and of resistance by defendants to the exercise by Negroes of the rights guaranteed by 42 U.S.C. 1971 and Sections 201 and 202 of the Civil Rights Act of 1964.

14. On July 4, 1964, defendant Clark arrested Karen House, Carol Lawson, Silas Norman and James Wiley, four Negro SNCC workers, on a charge of trespass after warning. The arrests arose from the attempt of the four Negroes to be served at the Thirsty Boy, a drive-in restaurant located on U.S. Highway 80 in Selma. The Thirsty Boy is a place of public accommodation whose operation affect commerce. James Wiley was also charged with resisting arrest and Carol Lawson was charged with carrying a concealed weapon. Defendant Clark knew that the arrested Negroes were merely attempting to exercise their right to be served at the Thirsty Boy on an equal basis as white persons and that they had committed none of the offenses with which he had charged them. During the arrests, defendant Clark and his agents, to further intimidate the arrested Negroes, unnecessarily prodded them with electric cattle prods.

15. On July 4, 1964, a group of Negroes were admitted to the Wilby Theater in Selma, on a non-discriminatory basis. The Wilby Theater is a place of public accommodation within the

meaning of the Civil Rights Act of 1964. When additional Negroes purchased tickets and tried to enter the theater, they were turned back by a white man who, by threats and by physical obstruction barred their entry into the theater. Throughout the afternoon the Wilby Theater was under the surveillance of the Selma police and Dallas County sheriff's officers. Defendant Clark was personally present outside the theater when the white man threatened the Negroes. One Negro, Alvery E. Williams, who is a staff worker for SNCC, approached defendant Clark and asked him to protect the Negroes in their attempt to enter the theater. Defendant Clark told Williams that he would make no arrest unless Williams would come to the sheriff's office and sign a warrant. When Williams declined to do so, defendant Clark told Williams he would not interfere except to preserve the peace. Defendant Clark subsequently, without just cause, charged Williams with inciting to riot and criminal provocation. No white persons were arrested for their actions at the theater.

16. On the evening of July 5, 1964, Benny L. Tucker, who is a Negro field secretary for SNCC and who is well known as such by defendant Clark, drove into Selma in an automobile belonging to SNCC and bearing Georgia license plates. Tucker had just returned from Memphis, Tennessee, where he had picked up this automobile. Immediately upon the arrival of Benny L. Tucker in Selma, defendant Clark arrested him and charged him with driving a car with improper

license plates.

17. On the night of July 5, 1964 a mass meeting was held at the A.M.E. Zion Hall. This meeting was attended by more than 200 Negroes and two white newsmen. At this meeting the speakers urged the Negroes in attendance to exercise their right to register to vote and to use public accommodations on an equal basis as white persons. Over 60 uniformed, armed deputy sheriffs and posse members were stationed outside the meeting hall. When the meeting ended, at about 9:30 p.m., the Negroes peaceably began to leave the church hall. At this point, an unidentified person threw a rock at an automobile belonging to the Dallas County Sheriff's Department, and Chief Deputy Sheriff L. C. Crocker ordered his men to fire tear gas. The officers fired tear gas at the Negroes and chased and clubbed Negro citizens who were attempting to leave the area, as well as Negro passers-by. At least two Negroes required emergency medical treatment for injuries inflicted by the officers. The officers clubbed two white newsmen who had been covering the meeting, seized and broke their photographic equipment and cursed and threatened them. Defendant McLeod and the officers told the newsmen to get out of Selma. The force used by the officers was more than was necessary to preserve order. No arrests were made in connection with this incident.

18. In Dallas County, the Board of Registrars normally meets to receive applications for voter registration two days a month. Beginning on July 6, 1964, the Board met

on five consecutive days pursuant to Alabama law. In anticipation of this special registration period, the Voters League and SNCC conducted an intensive voter registration drive among Negroes in Dallas County, similar to voter registration drives which they had conducted in the past. This drive was conducted through mass meetings, voter clinics, the distribution of literature, and peaceful demonstrations. On the morning of July 6, 1964 defendant Clark stationed officers at the entrances to the Courthouse and in the streets and alleys leading to the Courthouse. During the early morning applicants for registration were allowed to stand in the long hall inside the Courthouse. There two deputy sheriffs distributed priority numbers and had the applicants sign a log book. After about 22 Negroes had received numbers, the deputy sheriffs ordered them to wait in the alleyway outside. From then on, the numbers were distributed by deputy sheriffs from a table at the front of the alley on the Alabama Avenue side of the Courthouse. Negroes attempting to enter the Courthouse to register to vote were met at all entrances by deputy sheriffs or posse members who barred their entry and told them to go to the alley. After receiving a number at the table, the Negroes had to walk down the alleyway past more officers to an entrance on the alley. All but two or three Negroes had to wait outside this entrance. Inside, the registrars processed two applicants at a time. As one applicant finished, the registrar called in the next applicant; as that applicant

entered the office, the officer stationed at the entrance admitted a Negro from the alley to wait in the hall. On July 6, 1964, 49 persons, of whom at least 43 were Negroes, received numbers, and 21 persons were allowed to fill out applications for registration.

19. On the same day, July 6, 1964, around 1:00 p.m., three Negro youths began walking back and forth in front of the Dallas County Courthouse carrying signs that urged citizens to register to vote. Defendant Clark arrested the youths. During this time forty to fifty Negroes, both adults and minors, gathered on the steps of the Federal Building across the street from the County Courthouse and began singing "We Shall Overcome." Defendant Clark announced over a loudspeaker that the singers were under arrest, and defendant Clark's agents then surrounded the singers and other Negroes who were passing by and marched them to the jail four blocks away, herding them with nightsticks and cattleprods. About 41 Negro adults and 13 Negro minors were arrested and charged with violating a city ordinance prohibiting interfering with a court in session; a charge of contributing to the delinquency of a minor was later added as to the adults. The names of the arrested Negroes are set forth in Appendix A to this complaint. The activities of the arrested Negroes were directed at voter registration and not at any judicial proceeding. This fact was known to defendant Clark at the time of the arrests.

20. The city ordinance, referred to in paragraph 19, was adopted on October 14, 1963 for the purpose of prohibiting the urging of the registration of Negroes by the use of signs and other forms of public display. It was adopted immediately following a two week period during which numerous Negro citizens were arrested for carrying voter registration signs in the area of the Dallas County Courthouse. The text of the city ordinance is as follows:

Whoever, with the intent of interfering with, obstructing or impeding the administration of justice, or with the intent of influencing any judge, juror, witness, or court officer in the discharge of his duty, pickets or parades in or near a building in the City of Selma housing a court of the State of Alabama, or Dallas County, or City of Selma, or in or near a building or residence occupied or used by such judge, juror, witness, or court officer in the City of Selma, or with such intent uses any soundtruck or similar device or resorts to any other demonstration in or near any such building or residence, shall be fined not more than \$100.00 or imprisoned not more than 180 days or both.

Nothing in this ordinance shall interfere with or prevent the exercise by any court of the State of Alabama, or Dallas County, or City of Selma, of its power to punish for contempt.

21. On the afternoon of July 6, 1964 Charles Robertson, a SNCC field worker, while at the Dallas County Courthouse complained to a deputy sheriff about the voter registration procedure and criticized the numbering system. The deputy took Robertson to the sheriff's office, where Robertson repeated his complaint to Chief Deputy Sheriff Crocker. Crocker

thereupon arrested Robertson for criminal provocation.

22. On the nights of July 6 and 9, 1964, SNCC and the Voters League again held mass meetings at church halls in Selma. The purpose of each meeting was to encourage Negroes to exercise their rights to vote and their rights under the Civil Rights Act of 1964 and to encourage them to urge and assist other Negroes to do so. The meetings were well publicized in advance by the distribution of leaflets. Each meeting was attended by over 200 Negroes, both adults and minors. Defendant Clark stationed one of his officers inside each meeting and numerous officers outside the meeting halls. At no time before, during, or after these meetings was there any basis for the presence of so many officers.

23. On July 7 through 10, 1964, Negroes continued to appear at the courthouse for the purpose of registering to vote. Defendant Clark continued to station his officers at all entrances, alleys, and streets leading to the registration office. During this period another 18 Negroes were arrested, some by defendant Clark, some by defendant McLeod, and some by defendant Clark's officers. These Negroes were charged with interfering with court and, in the case of arrested adults, contributing to the delinquency of a minor. Defendants Clark and McLeod knew that the charges were wholly without legal justification and that the arrests were made to defeat the attempts of Negroes to register to vote. The arrested persons included the president of the Voters League,

a SNCC field worker, and Negroes who had, in small numbers, displayed in the area across the street from the Dallas County Courthouse signs protesting segregation and urging all citizens to register to vote. The names of these arrested Negroes are set forth in Appendix B to this complaint.

24. Defendant Clark set unreasonably high and discriminatory bail for all the persons whose arrests are alleged in this complaint.

25. On July 9, 1964, defendant Clark and the City of Selma, together with Dallas County and Chris B. Heinz, Mayor of Selma, petitioned defendant Hare, as Judge for the Fourth Judicial Circuit of Alabama, for an injunction against the Voters League, SNCC, and certain other organizations and 7 individuals. Defendant Hare issued the injunction, which restrains said individuals and organizations, their agents, servants, employees, and persons acting in concert or participation with them, in the following words:

1. From any assembly of three persons or more in a public place.
2. From engaging in meetings or any other activities whereby violation of law is suggested, advocated or encouraged, or engaged in meetings whereby the public ways, streets, sidewalks, or highways of the City of Selma, Dallas County, Alabama, are blocked or the unimpaired use thereof denied to other traffic and citizens.

3. From encouraging or engaging in meetings or any other activities designed or held for the purpose of impeding or obstruction or obstructing the administration of justice or the orderly function of government.
4. From encouraging or engaging in any activities designed to, or which do, impede, hinder, or obstruct officers of the law, or officials of Dallas County, Alabama, or officials of the City of Selma, Alabama, from performing and discharging the duties of their respective office.
5. From assembling anywhere on a public street three or more persons.
6. From committing any acts, things or deeds against any law enforcement officers of the City of Selma, Alabama, or any law enforcement officers of Dallas County, Alabama.

On July 13, 1964, the injunction suit was removed to the United States District Court for the Southern District of Alabama. A motion to remand the case to state court is now pending.

26. Since the issuance by defendant Hare of the injunction described in the preceding paragraph, neither the Voters League nor SNCC has held any meetings whatsoever in Selma, and no person has displayed in a public place in Selma any sign urging citizens to register to vote.

27. Since July 9, 1964, defendant Reynolds has been disposing of charges filed against juveniles in connection with the Negro registration drive. He has placed several minors on one year's probation, has sent some minors to a reform school, has remanded some back to the jail to await

further action, and has sentenced four to 60 days in the county jail.

28. On Sunday, July 12, 1964, two SNCC staff members were walking down a street in Selma when three Negro friends on their way to church offered them a ride. Thereupon, defendant Clark's officers took the five persons into custody allegedly for violating the injunction of July 9 by congregating on the street. The SNCC workers were warned and released.

29. On July 14, 1964, Henry Aronson, an attorney who represented some of the Negroes arrested during the registration drive, accompanied the parents of some arrested juveniles to the Dallas County Jail to assist in obtaining the release of the juveniles on bail. After being admitted to the jail booking room, he requested and received permission to use the jail telephone to call a parent who had not come with him. While Aronson was on the phone, defendant Clark entered the room and, after determining who Aronson was, bodily threw Aronson out of the room.

30. On July 16, 1964, Charles Johnson, a Negro youth who had been arrested during the July 6, 1964 voter registration activities, was in the process of being released from jail. As he took a drink of water from the spout of a water fountain traditionally reserved for white persons, defendant Clark kicked him.

31. On July 23, 1964, about fifteen Negro airmen of the United States Air Force who are stationed at Craig Air Force Base near Selma met at the Negro Elks Club in Selma to discuss their rights under the Civil Rights Act of 1964. Thereafter, on July 26, 1964, two Negro airmen sought service at a lunch counter at Carter's Drug Store on U.S. Highway 80 in Selma, and were refused service by the manager. They then went to the Glass House Drive-In on U.S. Highway 80 in Selma, but were denied entrance by an owner of the drive-in. Both establishments are places of public accommodations, the operations of which affect commerce within the meaning of Title II of the Civil Rights Act of 1964.

32. On July 27, 1964, defendants Hare, McLeod and Clark advised the commanding officer of Craig Air Force Base that the meeting of the airmen at the Elks Club on July 23, 1964, as well as any other meeting for the purpose of suggesting or encouraging the testing of the availability to Negroes of public accommodations in Selma, was in violation of the injunction described in paragraph 25.

33. On the same day, July 27, 1964, defendant Clark took from the Negro Elks Club in Selma a certificate evidencing the issuance of a liquor license to the club and announced that the license was revoked. Defendant Clark has no authority under Alabama law to revoke liquor licenses, and the Club had committed no acts for which, under Alabama law, its license could be revoked. On August 3, 1964, the certificate was returned.

34. The defendants, by the acts and practices described in paragraphs 12 through 33 have threatened, intimidated, and coerced, and attempted to threaten, intimidate and coerce Negro citizens of Dallas County, Alabama for the purpose of interfering with the exercise by Negroes of the right to vote in federal elections, free from racial distinctions as secured by 42 U.S.C. §§ 1971(a) and (b), and of the right to the full and equal enjoyment of public accommodations as secured by sections 201 and 202 of the Civil Rights Act of 1964, and have punished and attempted to punish persons for exercising said rights.

WHEREFORE, plaintiff prays:

1. That the Court issue a preliminary and permanent injunction restraining the defendants, their agents, officers, employees, successors, and all persons acting in concert or participation with them from intimidating, threatening, coercing, or attempting to intimidate, threaten, or coerce any person for the purpose of interfering with the exercise by Negroes of the rights secured by sections 201 and 202 of the Civil Rights Act of 1964; and by 42 U.S.C. §1971, and in particular, that this Court enjoin said defendants and said persons from:

(a) Arresting, detaining under unreasonable bail, prosecuting, convicting, punishing, or threatening to arrest, detain, prosecute,

convict or punish discriminatorily and without just cause any person who is known by defendants to be exercising, seeking to exercise, or to have exercised his right to vote or to use public accommodations free from racial discrimination;

- (b) Requesting, issuing, enforcing, or threatening to enforce any injunction that prevents persons from effectively organizing, meeting or assembling to discuss or advocate the exercise of said rights;
- (c) Using unreasonable force or threatening without just cause to use force, in the performance of law enforcement functions, against persons known to the defendants to be exercising, seeking to exercise or to have exercised the aforesaid rights;
- (d) Failing to provide ordinary police protection to persons

attempting peaceably to
exercise said rights;

- (e) Intimidating, threatening
or coercing, by any of the
means described in subpara-
graphs (a) through (d) or
by any other means, any
person whatever for the
purpose of preventing, inter-
fering with or discouraging
Negroes from voting or regis-
tering to vote or from using
public accommodations with-
out regard to race or color.

2. That the Court order the defendants to set aside
all convictions, to release all persons from custody, and
to reimburse all fines imposed as a result of the arrests
of the persons named in the appendices to this complaint.

3. That this Court enjoin the defendants, their officers,
agents, employees, successors and all those in active concert
or participation with them from enforcing or giving any force
or effect whatever to the injunction issued by the Circuit
Court of the Fourth Judicial District of Alabama on July 9,
1964, as herein described.

4. That the Court grant such additional relief as is or may be fair and equitable together with costs and disbursements of this action.

UNITED STATES OF AMERICA,

Plaintiff

ROBERT F. KENNEDY
Attorney General

BURKE MARSHALL
Assistant Attorney General

VERNOL R. JANSEN, JR.
United States Attorney

JOHN DOAR, Attorney
Department of Justice.

APPENDIX A

Eddie Allen	Charlie James Porter
Johnnie Anderson	Charles Edward Robertson
James Austin	Raymond Stanberry
Annie Lee Banks	William Steele
Profit Lee Austin Barlow	Leroy Stevens
Willie Henry Benjamin	Alice Mae Stewart
Johnny Mae Chestnut	Lewis Strong
Victor Edward Clay	Otis Strong
William James Gardner	George Suttles
Julius Griffin	George Thomas Suttles
Artis Nathaniel Harris	Jessie Torrance
Benjamin Franklin Harrison	Hewston Vaughan
Gloria Jean Harvell	William Woods
Willie John	Gertrude Young
Charles Edward Johnson	Bailey Theopolis
Lee Johnson	Bessie Lee Gordon
Arthur Godfrey Jones	Annie Pearl Harrison
Johnnie Jones	Mary Della Harrison
Loretta Riley	Eddie Dean Hooks
David Lewis, Jr.	Thelma Lee Jackson
John R. Lewis	Oscar Lee King
John Alexander Love	Johnnie Michael Leshore
Nathaniel McNeal	Shirley Minor
Eddie Minor, Jr.	Alma Lee Moore
Francis Hamlin Mitchell	Claude Nelson
Rozall Morton	Irene Delois Thomas
Fred Moss	George Lee Edwards

APPENDIX B

George Montgomery Hudson

Peter Hudson

Walter Reeves

Gloria Dean Bostick

Geraldine Elaine Mitchell

John Henry Suttles

James Edward Tilbert

Marjorie Ann Young

James Hearens

Earnest McMillion

Theotis Hawkins, Jr.

Samuel Newill

Willie James Reynolds

Alvery Lee Williams

Frederick Douglas Reese

Patricia Smith

Veronica Smith

Dee Jones, Jr.

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) CIVIL ACTION NO. _____
)
)
 JAMES G. CLARK, JR., et al.,)
)
 Defendants.)
)
 _____)

CERTIFICATE AND REQUEST FOR THREE-JUDGE COURT

Robert F. Kennedy, Attorney General of the United States, requests, pursuant to Section 206(b) of the Civil Rights Act of 1964, that a court of three judges be convened to hear and determine the above-captioned case.

The Attorney General of the United States certifies that in his opinion the above-captioned case is one of general public importance.

ROBERT F. KENNEDY
Attorney General of the United States